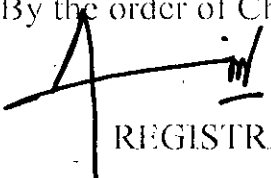


FORM OF ORDER SHEET

Court of _____

Appeal No. 2552/2023

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. Waqif Shah 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  REGISTRAR</p>

The appeal of Mst. Waqif Shah 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. 3681 /S.T.

DL 24-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Iftkhar Ali Adv.
High Court Swat.

all the objection are removed

Iftkhar
Ali

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . 2552 / 2023

Mst, Waqif Shah 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. Waqif Shah Mst. Waqif Shah

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. 2852 / 2023

Mst. Waqif Shah D/o Sarbala Mian R/o Qandil, Tirat, Tehsil
Bahrain, District Swat. Lady Health Worker (LHW) (BPS-05).
Place of Posting Qandil Tirat Tehsil
Bahrain District Swat ... Appellant

9400
24-11-2023

- 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 officē diary No. 24836 dated 25-07-2023, however, the grievances of appellant has not been redressed and no opportunity of hearing has been provided to the appellant. Thus, after completion of the specified period, the appellant approaches this Hon'ble tribunal inter alia on the following grounds. (Copy of memo of appeal is annexure C).

GROUNDS:

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

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

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

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

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

Appellant

Mst. Waqif Shah

Waqif Shah

Counsel:

Iftikhar Khan

Iftikhar Ali Khan

Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Waqif Shah 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, Waqif Shah - Waqif Shah

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

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

Service Appeal No. _____ / 2023

Mst. Waqif Shah.

... 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.

562
22.11.2023

Deponent:

Waqif Shah
Waqif Shah

Identified By Counsel:



Iffikhar Ali Khan
Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal . _____ / 2023

Mst, Waqif Shah Appellant

Versus

Govt: of KP and others. Respondents

Address of Appellant:

Mst. Waqif Shah D/o Sarbala Mian R/o Qandi, Tirat, Tehsil Bahrain, District Swat. Lady Health worker (LHW) (BPS-05)

Appellant through Attorney Javed Ali S/o Feroz Shah R/o Gunbad Maira Mingora, Tehsil Babozai District Swat.

CNIC No.15602-4655995-1

Cell No.0345-9191837

Address of Appellants:

1. Government of Khyber PakhtunKhwā through secretary Health at Peshawar.
2. Director General Health Service, government of Khyber PakhtunKhwā 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 PakhtunKhwā Peshawar.

Appellant

Mst, Waqif Shah Waqif Shah

Counsel:

Iffikhar Ali Khan

Iffikhar Ali Khan

Advocate High Court

Better Copy

وزیر اعظم کا پروگرام برائے خاندانی منصوبہ بندی و بنیادی صحت صوبہ سرحد

آرڈر برائے انتخاب نیشنل ہیلتھ ڈرگز

نمبر شمار: 6024LHW۔۔۔ مورخہ: 30-7-96۔۔۔ ڈی۔ ایچ۔ او آفس۔۔۔ سوات

مقام: واقف شاہ۔۔۔ زوجہ ادختر۔۔۔ سر بالا میاں۔۔۔

محلہ:۔۔۔ قندیل۔۔۔ گاؤں اشہر۔۔۔ تیرات

تحصیل:۔۔۔ بجزین۔۔۔ ضلع۔۔۔ سوات۔۔۔ صوبہ سرحد

بنیادی مرکز صحت ادیبی مرکز صحت تحصیل ہیڈ کوارٹر ہسپتال ضلع ہیڈ کوارٹر ہسپتال
کی سلیکشن کمیٹی کی سفارش پر بطور نیشنل ہیلتھ ڈرگز برائے ٹریننگ مہارتی
بنیاد پر منتخب کر لیا گیا ہے۔

