

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 608/2019

Date of Institution ... 09.05.2019

Date of Decision ... 30.09.2020

Mohammad Safer s/o Khan Afsar R/o Haripur present Ward orderly at DHQ Hospital, Haripur. ... (Appellant)

VERSUS

Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others. ... (Respondents)

MR. Sajid Ur Rehman,
Advocate

--- For appellant .

MR.USMAN GHANI,
District Attorney

--- For respondents.

MIAN MUHAMMAD
ROZINA REHMAN

--- MEMBER(Executive)
--- MEMBER(Judicial)

JUDGEMENT:


MIAN MUHAMMAD, MEMBER:-

This judgment shall dispose of the instant service appeal as well as five connected service appeals No. 609/2019 titled Ifikhar Ahmad -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others, No. 610/2019 titled Anayatullah -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others, No.611/2019 titled Niaz Ellahi -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others, No. 612/2019 titled Sajid Ali -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others and No. 657/2019 titled Awais Tasleem -vs- Director General Health, Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar and four others as similar question of law, facts and circumstances are involved therein.

02. Gist of the impugned orders is that respondent No.2 (Medical Superintendent DHQ Hospital Haripur) vide letter No. 167-69 dated 03.01.2019 addressed to respondent No.1 (Director General Health Services Peshawar) relieved the following officials of their duties and directed them to report for further posting to respondent No.1.

1. Muhamamd Safeer, Ward Orderly.
2. Iftikhar, Ward Orderly.
3. Muhammad Farid, X-ray Attendant.

03. In response to the above correspondence, respondent No.1 through his letter bearing No. 494 dated 14.01.2019 advised respondent No.2 to withdraw the relieving order in respect of the mentioned officials and initiate disciplinary action against them under the E&D Rules-2011. Similarly, letter No. 988 dated 06.02.2019 written by respondent No.2 and is addressed to respondent No.1 vide which the following officials were relieved from the DHQ Hospital Haripur on grounds of creating administrative problems for the Hospital administration.

- 
1. Muhammad Safeer, Ward Orderly
 2. Muhammad Farid, X-Ray Attendant
 3. Iftikhar, Ward Orderly.
 4. Niaz Ilahi, Sweeper.
 5. Anayat, Ward Orderly.
 6. Sajid, Mali
 7. Awais Tasleem, Ward Orderly.

04. Office order bearing endorsement No. 2274-78/personnel dated 05.02.2019 was issued by Respondent No.1 whereby the services of the above mentioned seven (7) officials were placed at the disposal of respondent No.5 (DHO Haripur impleaded later on vide order sheet dated 19.09.2019) for further posting against the vacant posts.

05. Brief facts and circumstances leading to institution of the instant service appeal and five other connected appeals are that the officials are Class-IV employees on the sanctioned strength of respondent No.2 (Medical Superintendent DHQ Hospital Haripur) who scheduled and were to stage a protest strike for their demands against the Hospital Administration on 08.12.2018. The Deputy Commissioner Haripur, on the face of "**strike call**" issued by Para Medical Association (Class IV Health Department Haripur), recorded "**Pl: send to Assistant Commissioner, Haripur for enquiry and report**". The Assistant Commissioner, Haripur vide his letter No. Reader/09/1300-01/AC(H) dated 14.12.2018 assigned the task of enquiry to respondent No.2 with the direction "**to inquire into the matter and detailed report**". Respondent No.2 constituted a committee comprising Dr. Waseem Ahmad (PMO) and Dr. Rafique Tanoli (PMO) of DHQ Teaching Hospital Haripur. The enquiry committee submitted two pages inquiry report on 02.01.2019 with the following recommendations;

1. Disciplinary action against the culprit Class IV.
2. Uniform and caps be provided to all Class IV staff as is practicing in all teaching institutes.

06. Now taking the shelter of findings and recommendations of the inquiry Committee the appellants were relieved of their duties in DHQ Hospital Haripur vide the impugned letter/order 06.02.2019 mentioned in the preceding para.

07. On institution of the Service Appeals, the respondents were asked to submit their replies and connected documents in support of their stance vis-à-vis the appellants. They submitted the documents and defended the case through the District Attorney where-after we heard the learned counsels for the parties and perused the available record minutely.

ARGUMENTS:

08. Learned counsel for Appellants contended that the appellants have been serving in DHQ Hospital Haripur and have never been found in any illegal, unprofessional, immoral, unethical and corrupt practices. The discriminatory conduct of respondent No.3, (Deputy Medical Superintendent DHQ Hospital Haripur), the Union announced a peaceful protest regarding which due notice was served upon respondent No.2 and others. That upon assurance of eradication of malpractice and discrimination, the call for peaceful protest was withdrawn. It was vehemently argued that respondent No.2 without having conducted proper inquiry, initially relieved three (3) appellants of their positions vide letter dated 03.01.2019 and they were condemned unheard who submitted departmental appeal to respondent No.1 on 07.01.2019 and whereon respondent No.2 was directed to conduct proper inquiry against them, if they are guilty of misconduct because relieving/transferring unwilling workers is no remedy. However, instead of initiating proper enquiry by respondent No.2, now seven (7) appellants (3 earlier and 4 more) were relieved of their duties in DHQ Hospital, Haripur through a consolidated order dated 06.02.2019. Moreover, the impugned orders are discriminatory in nature particularly where one of their colleagues namely Fareed Khan, X-Ray Attendant has been restored on his position by respondent No.2 and the appellants relieved of their duties in DHQ Hospital Haripur. The impugned orders by respondent No.2 being illegal, ultra vires, fanciful, perverse, against the principle of natural justice and equity, are therefore, liable to be set aside.

09. On the other hand, learned District Attorney representing the respondents contended that the very conduct of these appellants was itself responsible for their being relieved from their positions previously held by them. They were involved in

unprofessional and unethical activities not commensurate to their official position and were a constant source of trouble to the peaceful atmosphere and administration at DHQ Hospital, Haripur. So much so that one of them i.e Mr. Iftikhar Ahmad had attacked the attendant of respondent No.2 on 22.02.2019 for which FIR No. 243 was registered in Police Station City Haripur on 27.02.2019. They also instigated other staff of the hospital to stand up against the hospital administration and as a result of unpleasant incident dated 22.02.2019, they were not acceptable and once again directed to report to respondent No.1 for further posting, vide letter dated 23.02.2019. Since they were not performing their lawful duties and demanded exemption from duty taking the shelter of being representative of Class-IV Union. The appellants were, therefore, relieved of their positions after fulfillment of legal formalities including enquiry conducted against them by the inquiry committee.

CONCLUSION:

10. After having heard pro and counter arguments of the learned counsels for the parties and perused the record available on file with the assistance of learned counsels, it can safely be concluded that due course of law and rules has neither been observed nor adopted at all in the instant case. The enquiry conducted through two Doctors was basically a fact finding/preliminary enquiry on which the respondents did rely and the whole edifice of case has been built up by them. What actually the enquiry committee recommended was **“the enquiry committee recommends disciplinary action against the culprit Class-IV”**. Similarly, respondents no. 1 i.e the Director General Health Services Peshawar had advised respondent No.2 **“to initiate disciplinary action against them under E&D Rules 2011, if they are guilty of mis-conduct as relieving/transfer of unwilling worker is no remedy”**. Respondent No.2 was therefore not only duty bound and required

but rightly expected to have initiated formal/proper enquiry under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 by framing charges through a proper charge sheet and statement of allegations against them and simultaneously appointing an enquiry officer or inquiry committee to conduct formal inquiry. However, it is observed with great concern that being administrator who kept administration and discipline as paramount objectives in hospital, Respondent No.2 did miserably fail to have dispensed with his legal duties and responsibilities diligently, honestly and without bias in a befitting and professional manner. It is apprehended that he did not have knowledge of the disciplinary proceedings against the officials working under him and involved in activities falling in the meaning and parameters of mis-conduct. He, therefore, whimsically, with self grudges and discriminations, single handedly and with a single stroke of pen got rid of them by relieving them of their positions. These appellants were, therefore, treated like rolling stones between respondents, left not only in the lurch but virtually at the mercy of respondents to run from pillar to post for their due rights of posting and monthly pay. **“it is the wearer who knows where the shoe pinches”**. It is a classical case where the idiom is best suited as an example of victimization and injustices meted out to the appellants at the hands of respondents.

11. The appellants have, therefore, not being treated in accordance with law and canons of natural justice. They have not been given fair trial as enshrined under Article-4 and Article 25 as inalienable fundamental rights duly guaranteed by the 1973 constitution. They have been condemned unheard through one sided preliminary/fact finding enquiry. They have neither been issued proper charge sheet with statement of allegations nor show cause under the Khyber Pakhtunkhwa



Government Servants (Efficiency and Discipline) Rules, 2011. They have been discriminated when their one colleague nominated in FIR No. 243 by the Hospital Administration namely Fareed Khan was subsequently restored/posted on his original position at their sweet will having left the present appellants to knock the door of court for redressal of their grievances and legal rights.

12. As a sequel to the above, we therefore, accept the present service appeal as well as connected five (5) service appeals mentioned above and the impugned orders bearing No. 167-69 dated 03.01.2019 and No.988 dated 06.02.2019 being illegal, ultra-vires and discriminatory are set aside. The respondents are directed to post the appellants against their original positions previously held by them, immediately. A compliance report to this effect shall be submitted to the Services Tribunal within thirty (30) days of the receipt of this judgment. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
30.09.2020


(ROZINA REHMAN)
Member(J)


(MIAN MUHAMMAD)
Member(E)

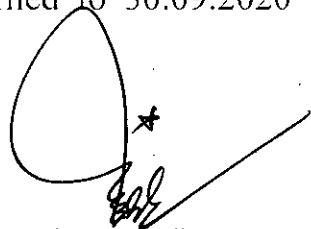
S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	30.09.2020	<p><u>Present.</u></p> <p>Mr. SAJID UR REHMAN ... For appellant Advocate</p> <p>Mr. USMAN GHANI, District Attorney ... For respondents</p> <p>Vide our detailed judgment of today, we therefore, accept the present service appeal as well as connected five (5) service appeals, mentioned above and the impugned orders bearing No. 167-69 dated 03.01.2019 and No.988 dated 06.02.2019 being illegal, ultra-vires and discriminatory are set aside. The respondents are directed to post the appellants against their original positions previously held by them, immediately. A compliance report to this effect shall be submitted to the Services Tribunal within thirty (30) days of the receipt of this judgment. Parties are left to bear their own costs. File be consigned to the record room.</p> <p><u>ANNOUNCED</u> 30.09.2020</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  (ROZINA REHMAN) Member (Judicial) </div> <div style="text-align: center;">  (Mian Muhammad) Member (Executive) </div> </div>

15.09.2020

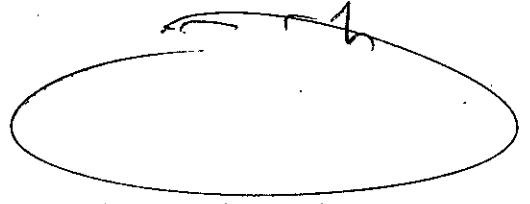
Appellant in person alongwith his counsel Mr. Sajid Ur Rehman, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Bashir, CT Technologist for respondents present.

Learned Assistant Advocate General is seeking time for consulting the authority concerned with regard to some important issue⁴ involved in the instant appeal. Learned counsel for the appellant stressed that the appellants have not been adjusted so far since the lapse of eighteen (18) months and they are suffering as such due to non-receipt of their salaries and requested the bench for a short period of time. While keeping in view the issue involved and the sensitivity of the matter and as per request of the learned counsel, the appeal has to be heard at principal seat at Peshawar where the parties and their respective counsels have to appear.

Adjourned to 30.09.2020 for arguments before D.B at Peshawar.



(Mian Muhammad)
Member(E)



(Muhammad Jamal)
Member
Camp Court A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on
14 19 20 at camp court abbottabad.

