


Form-A  
FORM OF ORDERSHEET

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

Case No. 262/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	1 3
1	12.02.2024	As per direction of the Worthy Chairman the present appeal is fixed for decision on office objections as well preliminary hearing before touring Single Bench at D.I.Khan on  REGISTRAR

Respected Sir,

It is submitted that the present appeal was received on 01.12.2023, which was returned to the counsel for the appellant for removing objections (Flag-A). Today i.e. 09.01.2024 the learned counsel re-filed the appeal through registered post without removing the objection no.3.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Worthy Chairman

*Conclusively demand*  
*157. when needed*  
*the appellate & would*  
*particular more sets*

*[Signature]*  
 10/01/24  
 REGISTRAR

*[Signature]*  
 07/01/24

The appeal of Mr. Usman Ghani received today i.e on 01.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/ marked with annexures marks.
- 2- Affidavit is not attested by the Oath Commissioner.
- ③ Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3777 /S.T.

Dt. 05-12 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Fouqeer Hassan Adv.  
High Court Tank.

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR, CAMP AT DERA ISMAIL KHAN**

Service Appeal No. 262 of 2023

Usman Ghani

**VERSUS**

Govt. of KPK etc

**INDEX**

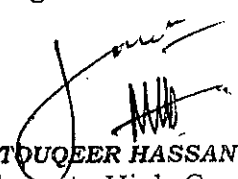
<u>S.NO</u>	<u>PARTICULARS</u>	<u>ANNEXURE</u>	<u>PAGE NO.</u>
1	Grounds of Service Appeal with affidavit		1-4
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Your Humble Appellant

  
Usman Ghani

Through counsel

Dated: 29/11/2023

  
TOUQEER HASSAN  
Advocate High Court  
District Tank.

①

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR, CAMP AT DERA ISMAIL KHAN**

Service Appeal No. 262 /2024

**Usman Ghani** S/o Sana Ullah R/o Janki Tehsil & District Tank,  
Presently residing at Sheikh Yousaf Road, Chah Juma Wala, Tehsil &  
District Dera Ismail Khan. *C.T Radiology DHQ Hospital SUTD.*  
Cell No. 0300-5900279.

.....(Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Health Govt. of K.P.K, Peshawar.
2. Secretary Health, Govt. of K.P.K, Peshawar.
3. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer, South Waziristan (Lower).
5. Medical Superintendent, DHQ Hospital Wana District South Waziristan.
6. District Account Officer, District South Waziristan.

.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF THE  
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
ACT 1973 AGAINST ILLEGAL ACT OF  
RESPONDENTS being passing the impugned order  
dated 273 dated 30/03/2023 AND THE  
APPELLANT MAY GRACIOUSLY BE ADJUSTED ON  
THE POST OF SCT RADIOLOGY WITH ALL BACK  
BENEFITS AS WELL AS MONTHLY SALARIES  
FROM MONTHS OF MAY 2023 TO TILL THE  
DECISION OF MAIN APPEAL.**

**Respectfully Sheweth:-**

The appellant submits as under:-

1-

That the addresses of the parties as given in the heading of the appeal are correct and sufficient for the purpose of service.

- 2- That appellant was appointed on 01/01/1999 as X-Ray technician in the office of District Health Office, Tank after completion of codal formalities and submission of charge report.
- 3- That after submission of source form personal data No. 50148922 was allotted.
- 4- That on satisfactory period, the present appellant was promoted as Supervisor from the post of CT Radiology through order dated 03/01/2023. Copy of order dated 03/01/2023 is enclosed as Annexure "A".
- 5- That appellant received salaries till April 2023 which is evident from monthly pay slip of April 2023 and lastly the appellant performed the duty on the post of CT Radiology (BPS-12) without any complaint. Copy of slip is enclosed as Annexure "A1".
- 6- That thereafter, the Health Manager (DHQ) Wana District South Waziristan passed an order bearing Endst; No. 1096-98 dated 30/01/2023 regarding relieving the appellant to DHQ Hospital Wana, District South Waziristan and such senior the respondent No. 4 sent an order bearing Endst; No. 273 dated 30/03/2023 to respondent No. 3 regarding relieving of appellant. Copy of letter dated 30/03/2023 are enclosed as Annexure "B".
- 7- That during the passing of above said order, the respondents illegally stopped the monthly salaries of appellant and in this respect a letter sent the District Account Officer South Waziristan. Copy of letter is enclosed as Annexure "C".
- 8- That the respondent No. 5 issued the No Objection Certificate vide Endst; No. 75/Paramedics dated 26/01/2023 regarding vacant post of SCT Radiology. Copy of NOC is enclosed as Annexure "D".
- 9- That the appellant having been aggrieved of the attitude of the respondents submitted his Departmental appeal to respondent No. 03 on 04/08/2023 through postal services for the redressal of legitimate rights. Copy of department appeal and postal receipt are enclosed are Annexure "E & F".
- 10- That respondents not announce any order on departmental appeal, therefore, having no other alternate remedy available to the appellant except to approach this Honourable Tribunal on inter alia the following grounds:-



