


FORM OF ORDER SHEET

Court of _____

Appeal No. 206/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/01/2024	<p>The appeal of Mr. Bashir Ahmad resubmitted today, by registered post through Mr. Saleemullah Khan Ranazai Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____</p>

By the order of Chairman


REGISTRAR

The appeal of Mr. Bashir Ahmad received today i.e on 04.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Address is given on separate page

- ① Annexure-D of the appeal is illegible be replaced by legible/better one.
- 2- Address of appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 50 /S.T.

Dt. 5/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Salemullah Khan Ranazai Adv.
High Court at D.I.Khan.

ser,
Resubmitted after the needful.

Sulekh
24/1/24

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No 206 2024

Bashir Ahmad

VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Bashir Ahmad EPI Technician Posted at CD Kot Inayat Tor Rgjhazai
Barwand Sarwakai South Waziristan Upper District

Resident of Kaniguram Tehsil Ladha District South Waziristan



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service appeal No. 206 /2024

Bashir Ahmad Versus **Government of Khyber Pakhtunkhwa, etc.**

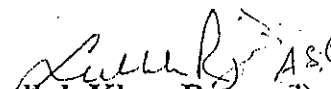
Index

S.NO.	PARTICULARS OF THE CASE.	ANNEXURES.	PAGES.
1.	Memo and grounds of appeal.		— 1-3
2.	Copy of appointment order	"A"	— 4-5
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4.	Copy of Adjusted order	"C"	— 8
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6.	Copy of Departmental Appeal/Representation	"E"	— 11-12
7.	Vakalatnamas.		— 13.

Your Humble appellant:
Bashir Ahmad

Dated:01.01.2024

Through counsel


(Saleemullah Khan Ranazai)
Advocate Supreme Court.

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal 206 2024

Bashir Ahmad

VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Bashir Ahmad EPI Technician Posted at CD Kot Inayat Tor Rgjhazai
Barwand Sarwakai South Waziristan Upper District

Resident of Kaniguram Tehsil Ladha District South Waziristan

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①

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal. *Job* /2024

Bashir Ahmad, EPI Technician South Waziristan Upper District.

(Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Merged Area Peshawar.
3. Regional Director (Southern Region), Health Services Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer, District South Waziristan Upper.

(Respondents)

SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT AGAINST THE NON-REPLY OF THE DEPARTMENTAL APPEAL SUBMITTED BY THE APPELLANT ON 21.09.2023 AND BY ACCEPTANCE OF APPEAL, THE RESPONDENTS MAY BE DIRECTED TO REGULARIZED THE SERVICES OF APPELLANT FROM HIS DATE OF APPOINTMENT i.e 30.03.2007 AND TO RELEASE THE MONETARY BENEFITS IN SHAPE OF ARREARS TO THAT ALLOWANCE.

Respectfully Sheweth,

The appellant prefers the instant petition on the grounds hereinafter submitted along with others.

(Note:- The addresses of respondents as given above are sufficient for the purpose of service.)

BRIEF FACTS

1. That the appellant was appointed as EPI Technician vide order dated 30.03.2007 on contract basis, after fulfilling all the codal formalities. Copy of appointment order is enclosed herewith as Annexure-A.
2. That the appellant was then regularized in service vide order dated 10.10.2018. Copy of regularization order is enclosed herewith as Annexure-B.
3. That the appellant was subsequently adjusted vide order dated 14.03.2019. Copy of adjusted order is enclosed herewith as Annexure-C.
4. That the appellant came to know about his colleagues, who were appointed on contract basis with the appellant but their services were regularized from the date of their contract appointment vide order dated 06.11.2018. Copy of order is enclosed herewith as Annexure-D.

That being aggrieved, the appellant preferred departmental representation / appeal on 21.09.2023, which was forwarded by the DHO concern vide covering letter dated 21.09.2023. Copy of the Departmental Appeal/representation is enclosed herewith as Annexure-E.

6. That no order was passed with regards to the departmental appeal/representation of the appellant hence after expiry of 90 days the appellant approaches this Honourable Tribunal for the redressal of his grievances on inter-alia the following grounds.

