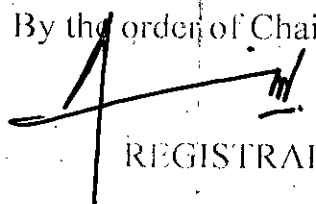


# FORM OF ORDER SHEET

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

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

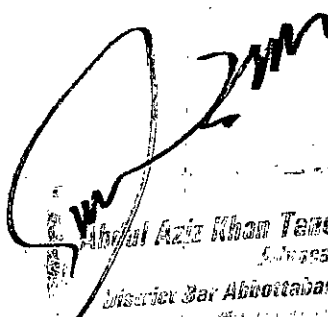
**117/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge:
1	2	3
1	11/01/2024	<p>The appeal of Mst. Shaheen Akhtar received today by registered post through Mr. Abdul Aziz Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____</p> <p>By the order of Chairman  REGISTRAR</p>

Before K.P Service Tribunal  
Peshawar.

Shahen Akhter. v/s Govt  
Service Appeal.

- (1) COURT FILE — Complete along with Flag
- 2) COPY FOR COURT FILE.
- (3) 6 EXTRA COPIES FOR RESP. & REG.

  
Abdul Aziz Khan Tanoli  
Advocate  
Wazirpur Bar Abbottabad

10/11/2024.

**BEFORE THE SERVICES TRIBUNAL, KHYBER**

**PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 117 / 2024

Shaheen Akhtar W/O Zia Ur Rehman (Lady Health Worker) BHU Bagarian, BPS-5, R/O Rakkaran, UC P.K. Khan, Tehsil Lower Tanawal, District Abbottabad.

.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa, Through Secretary Health Peshawar and others.

.....Respondents

**SERVICE APPEAL**

**INDEX**

S.No	Description	Page no	Annexure
1	Service Appeal	1-4	
2	Affidavit	5	
3	Copy Of Notification Dated 24-09-2014	6	"A"
4	Notification of Conveyance Allowance	7-8	"B"
5	Copy of Notification of Weather Allowance and Salary Slip of other similar civil servant	9-12	"C"
6	Copy of Application / Departmental Appeal by the Appellant to the Respondent Department	13	"D"
7	Wakalatnama	14	

Dated 10 January 2024

*Shaheen Akhtar*

Appellant

Through Counsels

*Abdul Aziz Tanoli*  
Abdul Aziz Tanoli

*Ahtisham Amjad Iqbal* &  
Ahtisham Amjad Iqbal  
Advocates, Abbottabad

①

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

Service Appeal No. 117 / 2024

Shaheen Akhtar W/O Zia Ur Rehman (Lady Health Worker) BHU Bagarian, BPS-5, R/O Rakkaran, UC P.K. Khan, Tehsil Lower Tanawal, District Abbottabad.

.....Appellant

**Versus**

1. Government of Khyber Pakhtunkhwa, through Secretary Health, Peshawar.
2. Director General Health Service, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Abbottabad.
4. Accountant General of Khyber Pakhtunkhwa, Peshawar.
5. District Account Office, Abbottabad.

.....Respondents

**SERVICE APPEAL UNDER SECTION-4 OF**  
**KHYBER PAKHTUNKHWA SERVICES**  
**TRIBUNAL ACT, 1974 AGAINST THE**  
**RESPONDENTS DEPARTMENT TO THE**  
**EFFECT THAT THE APPELLANT IS**  
**ENTITLED FOR GRANT OF WEATHER**  
**ALLOWANCE AS PER NOTIFICATION**  
**NUMBER FD SOSR-IVVI-1/2021-22, AND**  
**SIMILARLY THE APPELLANT IS ALSO**  
**ENTITLED TO CONVEYANCE ALLOWANCE**  
**AT ENHANCED RATE INCREASED BY THE**  
**GOVERNMENT FROM TIME TO TIME. THE**  
**APPELLANT IS REGULAR CIVIL SERVANT**  
**OF THE RESPONDENTS' DEPARTMENT.**  
**THE DENIAL OF THE RESPONDENTS'**  
**DEPARTMENT NOT TO ALLOW THE SAID**  
**ALLOWANCES TO THE APPELLANT IS**  
**HIGHLY ILLEGAL, DISCRIMINATORY,**  
**AND FANCIFUL AGAINST THE LAW AND**  
**AGAINST THE FUNDAMENTAL RIGHT OF**  
**THE APPELLANT. BESIDES, SOME**