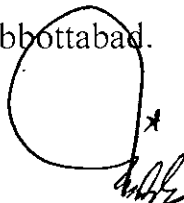

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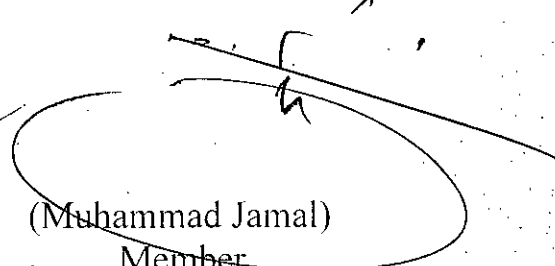
14.09.2020

Appellant in person alongwith his counsel Mr. Sajid Ur
Rehman, Advocate is present. Mr. Muhammad Riaz Khan
Paindakhel, Assistant Advocate General alongwith Dr. Ijaz,
DMS for respondents present.

There is rush of work and almost arguments in four
appeals have been concluded. It is now quarter past 4 Oclock.
The time of the Tribunal is over, therefore, the appeal is
adjourned by tomorrow.


Adjourned to 15.09.2020 for arguments before D.B at
camp court Abbottabad.


(Mian Muhammad)
Member(E)


(Muhammad Jamal)
Member
Camp Court A/Abad

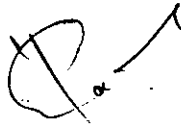
18.12.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith M/S Muhammad Bashir, C.T Technologist on behalf of respondent No. 2, Muhammad Shahab, Computer Operator on behalf of respondent No. 3 and Ahmad Zaman, Assistant on behalf of respondent No. 5 present. Written reply on behalf of respondents No. 1 to 4 already submitted while representative of respondent No. 5 requested for further time to file written reply. Adjourned to 23.01.2020 for written reply/comments before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad.

23.01.2020

Appellant in person present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Ahmad Zaman Assistant, Muhammad Bashir Focal Person and Amjid Ali Assistant present. Written reply on behalf of respondent No.5 submitted. Adjourn. To come up for rejoinder if any and arguments on 20.02.2020 before D.B at Camp Court Abbottabad.


Member
Camp Court, A/Abad

Postscript

23.10.2019

In the meanwhile Mr. Adeel Khan, Senior Auditor representative of the respondent No.4 turned up and furnished written reply, placed on file. To come up for written reply of respondent No. 5 on 19.11.2019 before S.B at camp Court, Abbottabad.



Member
Camp court, A/Abad

19.11.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith M/S Amjid Ali Assistant (for respondents No.1 to 3), Adeel Khan Senior Auditor (for respondent No.4) and Ahmad Zaman Assistant (for respondent No.5) present. Reply on behalf of respondents No.1 to 4 already submitted. Ahmad Zaman Assistant representative of respondent No.5 seeks adjournment to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.5 on 18.12.2019 before S.B at Camp Court, Abbottabad.




Member
Camp Court, A/Abad

19.09.2019

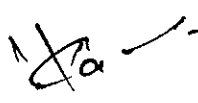
Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith M/S Muhammad Bashir, C.T Technologist, Muhammad Imran, Senior Clerk and Adeel Khan, Senior Auditor for the respondents present. Learned counsel for the appellant stated that in the instant service appeal, District Health Officer, Haripur is a necessary party but inadvertently, he was not impleaded in the panel of respondents therefore, requested that he may be impleaded as respondent in the panel of respondents as a necessary party.

Learned Deputy District Attorney expressed no objection. Hence, Muharrar is directed to enter the name of District Health Officer, Haripur in the panel of respondents and also issue notice to him for written reply/comments. Case to come up for written reply/comments on 23.10.2019 before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

23.10.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney present. Mr. Amjad Ali, Assistant for respondent No. 1 present. Dr. Mushtaq, M.S for respondents No. 2 & 3 present. Mr. Ahmad Zaman, Assistant for respondent No. 5 present. Joint parawise comments of respondents No. 1, 2 and 3 have already furnished. No one is present on behalf of respondent No. 4. Fresh notice be issued to respondent No. 4. Representative of respondent No. 5 requests for further time to furnish requisite reply. To come up for written reply/comments of respondents No. 4 & 5 on 19.11.2019 at camp Court, Abbottabad.


Member
Camp court, A/Abad

11.07.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Dr. Dildar Khan, Deputy Medical Officer and Mr. Muhammad Imran, Record Keeper Litigation for the respondents present. Representative of the department and learned Deputy District Attorney requested for adjournment. Last chance is given to the respondents to submit written reply/comments on main appeal as well as reply/arguments on application for suspension of operation of impugned order and release of salary of appellant on 22.08.2019 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

22.08.2019

Appellant with counsel present. M/S Dildar DMS and Amjid Ali Assistant for respondents No.1 to 3 present and submitted written reply/comments. No one present on behalf of respondent No.4. Notice be issued to the respondent No.4 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on behalf of respondent No.4 on 19.09.2019 before S.B at Camp Court, Abbottabad.



Member
Camp court A /Abad

17.06.2019

Counsel for the appellant present.


Contends that relieving/transfer order could not be legally passed as punishment to a civil servant. The order dated 14.01.2019 itself suggested that the appellant was relieved from DHQ Hospital Haripur in consequence to an enquiry wherein he was found guilty by the enquiry committee. On the other hand, such penalty awarded to the appellant, is nowhere provided in the Khyber Pakhtunkhwa Civil Servants Act, 1973 or the rules applicable. Further, on 05.03.2019 an office order was issued by respondent No. 1 whereby the service of appellant was placed at the disposal of DHO Haripur for further posting, however, the appellant has not been posted till date.

In view of the available record and arguments of learned counsel instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 11.07.2019 before S.B at Camp Court Abbottabad.

Alongwith the appeal there is an application for suspension of the operation of impugned order and release of salary of appellant. Notice of application be also given to the respondents for the date fixed.

Appellant Deposited
Security & Process Fee

28/6/19

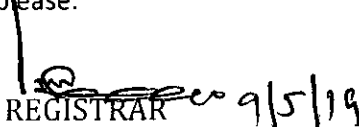


Chairman
Camp court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 608/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/05/2019	<p>The appeal of Mr. Muhammad Safer resubmitted today by Mr. Habit Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 9/5/19</p>
2-	15-5-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>12-7-19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

to

The worthy Registrar,
Service Tribunal,
14th,
Ferozshah.

Subject: Complaint as well as humble
appeal.

Respected Sir,

With due honor, I in broyati
me your kind notice, that almost 2 1/2
month time when office is taking being
an commercial enquiries upon the service
appeal, as this is no violation of the
dignity of the superior court nor should
the removal be upon technicalities and merit
should be to address the things upon
merit.

So, I would kindly submit your
your good self, that, this along with the
other appeals, may kindly be placed upon
the worthy tribunal for the decision on
merit.
Pract.

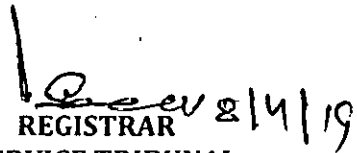
Yours sincerely
H. K. M. (V)
Haidar Khan Adv. D.C.

The joint appeal of M/S Iftikhar Ahmad, Muhammad Safeer, Niaz Elahi, Anayatullah, Sajid Ali and Awais Tasleem received today i.e. on 08.04.2019 is in complete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Sub-rule- 2 of rule-3 of the appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately. Therefore, the appeal of the above appellants may be filed separately/individually.
- 5- Copy of departmental appeal respect of appellant no.6 is not attached with the appeal which may be placed on it.
- 6- Copy rejection order of departmental appeal mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 7- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal may also be submitted.

No. 718 /S.T

Dt. 8/4 /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Habit Khan Adv.
High Court A.Abad

Objection no. 3 and 7 are still stand therefore, the appeal is again returned to the counsel for the appellant for completion and resubmission with in 15 days.

No. 863 /S.T,

Dt. 30/4 /2019

Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar.

Habit Khan Adv. High Court A.Abad.

To

The Registrar,
Service Tribunal,
KP Peshawar.

Subject - Reply to your letter No: 718 dated
8-4-2019 vide which almost seven
technical objections were raised.

venerable Sir,

In the light of your
office letter No 718 dated 8-4-19 all the
objections raised therein have been
settled by the undersigned.
Furthermore the request is being made that
the service appeal may kindly be placed
before the worthy tribunal as the
matter is urgent one. As the
superior court already announced the
principle that technicalities
should be avoided when the
violation of right is involved so
it is humbly prayed that service
appeal may kindly be placed
before the tribunal immediately.

Petitioner

through

Counsel

Habib Khan

Adv High Court

Dated:- 9-4-2019

Note: copy of this order of rejection shall
on other appeals.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 608 /2019

Mohammad Safer

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

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6.	Copy of impugned order	"D"	14
7.	Copy of Departmental appeal / order	"E"	15-16
8.	Vakalat Nama	--	17

...APPELLANT

Through:

Dated:- 9/4 /2019


(HABIT KHAN)

Advocate High Court, Abbottabad.

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

Appeal No. 608 /2019

Mohammad Safeer s/o Khan Afsar R/o Haripur present Ward orderly at DHQ Hospital Haripur.

...APPELLANT

V E R S U S

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services, Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.

4) District Account Office Haripur.

5) District Health offices, Haripur.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE ORDERS NO.167-69
DATED 03.01.2019, ISSUED BY RESPONDENT NO.2
VIDE WHICH THE APPELLANT WAS ILLEGALLY
RELIEVED FROM HIS RESPECTIVE POSITION
AND THEREAFTER THE APPELLANT FILED
DEPARTMENTAL APPEAL BUT ALL IN VAIN
HENCE THIS SERVICE APPEAL.

Re-submitted to -day
and filed.

Registrar
9/5/19.

vide
order
sheet
19-9-19

PRAYER:-

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDERS NO.167-69 DATED 03.01.2019 AND ORDER NO.988 DATED 06.02.2019 ISSUED BY RESPONDENT NO.2 AND ORDERS NO.494 DATED 14.1.2019 AND ORDER NO.2274-78 DATED ⁰⁵08.02.2019 ISSUED BY RESPONDENT No.1 MAY KINDLY BE DECLARED NULL VOID AND APPLLENT MAY KINDLY BE RESTORED TO HIS PREVIOUS POSITION.

Respectfully Sheweth,

FACTS:

Following facts giving rise to the instant Service Appeal, are arrayed as under:-

1. That, the appellant has been serving in the Health Department at DHQ Hospital Haripur.
2. That, appellant is law abiding citizen and never been found in any illegal, unprofessional, immoral, unethical and corrupt practices.
3. That, due to discriminatory conduct of the Respondent No.3 the union announced the peaceful protest regarding

which due notice was served upon the respondent No.2 and other respondent of the district. **(Copy of the notice is attached as Annexure "A")**

4. That, upon assurance of eradication of Mal practice and discrimination the peaceful protest have been withdrawn.
5. That, after sometime, Respondent No.2 without conducting proper enquiry relieved the appellant from his position. **(Copy of impugned order is annexed as Annexure "B")**
6. That, the appellant filed Departmental Appeal before the Respondent No.1 which was decided with the direction of proper enquiry should be conducted against the appellant if he is guilty of misconduct. **(Copy of Departmental Appeal order is annexed as Annexure "C")**
7. That the Respondent No.2 instead of complying the order of appellate authority again relived the Appellant. **(Copy of impugned order is attached as Annexure "D")**
8. That, thereafter, the appellant again filed the Departmental Appeal and respondent No.1 decided in negative hence this service appeal. **(Copy of**

Departmental appeal order is annexed as Annexure
“E”)

GROUNDS:-

- a) That, the orders No.167-69 dated 03.01.2019, issued by Respondent No.2 is illegal, ultravires, arbitrary, fanciful, perverse, against the principle of natural justice and equity and liable to be set aside on the following grounds.
- i. That, no proper enquiry has been conducted and appellant has been punished in a brutal way.
 - ii. That the appellant approached this forum for the redressal of his grievance and appeal is well within time and the Court has the jurisdiction to entertain the same.
- b. That, the action/ order of the respondent No.2 is amounting to discourage the Public Servant from doing his legal functions as assigned to him under the Rules of Business of the Government.
- c. That the instant service appeal is well within time and Hon'ble Tribunal has the jurisdiction to entertain the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the impugned orders No.167-69 dated 03.01.2019 and

order No.988 dated 06.02.2019 issued by respondent No.2 and orders No.494 dated 14.1.2019 and order No.2274-78 dated 08.02.2019 issued by respondent No.1 may kindly be declared null void and Appellant may kindly be restored to his previous position.