GROUND:

1. That admittedly the appellant along with others were appointed on contract basis and the services of certain employees were regularized through a separate order from the date of their appointment, whereas the services of the appellant were regularized through another order but not specifying to be from the date of his initial appointment, therefore, the appellant has been discriminated, therefore, the indulgence of this Honourable Tribunal is warranted in the circumstances.
2. That no doubt the appellant belongs to the then tribal area which was subsequently merged in the province of Khyber Pakhtunkhwa and in the meantime certain Acts were passed by the province, wherein the services of contract employees were regularized but the appellant and some others were refused the regularization by the department by saying that the Act of Khyber Pakhtunkhwa does not cover the tribal area, therefore the contract services of the appellant and others could not be regularized and this matter started from the year 2005, when the regularization Act was passed and subsequently in the year 2009, 2011, 2015, 2017 Acts of similar nature were passed.
3. That it is for the astonishment for the appellant when he lay hands over an order, wherein the services of his colleagues were regularized in 2018 but from the date of their initial contract employment i.e 2007 but why the same benefit was not extended to the appellant, it is a mystery and the respondents are in better position to explain the same, if they have any solid legal ground.
4. That the non-response on the appeal of the appellant by the Director General Health, clearly smell malafide and the appellant is justified by saying that the

respondents cannot justify the discrimination, therefore, they failed to decide the departmental appeal of the appellant.

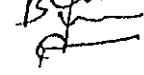
- 5. That as the appellant has been discriminated; therefore, he requested for his regularization from the date of his initial appointment and also asks for the arrears of that period along with other monetary benefits.
- 6. That the counsel for the appellant may be allowed to raise additional grounds during the course of arguments.


PRAYER:-

It is therefore, humbly prayed that on acceptance of instant service appeal, the respondents may be directed to regularized the services of the appellant from the year 2007, the date on which the appellant was inducted in service on contract basis and he may also be given the arrears and other monetary benefits acknowledged by the law by keeping the appellant at par with his colleagues.

Your Humble appellant:

Dated:01.01.2024

(Bashir Ahmad) 
 EPI Technician,
 District South Waziristan Upper.
 Through counsel

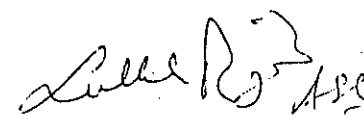

 (Saleemullah Khan Ranazai)
 Advocate Supreme Court.

AFFIDAVIT

I, Bashir Ahmad EPI Technician, District South Waziristan Upper, the appellant, do hereby solemnly affirm on Oath that the contents of the petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

Dated:01.01.2024

Deponent.
(Identified by)


 (Saleemullah Khan Ranazai)
 Advocate Supreme Court.

④
'Amra-A'

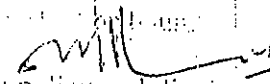
**OFFICE OF THE AGENCY SURGEON
SOUTH WAZIRISTAN AGENCY WANA**

APPOINTMENT ORDER

As recommended by the Departmental Selection Committee in the interview held on dated 20/03/2007, Mr. Bashir Ahmad S/O Shah Zar Khan Residence of Village Kaniguram Tehsil Landha SWA, is hereby appointed as EPI Tech: in BPS 05 plus usual allowance as admissible under the rules against the vacant post of, EPI Tech; at CHC Shakia K. L. P. SWA. His appointment will be subject to the following terms and conditions: -

1. His appointment shall be for a period of 2 years from the date of her joining in services and shall be extended on his satisfactory performance.
2. He is declared medical fit for this job.
3. His appointment is purely on contract basis (prescribed under Government of NWFP Contract Policy 2002) till the availability of post and he shall be bound to serve for at least 5 year in FATA.
4. His appointment is non-transferable. Moreover spouse policy and district cadre policy shall not be applicable to her.
5. Either party can terminate this contract with 60 days notice of pay in lieu thereof.
6. He shall be dealt in accordance with rules and regulation applicable to contract employees under contract policy 2002.
7. He shall not indulge in any trade, business and any other activity what so ever which has been declared prohibited for the Government servants in elaboration of civil servants Act 1973.
8. He will not be entitled for any TADA for joining service and the offer shall be automatically held cancelled if he fails to join in 15 days of receipt of this offer.

If he accepts the terms and condition he is directed to report for duty at _____


Agency Surgeon
South Waziristan Agency, Wana

No. 1132-34 /PF,


Dated Wana the

30 /03/2007

Copy forwarded to the: -

1. Political Agent South Waziristan Agency Wana
2. Agency Account office SWA at Tank.
3. Incharge CHC
4. Account/Head Clerk of this office
5. Official concerned

For information and necessary action.