شرائط برائے انتخاب

- 1- آپ کا انتخاب ابتدائی طور پر پندرہ ماہ کیلئے عمل میں لایا گیا ہے۔
- 2- پہلے بارہ ہفتے میں متعلقہ ٹریننگ سنٹر آپ کو ٹریننگ ہفتے میں پانچ دن (اتوار۔ سوموار۔ منگل۔ بدھ اور جمعرات کو ہوگی۔
- 3- ٹریننگ کے بعد اگلے بارہ ماہ آپ کو اپنے متعلقہ علاقہ میں کام کرنا ہوگا۔ ہر ماہ تین ہفتے کام کرنے کے بعد چوتھے ہفتے متعلقہ ٹریننگ سینٹر میں رپورٹ/ٹریننگ کیلئے آنا ہوگا۔
- 4- آپ کو بارہ ہفتے کی ٹریننگ کے دوران بجاس (50) روپے یومیہ اور اسکے بعد ہر ماہ بارہ سو (1200) روپے ماہوار اعزازیہ دیا جائیگا۔
- 5- آپ کا انتخاب آپ کے مستقل رہائشی علاقہ کیلئے ہے۔ اور دوران ٹریننگ و کام آپ کی کہیں تبدیلی اثرانسفر نہیں ہوگی۔
- 6- دوران ٹریننگ و کام متعلقہ انچارج بنیادی مرکز صحت ادیبی مرکز صحت تحصیل یا ضلعی ہیڈ کوارٹر ہسپتال آپ کی کارکردگی کو زیر رکھے گا۔ جس کی رپورٹ وہ وقتاً فوقتاً پہنچائے گا۔
- 7- انتخاب کے بعد جب بھی پتہ چلا کہ آپ کے انتخاب کے کوائف جمع نہیں ہیں یا پروگرام کے دوران کسی وقت بھی آپ کی کارکردگی غیر تسلی بخش رہی تو آپ کو بغیر نوٹس کے فارغ کر دیا جائیگا۔ اور اس سلسلے میں آپ کسی قسم کی قانونی چارہ جوئی کی حقدار نہیں ہوگی۔
- 8- اگر آپ کی کارکردگی تسلی بخش رہی تو آپ کی انتخابی معاہدہ میں توسیع ہوتی رہے گی۔ جو 1990 تک رہ سکتا ہے۔
- 9- آپ کو پروگرام کے دوران گاہے بگاہے جاری ہونے والے تمام ہدایات پر عمل کرنا ہوگا۔
- 10- آپ کو ہدایت کی جاتی ہے کہ آپ مورخہ 1-8-96 کو صبح 8:30 بجے ٹریننگ سینٹر۔۔۔ خوازہ خیل۔۔۔ میں رپورٹ کریں۔ اگر آپ مقررہ وقت پر حاضر ہونے سے قاصر رہیں تو آپ کا انتخاب خود بخود ختم سمجھا جائیگا۔

BHU۔۔۔ تیرات

C-T-C

NOOR

Clara

BETTER COPY

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

NOTIFICATION

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

S.No	Name of Community Embedded	Father Name	Husband Name	Des:	Date of appointment	FLCF	Name of Catchment Area
1	Sad Begum	F:	Shah Jehan Mian	LHS	15/10/2010	BHU Tirath	Shingal Madyan Swat
2	Waqif Shah	F:	Sarbal Amin	LHW	30/07/1996	BHU Tirath	Billage Qandil Tirath
3	Jehan Sefat	F:	Abdul Jan	LHW	15/06/1998	BHU Tirath	Damli Madyan Swat
4	Sehinaz	Javed		LHW	17/01/2000	BHU Tirath	Tirat Gokakal.
5	Rashida	F:	Baht Vesal	LHW	17/01/2000	BHU Tirath	Tirat Shegul
6	Asia	F:	Mian Said Wahab	LHW	17/10/2000	BHU Tirath	Madyan Shega Anghar Abad Swat
7	Batul Haram	Mohammad Rahman		LHW	15/09/2001	BHU Tirath	Vill Pela Teh. Khwaza Khela
8	Sha Zeenat	Mian Hurmat Jan		LHW	15/04/2002	BHU Tirath	Tirat morfundi.
9	Afsar Jehan	Nazam Mudin		LHW	15/04/2002	BHU Tirath	Madyan Qundil Swat
10	Sajida	Riza Hussain		LHW	15/04/2002	BHU Tirath	Tirat Madyan Damana Swat
11	Nazair Begum	F:	M. Ajmal	LHW	03/02/2003	BHU Tirath	Tirat Swat.
12	Fazal Rahmat	F:	Asil Zada	LHW	15/07/2005	BHU Tirath	Village Tirath Qandil Madyan Swat
13	Tasleem	F:	Babo Jan	LHW	15/10/2010	BHU Tirath	Kalagram Madyan
14	Samiat	F:	Abdul Wahid	LHW	15/10/2010	BHU Tirath	Damlai Madyan Swat

C.T.C

[Handwritten Signature]

[Handwritten Signature]

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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 confined herewith Facility Wise Notification of the Employees of LHWs Programme for kind information and further necessary action please.