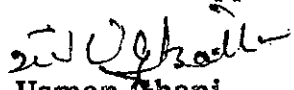
**GROUNDS:-**

- i.* That the act and action of the respondents department is illegal, irregular, against the law, facts and circumstances of the case, because the appellant never absent from his duty intentionally and deliberately and the so-called impugned Notifications to the extent of leave without pay is against law and is liable to be set aside.
- ii.* That the Constitution of Islamic Republic of Pakistan, 1973, guarantees the salary to a civil servant against the services rendered by him but, the Appellant has been refused of his such Constitutional right which amounts to improper exercise of duty by the respondents departments.
- iii.* That the respondents have refused to disburse the salary as well as back benefits to Appellant without any lawful justification, which act of the respondents is squarely unlawful, illegal, based on malafide and without jurisdiction.
- iv.* That there is no complaint or inquiry against Appellant and even the Appellant is liable to be adjusted on the post of SCT Radiology; but the Appellant is being discriminated by the respondents without any reasonable cause and justification which is against the principles of policy and rules of procedure.
- v.* That reliving order dated 30/03/2023 is being sent to the appellant on 26/04/2023 on

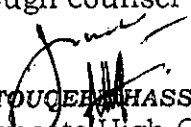
whatsapp media time 2:46PM, with the respondents is unlawfully and malafidly put the dairy dispatched from previous date on their record. Hence, this act of the respondents is highly handedness as well as against the norms of natural justice.

- vi. That appellant present appeal is well within time from the order of High Court.
- vii. That counsel for the appellant may kindly be allowed to raise additional grounds during the course of arguments.

*It is, therefore, humbly prayed that the instant service appeal of appellant may graciously be accepted in favour appellants.*

Your Humble Appellant  
  
**Usman Ghani**  
Through counsel

Dated: 29/11/2023

  
**TOUQUEER HASSAN**  
Advocate High Court  
District Tank.

**AFFIDAVIT:**

I, **Usman Ghani** S/o Sana Ullah R/o Janki Tehsil & District Tank, Presently residing at Sheikh Yousaf Road, Chah Juma Wala, Tehsil & District Dera Ismail Khan, the appellant, do hereby solemnly affirmed declare on oath that the contents of this service appeal are true & correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal on the facts mentioned in this service appeal.

  
Deponent



Ann A (5)



## OFFICE OF THE HEALTH MANAGER

DHQ: HOSPITAL WANA

SOUTH WAZIRISTAN

Ph: 9965-211400 Email: dhqhospitalwana@gmail



### OFFICE ORDER:

To improve service delivery, the following staff is hereby notified as supervisor of their concerned department/ward

### List of Supervisors

S/N	Name	Designation	Location
1	Kausar Alam	Charge Nurse	Gyneaz/Labor Room
2	Shazia Qayyum	Charge Nurse	FS/FM Ward
3	Fawad	Male Nurse	Children Ward
4	Fahim	Male Nurse	MMMS Ward
5	Haroon	CT Surgical	OT
6	Sherazad	Anesthesia	Anesthesia
7	Usman Ghani	CT Radiology	Radiology
8	Muhammad Rizq	Male Nurse	Emergency Unit

### Note: Responsibilities of Supervisors:

- Supervisor will be responsible for duty roster management and roster implementation.
- He/She will ensure completion of all documents and his/her department and ward.
- He/She will work under the supervision of Nursing supervisor/Deputy Health Manager.
- He/She will be responsible for keeping all record on the provided register, (consumption book and admission files, discharge card, IPD register and daily Bed statement).
- He /She will implement handing taking over mechanism under supervision of Nursing supervisor.