Agency Surgeon
South Waziristan Agency, Wana



OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT SOUTH WAZIRISTAN WANA

OFFICE ORDER.

Mr. Bashir Ahmad EPI technician regularized earlier against the post of Medical Technician SHS vide DHS order No. 23973-82 dated 10-10-2018 and this office order No.49-54 dated 14-03-2019 (Due to no vacant original cadre post), is hereby adjusted on original cadre vacant post of EPI technician with immediate effect.

Sd-----

District Health Officer
District South Waziristan

No. 73-75/1 dated 23/01/2020.

Copy forwarded to the:-

1. Director Health Services Merged areas, Peshawar.
2. District Accounts Officer SW.
3. FSMO EPI Unit SW.
4. Official concerned.

District Health Officer
District South Waziristan

Director Health Services,
Tribal Districts, Peshawar

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9210212

FAX: 091-9212110

⑥
Annex-B

OFFICE ORDER

In pursuance of Judgment of Peshawar High Court Peshawar (DI Khan Bench) dated 13.10.2015, in the Writ Petition No. 439-D/2015, titled "Nazeerullah and others VS Govt. of Khyber, Pakhtunkhwa and others" the contract services of the following officials working in South Waziristan Agency are hereby conditionally regularized subject to the final decision on CPLA filed in the Supreme Court of Pakistan with CP No. 45-P/2017.

S#	Name	Designation	Place of posting
1	Nazeerullah s/o Gul Sanar Khan	Junior EPI Techn	CHC Oss Pass SWA
2	Taj Alam s/o Said Rehman	--do--	CHC Speena Meela, SWA
3	Niaz Wali s/o Niaz Bat Khan	--do--	CHC Akhtar Gul Kot, SWA
4	Basheer Ahmad s/o Shalizer Khan	--do--	CHC Shakha Khel, SWA
5	Badshah Deen s/o Wareshan Khan	--do--	CHC Haji Shareef Seen Kot, Shah Kotai, SWA
6	Inamullah s/o Dost Wali	--do--	CHC Tangi Budinzai Badshah Khan SWA
7	Abdul Karim Khan s/o Gulzar Khan	Dispenser	SW Agency
8	Muhammed Shoaib s/o Muhammad Qareeb	--do--	--do--
9	Maliullah s/o Zar Nawaz Khan	--do--	--do--
10	Muhammad Eesa s/o Roh Khan	Pharmacy Tech.	--do--
11	Niaz Badshah s/o Mushat Khan	Dispenser	--do--
12	Peer Zada Khan s/o Shah Alam Khan	--do--	NW Agency

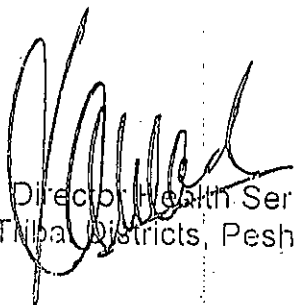
Sd/xxxxxxxxxxxxxx
Director Health Services,
Tribal Districts, Peshawar.

No. 23973-77 /DHS/Liti:

dated 10 / 10 / 2018

Copy to the:-

1. Registrar (J) Peshawar High Court Peshawar (DI Khan Bench) w/r to the above cited writ and order.
2. Agency Surgeon, SW Agency.
3. Additional Agency Surgeon SWA at Tank.
4. Agency Accounts Officer SW at Tank.
5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar.

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9210212

FAX: 091-9212110

OFFICE ORDER

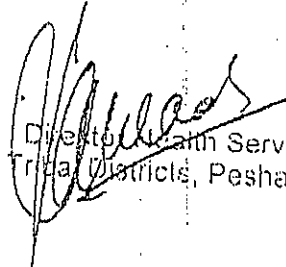
In pursuance of Judgment of Peshawar High Court Peshawar (Dikhan Bench) dated 13.10.2015, in the Writ Petition No. 440-D/2015, titled "Muhammad Farooq s/o Suffer Khan VS Govt. of Khyber Pakhtunkhwa and others" the contract service of Muhammad Farooq s/o Suffer Khan is hereby conditionally regularized subject to the final decision on CPLA filed in the Supreme Court of Pakistan with CP No. 4647/2017.

Sd/xxxxxxxxxxxxxx
Director Health Services,
Tribal Districts, Peshawar.