M. Safar

...APPELLANTS

Through:

Habit Khan

(HABIT KHAN)

Advocate High Court, Abbottabad.

Dated:- 9-4 /2019

VERIFICATION:-

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Court.

Dated:- 9/4 /2019

M. Safar

...APPELLANT

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

Appeal No. /2019

Mohammad Safeer

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Mohammad Safeer s/o Khan Afsar R/o Haripur present Ward orderly at DHQ Hospital Haripur, Appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

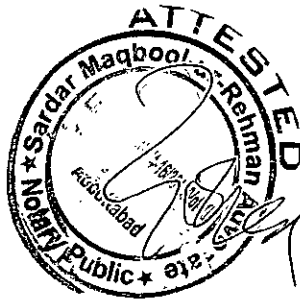
DEPONENT

M Safeer
...APPELLANT

Dated: -9-4- /2019

IDENTIFIED BY:-

(Signature)
(HABIT KHAN)
Advocate High Court &
Federal Shariat Court
Peshawar



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

Appeal No. /2019

Mohammad Safeer

...APPELLANT

VERSUS

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

CERTIFICATE

*Certified that no such Service Appeal has earlier been filed
before this Hon'ble Tribunal.*

M. Khan

...APPELLANTS

Through:

Dated:- 9/9 /2019

(HABIT KHAN)
Advocate High Court, Abbottabad
Federal Shariat Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. _____/2019

Mohammad Safeer

...APPELLANT

V E R S U S

DG Health Khyber Pakhtunkhwa and others

...RESPONDENTS

SERVICE APPEAL

=====

**APPLICATION FOR SUSPENSION OF THE OPERATION
OF IMPUGNED ORDER AND SIMULTANEOUSLY
RESPONDENT NO.4 BE DIRECTED TO RELEASE THE
SALARIES OF APPELLANT INCLUDING PENDING
ONE, TILL FINAL DISPOSAL OF APPEAL.**

=====

Respectfully Sheweth,

1. That titled appeal is filed before this Honourable Tribunal Court, the contents of the same may be treated as an integral part of this application.
2. That appellant has a good Prima-Facie case and balance of convenience also lies in his favour.
3. That if the impugned orders issued by Respondents No.1 & 2 are not suspended then appellant would suffer irreparable loss and the purpose of filing appeal would become infructuous.

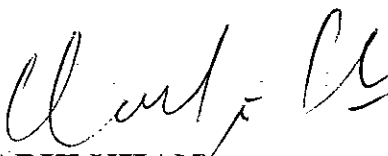
4. That the salaries of the Appellant has been stopped due to impugned order and this is absolutely illegal and against the settled law.

It is, therefore, humbly prayed that on acceptance of the foregoing application, the salaries of the Appellant may kindly be released by suspended the impugned orders and respondent No.4 be directed in this regard till final disposal of the titled appeal.

...APPELLANT

Through:

Dated:- 9/4/2019


(HABIT KHAN)

Advocate High Court, Abbottabad.

AFFIDAVIT:-

I, *Mohammad Safer s/o Khan Afsar R/o Haripur present Ward orderly at DHQ Hospital Haripur, Appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Application* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 9/4/2019



IDENTIFIED BY:-


(HABIT KHAN)

Advocate High Court, Abbottabad.


...APPELLANT

10 Annexure "A"

B
AC report
to
Khanpur
for enquiry

پیرامیڈیکل ایسوسی ایشن

Office of D.C Haripur
Diary No. 2024/
Date: 06/12/18

درجہ چہارم محکمہ صحت ہری پور

S-12-DEPUTY COMMISSIONER
HARIPUR

نمبر 04/HRP

مفتی امین احمدی پیرامیڈیکل ایسوسی ایشن ہری پور
 آج مورخہ 12/18 کو ایسوسی ایشن نے جلسہ منعقد کیا اور اس موقع پر
 پیرامیڈیکل ایسوسی ایشن کے صدر جناب ڈاکٹر محمد کواڑھا سہیل جو ہری پور صحت کے
 مندرجہ ذیل اور دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔
 سہیل پیرامیڈیکل ایسوسی ایشن کے صدر اور دیگر مندرجہ ذیل کے
 ڈاکٹر دلدار عرصہ تین ماہ سے پیرامیڈیکل ایسوسی ایشن کے
 صدر کے طور پر کام کر رہے ہیں۔ ان کے علاوہ دیگر
 ڈاکٹر اور دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔
 ان کے علاوہ دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔
 ان کے علاوہ دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔

خبردار احمدی نے تصدیق کر لی کہ ڈاکٹر دلدار نے غلامانہ اور جنت آباد ہری پور کے خلاف
 درخواستیں داخل کر کے پیرامیڈیکل ایسوسی ایشن کے صدر کے طور پر کام کر رہے ہیں۔
 ان کے علاوہ دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔
 ان کے علاوہ دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔
 ان کے علاوہ دیگر مندرجہ ذیل کے کئی تعداد میں شرکت کی۔

تاریخ 18-12-5

6-15/HRP

جنرل سیکرٹری
 سعید ایوب
 (Signature)

1. ڈاکٹر دلدار
2. ڈاکٹر دلدار
3. ڈاکٹر دلدار
4. ڈاکٹر دلدار
5. ڈاکٹر دلدار
6. ڈاکٹر دلدار
7. ڈاکٹر دلدار
8. ڈاکٹر دلدار
9. ڈاکٹر دلدار
10. ڈاکٹر دلدار

(Signature)

CIC
Aman

(Signature)

Dr. Farid Khan
High Court &
Magistrate Court

(11) Annexure B



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 167-69 / Dated 03/01/2019

To,

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Subject: **RELIEVING ORDER.**

Dear Sir,

Upon the directives of Deputy Commission Haripur vide his office letter No. 1(5)/Misc/App:/AS/DC(H) dated 06-12-2018 and Assistant Commissioner Haripur vide letter No./Reader/09/1300-01/AC(H) dated 14-12-2018, an inquiry was conducted by Inquiry Committee and recommend the Disciplinary action against the officials who were involved illegal / unlawful strike on 08/12/2018. They hampered the peaceful atmosphere of the Hospital and provoked the other class IV for strike. Therefore the following class-IV are hereby relieved from their duties with immediate effect and directed to report to your good office for further posting.

1. Mr. Muhammad Safer Ward Orderly
2. Mr. Iftikhar Ward orderly
3. Mr. Muhammad Farid X-Ray Attendant

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc: 168-69

1. Deputy Commissioner Haripur, for information w/r to above please.
2. Account Section undersigned office required action with immediate effect.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

NOTIFICATION

[Handwritten signature]

CTC *[Handwritten signature]*

[Handwritten signature]
Advocate High Court &
Federal Shariat Court

Amman

G

12

Definitional appeal

14/20

محکمہ صحت ڈائریکٹریٹ جنرل صحتیہ سروسز خیبر پختونخوا اور
معاون: درخواست برائے اپیل ٹریسفر والیسی جائے۔

ضابطہ الیاس

منیسا احمد ام کے ساتھ ٹریسفر کی جائے ہے کہ سائلان الیوسی الین عدالت ڈسٹرکٹ ڈی ایچ جی
ضلع پیر پور کے منتخب جرائین ہیں۔ جو کہ حکم عینا غیر دستخط خواہے جسے ڈسٹرکٹ سٹیج ہے۔ جو کہ
DMS ڈائریکٹر دلاور صاحب نے مکمل فورملز میں ڈسٹرکٹ ڈی ایچ جی جیٹال ضلع پیر پور کے غیر اہل
دو تہ اپنا کہ غیر قانونی فتوؤں میں کوششیں شروع کی ہے۔ جو کہ منیسا صاحبہ صرف جو EXPLANATION
آڈٹ ورک کا دسمبر 2018ء کو آڈٹ میں 8584-90 کیا گیا ہے۔ ہم نے سٹیج کی
غیر حاضری یا غیر اہل کام نہیں کیا۔ جو کہ ڈی ایچ جی جیٹال پیر پور میں مکمل فورملز میں
مہ تو جو منیسا احمد الاڈلسا دیا جاتا ہے۔ اور وہ میں لو منیسا احمد صاحبہ ہم غیر پابند ہیں۔ ہم
اسلام فتوہ میں لو منیسا احمد صاحبہ - آڈٹ کارڈ لگا ہے۔
ہم نے اپنے مکمل فورملز میں کے جائز حقوق کے حصول کیلئے ٹریسفر میں اصرار کیا ہے اور اسے پرتال مانوگر
دیا ہے۔ ہم نے مکمل فورملز میں کی فتوہ میں کوشش کی جائے۔ جس کے MS صاحبہ
نے ہمارے مکمل فورملز میں کے جائز مطالبات حل کی بجائے ٹریسفر میں اصرار کیا ہے جو کہ
اور سیاسی بنیادوں پر بیماری ٹریسفر کر دی۔ جو کہ کو آڈٹ میں 167-69 ہے
کامی لیا ہے۔ جناب عالی ہم نے سٹیج کی فتوہ میں غیر پابند ہیں اور اسے منیسا احمد صاحبہ کے
ہم مکمل فورملز میں منیسا احمد صاحبہ میں ٹریسفر کیا ہے۔ ہمارے ساتھ طلب ہوا ہے۔

یہاں پر صاحبان کی خدمت میں درخواست عرض کرتے ہیں بیماری ٹریسفر والیسی کے نام کا موقع میں
ہم آپ صاحبان کا حیات ڈھنڈے ڈھاؤہ دیتے

16/11/19

العالمی
بین الاقوامی

آئیے تا بعد

CTC
Atiqul Khan
Federal High Court &
Federal Shariat Court

محمد سفیر داد اور اول
افتخار احمد
محمد عزیز

13

66

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR



E-Mail Address: nwfo@phs.gov.pk office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax# 091-9210230
No. 494 / Personnel Dated: 14 / 01 / 2019

To,

The Medical Superintendent
DHQ Hospital Haripur.

Subject:
Memo:

RELIEVING ORDER.

I am directed refer to your letter No.167/ dated 03.01.2019 on the subject noted above.

You are requested to withdraw the relieving order in respect of Mr. Muhammad Safer Ward Orderly, Mr. Iftikhar Ward Orderly & Mr. Muhammad Farid X-Ray Attendant and initiate disciplinary action against them under E&D Rules 2011, if they are guilty of misconduct as relieving/ transfer of unwilling worker is no remedy.

[Signature]
ASSISTANT DIRECTOR (Ministerial)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR.

[Handwritten signatures and stamps]
CIC
Amaric
Khan
High Court &
Shariat Court

74

Amman D



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHO TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 988 / Dated 06 /02/2019

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Sub: RELIEVING ORDER.

Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019;
No. 769 / personal Dated 21/01/2019 and no.1266 /personal 29/01/2019.

I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry.

1. Mr. Muhammad Safeer ward orderly.
2. Mr. Muhammad Farid X-Ray attendant.
3. Mr. Istikhar ward orderly.
4. Mr. Niaz Ellahi sweeper. ✓
5. Mr. Anayat Ward Orderly. ✓
6. Mr. Sajid Mali. ✓
7. Mr. Awais Tasleem ward orderly.

You are requested to place them on the disposal of DHO Haripur for further posting.

[Handwritten Signature]

Medical superintendent
DHO Hospital Haripur.

