


FORM OF ORDER SHEET

Court of _____

Appeal No. 207/2024

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. Muhammad Farooq 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> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Farooq 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 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- Copy of regularization order mentioned in para-2 of the memo of appeal (Annexure-B) in respect of appellant is not attached with the appeal be placed on it.
- 4- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 45 /S.T.

Dt. 5/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

ser,

Re submitted after the needful.

Salentuliah Khan Ranazai Adv.

24/1/24

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No: 207 2024

Muhammad Farooq

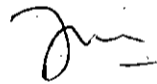
VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Muhammad Farooq EPI Technician Posted at BHU Barwand Sarwakai
South Waziristan Upper District

Resident of Gargora Tehsil Sararogha District South Waziristan



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

service appeal No. 207 /2024

Muhammad Farooq

Versus

Government of Khyber Pakhtunkhwa, etc.

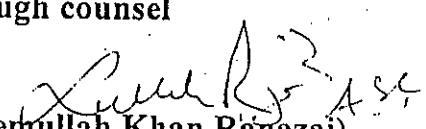
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**Your Humble appellant:
Muhammad Farooq**

Dated:01.01.2024

Through counsel


(Saleemullah Khan Ranazai)
Advocate Supreme Court.

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal 207 2024

Muhammad Farooq

VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Muhammad Farooq EPI Technician Posted at BHU Barwand Sarwakai
South Waziristan Upper District

Resident of Gargora Tehsil Sararogha District South Waziristan



①

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal. 207 /2024

Muhammad Farooq , 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 18.03.2008 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 18.03.2008 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 there 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.

5. 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.

GROUNDS:

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 monitory 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 2008, 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

M. Farooq
 (Muhammad Farooq)
 EPI Technician,
 District South Waziristan Upper.
 Through counsel

Saleem Khan
 (Saleemullah Khan Ranazai)
 Advocate Supreme Court.

AFFIDAVIT

I, Muhammad Farooq 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. *M. Farooq*
 (Identified by)

Saleem Khan
 (Saleemullah Khan Ranazai)
 Advocate Supreme Court.

Annexure 'A' (4)



DIRECTORATE OF HEALTH SERVICES WELFARE FATA

FATA SECRETARIAT, Warsak Road Peshawar

OFFICE ORDER

On the recommendation of the Departmental Selection Committee the competent authority is pleased to appoint Mr. MUHAMMAD FAROOQ S/O SAFFAR KHAN of SOUTH WAZIRISTAN AGENCY as EPI TECHNICIAN in BPS 09 on contract under ADP Programme on the terms and conditions laid down below:

1. His/Her appointment shall be for a period up to the life of the project from the date of his/her joining in services and shall be extended on yearly basis on his satisfactory performance.
2. He/She is declared medically fit for this job.
3. His/Her appointment is purely on contract basis (prescribed under Government of NWFP Contract Policy 2005).
4. It is non-transferable.
5. He/She shall not indulge in any trade, business and any other activity what so ever which has been declared prohibited for the Government Servants in Civil Servant Act 1973.
6. He/She shall be entitled for all those allowances admissible under the rules.
7. He/She will not be entitled for any TA/DA for joining service.
8. If he/she wishes to resign the services a prior notice of 60 days will be submitted or pay of 60 days should be deposited in lieu of resignation in Govt.
9. He/She will have to serve anywhere in FATA.
10. Salaries should be released after the verification of all the documents by the respective Agency Surgeon/Medical Superintendent from the concerned Board/Faculty etc.
11. He/She will submit undertaking on stamp paper on prescribed format prior to joining of the service.
12. The offer shall be automatically held cancelled if he/she fails to join the duty within 15 days of the receipt of this offer.