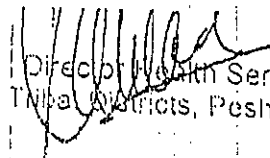
No. 23973-82 /DHS/L/III dated 10 / 10 / 2018

Copy to the:-

1. Registrar (J) Peshawar High Court Peshawar (D I Khan Bench) w/r to the above cited writ and order.
2. Agency Surgeon, SW Agency
3. Additional Agency Surgeon SWA at Tank.
4. Agency Accounts Officer SW at Tank.
5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar.

5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar.



**OFFICE OF THE DISTRICT SURGEON,
TRIBAL DISTRICT SOUTH WAZIRISTAN.**

8

Annex - C

OFFICE ORDER:

With the reference of the Director Health Services, Merged Areas, Peshawar No: 23973-77/DHS/Liti dated: 10/10/2018 and 23973-82/DHS/Liti: dated: 10/10/2018 and in pursuance of judgment of Peshawar High Court Peshawar (DIKhan Bench) dated: 13/10/2015 in the writ petition No:439-D/2015, the contract Services of the following officials working under this office are hereby conditionally regularized subject to the final decision on CPLA filed in the supreme Court of Pakistan with CP No:45-P/2017.

The Services of the following contract employees/EPI Technicians are hereby adjusted/posted against the vacant positions/posts mentioned against each for the purpose of drawl of pay till the availability of their original posts on regular basis in the interest of public.

S.NO	NAME	FATHER NAME	DESIGNATION	ADJUSTED AGAINST
1	Mr. Nazir Ullah	Gul Sanar Khan	EPI Technician	Clinical Technician Pharmacy
2	Mr. Taj Alam	Said Rehman	EPI Technician	Clinical Technician Pharmacy
3	Mr. Niaz Wali	Yar Bat Khan	EPI Technician	Clinical Technician Pharmacy
4	Mr. Bashir Ahmad	Shahzar Khan	EPI Technician	Clinical Technician Pharmacy
5	Mr. Badshah Din	Waresham Khan	EPI Technician	Clinical Technician Pharmacy
6	Mr. Inam Ullah	Dost Wali	EPI Technician	Dialysis Technician
7	Mr. Muhammad Farooq	Safar Khan	EPI Technician	Dialysis Technician

Sd-----
District Surgeon,
Tribal District, South Waziristan

No: 49-55 Dated Wana the: 14 /03/2019

Copy to the:

1. Director Health Services Merged Areas, Peshawar.
2. Deputy Commissioner, Tribal District, South Waziristan.
3. District Account Officer, Tribal District, South Waziristan at Tank.
4. Additional District Surgeon, Tribal District, South Waziristan at Tank.
5. Registrar (J) Peshawar High Court (DIKhan Bench).
6. Account Clerk of this Office.
7. Officials concerned. ✓

District Surgeon,
Tribal District, South Waziristan



(9)
Annex D

Directorate of Health Services
FATA Secretariat, Warsak Road, Peshawar

Phone #: (01-9210211 Fax #: 091-9212110/

OFFICE ORDER

Pursuant to Government of KPK, Civil servants (Amendment) Act, 2005, read with Govt. of KPK, Establishment & administration Department (regulation wing) notification No. SO (Regulation-VI) (E & AD) 1-13-2005, dated 10/08/2005, Government of Pakistan Cabinet Secretary Establishment Division Notification No.AC/30/2008-R:11 dated: 29th August, 2008, KPK Civil Servants(Amendment) ACT-2013 Notification No.SOSR-III /FD/12-1/2005 Dated Peshawar,27/02/2013 the services of the following contract paramedics attached to the Agency Surgeon Tribal District South Waziristan are hereby regularized from the date of their appointment as mentioned against each.

S. No	Name	Father Name	Designation	Date of Appointment
1	Matt Ullah	Zar Nawar Khan	C-T Pharmacy	26/01/2007
2	Abdur Rahim Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
3	Muhamad Tufail	Shamshir Khan	C-T Pharmacy	27/03/2007
4	Abdul Rahim Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
5	Pir Zada	Shah Alam Khan	C-T Pharmacy	26/01/2007
6	Alli Gohar	Abdul Khalik	C-T Pharmacy	01/08/2003
7	Muz Dal Shah	Mushat Khan	C-T Pharmacy	07/01/2007
8	Irfan Ullah	Mula Jan	PHC(EPI)	20/07/2004
9	Allaudin	Amir Nawar	PHC(EPI)	13/04/2004
10	Taj Muhammad	Musa Jan	PHC(EPI)	13/07/2004
11	Shamshair Ahmad	Noor Muhammad	PHC(EPI)	29/09/2004
12	Ambrin Habib	Habib Ahmad	PHC(MCH)	07/04/2007