[Handwritten Signature]
CFC
Ameri
Khan
Assistant High Court &
Federal Shariat Court

Annex E

18

ڈائریکٹر جنرل ہیلتھ سروس پشاور خیبر پختونخواہ

عنوان ایڈجسٹمنٹ آڈر

گزارش ہے کہ آپ کے دفتر سے جاری کردہ لیٹر نمبر 494 با تاریخ 14-01-2019 اور دوسرا لیٹر نمبر 769 با تاریخ 21-01-2019 کے مطابق آپ نے ہمارے آڈر Withdraw کرنے اور ڈی ایچ کیو ہسپتال ہری پور میں تعیناتی کے لیے احکامات جاری کیے تاہم اس کے بعد ہم متعدد بار حاضری کے لیے گئے لیکن ہماری حاضری منظور نہ کی گئی اور ناہی ہمیں کوئی تسلی بخش جواب دیا گیا ہر بار یہ کہہ کر ہمیں یہ کہہ کر ٹال دیا جاتا ہے کہ آپ کا جواب ڈی جی آفس کو لیکھ دیا گیا آپ لوگ ڈی جی آفس سے جواب آنے تک انتظار کریں۔ ہمارے ساتھ دفتر میں ناروا سلوک کیا جاتا ہے۔ ایم ایس کے ساتھ ملاقات کا موقع نہیں دیا جاتا اور ہر بار توہین امیز رویا اختیار کر کے ہمیں انتہائی ذہنی عزیت اور کوف میں مبتلا کیا جاتا ہے۔ خطہ کے ہمارے آپرنگھروٹ الزامات لگائے گئے ہیں لہذا ہماری آپ سے گزارش ہے کہ آپ فلفور ہماری دادری کریں اور ہماری درخواست پر غور کریں۔ تمام آڈر کی کاپیاں ہمارے درخواست کے ساتھ لف ہے۔

نام درخواست گزار۔

محمد سفیر "وارڈ بوائے" سہیلہ ۱۱

فرید خان "ایکسپریٹ اینڈنٹ" ابراہان

ساجد "مالی" ساجد

انجنا راجہ "وارڈ بوائے" حبیبی

عنایت اللہ "وارڈ بوائے" عنایت اللہ خان

نیاز الہی "سوپر" نبی زلمی

Atenid

Shan
High Court &
District Court

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[Handwritten initials]

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR



Postal Address: Peshawar office Ph: 091-9210269 Fax: 091-9210187, 97-0196 Fax: 971-9210236

OFFICE ORDER

As approved by the competent authority the services of following Class-IV staff relieved by MS DHQ Hospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

- i) Mr. Muhammad Saeef Ward Orderly.
- ii) Mr. Muhammad Farid X-Ray Attendant.
- iii) Mr. Iftikhar Ward Orderly.
- iv) Mr. Niaz Elahi Sweeper.
- v) Mr. Anayat Ward Orderly.
- vi) Mr. Sajid Mali.
- vii) Mr. Awais Tasleem Ward Orderly.

Arrival/ departure report should be submitted to this Directorate for record.

Sd/-
DIRECTOR GENERAL HEALTH SERVICES, K.P PESHAWAR
Dated: 05/02/2019

No. 9274-78 / Personnel
Copy forwarded to the:-

- 1. DHO Haripur.
- 2. MS DHQ Hospital Haripur w/r to his letter No. 988 dated 06.02.2019.
- 3. DAO Haripur.
- 4. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- 5. Officials concerned.

For information and necessary action.

[Handwritten signature]

DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH SERVICES, K.P PESHAWAR.

[Handwritten signature]
6/2/2019

[Handwritten: CTC / Attached]

[Handwritten signature]
High Court & District Court

کورٹ فیس

وکالت نامہ

Service Tribunal 19

بعدالت: _____
عنوان: _____
منجانب: _____

نوعیت مقدمہ:

باعث تحریر آئنگے

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دی کل کاروائی متعلقہ آن مقام
سب آف آفیس سب خان اندورس ہالی
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
جگہ تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا
ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے
استحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہوا
حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں
کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد
استجارت نالش بصینہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔
لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 13/4/19

بمقام:

دقامس فونوٹیسٹ کچھری (ایسٹ آباد)

Receipt

Flaibet Khan
Advocate High Court &
Federal Shariat Court
13/4/19

**BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR**

Service appeal No 608 / 2019.

Muhammad Safer S/O Khan Afsar R/O Seria Haripur and others.

.....Appellant.

VS

DG Health Khyber Pakhtunkhwa and others.

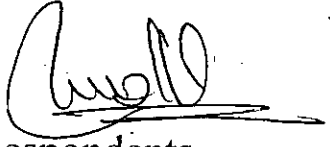
.....Respondents.

INDEX

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

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Dated _____


Respondents

A

**BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR**

Service appeal No 608 / 2019.

Muhammad Safer S/O Khan Afsar R/O Seria Haripur and others.

.....Appellant.

VERSUS

1. DG Health Khyber Pakhtunkhwa, at Directorate General Health Service, Peshawar.
2. Medical Superintendent DHQ Hospital Haripur.
3. Deputy Medical superintendent DHQ Hospital Haripur.
4. District Account office Haripur

.....Respondents-

Service Appeal.

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

Most Respectfully Sheweth:-

Preliminary objections:

1. That the appellant has got no cause of action/locus standi to file the instant appeal.
2. That the appellant has not come to this honorable Service Tribunal with clean hands.
3. That the appellant has concealed the facts from this honorable Service Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed.
4. That the appellant has filed appeal on malafidi.
5. That the appeal is against the prevailing law and rules.

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6. That the appellant is estopped by his own conduct to file instant appeal.

7. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.

8. That the appeal is liable to be dismissed due to mis-joinder and non-joinder of necessary parties.

9. That the competent authority has done all proceedings according to the law & Rules therefore appeal is liable to be dismissed.

10. That this Honorable service tribunal has no jurisdiction to adjudicate the matter.

Facts:

1. It is correct.

2. Incorrect. That the appellant was involved in unprofessional and unethical activities. He was nondutiful employee. Several times verbal and written explanations and warnings were issued to appellant but he did not mend his attitude.

(Copies no. 1,2,3,4,5,6,7,8 attached)

3. Incorrect. There was no discriminatory conduct of respondent no. 3. Respondent no. 3 time and again directed the appellant to be dutiful as per law and follow the professional ethics and service rules for a period of one year during daily morning Hospital round, but he refused to perform his lawful duty and demanded exemption from duty on the bases of being representative of class IV union which is illegal and against the service rules.

4. Incorrect.

5. Incorrect. Inquiry was conducted upon the directives of Deputy Commissioner Haripur and the appellant was found

C

guilty by the enquiry committee and was recommended for disciplinary action.

(copies 21 pages attached no. 9 - 29)

6. Incorrect. However a letter was issued by the Assistant director (ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings and to take disciplinary action under E&D Rules 2011 against the appellant if he was guilty. (copy no. 30 attached)

That the appellant entered in the office of respondent no. 02 on 23/02/2019 with reference of letter of the Assistant director (ministerial) requesting, for withdrawal of relieving letter and to initiate disciplinary proceedings, they started victory slogans, abused the administration and One appellant namely Mr. Iftikhar Ahmed attacked on the attendant of respondent no. 02 (Medical Superintendent), made him injured (Copy no. 31 of MLC report attached) and FIR was lodged against the appellant Mr. Iftikhar in P/S City Haripur. (Copy of fir no. 32 attached) they were not accepted and once again directed to report DGHS KP for further posting. (Copy no. 33 attached)

7. Incorrect, Respondent no. 2 relieved them on administrative ground after fulfillment of legal formalities and directed them to report DGHS KP for further posting.
8. Incorrect. Respondent no. 01 DGHS KP posted and placed all appellants at the disposal of DHO Haripur for further posting under his control. (Copy of order no. 34 attached.)
-

Furthermore there is no vacant post of class IV in the DHQ Hospital Haripur, as informed to DGHS KP through a letter vide no 5366-68/MS/DHQ/NF, Dated : Haripur the 13/07/2019. (Copy no. 35 attached)

Grounds:

- a) Incorrect. That order no. 167-69 dated 03/01/2019 issued by the respondent no. 02 is legal and lawful under the E&D rules of 2011.
 - i. Enquiry was conducted upon the directives of Deputy Commissioner Haripur. Enquiry committee found the appellant guilty and recommended disciplinary action against this class IV.
 - ii. Incorrect hence denied.
- b) Incorrect as stated. Being public servant the appellant is bound to follow the official norms and in case of any malpractice on their part he was liable to be proceeded according to the law.
- c) Incorrect; that the instant service appeal is hopelessly time barred at law and this honorable Service Tribunal has no jurisdiction as was not challenged before the departmental hierarchy.

It is therefore, most respectfully prayed that the appeal of the appellant may graciously be dismissed with cost.

Respondents:

- 1. MS DHQ Hospital Haripur. Respondent no. 02
- 2. DGHHS KPK Peshawar Respondent no. 01

[Handwritten Signature]

BEFORE THE HONOURABLE SERVICE TRIBUNAL OF KHYBER
PAKHTUNKHWA PESHAWAR

E

Service appeal No 608,61 and 657 of 2019.

Muhammad Safer S/O Khan Afsar R/O Seria Haripur and others.

.....Appellants.

VS

DGHS of Khyber Pakhtunkhwa and others.

.....Respondents-

Joint Para Wise Comments/Reply on the behalf of Respondent no. 1,2 and3:

AFFIDAVIT:

I, Dr. Mushtaq Khan Tanoli Medical superintendent DHQ Teaching Hospital Haripur do here by solemnly affirm and declare that contents of fore going comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Dated. _____


Deponent.



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 1456-58 Dated 07 /03/2018

To,

Mr. Safer W/Orderly
DHQ Hospital Haripur.

Subject: EXPLANATION

Memo:

It is noted with great concerned that under which authority you were changed / altered the duties of Awais and Ghulam Mohayu Din W/Orderlies without any prior permission/information of the undersigned. Your this irresponsible and negative attitude is highly offensive.

Therefore, you are directed to explain your position within three days of receipt of this letter, otherwise stern disciplinary action will be taken against you.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

- ✓ 1. Dr. Dildar khan DMS DHQ Teaching Hospital Haripur.
- 2. Supervisor Class-IV DHQ Teaching Hospital Haripur

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 4574-75 Dated 29 /06/2018

To,

Mr. Awais Tasleem W/Orderly Paeds deptt:
DHQ Teaching Hospital Haripur

Subject: **WARNING**

Reference your reply to the explanation bearing dated Nil.

Your reply of Explanation is not satisfactory, you are hereby strictly directed to follow the rules and perform duties with proper uniform, if found without proper uniform in future you will be considered as absent & your pay will be deducted & also stern disciplinary action will be initiated against you.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

Cc:

- DMS DHQ Teaching Hospital Haripur.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No 6290-93 /Dated 18/09/2018.

To,

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: **EXPLANATION**

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No. 6496-93 /Dated 24/09 /2018.

To

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: WARNING:

You are hereby strictly warned to refrain yourself from illegal activities and perform your lawful duties other wise strict disciplinary proceeding under E&D rules of 2011 will be initiated.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.


Medical Superintendent
DHQ Hospital Haripur.



OFFICE THE MEDICAL SUPERINTENDENT

DHQ HOSPITAL HARIPUR

Tel: 0995-611850, Fax # 0995-610069

No 6290-93 /Dated 18/09/2018.

To,

1. Mr. Muhammad Safeer ward orderly
2. Mr. Shoukat Zaman ward orderly
3. Mr. Iftikhar ward orderly

Subject: **EXPLANATION**

Memo,

It was notice with great concern that you do not perform your lawful duty. You are involved in illegal and unethical practice which is violation of service rules.

You are hereby directed to explain cogent reasons of such unethical attitude and malpractice during your duty hours within three days positively, abstain yourself from illegal and malpractice in future. Otherwise disciplinary proceedings will be initiated against you under the Khyber Pakhtunkhwa Govt: Servants (Efficient and Discipline) rules 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



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OFFICE OF THE MEDICAL SUPERINTENDENT

DHQ TEACHING HOSPITAL HARIPUR

Ph: No. 0995-611850, Fax No. 0995-616069

No. 7957-60 Dated 13/11/2018

To

1. Mr. Shoukat Zaman W/ orderly.
 2. Mr. Muhammad Safer W/Orderly.
 3. Mr. Iftikhar W/orderly.
- DHQ Hospital Haripur.

Subject: WARNING.

It was noted with great concern that inspite of repeated written and verbal directions you are not refraining yourself from unethical and illegal activities. Your this attitude is also encouraging the other staff to disobey the administrative orders.

Once again you are hereby warned to be dutiful and wear proper uniform and refrain yourself from illegal/unethical activities otherwise you will treated with E & D rules of 2011.

Medical Superintendent
DHQ Hospital Haripur.

Cc:

DMS DHQ Hospital Haripur for information.

Medical Superintendent
DHQ Hospital Haripur.



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**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 8917-19 Dated 14 /12/2018

To,

Mr. Owais Tasleem W/Orderly
DHQ Teaching Hospital Haripur.

Subject: EXPLANATION

Memo:

It is reported by C/Nurse of ICU/CCU on Night Duty that you were found absent from duty for three days, without prior information / permission. You're this act of negligence and irresponsible attitude towards your duties is against the service rules.