Similarly in exercise of powers confined under sub section (2) of the Section I bid, 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

Endst No. 11232/LHW/R/Dated 20/9/2014

Copies forwarded to the:

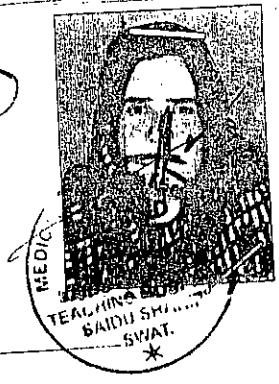
1. The Director Health Services, Health Directorate Peshawar for kind information and further necessary action with reference to the meeting held with the Secretary Health Khyber Pakhtunkhwa on 18/9/2014 please.
2. Provincial Coordinator LHW Programme for F/P & PHC KPK Peshawar for kind information and further necessary action with reference to the letter No. nil dated nil please.
3. Incharge of FLCF concerned for information.
4. District Accounts Officer Swat for information.

District Health Officer
Swat At Gulkada

C.T.C. 50

Ok
Khan

12



Health and Age Certificate

Name of Official Waqif Shah
Religious Performed Islam
Resident Village Bandil P.O. Madyan Tehsil Behrain District Swat
Father Name Sarbal M.A Address Bandil
Date of Birth (In words & Figure) 1-04-1979 On one March nineteen seventy nine
Exact high by measurement 5 Feet 5 Inch

Marks of Identification Nat.

Signature of Official Waqif Shah
Signature of Head of Office Waqif Shah
District Health Officer
DIST. SWAT

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

I do not certify this disqualification for employment as DHO her according to
her statement 35 year and by appearance is Healthy
Left hand thumb Impression Healthy

First Figure Second Figure Third Figure Small Figure Thumb

Taken before
Examination Medical Officer,
With Official Stamp
Dated / /



Medical Superintendent
Saidu Group of Hospitals
Saidu Sharif Swat

1/2/14
C.T.C
Waqif Shah

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

13

Name: Waqif Shah

Race: Afgham

Residence: village; Qandil, P.O; Madyan, Tehsil; Betrain.
District; Swat.



Father's Name and residence: Sar Bala Mian -
resident of Qandil, Madyan, Swat.



Date of birth by christian era as
nearly as can be ascertained: 01-04-1979

Exact height by measurement:
5 feet and 5 inches

Personal marks for identification:
NIL

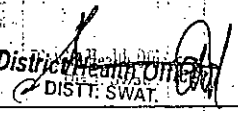
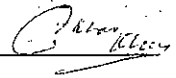
Left hand thumb and Finger impression
of (Non-Gazetted) officer:

Little Finger:  Ring Finger: 

Middle Finger:  Fore Finger: 

Thumb: 

Signature of Government Servant:
Waqif Shah

Signature and designation of the
Head of the officer, or other Attesting
Officer: 
District Health Officer
DISTT. SWAT. | C.T.C


(For Use in Police Department Only)

Note: The entries on page 9 and 10 should be done

Heirs,

1. _____
2. _____
3. _____

Name: _____

Race: _____

Residence: _____

Verification Roll No: _____ dated _____ received back _____

Father's Name as _____

resident

Date of birth by nearly as can be _____

Left Thumb Impression

Exact height by _____

Qualification	Roll No.	Session	Marks	Date Board	Qualification	Date
English Middle					First Arts	
Pashto NSSC	23882	1996	361	Laidi Sharif Swat	B.L Or B.A	
Urdu FA	2302642	2002	593	Duaba University	Pleadership Examination	
Plan-drawing B.A	Roll No. 10142	Session 2014	Marks 278	Malakand University	Training School Final Examination	
Finger Print					Other qualification	
Drill Instructing						
Court Duties						
Reserve Duties						

District Health Officer
DIST. SWAT

Personal mark _____

Left hand thumb of (Non-Ga) _____

Little Finger _____

Middle Finger _____

Thumb: _____




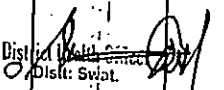
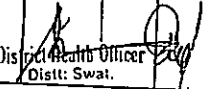
Signature _____