2

SIMILAR EMPLOYEES WHOSE TERMS AND  
CONDITION ARE SIMILAR AND SAME IS  
RECEIVING THE SAID ALLOWANCE  
WHICH IS A SHEER DISCRIMINATION ON  
PART OF THE DEPARTMENT.

PRAYER: ON ACCEPTANCE OF THE  
INSTANT SERVICE APPEAL, THE  
RESPONDENTS' DEPARTMENT MAY  
KINDLY BE DIRECTED TO MAKE  
PAYMENT OF THE WEATHER  
ALLOWANCE AND CONVEYANCE  
ALLOWANCE TO APPELLANT FROM THE  
DATE OF ENTITLEMENT WITH ARREAR  
THEREOF. ANY OTHER RELIEF WHICH  
THIS HONORABLE TRIBUNAL DEEMS  
APPROPRIATE ON THE CIRCUMSTANCES  
OF THE CASE MAY ALSO BE GRANTED TO  
THE APPELLANT.

Respectfully Sheweth,

The Appellant very humbly submits as under:

1. That the Appellant was appointed as Lady Health Worker in the Respondent Department and later on the service of Appellant was regularized with effect from first July 2012 under KPK Regularization of Lady Health Workers Program and Employees (Regularization and Standardization Act 2014). *Copy Of Notification Dated 24-09-2014 Is Annexed As Annexure A.*
2. That after regularization the Appellant become regular civil servant of Respondent department and served the Respondent department with full devotion. *Notification of Conveyance Allowance Is Annexed As Annexure B.*
3. That it is pertinent to mention here that the Finance department of KPK issued a notification dated 25-2-2022 for grant of Weather Allowance to civil servants of KPK, in compliance of which the health department is issuing the said Allowance to similar employees of BPS-5. *Copy of Notification of Weather Allowance and Salary Slip of other similar civil servant is Annexed as Annexure C.*

4. That the appellant time and again as per the above mentioned notification requested the respondent department for grant of conveyance and weather allowances which was the Appellants right, but the respondent department kept on playing delaying tactics on one pretext and another .
5. That the Appellant on 25-9-2023 submitted an Application / Departmental Appeal to the Respondent department for issuance of the said allowances, but the same has not yet been decided nor has it ever been conveyed to the Appellant. *Copy of Application / Departmental Appeal by the Appellant to the Respondent Department is Annexed as Annexure D.*
6. That feeling aggrieved from the act and action and denial of the Respondent Department to allow the said allowances to the Appellant the instant appeal is being filed before this Honorable Tribunal inter alia on following grounds

#### GROUNDS

- a. That the act of Respondent Department is against the law, discriminatory, unconstitutional and based on malafide.
- b. That the Appellant has been deprived of her fundamental right as well as lawful right which is against the law and complete violation of Article 25 of the Constitution of The Islamic Republic of Pakistan, 1973.
- c. That the Respondent department was morally and legally bound to act upon the said notification and pay Appellant the demanded / requested allowances but failed to do so, which is sheer violation and an act of disobedience with regards to the notification issued by the Government of KPK on part of the Respondent Department
- d. That the Appellant is entitled for all the consequential allowances from the date of notification till date and denial of such by the Respondent Department is illegal, unlawful and not warranted by law.
- e. That it is settled principle of administrative law that when law prescribes something to be done in a particular manner, that must be done in that manner and not otherwise.
- f. That other department allowed back benefits to their employees as well, while ignoring the Appellant by not allowing back

benefits, amounts to discrimination which is against the fair play and good governance.