Their appointment will be subject to the following terms and conditions:-

The Khyber Pakhtunkhwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 18th January 2013 and assented to by the Government Khyber Pakhtunkhwa on 17th January 2013, has been published as an Act of the Provincial Assembly of Khyber Pakhtunkhwa. Under the said Act all Civil Servants appointed to a post on or after 1st July 2001 shall be deemed to have been appointed on regular basis and will be eligible for pension/ deduction of G.P Fund. Accordingly the following instructions/guidelines are issued for compliance of all concerned Departments/Organizations.

- 1) Deduction on account of General Provident Fund at prescribed rates from all the Civil Servants, who have become eligible for pension under the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 should be started forthwith.

All deductions in respect of Contributory Provident Fund made before the commencement of Mysore Panchayat Civil Service (Amendment) Act, 2013 from such Civil Servants, excluding Government counterpart shall immediately be transferred to their respective General Provident Fund Accounts. However, such Civil Servants will be entitled to marking on as declared GPF fund deduction/subscription made.

Director Health Services
Tribal District, Panchayat

W/ 27/4/18
MHEP/PA/PA/Parmedic Dated 27/4/2018

Director General Health Services Mysore Panchayat
General Director Admin Tribal District for Information purpose
District Engineer Tribal District South West
District Health Officer Tribal District South West
Mysore Corporation

Director Health Services
Tribal District, Panchayat

Directorate of Health Services
Fata Secretariat Warsak, Road, Peshawar
Phone # 091-9210212 Fax# 091-9212110/

OFFICE ORDER

Pursuant to Government of KPK, Civil servant (Amendment) Act, 2005, (and with Govt of KPK, Establishment & Administration Department Regulation wing) Notifications No. SO(Regulation-VI) (E & AD) 1-13-20012, dated: 10/08/2005, Government of Pakistan Cabinet Secretary Establishment Division Notification No. AC/30/2008-R.11 dated 29th August, 2008, KPK Civil Servant (Amendment) ACT-2013 Notification No. SOSR-III /FD/12-1/2002 Dated Peshawar, 27/02/2013 the Services of the following content paramedics attached to the Agency Surgeon Tribal District South Waziristan are hereby regularized from the date of their appointment as mentioned against each.

S.No	Name	Father Name	Designation	Date of Appointment
1.	Mati Ullah	Zar Nawaz Khan	C-T Pharmacy	26/01/2007
2.	Abdur Rehman Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
3.	Muhammad Tufial	Shamshir Khan	C-T Pharmacy	27/01/2007
4.	Abdul Rehman Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
5.	Pir zada	Shah ALam Khan	C-T Pharmacy	26/01/2007
6.	Ali Gohar	Abdul Khalig	C-T Pharmacy	01/08/2003
7.	Niaz Badsha	Mushat Khan	C-T Pharmacy	07/01/2007
8.	Irfan Ullah	Mula Jan	PHC(EPI)	20/07/2004
9.	Allaudin	Amir Nawaz	PHC(EPI)	13/04/2004
10.	Taj Muhammad	Musa Jan	PHC(EPI)	13/07/2004
11.	Shamshair Khan	Noor Muhammad	PHC(EPI)	29/09/2004
12.	Ambrin Habib	Habib Ahmad	PHC(MCH)	07/04/2007

Their appointment will be subject to the following terms and conditions:

The Khyber Pakhtunkhwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 15th January 2013 assented to by the Government Khyber Pakhtunkhwa on 17th January 2013 has been publish as an Act of the Provincial Assembly of Khyber Pakhtunkhwa, Under the said Act all Civil Servants appointed to a service or post on or after 1st July 2001 shall be deemed to have been appointed on regular basis and will be eligible for pension/deduction of G.P Fund Accordingly the following instructions/guidelines are issued for compliance of all concerned Departments/ Organizations.

- Deduction on account of General Provident Fund at prescribed rates from all the Civil Servants, who have become eligible for pension under the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 should started forthwith.
- As deduction/instructions in respect of Contributory Provident Fund made before the Government of Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 from such Civil Servants, including Government Competent Authority shall immediately be transferred to their respective General Provident Fund Accounts. However such Civil Servants will be entitled to markup on so decided G.P Fund deduction/instruction were made.