Signature Head Office _____

N.B. Line to be drawn under the qualification possessed

1	2	3	4	5	6	7	8	9	10
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"	Day of Appointment	Signature of Government servant	Signature and Designation of the head of the officer or other attesting officer in attesting of columns 1 to 8	Date of termination or appointment
L.H.W									
Lady Health worker			Rs. 1200/pm (Fixed)			30-07-96	دافستانہ		
L.H.W									
do		Scale No. 5 = 5400 - 2600 - 13200				01-07-02	دافستانہ		
do			Rs. 5400/pm			01-07-12	دافستانہ	Health Officer Distt: Swat.	30-11-0
do			Rs. 5660/pm			01-12-07	دافستانہ	Health Officer Distt: Swat.	30-11-0
do			Rs. 5920/pm			01-12-07	دافستانہ	Health Officer Distt: Swat.	30-11-0

C.T.C. Distt: Swat

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer to 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	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>L.H.W.</u> in the NP vide DHO Swat office Order No <u>6024</u> dt. <u>30-07-96</u> and accordingly submitted her arrival Report at BHU/CH/CD <u>02/08/96</u> for duty.			
				Service Verified from <u>30-07-96</u> to <u>01-07-01</u>			
				 District Health Officer Distt: Swat.			
				On 22/9/2014 issued Notification order for the Regularization of Staff vide DHO Swat letter No.11 232/LHW W.E.F 17/2012 in view of approval granted by the P.C LHW Programme KFK through letter No 1340/PC Dated. 20/9/2014.			
				 District Health Officer Distt: Swat.			
		Annual Increment not allowed		Service Verified from <u>21-7-01</u> to <u>30-11-01</u>			
				 District Health Officer Distt: Swat.			
		Annual Increment allowed		Service Verified from <u>21-12-012</u> to <u>30-11-013</u>			
				 District Health Officer Distt: Swat.			
		Annual Increment allowed		Service Verified from <u>21-12-013</u> to <u>30-11-014</u>			
				 District Health Officer Distt: Swat.			

15

1	2	3	4	5	6	7	8	9	10
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 officer or other attesting officer in attesting of columns 4 to 6	Date of termination appointment
LHW BPS-5 (6985-342-2785)			Rs 7665/-			17/2015 FN			
									30
LHW BPS-5 (8590-220-2190)			Rs 8005/-			12/2015 FN		J. H. ... Health ... District ...	
7665/15 9856/16									Pay ... Vide ... Imp (2)
do			Rs 9850/-			17/2016		J. H. ... Health ... District ...	
									30/9/2016
									J. H. ... District ... District ...
LHW BPS-5 (10260-500-25260)			Rs 12260/2			17/17	C.T.C Chatterjee		

1	2	3	4	5	6	7	8	9	10
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"	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	Date of termination appointment
					Office of the Accountant General Khyber Pakhtunkhwa Peshawar				
					Pay Fixed in the Basic Pay Scales:				
					CPST-340-17/85	5			
					Pay Fixed @ Rs. 7665	07-2015			
					R.B.P.S. 85P-420-2BHP	F			
					Pay Fixed @ Rs. 9850	01-07-2016			
					Date of Next increment is on:	01-12-2016			
					Accounts Officer Pay Fixation Party Peshawar				
1100 BPS-5						1/12			3
10260-500-25260					Rs. 12760/=	1/17			3
									Dist: 3
	2017				Office of the Accountant General Khyber Pakhtunkhwa Peshawar				
					Pay Fixed in The R.B.P.S. 2017				
					R.B.P.S. 10760-500-15260	5			
					At Rs. 12260 P.M.W.E.F. 1.07.2017				
					With Next Increment On 1.12.2017				
					Accounts Officer Pay Fixation Party K. Pakhtunkhwa Peshawar				
-do-						1/12			3
					Rs. 13260/=	2018			3