Sd/-  
Health Manager  
DHQ: Hospital Wana SWTD

No. 1012 / Charge Nurse/Admin

Dated 03-01-2023.

Attested  
J  
#

~~Sd/-~~  
Health Manager  
DHQ: Hospital Wana SWTD

AWA A-1-6

Government of Khyber Pakhtunkhwa  
District Accounts Office Tank-S.W.Agency  
Monthly Salary Statement (April-2023)



Personal Information of Mr Usman Ghani d/w/s of SANA ULLAH

Personnel Number: 50148922 CNIC: 217999999112  
Date of Birth: 16.03.1974 Entry into Govt. Service: 01.07.1999

NTN:  
Length of Service: 23 Years 10 Months 001 Days

Employment Category: Active Temporary

Designation: SENIOR CLINICAL TECHNICIA 80877363-GOVERNMENT OF KHYBER PAKH

DDO Code: TW4031-Medical Superintendent District Head Quarter Hospital Wana South

Payroll Section: 001 GPF Section: 001 Cash Center: 003

GPF A/C No: GPF Interest Free GPF Balance: 283,926.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 12 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	48,370.00	1001	House Rent Allowance 45%	2,940.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,000.00	1985	Health Professional Allow	15,000.00
2148	15% Adhoc Relief All-2013	614.00	2199	Adhoc Relief Allow @10%	411.00
2341	Dispr. Red All 15% 2022KP	4,734.00	2347	Adhoc Rel AI 15% 22(PS17)	4,734.00

Deductions - General

Wage type		Amount	Wage type		Amount
3012	GPF Subscription	-2,220.00	3501	Benevolent Fund	-1,200.00
3609	Income Tax	-804.00	4004	R. Benefits & Death Comp:	-600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	200,000.00	-8,331.00	100,028.00

Deductions.- Income Tax

Payable: 9,468.93 Recovered till APR-2023: 7,863.00 Exempted: 0.71 Recoverable: 1,606.64

Gross Pay (Rs.): 82,159.00 Deductions: (Rs.): -13,155.00 Net Pay: (Rs.): 69,004.00

Payee Name: Usman Ghani

Account Number: 5450-8

Bank Details: NATIONAL BANK OF PAKISTAN, 231545 PAROA ROAD D.I.KHAN PAROA ROAD D.I.KHAN,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: S.W.A

City: S.W.A

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: ghaniu396@gmail.com

Attested  
*[Signature]*



OFFICE OF THE DISTRICT HEALTH OFFICER  
SOUTH WAZIRISTAN LOWER AT WANA

Ph. No. 0965-210122

Email: [dhq.wana@pmail.com](mailto:dhq.wana@pmail.com)

Act 10

B 7

No. 273

/Paramedics

Dated Wana the 30 /03/2023.

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject: RELIEVING OF MR. USMAN GHANI S/O SANA ULLAH (CT-  
RADIOLOGY BPS-12) AT DHQ HOSPITAL WANA, SWTD LOWER ON  
ACCOUNT OF MISBEHAVIOR, INVOLVED IN PROPAGANDA AGAINST  
THE HOSPITAL AND ALSO IRREGULAR IN DUTY.

Please refer to the subject cited above and to state that the employee concerned was reported by the Health Manager MERF at DHQ Hospital Wana SWTD Lower on account of his irregularity, misbehavior with the Hospital staff and involvement in propaganda against the hospital vide his office letter No. 1096-98/ Paramedics / Admn. Dated 30-01-2023 & No. 1126-29/DHO/Admn. Dated 11-02-2023. Copies attached for ready reference.

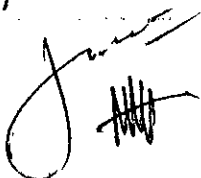
Keeping in view of the above, he is hereby relieved from DHQ Hospital Wana SWTD to your good office for further posting at Tank/D I Khan or nearby district as he is resident of District Tank.