Director Health Services
Tribal District Peshawar

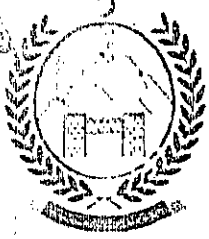
No. _____ DSH/FATA Paramedics

Dated 06/11/2018

Copy to the

- Director health Services, Khyber Pakhtunkhwa
- Deputy Director Admin DHS Tribal District for information please.
- Agency Surgeon Tribal District South Waziristan.
- Agency Account Officer Tribal District South Waziristan.
- Official Concerned.

Sd
Director Health Services
Tribal District Peshawar



OFFICE OF THE

District Health Officer

South Waziristan Upper

No: 1524 Dated: 27/05/2023

11
" Annex-E "

To,

The Director General Health services
Khyber Pakhtunkhwa, Peshawar.

Subject: Request of Employees for regularization from the Date of
Appointment as per Application Submitted

R/Sir,

Enclosed please find herewith an application by EPI Techs/Dispenser who are working under the control of this Office since 2007/2008. Therefore it is requested that kindly regularization of said EPI Techs may be considered/issued from their date of appointments, i.e 30/03/2007, so that these officials may claim their outstanding arrear of pay & allowances.

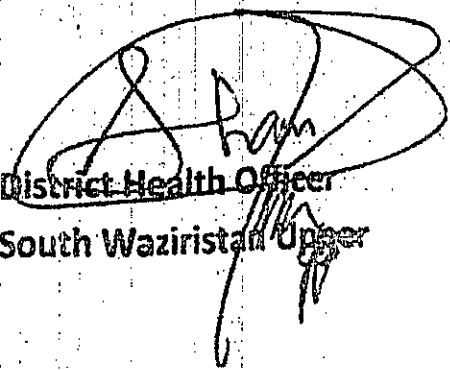
Your kind cooperation is highly essential in this regard.

.....sd.....
District Health Officer
South Waziristan Upper

Even date & No.

Copy to.

1. The Regional Director (Southern region) KP, Peshawar
2. The District Account Officer, Tank.
3. Accountant of this Office.
4. Concerned Officials.
5. Record.


District Health Officer
South Waziristan Upper

بھنور جناب ڈسٹرکٹ ہیلتھ آفیسر صاحب ساوتھ وزیرستان SWTD پر

عنوان: درخواست بمراد تصحیح فرمائے جانے تاریخ تعیناتی۔

جناب عالی! سائل حسب ذیل عرض رساں ہے۔

1. یہ کہ سائل آپ کے محکمہ میں بطور EPI Technician مورخہ 30/03/2007 کو بھرتی ہوا۔
2. یہ کہ سائل اولاً کنٹریکٹ پر بھرتی ہوا بعد میں حکومت خیبر پختونخواہ نے سابقہ فائنا محکمہ جات کو ریگولر اور اسی طرح تمام ملازمین کو بھی ریگولر کر دیا ہے۔
3. یہ کہ سائل کے ہمراہ دیگر ملازمین کے ریگولر یزیشن احکامات بھی جاری ہوئے جن کی تاریخ تعیناتی 2007 سے جاری ہوئی اس لئے سائل کی تعیناتی کے احکامات بھی سال 2007 سے جاری فرمائے جائیں۔ (نقول احکامات لف ہیں)

4. یہ کہ سائل کی تعیناتی کے احکامات جاری فرمائے جاویں۔

5. یہ کہ درخواست ہذا کو منظور فرمانے کے جناب کے پاس وسیع تر اختیارات حاصل ہیں۔
لہذا استدعا ہے کہ سائل کی تاریخ تعیناتی درست / تصحیح کئے جانے کے احکامات صادر فرمائے جاویں۔ عین
نوازش ہوگی