g. That the Appellant is well qualified and entitled for weather as well as conveyance allowance as per notification issued by Government of KPK to all civil servants including Appellant and denial of same is sheer violation of prevailing laws of the country and against the principle laid down by Honorable Apex Court.

h. That Respondent department has extended the same relief to similar employees and the apprehended denial to issue / release of said allowances to Appellant is not only against the law but also highly discriminating, therefore the act and action of the Respondent department is liable to be interfered by this Honorable Tribunal.

**PRAYER** ON ACCEPTANCE of the Instant Service Appeal the Respondent department may kindly be directed to issue / release / allow the weather allowance and conveyance allowance to the Appellant from the date of entitlement of the Appellant with all consequential back benefits with arrear thereof. Any other relief which this Honorable Tribunal deem fit may also be granted.

Dated 10 January 2024

*Shahen Akhter*

Appellant  
Through Counsels

*Abdul Aziz Tanoli*

Abdul Aziz Tanoli

*Ahtisham Amjad Iqbal*

&  
Ahtisham Amjad Iqbal  
Advocates, Abbottabad

**VERIFICATION**

Verified on Oath that the contents of foregoing Service Appeal are True and Correct to the best of my Knowledge and Belief and Nothing has been Mis-stated or Concealed from this Honourable Tribunal.

Dated 10 January 2024



*Shahen Akhter*

DEPONENT

8/1/24

5

**BEFORE THE SERVICES TRIBUNAL, KHYBER**

**PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2024

Shaheen Akhtar W/O Zia Ur Rehman (Lady Health Worker) BHU Bagarian, BPS-5, R/O Rakkaran, UC P.K. Khan, Tehsil Lower Tanawal, District Abbottabad.

.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa Through Secretary Health Peshawar and others.

.....Respondents

**SERVICE APPEAL**

**AFFIDAVIT**

I, Shaheen Akhtar W/O Zia Ur Rehman (Lady Health Worker) BHU Bagarian, BPS-5, R/O Rakkaran, UC P.K. Khan, Tehsil Lower Tanawal, District Abbottabad, **ON OATH** stated that the contents of foregoing Service Appeal are True and Correct to the best of my Knowledge and Belief and Nothing has been Mis-stated or Concealed from this Honourable Tribunal.

Date  
10-01-2024



*Shaheen Akhtar*  
DEPONENT



6

از دفتر و شریک ہیلتھ آفیسر ایبٹ آباد

Annexure A

سروری 2014-09-24

نمبر 9989-9976

میرپنشنی ادارہ کی طرف سے ایبٹ آباد میں ایک ایس آر ڈی (ریگولر ٹیلی ہیڈ آفسر) کی عہدہ سوار کی اجازت نامہ کے بارے میں  
14 دسمبر 2012ء سے متعلق ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

نمبر شمارہ	نام لادم	ادارہ	شعبہ	تاریخ تقرری	سرکسٹ ڈیپارٹمنٹ	حفاظت کے کام
1	شاہین اختر	گورنمنٹ ہسپتال	ایبٹ آباد	08-01-1997	ایبٹ آباد	ای کے ٹان
2	ذیشان	غلام آباد	ایبٹ آباد	15-03-2002	ایبٹ آباد	پولیس
3	مہاراجا	گورنمنٹ ہسپتال	ایبٹ آباد	22-07-2002	ایبٹ آباد	پولیس
4	شاہین اختر	گورنمنٹ ہسپتال	ایبٹ آباد	22-07-2002	ایبٹ آباد	پولیس
5	ایبٹ آباد	گورنمنٹ ہسپتال	ایبٹ آباد	22-07-2002	ایبٹ آباد	پولیس
6	نور علی	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
7	مہاراجا	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
8	سارانی	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
9	رعنا بی بی	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
10	سورجی	پولیس	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
11	مہاراجا	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
12	آسیہ بی بی	گورنمنٹ ہسپتال	ایبٹ آباد	09-12-2002	ایبٹ آباد	پولیس
13	مہاراجا	گورنمنٹ ہسپتال	ایبٹ آباد	01-05-2003	ایبٹ آباد	پولیس
14	کرنل	گورنمنٹ ہسپتال	ایبٹ آباد	01-07-2004	ایبٹ آباد	پولیس