  
DISTRICT HEALTH OFFICER  
South Waziristan Lower at Wana

Cc-

- 1- The Regional Director General (South Regions) KPK Peshawar.
- 2- The Deputy Commissioner South Waziristan Lower at Wana.
- 3- The Assistant Commissioner Wana, South Waziristan Lower.  
For information please.
- 4- The Health Manager MERF at DHQ Hospital Wana SWTD, for information and w/r to his office letters No. cited above.
- 5- The District Account Officer SWTD at Tank for information and with the request to stop his pay and issue his LPC please. (Source-II Form is attached).
- 6- Official concerned cited above is directed to report to the Director General Health Services Khyber Pakhtunkhwa Peshawar for further posting with immediate effect.

  
DISTRICT HEALTH OFFICER  
South Waziristan Lower at Wana

Attested  


Allocated  
*[Signature]*



PAYROLL SYSTEM  
ATTENDANCE FORM  
SMALL EMPLOYEE ENTRY

OFFICE OF THE : MEDICAL SUPERINTENDENT CHD HOSPITAL WANA SWTD

FROM THE MONTH OF : April 2002

BOOK DATE : 17/04/03 3/1 Passbook

PERSONAL NUMBER : 50148922

GRAND FRY (SEEY GROW) : 12 of Rada's loggy

EMPLOYEE NAME : Umasi Ghansi

NATIONAL ID CARD NUMBER

SALEBY IN STATUS  SIA  SIB

Page No. 50  
Date 17/04/03

EMPLOYEE NAME

DATE

PAGE NO.

Sl. No.	Particulars	Income	Debit	Balance
1	Stoppers			
2	Quintin			
3	<i>[scribble]</i>			
4	<i>[scribble]</i>			
5	<i>[scribble]</i>			
6	<i>[scribble]</i>			
7	<i>[scribble]</i>			
8	<i>[scribble]</i>			
9	<i>[scribble]</i>			
10	<i>[scribble]</i>			
11	<i>[scribble]</i>			
12	<i>[scribble]</i>			
13	<i>[scribble]</i>			
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49	<i>[scribble]</i>			
50	<i>[scribble]</i>			

Medical Superintendent  
CHD Hospital Wana SWTD

District Accounts Officer  
SNTD Bank  
*[Signature]*  
5/18

Please stop -  
the pay of the  
officer as of 1/5  
due to the official  
has been referred  
to DGTs for further  
proceeding vide MS  
DTS Wana letter NO. 2  
- 273/penamaly dt 30.2  
03

AWX "D" 9



OFFICE OF THE MEDICAL SUPERINTENDENT  
DHQ: HOSPITAL WANA  
SOUTH WAZIRISTAN

Phone & Fax # 0965-211400 Email: dhqhospitalwana@gmail.com

No. 75

/Paramedics

Dated Wana the 26 /01/2023.

To,

The Director General Health Services,  
Khyber Pakhtunkhwa Peshawar.

Subject:  
Dear Sir,

**No Objection Certificate.**

With reference to your good office order No. 3584-684 dated 27-05-2021.

It is to be intimated in your kind honour that Mr. Usman Ghani S/O Sana Ullah is serving as CT Radiology BPS-12 and promoted as SCT Radiology BS-14 and posted at DHO Lakki has approached to the undersigned for grant of NOC for posting and to retained at DHQ: Hospital Wana SWTD against the new upgraded post of SCT Radiology BS-14.

It is further stated that there is one post of SCT Radiology BS-14 is upgraded and lying vacant according to budget book vide Position No. 80924972.

So he may kindly be retained at DHQ: Hospital Wana SWTD against the said vacant post and the undersigned has no objection.

~~Medical Superintendent  
DHQ: Hospital Wana SWTD~~

Attested  
Jwan  
[Signature]

بخدمت جناب ڈائریکٹر جنرل ہیلتھ سروس خیبرپختونخواہ پشاور

محکمہ ایپیل بناراضگی برخلاف ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان کہ وہ من ایپیل کو بروئے آفس آڈر نمبر 405-3399-2023 مورخہ 11-05-2023 جاری کردہ آجینڈا کی ہسپتال وانا ضلع ساوتھ وزیرستان میں بحیثیت SCT Radiology Adjust نہیں کرتا ہے۔

استدعا محکمہ ایپیل: بمطوری ایپیل ہذا بروئے آفس آڈر نمبر 405-3399-2023 مورخہ 11-05-2023 جاری کردہ آجینڈا ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان من ایپیل کو ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان میں بحیثیت SCT Radiology Adjust کرے، من ایپیل کی ماہوار تنخواہ جاری کرے اور سابقہ بقایا جات ماہوار تنخواہ من سائل کو یکمشت ادا کرے۔

