

# FORM OF ORDER SHEET

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

Appeal No. 205/2024

| S No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1     | 29/01/2024                | The appeal of Mr. Inamullah 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 _____ |

By the order of Chairman



REGISTRAR

The appeal of Mr. Inamullah 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.

- 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.

*Address is given on separate page*

No. 48 /S.T.

Di. 5/1 /2024.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

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

*See,*

*Re submitted after the needful.*

*Salemullah Khan Ranazai Adv.*  
*24/1/24*

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

service appeal No. 205 /2024

Inamullah

Versus

Government of Khyber Pakhtunkhwa, etc.

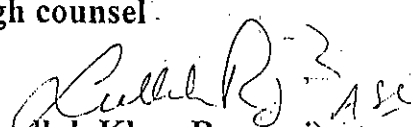
Index

| S.NO. | PARTICULARS OF THE CASE.                   | ANNEXURES. | PAGES.    |
|-------|--|------------|-----------|
| 1.    | Memo and grounds of appeal.                |            | — 1 — 3   |
| 2.    | Copy of appointment order                  | "A"        | — 4       |
| 3.    | Copy of Regularization Order               | "B"        | — 5 — 6   |
| 4.    | Copy of Adjusted order                     | "C"        | — 7       |
| 5.    | Copy of order                              | "D"        | — 8 — 9   |
| 6.    | Copy of Departmental Appeal/Representation | "E"        | — 10 — 11 |
| 7.    | Vakalatnamas.                              |            | — 12.     |

Your Humble appellant:  
Inamullah

Dated:01.01.2024

Through counsel.

  
(Saleemullah Khan Ranazai)  
Advocate Supreme Court.

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

Service Appeal No: 205 2024

Inam Ullah

**VERSUS**

GOVT KPK

**(COMPLETE ADDRESS OF APPELLANT)**

Inam Ullah EPI Technician Posted at BHU Chagmalai South Waziristan  
Upper District

Resident of Izza Kachkai Tehsil Sarwakai District South Waziristan



①

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No 205 /2024

Inamullah, 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.

- 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

(3)

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

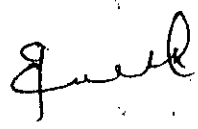
5. That as the appellant has been discriminated; therefore, he requested for his regularization from the date of his initial appointment and also asks for the arrears of that period along with other monetary benefits.
6. That the counsel for the appellant may be allowed to raise additional grounds during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

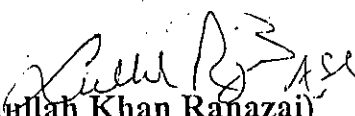
**PRAYER:-**

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

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

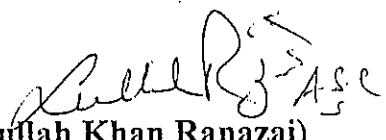
  
(Saleemullah Khan Ranazai)  
Advocate Supreme Court.

**AFFIDAVIT**

I, Inamullah 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.

Annex-A (4)

**AGENCY SURGEON OFFICE  
SOUTH WAZIRISTAN AGENCY WANA**

**APPOINTMENT ORDER**

As recommended by the Departmental Selection Committee in the interview held on dated 20/03/2007, Mr. Inamullah S/O Dost Wali is hereby appointed as a Junior ECT Technician in BPS-05 plus usual allowances as admissible under the rules against the vacant post at CHC Tangi Budinzai Badshah Khan Kot in South Waziristan Agency, on contract basis on the terms and condition lay down below:

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 contact 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 leave 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 CHC Tangi Budinzai Haji Badshah Khan Kot.

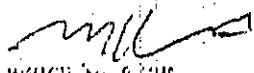
Sd/- Dr. Mohammad Nazir  
Agency Surgeon  
South Waziristan Wana

No. 1059-77

Dated Wana the 30/03/2007.

Copy for information and necessary action to the:-

1. Director Health Services FATA, Peshawar.
2. Agency Account Officer at Wana
3. Official Concerned.
4. Head Clerk of this office
5. Incharge CHC Tangi Budinzai Haji Badshah Khan Kot.

  
Agency Surgeon  
South Waziristan Wana



# DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar

Phone: 091-9210212

FAX: 091-9212110

"Annex-B" (5)

## 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 "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 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 Shahzeer 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 Shoab s/o Muhammad Qareeb | --do--           | --do--                                     |
| 9  | Matiullah 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 (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

6

# DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9212112

FAX: 091-9212116

## OFFICE ORDER

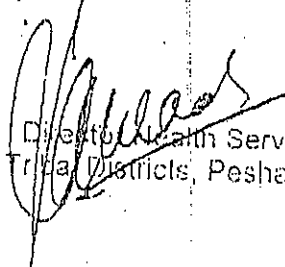
In pursuance of Judgment of Peshawar High Court Peshawar (Dikhan Bench) dated 13.10.2015, in the Writ Petition No. 440-D/2015, titled "Muhammad Farooq s/o Suffer Khan VS Govt. of Khyber Pakhtunkhwa and others" the contract service of Muhammad Farooq s/o Suffer Khan is hereby conditionally regularized subject to the final decision on CPLA filed in the Supreme Court of Pakistan with CP No. 46372017.