ذرا دیکھنا ایک کنکشن نمبر 2 سے متعلق ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

نمبر شمارہ	نام لادم	ادارہ
7	شاہین اختر	گورنمنٹ ہسپتال
8	ذیشان	گورنمنٹ ہسپتال
4	مہاراجا	گورنمنٹ ہسپتال

نمبر 75-9968

ڈسٹرک ہیلتھ آفیسر ایبٹ آباد

کاپی برائے اطلاع:

1. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

2. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

3. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

4. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

5. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

6. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

7. ایبٹ آباد میں ایس آر ڈی کی اجازت نامہ کے بارے میں ایبٹ آباد میں ایس آر ڈی کے تعلق سے ایس آر ڈی کے متعلق ہے۔

ڈسٹرک ہیلتھ آفیسر ایبٹ آباد

Attested

Abdul Aziz Khan Tanoli  
District Bar Abbottabad

**FINANCE DEPARTMENT****7****(REGULATION WING)****Annexure B**NO. FD/SO(SR-II)/8-52/2014  
Dated Peshawar the: 09-07-2014**From:**The Secretary to Govt. of Khyber Pakhtunkhwa,  
Finance Department,  
**Peshawar.**

Attested  
Abdul Aziz Khan Tanoli  
Advocate  
District Baluchistan

**To:**

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
3. The Secretary to Governor, Khyber Pakhtunkhwa
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa
6. All Heads of Attached Departments in Khyber Pakhtunkhwa.
7. All Commissioners in Khyber Pakhtunkhwa.
8. All Deputy Commissioners in Khyber Pakhtunkhwa.
9. All Political Agents / District & Sessions Judges in Khyber Pakhtunkhwa
10. The Registrar, Peshawar High Court, Peshawar.
11. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
12. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.
13. The Chairman, Provincial Ombudsman Secretariat, Khyber Pakhtunkhwa

**Subject:****REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL SERVANTS OF THE KHYBER PAKHTUNKHWA PROVINCIAL GOVERNMENT IN BPS 1-15****Dear Sir,**

I am directed to refer to this Department circular letter of even number dated 20/12/2012 and to state that the Competent Authority has been pleased to enhance / revise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants, Government of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from 1<sup>st</sup> July, 2014 at the following rates:-

S.NO	BPS	EXISTING RATE (PM)	REVISED RATE (PM)
1.	1-4	Rs.1,700/-	Rs.1,785/-
2.	5-10	Rs.1,840/-	Rs.1,932/-
3.	11-15	Rs.2,720/-	Rs.2,856/-

SECRETARY TO GOVERNMENT  
OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

Endst: FD (SOSR-II)/8-52/2014,

Dated Peshawar the 9<sup>th</sup> July, 2014

A Copy is forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Secretaries to Government of Punjab, Sindh and Balochistan.
3. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.

Attested  
Abdul Aziz Khan Tanoli  
Advocate  
District Baluchistan

Razaullah  
(Razaullah)  
Additional Secretary (Rep.)