CTC

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 to 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 reward or raise of the Government Servant
	30/11/17		Annual Increment Allowed			Services Verified From 11/2/2016 to 30/11/2017	
	<i>[Signature]</i> District Health Officer DIST. SWAT.		<i>[Signature]</i> District Health Officer DIST. SWAT.			<i>[Signature]</i> District Health Officer District SWAT.	
				Paid arrears on a/c of Pay & Allowances. w.e. 01-07-2013 to 30-11-2015 Amounting to Rs <u>16,386/-</u>			
						Finance Officer LHW Program KP, Peshawar	
	30/11/2018		Annual Increment Allowed			Services Verified From 11/2/2017 to 30/11/2018	
	<i>[Signature]</i>		<i>[Signature]</i> District Health Officer DIST. SWAT.			<i>[Signature]</i> District Health Officer DIST. 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 & Basic Health, Khyber Pakhtunkhwa in the year 2005-06.
2. That after fulfilling all the codal formalities, petitioners join their services and perform their duties with zeal and devotion and no single complaint had ever been made against them in the entire service till now.
3. That later on services of the petitioners were regularized under Regulation of LHW's Program & Employees (Regularization & Standardization) Act, 2014 and entries in the service book were made in this regard.
4. That arrears i.e. (pay & allowance) from the period 01-07-2012 to 30-11-2015 were paid to other LHW's / LHS's of the same department, so petitioners also knocked the doors of this High Court for their redressal. It is pertinent to mention here that entry was 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.

C.T.C
Khalid
Khan

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.

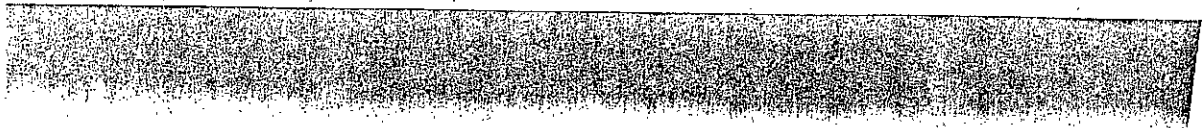
Any other remedy to which the petitioners are entitled, may also be awarded.

C.T.C
[Signature]

Petitioners

- | | | | |
|---------------------------------|-------------------------|------------------------|------------------------|
| 1) Mst. Shehnaaz P/B | (2) Mst. Shehnaaz | (3) Mst. Saima | (4) Mst. Jehan Sif ul |
| 5) Mst. Rawasira | (6) Mst. Arabistan Bibi | (7) Mst. Ashrafia Bibi | (8) Mst. Abida |
| 9) Mst. Neelan | (10) Mst. Rabia | (11) Mst. Hussain Pori | (12) Mst. Bacha Zornul |
| 13) Mst. Waqif Shah | (14) Mst. Faizana | (15) Mst. Saima Bibi | (16) Mst. Farhana |
| 17) Mst. Saleem Akhtar | | | |