جناب عالی! من ایپیل حسب ذیل عرض رساں ہے۔

1- یہ کہ من ایپیل سال 1999ء میں بحیثیت x-ray technician محکمہ ہیلتھ میں تعینات ہوا اور بعد از تعیناتی من ایپیل نے اپنی ڈیوٹی احسن طریقہ سے سرانجام دی اور دیتا چلا آ رہا ہے۔

2- یہ کہ ہیلتھ فیڈر ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان نے بغیر کسی وجہ کے بروئے آفس آڈر نمبر 98-1096-2023 مورخہ 30-01-2023 من ایپیل کو ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان سے relieve کر دیا اسی طرح بعد ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان نے بروئے آفس آڈر نمبر 273-2023 مورخہ 30-03-2023 ڈائریکٹر جنرل ہیلتھ سروس خیبرپختونخواہ پشاور کو من ایپیل کی relieving کی بابت آفس آڈر مذکورہ جاری کیا ہے کہ من ایپیل ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان سے فارغ ہے اور ساتھ ہی ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان نے من ایپیل کی ماہوار تنخواہ کو بند کرنے کی ہدایت ڈسٹرکٹ اکاؤنٹ آفسر ساوتھ وزیرستان آفس بمقام ٹانک کو دی جو کہ ڈسٹرکٹ اکاؤنٹ آفسر ساوتھ وزیرستان آفس بمقام ٹانک نے حسب الحکم آفس آڈر مذکورہ جاری کردہ ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان کے تحت من ایپیل کی ماہوار تنخواہ کو بند کر دیا ہے۔

3- یہ کہ آجینڈا نے بروئے آفس آڈر نمبر 405-3399-2023 مورخہ 11-05-2023 منمندی کو ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان میں بحیثیت SCT Radiology Adjust کرنے کا حکم ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان کو دیا ہے لیکن ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان من ایپیل کے ساتھ بدینتی رکھتے ہوئے نہ ہی من ایپیل کو بروئے آفس آڈر نمبر 405-3399-2023 مورخہ 11-05-2023 ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان میں adjust اور arrival کرنے دیتا ہے، نہ ہی من ایپیل کی ماہوار تنخواہ کو جاری کرنے دیتا ہے اور نہ ہی من ایپیل کو تحریری حکم نامہ دیتا ہے۔

Attested  
Jawid

4- یہ کہ ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان کے مذکورہ افعال سراسر غلط، فرضی، بناوٹی، سازشی، خلاف قانون و Mala fide ہونے کی وجہ سے باطل / Void ہیں اور من اپیلانٹ کے پہلے سے موجود قیمتی حقوق پر انتہائی غیر موثر ہیں من اپیلانٹ کے ساتھ ناانصافی ہوئی ہے من اپیلانٹ کی وادرس فرمائی جائے اور من اپیلانٹ کو زبانی شنوائی کا بھی موقع فراہم کیا جائے عین قرینہ انصاف ہے۔

لہذا استدعا ہے کہ بمقتوری اپیل ہذا بروئے آفس آڈر نمبر 405-3399 مصدقہ مورخہ 11-05-2023 جاری کردہ آپجناب ڈاکٹر عنایت اللہ ڈسٹرکٹ ہیلتھ آفسر ساوتھ وزیرستان لوئر بمقام وانا ضلع ساوتھ وزیرستان من اپیلانٹ کو ڈی ایچ کیو ہسپتال وانا ضلع ساوتھ وزیرستان میں کنٹریٹ SCT Radiology Adjust کرے، من اپیلانٹ کی ماہوار تنخواہ جاری کرے اور سابقہ بقایا جات ماہوار تنخواہ من سائل کو یکمشت ادا کرے۔

العبد

عثمان غنی ولد ثناء اللہ ساکن جاگی تحصیل و ضلع ٹانک حال ڈی آئی خان۔

(اپیلانٹ)

بیان حلفی:

برحلاف بیان کیا ہے کہ جملہ اندراجات محکمہ اپیل ہذا حرف بحرف بالکل درست و صحیح ہیں۔ کوئی امر پوشیدہ نہیں رکھا گیا ہے۔