If he/she accepts the above terms and conditions, he/ she is directed to report for duty to the Agency Surgeon SOUTH WAZIRISTAN AGENCY

Sd/xxxx
Dr Muhammad Zubair Khan
Director Health Services FATA
Peshawar

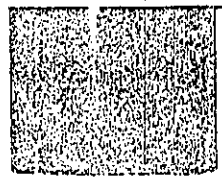
No. 4129-33 /DHS/Admin/FATA Dated: 10 /03/2008.
Copy for information an necessary action to:

1. Deputy Director Admin DHS FATA.
2. Agency Surgeon SOUTH WAZIRISTAN AGENCY
3. Agency Accounts Officer SOUTH WAZIRISTAN AGENCY
4. Dealing Assistant for record DHS FATA
5. Official Concerned.

Deputy Director (Admin)
DHS FATA Peshawar

Received
AS copy

18/03/08





OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT SOUTH WAZIRISTAN WANA

OFFICE ORDER.

Mr. Muhammad Farooq EPI technician regularized earlier against the post of Medical Technician BHU Shawal 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. 69-72 / 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

District Health Officer, Peshawar

Annexure B (6)

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. 439-D/2015, titled: "Nazeeullah 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.

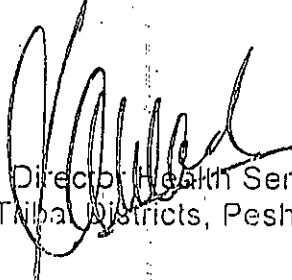
S#	Name	Designation	Place of posting
1	Nazeeullah s/o Gul Sanar Khan	Junior EPI Tech.	CHC Oss Pass.SWA
2	Taj Alam s/o Said Rehman	--do--	CHC Speena Meela, SWA
3	Niaz Wali s/o Niaz Bat Khan	--do--	CHC Akhtar Gul Kot, SWA
4	Basheer Ahmad s/o Shalizer Khan	--do--	CHC Shakha Khel, SWA
5	Badshah Deen s/o 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	Abdur Rahman Khan s/o Gulzar Khan	Dispenser	SW Agency
8	Muhammed S/o oalb s/o Muhammad Qareeb	--do--	--do--
9	Matiullah s/o Zar Nawaz Khan	--do--	--do--
10	Muhammad Eesa s/o Rohi 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/xxxxxxxxxxxxx
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 SWA at Tank.
5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9219213

FAX: 091-9212110

OFFICE ORDER

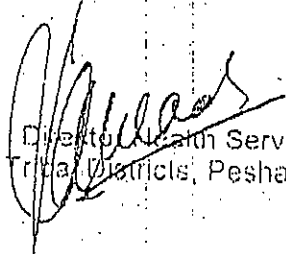
In pursuance of Judgment of Peshawar High Court Peshawar (D Khan Bench) dated 13.10.2015, in the Writ Petition No. 440-D/2015, titled "Muhammad Farooq s/o Suffer Khan VS Govt. of Khyber Pakhtunkhwa and others" the contract service of Muhammad Farooq s/o Suffer Khan is hereby conditionally regularized 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

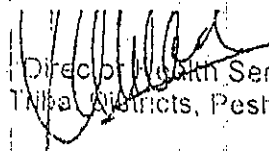
No. 23973-89 /DHS/LIII dated 10 / 10 / 2018

Copy to the:-

1. Registrar (J) Peshawar High Court Peshawar (D 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.**

Anerute 'C' (8)

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



Directorate of Health Services
FATA Secretariat, Warsak Road, Peshawar

Phone III (091-9210211 Fax II: 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.

No	Name	Father Name	Designation	Date of Appointment
	Mall Ullah ✓	Zar Nawaz Khan	C-T Pharmacy	26/01/2007
	Abdul Rahim Khan ✓	Gul Zar Khan	C-T Pharmacy	26/01/2007
	Muhammad Tufail	Shamshir Khan	C-T Pharmacy	27/01/2007
	Abdul Rahim Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
	Pir Zada ✓	Shah Alam Khan	C-T Pharmacy	26/01/2007
	Alli Gohar	Abdul Khaliq	C-T Pharmacy	01/08/2003
	Niaz Dad Shah ✓	Mushtaq Khan	C-T Pharmacy	07/01/2007
	Irfan Ullah	Mula Jan	PHC(EPI)	20/07/2004
	Allawdin	Amir Nawaz	PHC(EPI)	13/04/2004
	Taj Muhammad	Musa Jan	PHC(EPI)	13/07/2004
	Shamshair Ahmad	Noor Muhammad	PHC(EPI)	29/09/2004
	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 16th 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 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.