You are hereby directed to explain regarding irresponsible attitude within three days otherwise strict disciplinary action will be taken against you under E&D rules 2011.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**

Cc:

- DMS DHQ Teaching Hospital Haripur.
- Supervisor Paramedics/Class-IV for information.

**MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR**



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**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph:No. 0995-611850, Fax No.0995-610069

No 159-83 /Estab/E/Exp

Dated 03 /01/2019

To,

1. Mr. Tariq Ward Orderly, Casualty Unit
2. Mr. Sajjad Ali Sweeper Surgical Male Unit
3. Mr. Awais Tabasum Ward Orderly CCU Night Shift
4. Mr. Anayat Ward Orderly, Paeds Ward

DHQ Teaching Hospital Haripur .

SUBJECT: Explanation.

Memo:

It has been reported by Incharges of above Department / Wards that you all were not physically present at your place of duty, the dates mentioning in the reports. This shows negligence on your part.

You all are therefore directed to explain reason of your willful absence within three days positively; otherwise strict disciplinary action shall be taken against you under E&D Rules 2011.


MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR

CC:

Accounts Section undersigned office with the direction to deduct (02) days salary of the above officials on account of absence and deposit the deducted amount into Government Treasury. Their absence is treated as leave without pay.

MEDICAL SUPERINTENDENT
DHQ HOSPITAL HARIPUR



To
The Medical Superintendent,
DHQ Teaching Hospital Haripur

Sub: INQUIRY REPORT (CLASS IV ASSOCIATION RESOLUTION STRIKE) DHQ HARIPUR

Sir,

With reference to your directive vide letter No.1300-01/AC(H) dated 14/12/2018, the Inquiry Committee comprising of Dr. Waseem Ahmed PMO and Dr. Rafique Tanoli PMO conducted an inquiry regarding subject (annexure C). During the course of inquiry the members of the inquires committee recorded statement of Dr. Dildar DMS, other officials and gathered circumstantial evidences; the findings, conclusions and recommendation are summarized below: -

Findings:

1. It has been found that the allegations against Dr. Dildar DMS are baseless and fabricated. The fact of the matter is that Dr. Dildar DMS has been found to be a dedicated and dutiful officer, the conduct of said officer has been found modest during the whole episode.
2. The crime of Dr. Dildar is that he put his utmost efforts for smooth running of hospital's daily affairs.
3. It is the duty of Dr. Dildar DMS to implement the TOR's (duties) of all paramedics & Class-IV, in this context, he persuades class-IV to be dutiful and wear proper uniform (Cap) during duty hours. He reports the officials who remain habitually absent from duty to MS for disciplinary action. Consequently the MS of the hospital does the necessary action which includes deduction of pay under Khyber Pakhtunkhwa (E&D) rules 2011 with the involvement of IMU personnels.
4. The inquiry committee probed further and found that "to wear cap during duty hours" is the pivotal point on which class-IV showed concerns and they are not willing to wear proper cap during duty hours as designated by Government of Khyber Pakhtunkhwa Health Department. It is worth mentioning that different colour of caps are allotted to various class-IV as their dress code i.e. black colour cap for Security Guards, green for Sweepers and red for Ward Orderly.
5. It has been found that most of the class-IVs take it as a disgrace to wear proper cap during their duties, perhaps they are considered as doctors in their local communities.
6. It has been found that they choose wrong way i.e. strike for fulfillment of their un-lawful demands. Consequently they observed strike in DHQ Teaching Hospital Haripur on 08-12-2018. Some of the class-IV took active participation and engaged provincial association in the said strike. As a result the smooth running of hospital hampered and public suffered a lot (Annex - I).
7. The names of class-IVs who planned the strike, provoked it and took active participation are
 - a) Shoukat Zaman Ward Orderly
 - b. Safeer, Ward Orderly
 - c. Ifikhar Ward Orderly
 - d. Awais Tasleem Ward Orderly
 - e. Fareed X Ray Attendant
 - f) Saeed Ayub, Behshti BHU Kokalian Peeran
 - g. Anayat Ward Orderly
 - h. Sajid, Mali
 - i. Niaz Elahi, Sweeper
8. Majority of the class-IVs remained inactive and did not participate in strike, the list of those class-IV is attached (Annex - I to IX).

Conclusions:

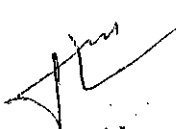
1. The observed strike was unjustifiable and un-lawful.
2. The observed strike brought disgrace to prestige of Dr. Dildar Khan DMS.
3. The way, the strike conducted i.e raise of slogans in public against Dr. Dildar, involvement of Provincial Associations and out siders.

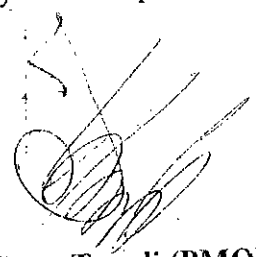
Recommendations:

1. The Enquiry Committee recommends disciplinary action against the culprit Class-IV.
2. Uniform & cap should be provided to all Class IV staff as is practicing in all Teaching Institutes.

Enclosures:

1. I-IX, The List (09 pages) of non-strikers (Class IV) who did not participate in strike.
2. G, H, I, J (Photos of Class - IV observing strike 04 pages).
3. A (letter from Assistant Commissioner Haripur to MS DHQ Teaching Hospital Haripur)
4. B (letter from Deputy Commissioner Haripur to Assistant Commissioner Haripur)
5. C (Resolution letter from Class - IV DHQ Teaching Hospital Haripur)
6. D (letter from Deputy Commissioner Office Haripur regarding strike)
7. E (statement of Dr. Dildar DMS DHQ Teaching Hospital Haripur)
8. F (statements of Class IV in response to enquiry conducted by Dr. Rafique & Dr. Tahir Aziz)

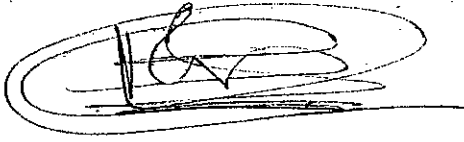

Dr. Waseem Ahmed (PMO)
(Enquiry Officer)
DHQ Teaching Hospital Haripur


Dr. Rafique Tanoli (PMO)
(Enquiry Officer)
DHQ Teaching Hospital Haripur

ESTH

Reline to report to DGHS for
further posting in first phase
- Super W/ordesty
- Officer W/ordesty
- Fareed x-ray attendant
Fareed

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Deputy Medical Superintendent
Dir. Teaching Hospital
Haripur

Phone Number	Name	Address	Notes
0307-5499835	Handwritten	OPD	خان
0336-9799697	Handwritten	Emergency	بیتا
0323-9815188	ANIC	Emergency	نادر
0334-9501496	Muj	---	والت خان
0313-5777995	Handwritten	OPD	پشان
0335-8348418	Handwritten	---	بیتا
0310-5005858	Handwritten	---	لان شورت
0348-9213296	Handwritten	---	بیتا
0313-913722	Handwritten	Daoud	بیتا
0333-5099204	S. Ahmad	Ward	بیتا
0312-9404616	Bellai	---	بیتا
0336-0088844	---	Ent	خان
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0334-5668256	Bibi Aftab	---	بیتا
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0334-9655847	Handwritten	Sweeped	خان

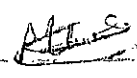
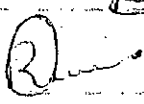
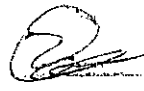
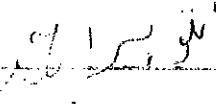
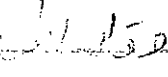
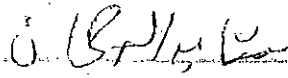
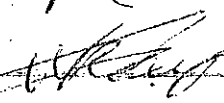



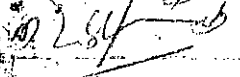



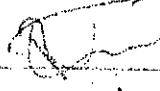
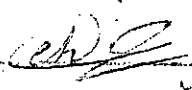
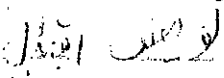
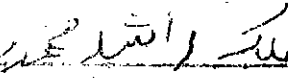
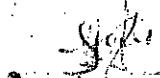
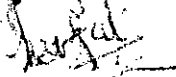
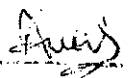
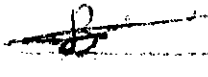
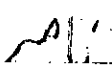
Phone Number	Name	Job Title	Remarks
3331-5188254	Aslam	Sweeper	سجاد علی
3420904158	Aslam	Ward Boy	شرفیور
3345665296	Aslam	Ward	اطہر خان
336-9003148	M. Aslam	Ward	محمد صادق
317-1572828	Aslam	Ward	محمد صادق
	Aslam	Ward	محمد صادق
	Aslam	Ward	محمد صادق
329136948	Aslam	Ward	محمد صادق
3429672419	SS Aslam	Sweeping	محمد صادق
331-5148245	Aslam	Night Ward	(M)
336-9790710	Sahil	Night Ward Sweep	محمد صادق
316-9719736	K. Aslam	Night Ward Boy	محمد صادق
31-0594547	Aslam	Night Ward Boy	محمد صادق
332-5084101	Aslam	Sweeper Night	ادیس
340-8169533	M. Aslam	Security Guard (Night)	عابد حسین شاہ
335-5637401	Aslam	Ward Boy Night	محمد شریف
31-0168245	Aslam	Electrical	عبد السلام
312-0532655	Aslam	Electrical	رفیق خان
06-5309639	Aslam	Electrical	حافظ شرف
134-5077509	Aslam	Electrical	محمد شرف
311-5524123	a YASIR	Sweeper	قاضی یاسر

SUBJECT PHONE NUMBER PROFESSION NAME

	0334-9644102	سولہ وارڈ لوٹ	ان سان فضل
	0322-5728542	وارڈ لوٹ	غالب
فیصل	0336-5071824	وارڈ لوٹ	علی محمد
Fawad Anwar	0312-5447247	وارڈ لوٹ	انوار
Prof.	0348-9821713	-	پروفیسر
عالم شاہ	0312-5456347	وارڈ لوٹ	عالم شاہ
	0336-5604326	سیکوریٹی	سید الرحمان
ZIA	0301-8108073	-	زیاء
	0317-5956712	-	سید شہزاد
	0314-7311194	-	سران خان
Deena	0314-95101560	وارڈ لوٹ	قاری خالد
عمران	0334-9655277	پروفیسر	عمران
محمد قاسم	0313-2155746	"	محمد قاسم
	0333-5762990	II	ایاز
	0335-7008070	سیکوریٹی	ایوب خان
	0334-8110916	وارڈ لوٹ	غلام محی الدین
خالد محمود	0316-5120640	ٹریڈنگ	خالد محمود
Adil	0308-3340241	ADMIN	عادل
	0332-5926832	سیکوریٹی	فکر
	0306-5309639	ایڈمنسٹریٹو	حمزہ
	0332-5072201	سیکوریٹی	عامر شہزاد
	0314-2358881	سیکوریٹی	محمد ساجد
ذالہ محمود	0312-5429026	"	ذالہ محمود
	0313-5912282	"	محمد سعید
	0312-9136948	وارڈ لوٹ	اختر بیاز

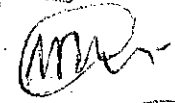
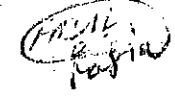
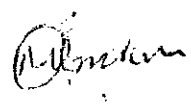
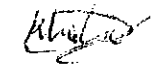
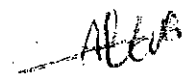
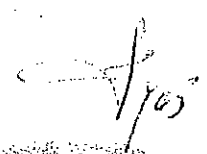

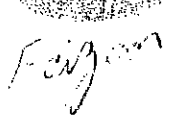
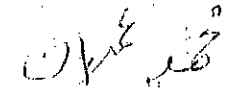
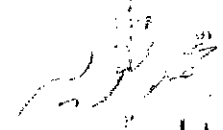