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

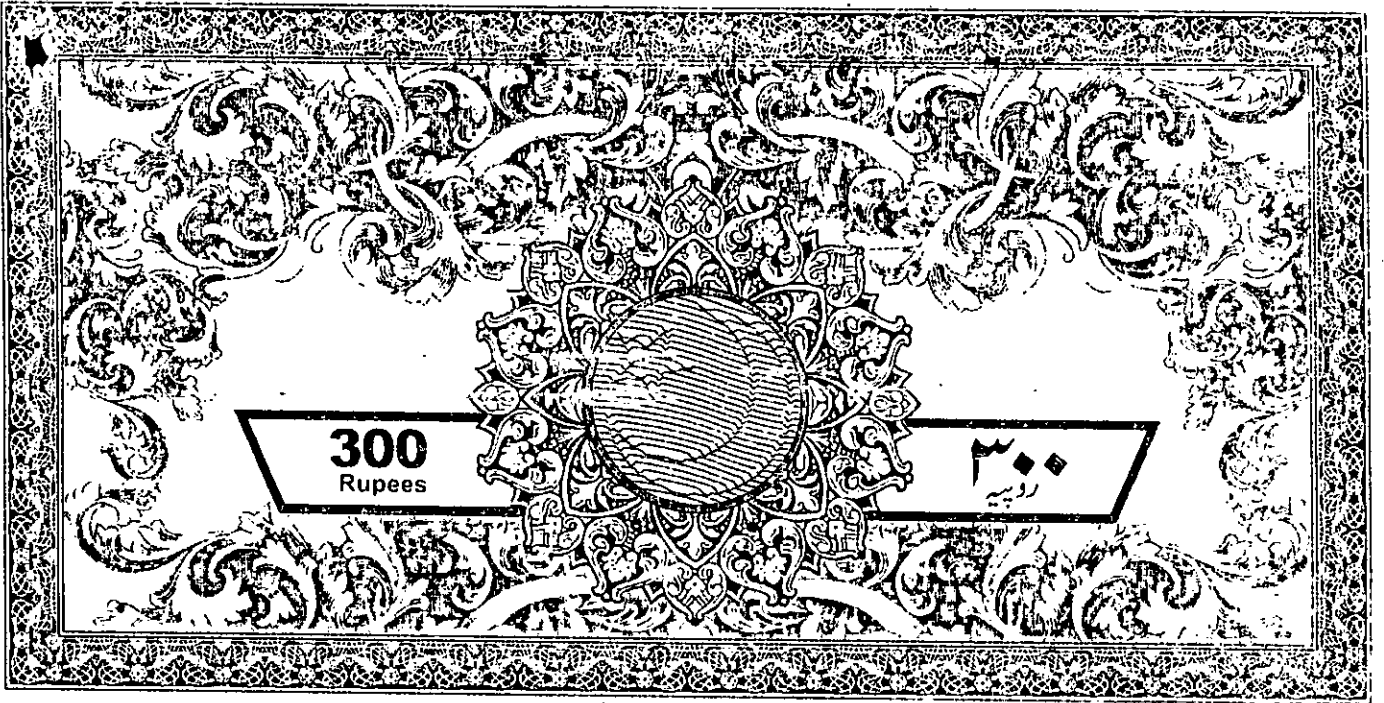


LIST OF ARREARS OF THE PETITIONERS

S.No	Name	Designation	Amount of arrears with period
01.	Mst. Shehnaaz Bibi	LHW (BPS-5)	Rs. 31,290/- from 01-07-2016 to 31-08-2016
02.	Mst. Shehnaz	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
03.	Mst. Saima	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
04.	Mst. Jehan Sifat	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
05.	Mst. Rawasia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
06.	Mst. Arabistan Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
07.	Mst. Ashrafia Bibi	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
08.	Mst. Abida	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
09.	Mst. Neelam	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
10.	Mst. Rabia	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
11.	Mst. Hussan Pari	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
12.	Mst. Bacha Zeenal	LHW (BPS-5)	Rs. 1,63,866/- from 01-07-2012 to 30-11-2015
13.	Mst. Waqif Shahi	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