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

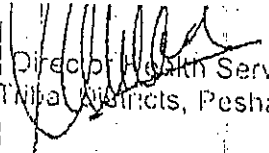
No. 23973-82 /DHS/LIII, dated 10/10/2018

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.

⑦  
Annex-C

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

**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.

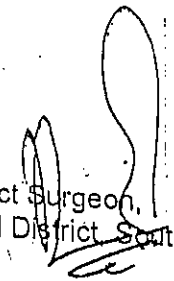
| S.NO | NAME                | FATHER NAME    | DESIGNATION    | ADJUSTED AGAINST             |
|------|---------------------|----------------|----------------|------------------------------|
| 1.   | Mr. Nazir Ullah     | Gul Sanar Khan | EPI Technician | Clinical Technician Pharmacy |
| 2    | Mr. 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 | Clinical Technician Pharmacy |
| 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 No: 091-9210211 Fax No: 091-9212110/

## OFFICE ORDER

Pursuant to Government of KPK, Civil servants (Amendment) Act, 2005, and 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: 28<sup>th</sup> 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 |
|-----|------------------|----------------|--------------|---------------------|
| 1   | Mati Ullah       | Zar Nawar Khan | C-T Pharmacy | 26/01/2007          |
| 2   | Abdul Rahim Khan | Gul Zar Khan   | C-T Pharmacy | 26/01/2007          |
| 3   | Muhammad Tufail  | Shamshir Khan  | C-T Pharmacy | 27/01/2007          |
| 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   | All Gohar        | Abdul Khalik   | C-T Pharmacy | 01/08/2003          |
| 7   | Mirza Dard Shah  | Mushat Khan    | C-T Pharmacy | 07/01/2007          |
| 8   | Irfan Ullah      | Mula Jan       | PHC (EPI)    | 20/07/2004          |
| 9   | Allawdin         | 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 18<sup>th</sup> January 2013 and assented to by the Government Khyber Pakhtunkhwa on 17<sup>th</sup> 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 1<sup>st</sup> 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.

of the Department of Health and Social Security in respect of conditions of employment...  
...the Government of the United Kingdom...  
...the Department of Health and Social Security...  
...the Government of the United Kingdom...  
...the Department of Health and Social Security...

Director General of Health Services  
Tribunal Director, Portsmouth

10/10/78

Director General of Health Services  
Tribunal Director, Portsmouth  
10/10/78

10/10/78



**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 24th 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 Khaliq   | C-T Pharmacy | 01/08/2003          |
| 7.   | Niaz Badsha       | Mushat Khan    | C-T Pharmacy | 07/01/2007          |
| 8.   | Irtan 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.

**S. A.**  
**Director Health Services**  
**Tribal District Peshawar**



OFFICE OF THE  
District Health Officer

South Waziristan Upper

No: 1520 Dated: 31/07/2023

⑩  
"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.

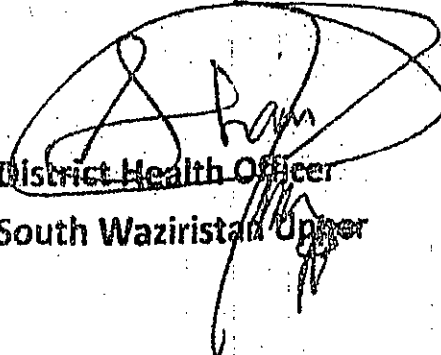
.....sd.....

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 ڈسٹر کٹ ہیلتھ آفیسر صاحب سوات تھ وزیر ستان SWTD اپر

عنوان: درخواست بمراد تصیح 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 / تصیح کئے جانے کے احکامات صادر فرمائے جاویں۔ عین نوازش ہوگی

مورخہ 21/09/2023

عرضے

انعام اللہ علیہ 9/9/2023 EPI Technician سوات تھ وزیر ستان SWTD اپر





**PAKISTAN** National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name  
Inam Ullah



Father Name  
Dost Wali Khan



Gender  
Male

Country  
Pakistan

Identity Number  
21705-3239297-3

Date of Birth  
16-03-1988

Date of Issue  
13-06-2017

Date of Expiry  
13-06-2027

Holder's Signature