مورخہ 21/09/2023

عرضے

بشیر احمد
EPI Technician ساوتھ وزیرستان پر SWTD

حکومت پاکستان

قومی شناختی کارڈ

21702-7812316-3



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تاریخ: 16/03/2025

16/03/2015

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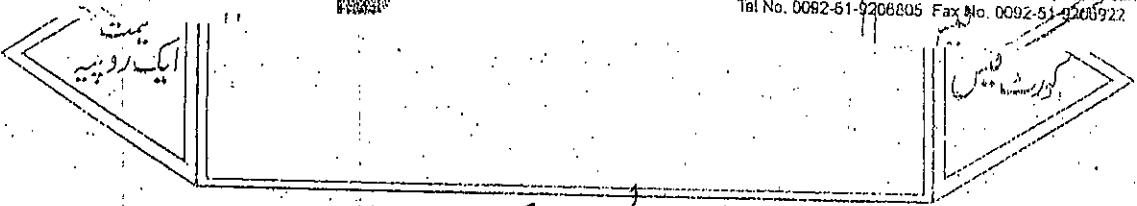
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لشیر احمد
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S.A
تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ متعارفہ الامتوان میں اپنی طرف واسطے بیرونی وجوہات ہی برائے پیشی یا تصفیہ مقدمہ بمقام سٹار کے لیے
مسلم الحق خان رائز
کو صوبہ ذیل مقررہ ایک ملزم کیا ہے، کہ میں ہر پیشی پر خود بڑھ کر اختیار خاص رو برو عدالت حاضر ہونا ہوں گا اور ہر وقت پکارے جائے مقدمہ ایک صاحب
موسوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر ملزم حاضر نہ ہوں اور مقدمہ میری غیر معافی کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موسوف
میں کسی طرح ذمہ دار نہ ہوں گے، نیز ایک صاحب موسوف مقدمہ تمام پگھری کے علاوہ کسی ایک یا پگھری کے اوقات سے پہلے یا پگھری یا برو عدالت میں ہر ذی کرنے کے
ذمہ دار نہ ہوں گے۔ نیز ایک صاحب موسوف مقدمہ تمام پگھری کے علاوہ کسی ایک یا پگھری کے اوقات سے پہلے یا پگھری یا برو عدالت میں ہر ذی کرنے کے ذمہ دار نہ
ہوں گے۔ اور مقدمہ میرا پگھری کے علاوہ ایک صاحب موسوف، ہوں یا برو عدالت میں یا پگھری کے اوقات سے پہلے یا پگھری یا برو عدالت میں ہر ذی کرنے کے ذمہ دار نہ
دار یا اس کے واسطے کسی عداوت کے ادا کرنے یا مٹانے واجب کر کے کہ جسی صورت ذمہ دار نہ ہوں گے۔ مقدمہ کوکل ساختہ پر اطلاع صاحب موسوف میں کرو
ذات خود منظور وکول ہوگا۔ اور صاحب موسوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذریعہ نظر فانی اولیٰ گمانی اور جرم درخواست پر ملاحظہ و تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی تنظیم یا ذریعہ سے اور جرم کا روپیہ وصول کرنے اور سیدہ سہنے اور واصل کر لے اور جرم کے بیان دہنے اور اس پر پاشی یا پاشی نامہ فیصلہ پر
حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور صورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ میں دن ال پگھری میں ہر ذی مقدمہ مذکورہ نظر فانی وکیل و گمانی ویر آمد کی
مقدمہ یا مشورتی ذریعہ یا مقررہ یا درخواست ہم امتیازی یا ترقی یا کرائی کیل از فیصلہ اجراء کے ذریعہ بھی صاحب موسوف کو بشرط ادارائی طبعہ مٹانے ہر ذی کا اختیار ہوگا
اور تمام ساختہ پر ساختہ صاحب موسوف میں کروہ ذات خود منظور وکول ہوگا۔ اور صورت مقررہ صاحب موسوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اس کے جزو
کی کارڈاری یا صورت درخواست نظر فانی اولیٰ گمانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا پگھری کر کے ہمانے یا اپنے امراء مقرر کریں۔ اور ایسے مشیر قانون کو
بھی ہر امر میں وہی اور دینے اختیارات حاصل ہوں گے۔ جیسے صاحب موسوف کو حاصل ہیں، اور ذمہ داران مقدمہ میں جو کچھ ہر جانہ التزام پر کیا، وہ صاحب
موسوف کا حق ہوگا۔ مگر صاحب موسوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موسوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی ہر ذی نہ کریں اور ایسی
صورت میں ہر ایک مبالغہ کسی کا صاحب موسوف کے برخلاف ہیں ہوگا۔

موسوف... 201...

مضمون وکالت نامہ کن لیا ہے۔ اور ایسی طرح سمجھ لیا ہے اور منظور ہے۔

الحدیب الحدیب الحدیب
بشیر احمد
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