**Endst: No & Date even.**

**A copy for information is forwarded to:-**

1. The Director General, Provincial Disaster Management Authority, Khyber Pakhtunkhwa.
2. The Director, Local Fund Audit Department, Khyber Pakhtunkhwa, Peshawar.
3. The Director, Treasuries and Accounts, Khyber Pakhtunkhwa, Peshawar.
4. The Director, FMIU, Finance Department.
5. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
6. The All the *District* Agency Accounts Officers in Khyber Pakhtunkhwa / FAT A.
7. The Treasury Officer, Peshawar.
8. All the Section Officers/Budget Officers in Finance Department.
9. P.S to Minister for Finance Khyber Pakhtunkhwa.
10. P.S to Chief Secretary, Khyber Pakhtunkhwa.
11. P.S to Secretary Finance Khyber Pakhtunkhwa.
12. Section Officer (Reg.5) Govt: of Pakistan, Finance Division, (Regulation Wing) with reference to his O.M No.F.3(1)-Reg.5/2010 dated 07/07/2014 for Information and record.

  
(ZAR GUL KHAN)  
SECTION OFFICER (SR-II)


100

9

Annexure C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT  
(REGULATION WING)

Dated Peshawar the 29-02-2022

NOTIFICATION

No. FDSO/SL/IV/01-L/2021-22 Weather Allowance: In supersession of this Department's No. FDSO/SL/IV/01-L/2021-22 Weather Allow dated 29-11-2021, sanction is hereby accorded to the grant of Weather Allowance to the Civil Servants of Khyber Pakhtunkhwa as per following rates & days:-

Categorization of Weather	Rates (Rs)	No. of Days	Areas
Hard extreme	80	115	Battagram, Huner, Chitral, Chitral Upper, Dir Lower, Dir Upper, Kohistan Upper, Kohistan Lower, Kalam Pallas Kohistan, Shangla, Swat, Topi, Dir
Moderate	50	85/65	85 days Abbottabad, Hangu, Ferozpur, Malakand, Mansehra, North Waziristan 65 days Khyber, Mardan, Peshawar
Warm	15	45	Bajaur, Bannu, Charsada, Dir Khan, Haripur, Karak, Kohat, Lakha Marwat, Moolmand, Nowshera, Orakzai, South Waziristan, Swabi, Tank

- The Weather Allowance shall be admissible to BS-01 to BS-06 in case of Moderate and Warm Areas. However, in case of Extreme Weather Areas the same allowance shall be extended to all officers/officials at the prescribed rates and duration.
- The Weather Allowance shall not be admissible to the employees working in the vacation departments in all categorized Weather Areas except Class-IV on duty during the permissible period.
- Consequent upon above, the admissibility of Hot & Cold Weather Charges shall stand discontinued forthwith.
- The newly notified rates may be started w.e.f. February/March during the current financial year (2021-22) while the same will take effect from December/January each year in the coming financial years.
- All Autonomous/Semi-autonomous/Medical Teaching Institutions/Other Institutions and Authorities under Provincial Government shall adopt this notification within their respective organizations with the approval of their Competent Forum within their available resources.

Secretary to Govt. of Khyber Pakhtunkhwa  
Finance Department

Exdt: No. & Date even

Copy of the above is forwarded for information & necessary action to the:-

- The Accountant General, Khyber Pakhtunkhwa.
- The Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
- The Principal Secretary to Governor Khyber Pakhtunkhwa.

*Attested*

Abdul Aziz Khan Faridi  
Advocate  
District Bar Abbottabad

(10)

BETTER COPY

**GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE  
DEPARTMENT (REGULATION WING)**

Dated Peshawar 25/02/2022

**NOTIFICATION**

**No-FD(SO SR-IVVI/2021-22/Weather Allowance;** In super session of this Department's Notification No-FD(SO SR III) 2-5 2021-222 Weather Allow dated 29/11/2021, section is hereby accorded to the grant of Weather Allowance to the Civil Servants of Khyber Pakhtunkhwa as per following rates & days.