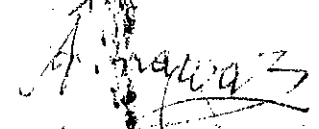


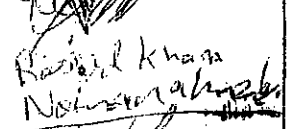
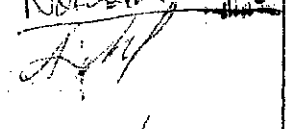
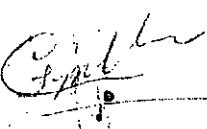
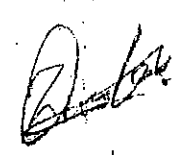
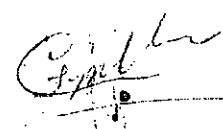
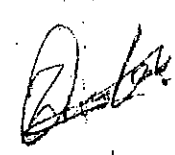
✓

Signature Phone No. Profession Name

	0314-9353303	وارڈوائٹ	طیگر عباس
	0344-9432439	"	صاف خان
	0316-9026907	"	ذوالقرنین
SHAZIB	0331-5355980	"	شہانزیب خان
	0337-3219823	سوسائٹی	نویسٹر
	0311-5813823	وارڈوائٹ	ذوالقرنین
	0336-9790710	سوسائٹی	شاہد
Nayan	0312-1551191	وارڈوائٹ	نور ہدیہ
	0316-0265834	-	ملک
	0323-3371765	وارڈوائٹ	ماہر
	0323-9173762	سوسائٹی	طیگر انور
	03135866394	وارڈوائٹ	ملک فیصل
	0332-5259075	وارڈوائٹ	محمد نجیب
	0312-5877387	"	حاجہ یاسمین
	0313-5814581	"	ذوالقرنین
	0342-9359157	سکول	شہدائت
	0308-5648428	وارڈوائٹ	محمد اعجاز
	0347-5270160	"	ذوالقرنین
	0316-5817256	سوسائٹی	انور حفیظ انصاری
	0344-944451	(OPD) وارڈوائٹ	ذوالقرنین
	0312-9872894	جو کینڈا	عبدالرحمن
	0312-7671409	وارڈوائٹ	محمد علی
	0312-5969873	"	انور ایمن
Muhammad	0344-9414223	(OPD) "	محمد
	0310-5280085	"	ذوالقرنین
	0347-8945065	انور حفیظ	انور

Signature	Phone number	Profession	Name
	0332-0924346	-	احمد حسن
	0333-9361658	-	محمد يوسف
Amir HAMAYUN	0311-99755446	119 شارع لوات	عاصم محمد
Tahid	0317-1592296	سويبر	طارق
	0314-7311894	//	عمران
	0315-9634009	-	اختر محمد
	0312-4431344	-	شهباز علي
	0345-9633505	وارد لوات NITE	عمر
	0345-9575132	-	فانوس احمد
S. Durrani	0310-4035657	LAB	شوکت (LAB)
	0300-5623580	وارد لوات	ایوب رفیق
	0346-5622275	وارد لوات (آ.آ)	مید نذیر
Muhamm	0334-5900960	وارد لوات (LAB)	ناظر خان
	0331-5850589	//	محمد مراد
	0305-8914286	سکریٹری	راوان
	0302 5104156	وارد لوات (برقی)	اعجاز
	0316-0281510	Sweeper	شیراز علی
Tahira Akhtar	0313-5893142	داتی	تالیم
	0313-5893142	سیوریٹی	طاہر امیر
	0336 5374674	وارد لوات سرینگی	ادیشہ
	0336-5071660	سویبر	روال فقیر
	0336-8101088	وارد لوات	ایوب خان
	0308-5628167	سویبر	سید علی
	0307 8400645	سویبر	شیخ رحمان
	02990501025	سویبر	افتخار

Signature	PHONE NUMBER	Profession	Source
Abdur Rahman	0312-6618866	کارڈ لائٹ	سید الہامان
[Signature]	0345-9893981	سیلورٹی	ابوالور
نیل احمد	0307-5074431	سویپر کوارٹر	علی محمد
[Signature]	03349640806	سیلورٹی	باس
[Signature]	03459471098	Welding	صابیح
Al Faraz	0346-5891429	سویپر	غلام شاہ
[Signature]	0305-8672095	Welding	عاشق
THSEEN	—	Aje	Taseen
[Signature]	0310-5346995	Sweeper	سیدنا
[Signature]	03149794722	Welding	[Signature]
[Signature]	03005074170	[Signature]	[Signature]
[Signature]	03211229866	[Signature]	[Signature]
[Signature]	0343-9911779	[Signature]	[Signature]
[Signature]	0312-5902969	..	[Signature]
[Signature]	0327-8576228	..	[Signature]
[Signature]	0300-9113617	..	[Signature]
[Signature]	0332-5037238	..	[Signature]
[Signature]	03115230091	OPD	وناس
[Signature]	03018108073	..	سیا
[Signature]	03138778858	سویپر کوارٹر	نارنگان
Rehman	343-9483-21	OPD Peady	بابر
Ibnul Khaw	03344221023	سویپر	الہامان
[Signature]	0333-5097297	سویپر کوارٹر	سیدنا
[Signature]	0305911199	سویپر کوارٹر	سیدنا
[Signature]	03118635710	کارڈ لائٹ	احمد لہاز

Name	Phone Number	Profession	Address
Fazal Hussain	0315 5663154	دارد ادرات	یاد حسین
	0305 8911474	خودکیراد	د سید
	0511-5949072	دارد ادرات	دارد ادرات
	0315 5803606	دارد ادرات	دارد ادرات
	0347 2921477	سویسر	سویسر
	0347 97541193	"	آکسلیان
	0334 3104050	ادبی اشیرا پست	ادبی اشیرا
	0336 9903659	سویسر	سویسر
	0336 5754480	دارد ادرات	دارد ادرات
		"	"
	0333-7766149	سویسر	سویسر
	0336-9163465	سویسر	سویسر
	0312-9136945	Ward Boy	Ward Boy
	0334 4654054	ادبی	ادبی
	0345 1585245	Sacred City Group	Sacred City Group
	0335 4330684	" "	" "
	0336 5427831	" "	" "
	0332 9202164	" "	" "
	0334 5711460	" "	" "
	0336-0088844	دارد ادرات	دارد ادرات
	0334-0594422	دارد ادرات	دارد ادرات

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3/11

Shahzaib

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سید آغا خان

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میرا حق
Barakat

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0302-8948460

0304-5983046

03400912134

0337-9256007

0310-9304149

0312-9978975

0345968270

0336-5071004

0334-5393715

0311-5842571

0344-9417163

0317-5986311

0347-5269509

Security guard

سویسر

shahzaib

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سید آغا خان

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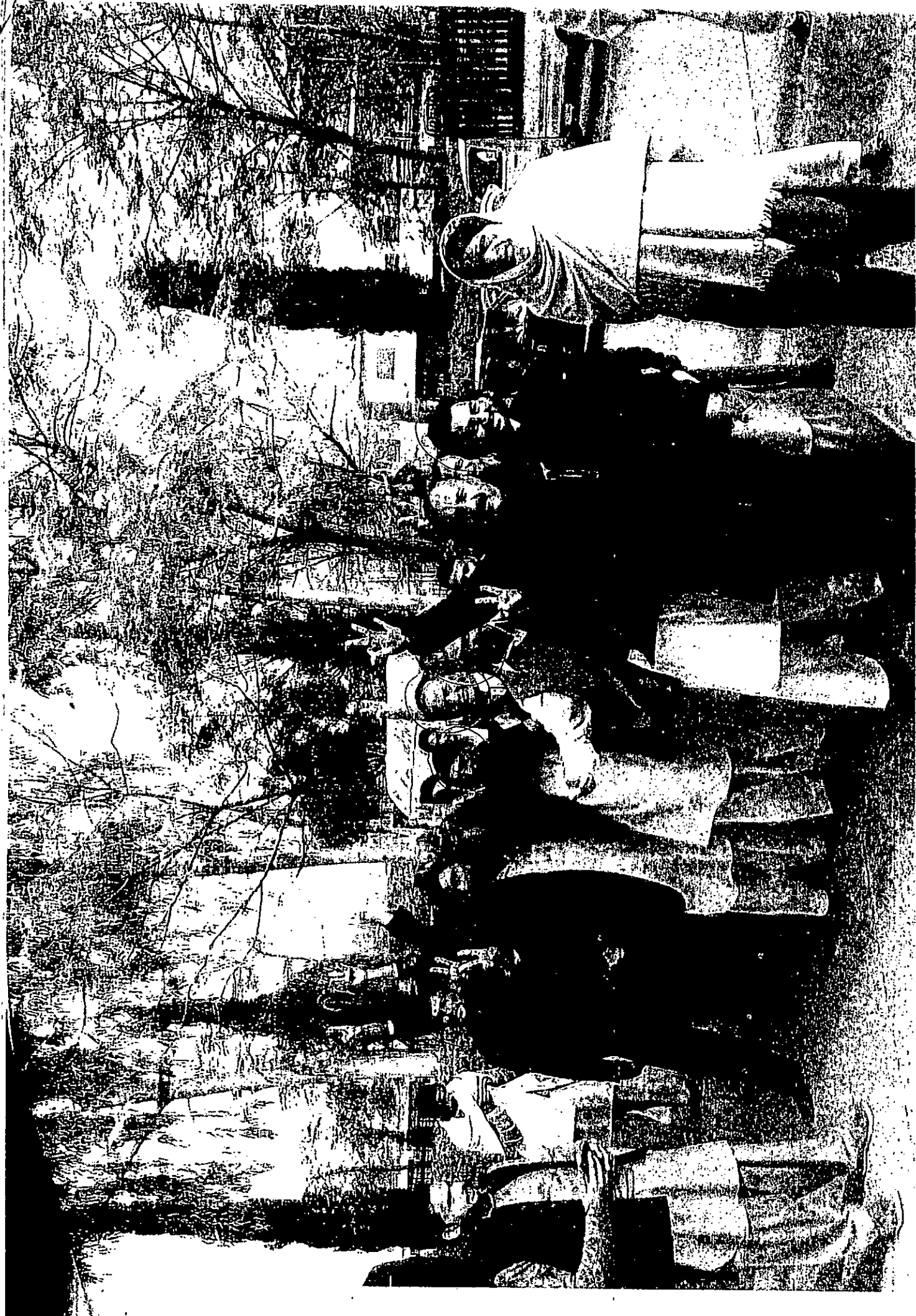
سید آغا خان