- a) 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.

b) All deductions/subscriptions in respect of Contributory Provident Fund made before the commencement of Mysore Palkumbura Civil Services (Amendment) Act, 2013 from such Civil Servants, excluding Government employees shall immediately be transferred to their respective General Provident Fund Accounts. However, such Civil Servants will be entitled to mark up on so declared C.P.F. fund deductions/subscriptions were made.

Director Health Services
Tribal District, Pashawar

CHS PATTU Panamada Dated: 11/11/2013

- 1. Director General Health Service Mysore Palkumbura
- 2. Deputy Director Admin. Tribal District for Information purpose
- 3. Deputy Director Tribal District South Madakara
- 4. Deputy Director Tribal District South Madakara
- 5. All concerned

Director Health Services
Tribal District, Pashawar



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 Pakhtunkwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 15th January 2013 asserted 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: 1521 Dated: 21/07/2023

Anexure 'E' (11)

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.

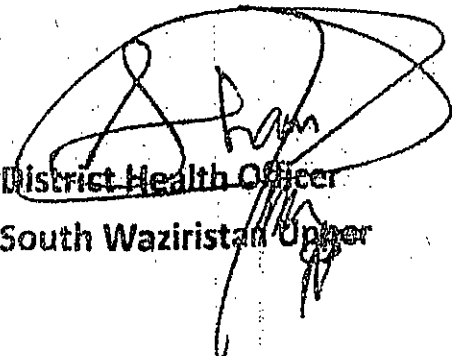
.....sd.....

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

بھجور 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 18/03/2008 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 ریگولریشن 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

EPI Technician ساوتھ وزیرستان پر SWTD

M. J. Khan
محمد فاروق



PAKISTAN National Identity Card

GOVERNMENT OF PUNJAB

Name
Muhammad Farooq

محمد فاروق

Father Name
Safar Khan

سفر خان

Gender / Country of Stay
M Pakistan

Identity Number / Date of Birth
21764-9104701-7 / 07.01.1971

Date of Issue / Date of Expiry
15.01.2022 / 15.03.2032



Holder's Signature

21704-9104201-7
سٹیجنگ ہاؤس، گورنمنٹ سروس، گلگت بلتستان
سٹیجنگ ہاؤس، گورنمنٹ سروس، گلگت بلتستان
101651233227
152-71-150774
Postage & General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

PAKISTAN BAR COUNCIL



MR. SALEEM ULLAH KHAN RANA ZAI

Advocate
Supreme Court of Pakistan (ASC)

Date of Issue: 19-4-2016



(Abdul Fayez)
Chairman
Excoch & Committee

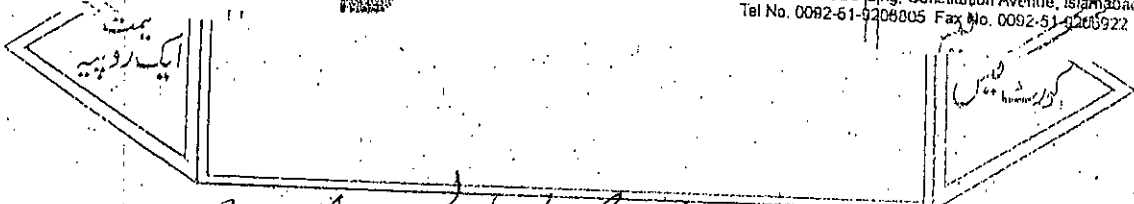
(Muhammad Arshad)
Secretary
Pakistan Bar Council

Non Transferable.
In the event of joining or carrying on any other profession, business, service or vocation, the holder will not be entitled to use this Card and shall forthwith surrender it to The Pakistan Bar Council.