Categorization of Weather	Rates (Rs)	No. of Days	Areas
Hard Extreme	80	115	Battagram, Buner, Chitral, Chitral Upper, Dir Lower, Dir Upper, Kohistan Upper Shangla, Swat, Torghar
Moderate	50	85/65	85 days Abbottabad, Hangu, Kurram, Malakand, Mansehra, North Waziristan
Warm	15	45	Bajour, Bannu, Charsada, DI Khan, Haripur, Karak, Kohat, Lakki Marwat, Mohmand, Nowshera, Orakzai, South Waziristan, Swabi, Tank

2. The Weather Allowance shall be admissible to BS-01 to BS-06 in case of Moderate and Warm Areas. However, in case of Extreme Weather Areas the same allowance shall be extended to all officer at the prescribed rates and duration.
3. That Weather Allowance shall not be admissible to the employees working in the vacation department in all categorized Weather Areas except Class-IV on duty during the admissible period.
4. Consequent upon above, the admissibility of Hot & Cold Weather Charges shall stand discontinued forthwith.
5. The newly notified rates may be started w.e.f February/ March during the current financial year (2021-22) while the same will take effect from December/ January each year in the coming financial years.
6. All Autonomous Semi autonomous/Medical Teaching Institutions/Other Institutions and Authorities under Provincial Government shall adopt this notification within their respective organizations with the approval of their Competent Forum within their available resources.

**Secretary to Govt. of Khyber Pakhtunkhwa  
Finance Department**

**Endst: No. & Date even.**

Copy of the above is forwarded information & necessary action to the.

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
3. The Principal Secretary to Governor Khyber Pakhtunkhwa.

*Attested*  
*Sm*  
Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

Government of Khyber Pakhtunkhwa  
District Accounts Office Malakand  
Monthly Salary Statement (September-2023)

11



Personal Information of Mr ROBINA d/w/s of FAZAL HAKIM

Personnel Number: 00293222 CNIC: 1540106765514 NTN:  
Date of Birth: 30.07.1976 Entry into Govt. Service: 02.07.2012 Length of Service: 11 Years 03 Months 000 Days

Employment Category: Active Permanent

Designation: LADY HEALTH WORKER 8118613-GOVERNMENT OF KHYBER PAKH

DDO Code: MD4625-District Health Services (Administration) Malakand

Payroll Section: 003 GPF Section: 005 Cash Center:

GPF A/C No: 793211 Interest Applied: Yes GPF Balance: 114,703.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 05 Pay Stage: 10

Wage type		Amount	Wage type		Amount
0001	Basic Pay	22,730.00	1001	House Rent Allowance 45%	2,255.00
1300	Medical Allowance	1,500.00	1911	Compen Allow 20% (1-15)	1,000.00
2148	15% Adhoc Relief All-2013	296.00	2199	Adhoc Relief Allow 6 10%	200.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2332	Lady Health Worker Allow	2,200.00
2341	Dispr Rel All 15% 2022 KP	2,214.00	2347	Adhoc Rel At 15% 22(PS17)	2,214.00
2378	Adhoc Relief All 2023 35%	7,951.00	5353	Ad. Weather Allowance	4,250.00

Deductions - General

Wage type		Amount	Wage type		Amount
3005	GPF Subscription	-1,330.00	3501	Benevolent Fund	-1,200.00
4000	R. Benefits & Death Comp	-450.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till September-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 49,414.00 Deductions: (Rs.): -2,980.00 Net Pay: (Rs.): 46,434.00

Payee Name: ROBINA  
Account Number: 7900303703  
Bank Details: HADIB BANK LIMITED, 225030 IB.Br. Batkhela, IB.Br. Batkhela, Malakand

Leaves: Operating Balance: Availed: Earned: Balance:

Permanent Address:

City: BATKHELA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email:

*Abdul Aziz Khan Tanoli*  
Advocate  
District Bar Abbottabad

**Government of Khyber Pakhtunkhwa**  
**District Accounts Office Abbottabad**  
**Monthly Salary Statement (November-2023)**

(12)



**Personal Information of Mr SHAHEEN AKHTAR d/w/s of ZIA UR REHMAN**

Personnel Number: 00808913 CNIC: 1310108195014 NTN:  
 Date of Birth: 02.02.1977 Entry into Govt. Service: 01.07.2012 Length of Service: 11 Years 05 Months 001 Days