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سید آغا خان

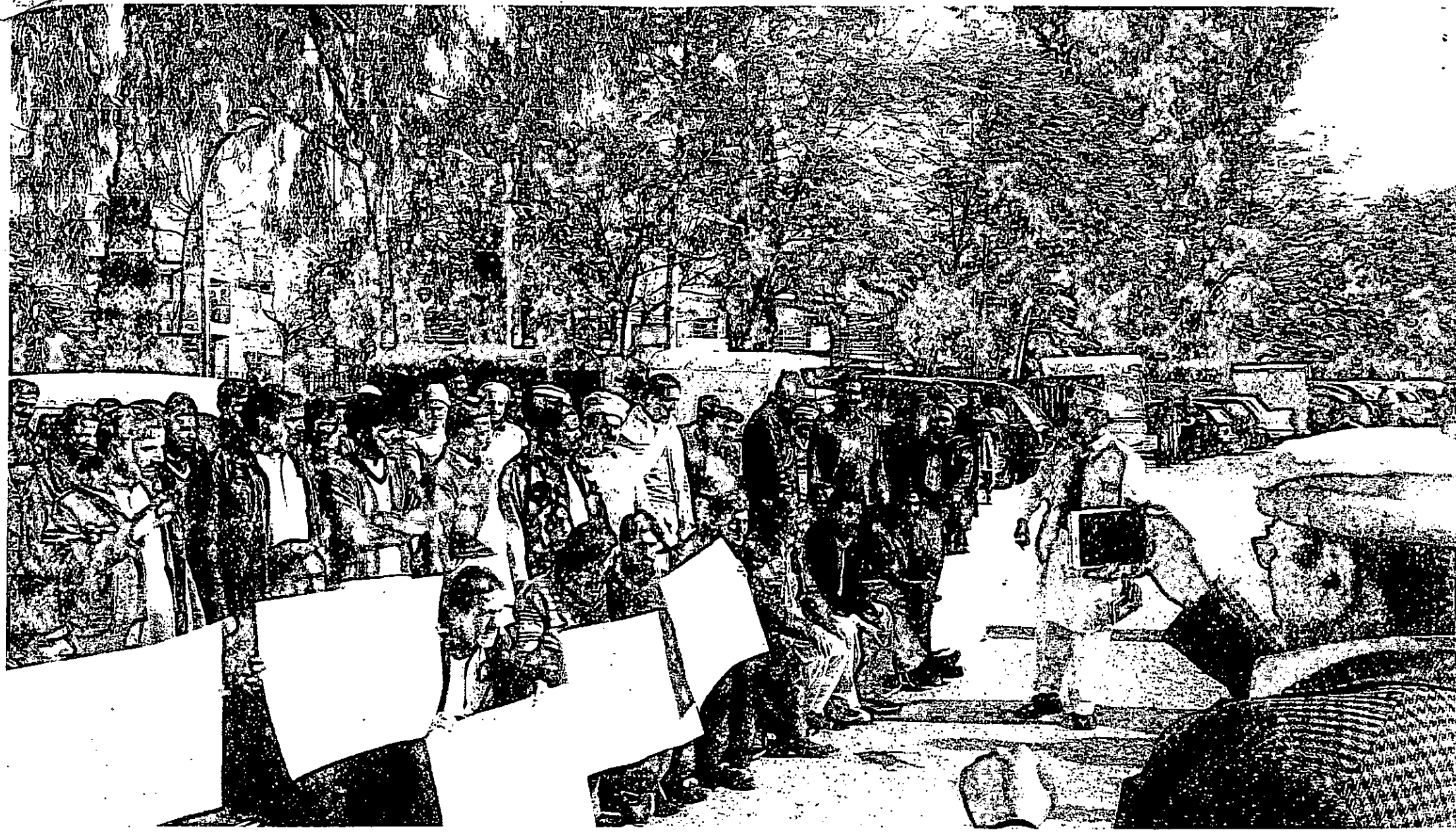
سید آغا خان

سید آغا خان



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OFFICE OF THE ASSISTANT COMMISSIONER, HARIPUR

No. /Reader/09/ 1300-02 /AC (H)

Date: 14 / 12 / 2018

Phone No: 0995-610455

To,

The Medical Superintendent,
DHQ Hospital,
Haripur.

Subject: **SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.**

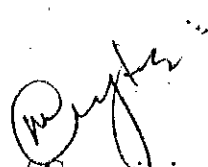
Enclosed please find herewith letter No. 1(5) /Misc/App: /AS/DC (H) dated 06-12-2018 along with the Resolution No. 6-15/HPR dated 05-12-2018 of Para Medical Association, Class-VI, Health Department Haripur, received from The Deputy Commissioner Haripur to enquire into the matter and detailed report.

It is requested to inquire into the matter and detailed report and comment at an early date positively for onward submission to Deputy Commissioner Haripur please.


Assistant Commissioner,
Haripur.

Copy to:

The Deputy Commissioner, Haripur for information please.


Assistant Commissioner,
Haripur.

~~Dr. was in~~ Dr. was in PMO + Dr. ~~was in~~ PMO
Do as directed
Free
2/12

(B)

(2)



Office of the Deputy Commissioner, Haripur

Phone No. 0995 - 613391, 613389 FAX - 615412
No. 1(5)/Misc/App./AS/DC (H)
Dated: 06 /12/2018

Matter important / urgent

To,

✓
The Assistant Commissioner,
~~Haripur~~ Haripur.

Subject: SESSION OF PARA MEDICS ASSOCIATION, HARIPUR.

Enclosed please find herewith a copy of memo No. 04/HPR dated 05-12-2018, on the subject noted above from the General Secretary, Para Medical Association, Haripur with the request to inquire into the matter and submitted detailed report at an early date, please..

ENCLS: {02 ONLY}

AC Office Haripur

Diary No. 1708

Date: 07-12-2018

Deputy Commissioner,
Haripur.

Copy to:

The General Secretary, Para Medical Association, Haripur for information with reference to above.

Read
call all concerned
For inquiry at the
earliest.

Deputy Commissioner,
Haripur.

ASSISTANT COMMISSIONER
HARIPUR

AC/H
07/12/18

(e)

AC report
Khanpur
enquiry
to

پیرامیڈیکل ایسوسی ایشن

درجہ چہارم محکمہ صحت ہری پور

Office of D.C Haripur
Diary No. 20241
Date 06/12/18

DEPUTY COMMISSIONER
HARIPUR
5-12-18

نمبر 04/HPR

مختصی ایسوسی ایشن پیرامیڈیکل ایسوسی ایشن ہری پور کے صدر
 آج مورخہ 5/12/18 کو ایسوسی ایشن نے جلسہ عہدیداران کا ایک اجتماع ایسوسی ایشن زیر صدارت شوکت زمان صدر
 پیرامیڈیکل ایسوسی ایشن درجہ چہارم ملڈز میں عقام ڈسٹرکٹ ہیڈ کوارٹرز ہاسپتال جوہانپور منعقد ہوا جس میں تنظیم کے تمام
 عہدیداروں اور دیگر ملڈز میں تشریف لداؤں میں شرکت کی۔ شرکاء ایسوسی ایشن نے ڈاکٹر دلدار DMS کے ملڈز میں رجسٹریشن روٹیوں پر
 سخت برہمی کا اظہار کیا۔ ڈاکٹر دلدار ملڈز فور ملڈز میں کوکے میں بند کرنے کا نام نکلیج کرنا اس کا معمول بن چکا
 ہے۔ ڈاکٹر دلدار عرصہ تین ماہ سے بغیر کسی رسم سے ملڈز میں رجسٹریشن کی تھی اور اس سے ٹھوٹی کر رہے ہیں جو ریٹاز سے ظلم
 اور زیادتی ہے۔ جسکی جتنی بھی صورت کی جائے کم ہے۔ ڈاکٹر دلدار نے ملڈز میں کوکے کو اس سال کرنا۔ اطلاق سے
 کبھی رجسٹریشن کیا گیا۔ کالی نکلیج کرنا ان کی فطرت میں ڈسٹرکٹ ہیڈ کوارٹرز کے بعد دیا گیا ہے۔ ڈاکٹر دلدار کے اس
 رویے پر تمام درجہ چہارم ملڈز میں سخت غم و غصہ اور تشویش پائی جا رہی ہے۔ ان کے اس ظالمانہ رویے کے
 خلاف ریم ایس وی کرنا مانگوں شکایت کی گئی جس پر کوئی بھی مقصدت گزارائی سافٹ لین آئی۔ شرکاء ایسوسی ایشن
 نے ڈاکٹر دلدار کو سب سے ملڈز فور کے حوالے نہ کرنے پر بھی ڈاکٹر دلدار کو صرف تسخیر بنایا۔ اور مطالبہ کیا کہ
 جن ڈکٹروں کی رجسٹریشن سے بغیر کسی رسم سے کوکے کی گئی انکو ہی الفور ریٹاز میں اوائیل کی جائے اور ڈاکٹر دلدار کو سب سے درجہ چہارم
 ملڈز میں حوالے کیا جائے۔

شرکاء ایسوسی ایشن نے متعلقہ طور پر ڈاکٹر دلدار کے ظالمانہ اور جھٹک آمیز رویے کے خلاف درخواست
 رجسٹریشن میں شمول طلب کرنے کا اعلان کیا ہے۔ جبکہ ڈاکٹر دلدار کو DMS کے عہدے سے ہٹا دیا
 جائے گا۔ جب تک حصار اجتماع جاری رہے گا۔ اور حالات کے خراب ہونے کا عام تر ذمہ داری
 MS پر عائد ہوگی۔

- 1- مورخہ 6/12/18 بروز جمعرات اور 7/12/18 بروز جمعہ بائیں پر سیاہ پٹیاں بائیں طاق میں لگی
 - 2- مورخہ 8/12/18 سے تاحکم نان مکمل ہر حال جاری رہے گی۔ جب تک مطالبات تسلیم نہیں ہوئے۔
- حصار اجتماع طوری رہے گا۔

تاریخ 5-12-18

نمبر 6-15/HPR

- کالی برائے اطلاع و فوری کارروائی
- 1- خطاب ڈی سی جی، جوہانپور
 - 2- ضابطہ DPO، جوہانپور
 - 3- ضابطہ ڈسٹرکٹ انڈسٹریل ڈیپارٹمنٹ، جوہانپور
 - 4- ضابطہ ڈاکٹر دلدار کے عہدے پر رجسٹریشن کے بارے میں
 - 5- ضابطہ DHO، جوہانپور
 - 6- خطاب ایم ایس جوہانپور
 - 7- ضابطہ طبیعت اطوار صوبائی صدر، جوہانپور
 - 8- خطاب صدر ایسوسی ایشن، جوہانپور
 - 9- ضابطہ DMS، جوہانپور
 - 10- ضابطہ DPO، جوہانپور
- جنرل سیکرٹری
سعدی ایوب
دستخط

۷۵۳۷

(D)

خبریات کے مطابق 06.12.2018 تا 07.12.2018 بوقت 11:00 بجے بمقام ڈی ایچ کیو ہسپتال ہری پور علاقہ
 ضلع شہین شاہ پور ہتھیام شوکت زمان بی صدر پرامنڈ بک ایسوسی ایشن کے بازوؤں پر سیاہ پیمانہ باندھ کر ڈاکٹر ولددار احمد ڈی
 ایچ کیو کے خلاف کلاس فورملز میں احتجاج کریں گے اور پورے 08.12.2018 کو تا حکم نامہ مکمل ہر حال میں جائے گی۔
 کلاس فورملز میں کا کہنا ہے کہ ڈاکٹر ولددار احمد ہری پور سے کوئی کرتا ہے ہر ملازم سے مدد اخلاقی اور خیرا س کرتا

ڈی جی کشن صاحب ہری پور کو بھجوائی جائے۔

[Handwritten signature]
 ڈی جی کشن صاحب ہری پور

A=SB Hospital
 AC ~~has~~ already been
 appointed to conduct enquiry
 on the above allegation. Pl send it
 to his office for further n/action.

[Handwritten signature]
 6/12/18

- g. Ana .. a
 - h. Sajid, Mali
 - i. Niaz Elahi, S
8. Majority of the class-
 is attached (Annex-1)



OFFICE OF THE DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR

Telephone #: 0995-611850, Fax #: 0995-610089

No. 109 Dated 01/11/2019

اسلام علیکم۔ ممبرز انکوائری کمیٹی۔

گزارش ہے کہ ہسپتال میں گزشتہ کئی سال سے کچھ کلاس فور ملازمین کا رویہ ٹھیک نہیں تھا۔ نہ ہی اپنی ڈیوٹی ادا کر رہے تھے اور نہ ہی ڈیوٹی کے دوران ٹوپی پہنتے تھے۔ یہ لوگ ہسپتال آتے تھے اور ان کا رویہ ایسا تھا جیسے یہ ہسپتال میں بہت بڑے ڈان ہیں۔ جب کسی کو ڈسپلن کی پابندی کرنے اور ٹوپی پہننے کا کہا جاتا تو یہ مداخلت کرتے اور مدمعاشی کرتے تھے۔ اور بیغیر ایم ایس صاحب کی اجازت کے اپنی مرضی سے چھٹی کرتے تھے

میں نے ان کی ڈیوٹی لگائی اور ٹوپی پہننے کا کہا اس کے علاوہ جو بیغیر ایم ایس صاحب کی منظوری کے غیر حاضر ہوتا اس کی تحریری رپورٹ ایم ایس صاحب کو کرتا جس وجہ سے ان لوگوں کو تکلیف ہوئی کہ ہماری ڈیوٹی ڈی ایم ایس نے کیوں لگائی۔ اس طرح انہوں نے دوسرے لوگوں کو ہڑتال کرنے کے لئے اکسایا۔ اور ناکام ہڑتال کی جبکہ 196 کلاس فور ملازمین میں سے 165 ملازمین نے لکھ کر دیا کہ ہمارا ہڑتال کے ساتھ ہمارا کوئی تعلق نہیں۔

غیر حاضر لوگوں کے خلاف یا ڈیوٹی نہ کرنے اور ٹوپی نہ پہننے والوں کے خلاف کارروائی کرنا ایم ایس صاحب کا اختیار ہے میرا کام صرف ایم ایس صاحب کو رپورٹ کرنا ہے جو کہ میں نے کی ہے۔

DEPUTY MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR.