Name **MR. SALEEM ULLAH KHAN RANA ZAI**
Father's Name **HABIB ULLAH KHAN**
Date of Birth **10-5-1966** CNIC **12101-074166593**
Date of Enrollment as Advocate of Supreme Court **3-6-2003**
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حضرت محترم خواجہ / صاحبزادہ سید سجاد
مخاتب اسٹارٹ اپ
محمد نازک
نام مکمل پتہ
S.A
دعویٰ یا جرم
تفصیل دعویٰ یا جرم

باعث تحریر آنگہ

مقدمہ مندرجہ بالا ماثولان میں اپنی طرف واسیلے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام سید سجاد کیلئے
سید سجاد خان رانا زای
ASC

کوسب ذیل شرائط پر عمل پیرا کیا ہے کہ میں ہر قسمی پر خود بذریعہ اختیار خاص رو بردہ عدالت، حاضر و تاروں کا اور ہر وقت پکارے جاے مقدمہ وکیل صاحب
موسوف کو الامان دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر ہوا اور مقدمہ میری غیر ماضری کی وجہ سے کسی اور پر میرے برخلاف ہو گیا تو صاحب موسوف
اسٹیلے کسی طرح ذمہ دار نہ ہوں گے، نیز ذیل صاحب موسوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا کچھ یا بروز تعطیل میری کرنے کے
ذمہ دار نہ ہوں گے، نیز ذیل صاحب موسوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا کچھ یا بروز تعطیل میری کرنے کے ذمہ دار نہ
ہوں گے اور مقدمہ صدر مقام کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے کچھ پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
دار یا اس کے واسیلے کسی معاوضہ کے ادا کرنے یا مکانہ واپس کر لے کے بھی موسوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موسوف مل کر وہ
ذات خود منظور و قبول ہوگا۔ اور صاحب موسوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذریعہ نظر ثانی اپیل گھرائی و ہر قسم درخواست پر دخلہ تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ذریعہ کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور دائل کرنے اور ہر قسم کے بیان دینے اور اس پر چالنی یا راضی نامہ دینے پر
حلف کرنے، اقبال دعویٰ کا ضمن اختیار ہوگا۔ اور ہر صورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ ویران از کچہری صدر بیروی مقدمہ مذکورہ نظر ثانی اپیل و گھرائی و ہر قسم
مقدمہ یا مندرجی ذریعہ کیلئے یا درخواست حکم امتحانی یا ترقی یا کرناری مل از فیصلہ اجراء کے ذریعہ بھی صاحب موسوف کو بشرط ادا اسکی طبعہ و عائد میری کا اختیار ہوگا
اور تمام ساختہ پر داخلہ صاحب موسوف مل کر وہ ذات خود منظور و قبول ہوگا۔ اور ہر صورت ضرورت صاحب موسوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کاروائی یا ہر صورت درخواست نظر ثانی اپیل یا گھرائی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا ہر شراکتہ سے جمانے یا اپنے امرام مقرر کریں۔ اور اپنے پیشی قانون کو
بھی ہر امر میں وہی اور دینے امتیازات حاصل ہوں گے۔ جیسے صاحب موسوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جائزہ التوا ہو گیا، وہ صاحب
موسوف کا حق ہوگا۔ مگر صاحب موسوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موسوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی
صورت میں ہر کوئی مطالبہ کسی صاحب موسوف کے برخلاف نہیں ہوگا۔

لہذا عدالت نامہ گھرایا ہے۔ تاکہ مسترد ہے

تاریخ: 20/4/2016

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

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Sulekha
M. J. Shaukat
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