**Employment Category: Active Permanent**

Designation: LADY HEALTH WORKER 81185249-GOVERNMENT OF KHYBER PAKH

DDO Code: AD4666-District Health Officer Abbottabad

Payroll Section: 002

GPF Section: 001

Cash Center:

GPF A/C No:

GPF Interest applied:

GPF Balance:

81,456.00 (provisional)

Vendor Number: -

**Pay and Allowances:**

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 05

Pay Stage: 10

Wage type		Amount	Wage type		Amount
0001	Basic Pay	22,730.00	1001	House Rent Allowance 45%	2,255.00
1300	Medical Allowance	1,500.00	1968	Incentive Allowance 20%	1,000.00
2148	15% Adhoc Relief All-2013	296.00	2199	Adhoc Relief Allow @ 10%	200.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2332	Lady Health Worker Allow	2,200.00
2341	Dispr. Red All 15% 2022KP	2,214.00	2347	Adhoc Rel Al 15% 22(PS17)	2,214.00
2378	Adhoc Relief All 2023 35%	7,955.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3005	GPF Subscription	-1,330.00	3501	Benevolent Fund	-1,200.00
4004	R. Benefits & Death Comp:	-450.00	6075	Adj GPF	-1,760.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till NOV-2023: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 45,164.00 Deductions: (Rs.): -4,740.00 Net Pay: (Rs.): 40,424.00**

Payee Name: SHAHEEN AKHTAR

Account Number: 09330005143501

Bank Details: HABIB BANK LIMITED, 220933 HBL SHERWAN KHURD, Abbottabad

Leaves: Opening Balance: Aailed: Earned: Balance:

**Permanent Address:**

City: ABBOTTABAD

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: shaheen808913@gmail.com

*Attested*  
  
 Abdul Aziz Khan  
 District Accounts Officer  
 District Accounts Office  
 Abbottabad

حکومت جناب ڈائری کٹر پبلتھ سروسز میں تیسری سوال لیسٹ اور  
Annexure D

اپیل

جناب عالی سائل لیڈی پبلتھ وڈنگ کی حد سے گھٹتی  
ہوں اور اجازات Standardization and regularization Act 2014  
کے تحت Regular سول سروسز ہولڈنگ کی اور سائل  
BSP (5) میں کام کر رہی تھی سائل کو تو Conveyance Allowance  
دیا جارہا ہے اور نہ ہی سائل کو Weather allowance  
دیا جارہا ہے۔

جناب عالی سائل کا Conveyance Allowance اختیار کسی اور  
کے سروسز ریگولر ہونے کے بعد سے لے کر تاحال ادا نہ کیا  
جارہا ہے اور اسی طرح سائل کو مطابق نوٹیفیکیشن  
Finance Department تاحال Moderate weather allowance  
سائل کی تنخواہ میں شامل نہ کیا جارہا ہے جو کہ سراسر ناقص  
ہے۔

لہذا استدعا ہے کہ لٹڈسٹ وصال  
و آئندہ مذکورہ بالا الاؤنس جاری  
فرمانے کے حکم صادر فرمائے جائیں  
سائل آپ کی دعاؤں سے ہے

Attest  
Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

25-09-2023

محمد احسن زوب فیاض الرحمن  
Shakeen Akhter

کاچی ڈی کامیونلٹی / اکاؤنٹ آفیس ایبٹ آباد



کورٹ فیس

# وکالت نامہ

بعدالت  
 عنوان: شاہ عین الحق کے ذریعہ شہزادہ شاہنشاہ کو رولنگ آفٹ اپن 148 ویٹی  
 منجانب: اسد علی  
 نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام محمد اعجاز الحق کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں محمد اعجاز الحق کو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناکش بھینٹ مغلانی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ مندرجہ۔

اسد علی

المرقوم: 9-01-2024

بمقام:

Shah e in