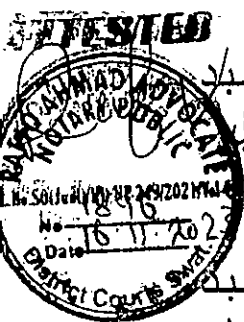
C.T.C

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12/11/2015



مختار نامہ خاص

۱) مسماۃ سلیم اختر دختر لیاقت علی سکند فرشین تحصیل خوازہ خیلہ ضلع سوات (۲) مسماۃ فرزاندہ 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 لڈیکس 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 عبدالودد سکند چینہ جماعت میانم تحصیل خوازہ خیلہ ضلع سوات (۷) مسماۃ نیام دختر اعتبار گل سکند تندو ڈاگ (حال) گنبد میرہ بیگورہ تحصیل بابوزئی ضلع سوات (۸) مسماۃ عربستان بی بی دختر سلطان باجا سکند خزہ تحصیل مد ضلع سوات (۹) مسماۃ ربابہ دختر زربینوش سکند نیوکالونی تحصیل مد ضلع سوات (۱۰) مسماۃ جہان ہفت دختر عبداللہ جان سکند داملی مدین تحصیل بحرین ضلع سوات (۱۱) مسماۃ مریم بی بی دختر بارون صاحب سکند محلہ کوز پلو باہ خیلہ تحصیل مد ضلع سوات (۱۲) مسماۃ فرحانہ زوجہ محمد انور سکند شلتا تحصیل چارباغ ضلع سوات (۱۳) مسماۃ شہنازی بی بی دختر خیر خان سکند محلہ برکے تحصیل خیر ذخیلہ ضلع سوات (۱۴) مسماۃ عابدہ دختر محمد سکند سرخزاندہ دیوبلی تحصیل کبل ضلع سوات (۱۵) مسماۃ صائمہ دختر بخت روان سکند محلہ بر پلو خیر ذخیلہ ضلع سوات (۱۶) مسماۃ زینبہ دختر فضل حسین سکند میانم تحصیل خوازہ خیلہ ضلع سوات (۱۷) مسماۃ صائمہ بی بی دختر بخت روان خان سکند اکتہ تلگرا م تحصیل چارباغ ضلع سوات کے ہیں۔ اندریں وقت بھائی ہوش و حواس غصہ برضا مندی ہوشی اتر کر کے لکھ دیتے ہیں۔ کہ میں مقرران ایک سروں اجلی سروں تریوں میں دائر کرنا چاہتے ہیں، چونکہ مقررات بوجہ مصروفیات و زمانہ ذات اجیل ہذا کی اصالتاً کے پیروی سے قاصر ہیں۔ بدیں وجہ مقررات اپنی جانب سے سہمی جاویدہ منی وند فیروز شاہ سکند گنبد میرہ بیگورہ تحصیل بابوزئی ضلع سوات کو مختار خاص مقررہ کر کے اختیار دیتے ہیں۔ کہ وہ ہذا تہی یا بذریعہ وکیل بیرسٹرز عدالت ابتدائی سروں ٹریوں عدالت عظمیٰ سپریم کورٹ آف پاکستان یا دیگر عدالت ہائے مروج کرے اور کروائے، درخواست ہائے جواب درخواست ہائے، جواب الجواب یا دیگر درخواست ہائے دیوے۔ اجیل۔ نگرانی۔ نظر ثانی۔ رٹ پٹیشن دائر کرے اور کروائیں یا مقدمہ ہذا ریٹ ہائے ہونے کے صورت میں ماتحت عدالت میں کارروائی کرے۔ وکالت نامہ تصدیق کرے، عرائض کی تصدیق کریں، درخواست فریق مقدمہ وغیرہ دائر کریں، درخواست اخراج مقدمہ دائر کریں۔ فہرست گواہان داخل کریں شہادت پیش کریں، اہل کیشن متبر کریں، اہل کیشن کے ساتھ بر موقع کارروائی عمل میں لائیں، عذرات داخل کریں، مختاران، ناصح مقرران کی طرف سے راضی نامہ کریں ثالثی قبول کریں، مصلح مقرر کریں بیان طغنی دیوے/تخریر و زبانی بیان دیوے/ترسی 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 ریٹ ہونے کی صورت میں مختاران موصوف کو بھی یہی تمام اختیارات بعد از ریٹ ہائے حاصل ہونگے جو کہ آج مختاران موصوف کو دئے گئے۔ الفرض جملہ کارروائی باہت مقدمہ ہذا میں مقرر کو قبول و منظور ہوگی۔ لہذا مختار نامہ سند تخریر ہے۔ المرقوم 16/11/2023



العبد
مسماۃ اشرفیہ بی بی

العبد
مسماۃ واقف شاہ

العبد
مسماۃ فرزاندہ

العبد
مسماۃ سلیم اختر

العبد
مسماۃ باجارت بنت

العبد
مسماۃ حسن پری

العبد
مسماۃ نیام

العبد
مسماۃ عربستان

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15602-7538465-3-3/8/81

پرائمری سکول، لاہور

گواہ

15602-7161460-7-3/8/81

پرائمری سکول، لاہور

گواہ

18/8/81

Signature

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Head Master's Office
STANDARD
DISTRICT OFFICE

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18.11.81

بار کونسل نمبر: bc=11-225/17
 بار ایسوسی ایشن نمبر: 301
 رابطہ نمبر: 0345-9514585
 ای میل ایڈریس: ۷۷

بریل نمبر: 132024



 ڈسٹرکٹ بار ایسوسی ایشن سوات

بعدالت جناب: سروس ٹریبونل بمقام مسماور

منجانب: ایڈوکیٹ	دعویٰ اور خواست سروس ٹریبونل
صحت و اطمینان: ایڈوکیٹ	علت نمبر:
موضوع:	موضوع:
جرم:	جرم:
تھانہ:	تھانہ:

باعتبار آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سروس ٹریبونل کیلئے اہم جناب علی خاں ایڈوکیٹ صاحب کو مقرر کر کے
 اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو قابل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ
 کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری
 یکطرفہ، اجراء و پیروی کرنے کا 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 ہمارے یا اپنے بجائے تقرر کا اختیار ہوگا
 اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران
 مقدمہ جو خرچہ ہر جانب کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیش
 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 خیر محقق خواجہ مسماور کے لئے منظور ہے۔

ایڈوکیٹ ادستخط:

ایڈوکیٹ ادستخط:

المقوم: 22/11/023

ایڈوکیٹ خیر محقق خواجہ مسماور

ایڈوکیٹ خیر محقق خواجہ مسماور