A committee comprising of the following is constituted to prepare a report within 05 days
- Dr. Rafiq Tanoli
- Dr. Tabir Aziz

بخدمت جناب MS صاحب DHQ ہسپتال ہری پور

جواب نوٹس نمبری 54-9246 مورخہ 24.12.2018

27/12/18

جناب عالی! جواب نوٹس ذیل ہے۔

یہ کہ مسائل بطور کلاس فور ملازم ہے اور عرصہ دراز سے پتے فراخ احسن طریقہ سے سرانجام دے رہے ہیں اور اس دوران مسائل کسی قسم کی غیر قانونی کام میں ملوث نہیں پائے گئے

یہ کہ مسائل اور دیگر ممبرز یونین نے باقاعدہ پراسن احتجاج ریکارڈ کرانے کی نسبت ایک نوٹس مورخہ

5.12.2018 جاری کیا کہ کلاس چہارم کے ایسپلائز ڈاکٹر دلدار DMS کیخلاف پراسن سیاہ پٹیاں باندھ کر

احتجاج کریں گے کیونکہ DMS بلاوجہ کلاس فور ملازمین کی تنخواہوں سے گزشتہ 3/4 ماہ سے غیر قانونی کٹوتی

بغیر کسی نوٹیفکیشن/ آرڈر کی جارہی ہیں۔ ملازمین درجہ چہارم بے جا طور پر گالی گلوچ کرنا، DMS صاحب نے

دظیرہ بنایا ہوا ہے جس نسبت اس سے قبل بھی اپنی شکایات جناب کے پاس کر چکے ہیں۔ کوئی کارروائی نہ ہونے

کی صورت میں درجہ چہارم کے ملازمین نے مجبوراً سیاہ پٹیاں باندھ کر پراسن احتجاج ریکارڈ کرایا باوجود کہ

جناب نے کلاس فور ملازمین کو یقین دلایا تھا کہ آپ کی تمام شکایات دور کر دی گئی ہیں آئندہ کسی کلاس فور کو کوئی

شکایت نہ ہوگی اور نہ ہی کوئی written کارروائی کی جائے گی۔

یہ کہ احتجاج کی طرف سے جاری کردہ نوٹس سرسرفلٹ ہے کیونکہ ہمارا احتجاج پراسن تھا اور احتجاج کی وجہ سے

مریضوں کو کوئی تکالیف نہ پہنچائی گئی ہے نہ ہی انتظامیہ کو ہراساں کیا گیا ہے اور ہم نے پراسن احتجاج بطور

پبلک سروٹس قاعدہ و قوانین کے اندر رہ کر کیا ہے۔ لہذا نوٹس ہذا میں لگائے گئے الزامات سب پر بنیاد ہونے کی

بنیاد پر نوٹس قابل تسوخی ہے۔

لہذا استدعا ہے کہ نوٹس ہذا حقائق کے منافی ہونے کی بناء پر داخل دفتر فرمایا جائے۔

انصاف

ادیس

رہنما

S

محمد سرور

ادیس

رہنما

زمان

M - Saif

عنایت اللہ خان

منشیہ خان

محمد سرور

13

06

DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA PESHAWAR



E-Mail Address: ncfh@dhq.gov.pk office Ph# 091-9210269 Exchanges# 091-9210187, 9210196 Fax# 091-9210230
No. 494 / Personnel Dated: 14/01/2019

To,

The Medical Superintendent
DHQ Hospital Haripur.

Subject:
Memo:

RELIEVING ORDER.

I am directed refer to your letter No.167/ dated 03.01.2019 on the subject noted above.

You are requested to withdraw the relieving order in respect of Mr. Muhammad Safer Ward Orderly, Mr. Iftikhar Ward Orderly & Mr. Muhammad Farid X-Ray Attendant and initiate disciplinary action against them under E&D Rules 2011, if they are guilty of misconduct as relieving/ transfer of unwilling worker is no remedy.

[Handwritten Signature] 14/1/19

ASSISTANT DIRECTOR (Ministerial)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR.

[Handwritten Signature] 14/1/19

[Handwritten Signature]
C/C
Armed
M. J. Khan
S. J. Khan
S. J. Khan
S. J. Khan
S. J. Khan
S. J. Khan

No. 22/19 Name M. D. A. M. B. Son of M. D. A. M. B. Age 16 Sex M Caste M Occupation Student
Residence Sari Salich Name of relative or friend 22/2/19 Date of examination

Date and hour of arrival 22/2/19 2.20 PM
No. And date of Police docket A.P. 100/2019
No. And date of Constable P. D. M. D. M. D.
Date of admission _____
Date of discharge 23/2/19
Date and hour of report sent to Police _____

Space for particulars as to further reference to the case date of Giving evidence in Court of despatch of articles said to contain poison.

[Handwritten signature]

Two identification marks:

Particulars of injuries of symptoms, in case of poisoning.

Pl. is swollen and excoriated
② incised wound of 3/4" x 1/2" on long
and bone exposed on back
of left hand.

1 Nature of injuries (Simple, grievous or dangerous)	Front exposed
Probable duration of injury	2-3 days (approx.)
The kind of weapon used or poison Suspected in the case of poisoning	Sharp edges

Dated 22/2/19 of 20

[Signature]
Examining Medical Officer

In Private case A fee of Rs. _____ Paid to the Medical Officer.

Examining Medical Officer

Signature or Thumb-impresion of Private Party



**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL HARIPUR**

Ph: No. 0995-611850, Fax No. 0995-610068

No 1498-1505 / Dated 23/02/2019

To

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

Sub: RELIEVING ORDER.

Dear Sir,

With the ref. of your office letter vide no. 494/personal dated 14/01/2019;
No. 769 / personal Dated 21/01/2019 and no. 1266 /personal 29/01/2019
and this office vide letter no. 988 dated 06/02/2019.

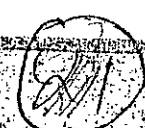
I have the honor to state that the following class IV were relieved from this Hospital on administrative ground. These class IV were creating administrative problems for the Hospital administration and also provoking the other class IVs not to perform duties. They were also not performing their own duties and were unwilling workers and proved guilty in the inquiry conducted against them vide diary no. 19 dated 02/01/2019. (Copy of inquiry report attached).

1. Mr. Muhammad Safeer ward orderly.
2. Mr. Muhammad Farid X-Ray attendant.
3. Mr. Ifikhar ward orderly.
4. Mr. Niaz Ellahi sweeper.
5. Mr. Anayat Ward Orderly.
6. Mr. Sajid Mali.
7. Mr. Awais Tasleem ward orderly.

Furthermore today they abused the employees on duty in MS office and attacked and injured the person on duty at MS office. This office is unable to accept such employees in this office. You are therefore requested to transfer them out of district.

Free
Medical superintendent
DHQ Hospital Haripur.

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**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR**



E-Mail Address: dgshk@peshawar.gov.pk Office Phn 091-9210209 Pk Teaching H 091-9210107, 92-0196 Fax # 921-9210410

OFFICE ORDER

As approved by the competent authority the services of following Class-IV staff relieved by MS DHQ Hospital Haripur are hereby placed at the disposal of DHO Haripur for further posting under his control against the vacant post in the interest of public service with immediate effect.

- i) Mr. Muhammed Safer Ward Orderly.
- ii) Mr. Muhammad Farid X-Ray Attendant.
- iii) Mr. Iftikhar Ward Orderly.
- iv) Mr. Niaz Elahi Sweeper.
- v) Mr. Anayat Ward Orderly.
- vi) Mr. Sajid Mali.
- vii) Mr. Awais Tasleem Ward Orderly.

Arrival/ departure report should be submitted to this Directorate for record.

Sd/XXXXXXXX
DIRECTOR GENERAL HEALTH
SERVICES, K.P PESHAWAR.
Dated 05/02/2019

No. 2274-78 /Personnel

Copy forwarded to the:-

- 1. DHO Haripur.
- 2. MS DHQ Hospital Haripur w/r to his letter No. 988 dated 06.02.2019.
- 3. DAO Haripur.
- 4. P.A to DGHS Khyber Pakhtunkhwa Peshawar.
- 5. Officials concerned.

For information and necessary action.

DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR.

27/02/19

CTC
Attended
Mansoor



DHQ TEACHING HOSPITAL HARIPUR

Ph # 0995-611850, Fax # 0995-610069

Email: hrp7008@gmail.com

35

No. *966-68* /MS/DHQ/INF

Dated: Haripur the *13* /07/2019

To,

The Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

Subject: VACANT POST OF CLASS-IV CONSTITUENCY.

Sir,

Reference your letter No. 8548-85/ADMN dated 11-07-2019.

I have the honor to forward herewith the requisite information on prescribed format for your kind information and further necessary action.

S.No	Name of Facilities	Name of posts	Number of posts	Filled	Vacant
1	DHQ Teaching Hospital Haripur	OT Attendant	1	1	0
2		Blood Bank Attendant	1	1	0
3		Dental Attendant	1	1	0
4		Lab: Attendant	2	2	0
5		X-Ray Attendant	2	2	0
6		Dai	6	6	0
7		Ward Orderly	57	57	0
8		Ward Attendant	51	51	0
9		Ward Aya	1	1	0
10		Baheshti	1	1	0
11		Chowkidar	20	20	0
12		Mali	10	10	0
13		Sweeper	53	53	0
14		Laundry Attendant	2	2	0
15		Laundry Operator (Dhobi)	2	2	0
Total			210	210	0

Full
Medical Superintendent
DHQ Hospital Haripur

Cc:

1. PS to Minister for Health Khyber Pakhtunkhwa.
2. PS to Secretary to Govt. Khyber Pakhtunkhwa for information.

Full
Medical Superintendent
DHQ Hospital Haripur

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.608/2019

Mohammad Safeer s/o Khan Afsar R/O Haripur present ward orderly at DHQ
Hospital Haripur.

.....APPELLANT

VERSUS

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services,
Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.
- 4) District Account Office Haripur.

(Para wise reply on behalf of respondent No.04)

Preliminary Objection:-

- 1) That the petitioner has no cause of action.
- 2) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1,2
- 2) No comments
- 3) No comments related to Respondent No.2,3
- 4) No comments related to Respondent No.2,3
- 5) No comments related to Respondent No.2,3
- 6) No comments related to Respondent No.2,3
- 7) No comments related to Respondent No.2
- 8) No comments related to Respondent No.1

GROUNDS:-

- a) No comments related to Respondent No.2
 - i) No comments related to Respondent No.2
 - ii) No comments related to Respondent No.2
- b) No comments related to Respondent No.2
- c) No comments

Keeping in view spirit of letter No 1998-1505 dt23/02/2019 (copy of letter attached for ready reference) a FORM PAY 02 for stoppage of salary was received from respondent-02 for action.


DISTRICT ACCOUNTS OFFICER
HARIPUR

BEFORE THE KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Appeal No.608/2019

Mohammad Safeer s/o Khan Afsar R/O Haripur present ward orderly at DHQ

Hospital Haripur.

.....APPELLANT

VERSUS

- 1) DG Health Khyber Pakhtunkhwa, at Directorate General Health Services,
Peshawar.
- 2) Medical Superintendent DHQ Hospital Haripur.
- 3) Deputy Medical Superintendent DHQ Hospital Haripur.
- 4) District Account Office Haripur.

(Para wise reply on behalf of respondent No.04)

Preliminary Objection:-

- 1) That the petitioner has no cause of action.
- 2) That the petition in hand is not maintainable.

Respectfully Sheweth:-

- 1) No comments related to Respondent No.1,2
- 2) No comments
- 3) No comments related to Respondent No.2,3
- 4) No comments related to Respondent No.2,3
- 5) No comments related to Respondent No.2,3
- 6) No comments related to Respondent No.2,3
- 7) No comments related to Respondent No.2
- 8) No comments related to Respondent No.1

GROUNDS:-

- a) No comments related to Respondent No.2
 - i) No comments related to Respondent No.2
 - ii) No comments related to Respondent No.2
- b) No comments related to Respondent No.2
- c) No comments

Keeping in view spirit of letter No 1998-1505 dt23/02/2019 (copy of letter attached for ready reference) a FORM PAY 02 for stoppage of salary was received from respondent-02 for action.


DISTRICT ACCOUNTS OFFICER
HARIPUR