العبد

عثمان غنی (اپیلانٹ)

بسم اللہ الرحمن الرحیم  
03/08/2023

Attested  
Jus  
[Signature]

Ann "F"

12

090

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*[Handwritten signatures and scribbles]*



13



**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to The Director General Health Services Peshawar and not to any official by name

Office Ph (091) - 9210209 Exchange (091) - 9210187, 091 - 9210190 Fax (091) - 9210230

**OFFICE ORDER**

As approved by the Competent Authority, Mr. Usman Ghani Promoted as "Senior Clinical Technician" Radiology BS-14 Vide this Directorate Office Order bearing Endst: No.3584/684 (Promotion Cell) date 27.05.2021 (Under Transfer) from DHQ Hospital Wana to DHO Lakki Marwat is hereby adjusted against the vacant post of "SCT" Radiology BS-14 in DHQ Hospital Wana with immediate effect.

NB: - Arrival/Departure reports should be submitted to this Directorate for record.

Sd/-xxxxxx  
DIRECTOR GENERAL HEALTH  
SERVICES, KP, PESHAWAR.

No. 3399-405 /AE-VI.

Dated Pesh: the: 11/05/2023.

Copy forwarded to the:-

1. DHQ Wana (SWTD).
2. Medical Superintendent DHQ Hospital Wana (SWTD).
3. DHO Lakki Marwat.
4. DAO Wana (SWTD)/Tank.
5. Director DHIS Cell DGHS Office Peshawar.
6. DA Paramedics Promotion Cell DGHS KP Peshawar.
7. Official Concerned.

For information and necessary action.

*Alleged*  
*[Signature]*

*[Signature]*  
DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES, KP PESHAWAR

*[Signature]*  
11/05/23

The Medical Superintendent  
DHS Hospital Wana Swis

Subject  
D/Sr

Arrival Report

I have honour to submit my arrival  
report for July to DHS: Hospital Wana Sw  
while I have been transferred and  
posted by the DGH, KP Peshawar vide  
order No. 3399-405/AE-VI, dated 11-05-2023  
So you are therefore requested to accept  
my arrival please.

Dated. 12/05/2023.

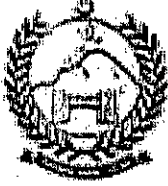
Attested

Yours sincerely

[Signature]

[Signature]

1/1



OFFICE OF THE HEALTH MANAGER

DHQ HOSPITAL WANA

LOWER SOUTH WAZIRISTAN

Ph: 0905-211400 Email: dhqhospitalwana@swtd.gov.pk



No. 1096-98 /Paramedics/Admn

Dated Wana the 30-01-2023

To

The District Health Officer  
Lower South Waziristan Tribal District

Subject: Relieving Order

Sir,

It is to inform you that one of government employee Mr. Usman Ghani (CT Radiology BPS-14) is currently working at DHQ hospital, Wana.

However, he has been found in misbehavior with hospital staff, propogandas against hospital and also having no regularity in duty.

Therefore, his services are hereby relieved back to your office, please

Sd/ .....  
Health Manager  
DHQ: Hospital Wana SWTD

Copy forwarded to:-

- 1- The Director General Health Services, Khyber Pakhtunkhwa at Peshawar.
- 2- The Assistant Commissioner Wana, SWTD.  
For information please
- 3- All Notice Board.

Attested  
J. Khan

Health Manager  
DHQ: Hospital Wana SWTD

← 26 April 2023  
2:46 PM



(16)



OFFICE OF THE DISTRICT HEALTH OFFICER  
SOUTH WAZIRISTAN LOWER AT WANA

Ph: 0965-210122

Fax: 0965-210122

No. 273 /Paramedics Dated Wana the 30/03/2023.

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

Subject: RELIEVING OF MR. USMAN GHANI S/O SAHA ULLAH (CT-  
RADIOLOGY BPS-12) AT DHQ: HOSPITAL WANA, SWTD LOWER ON  
ACCOUNT OF MISBEHAVIOR, INVOLVED IN PROPAGANDA AGAINST  
THE HOSPITAL AND ALSO IRREGULAR IN DUTY.

Please refer to the subject cited above and to state that the employee concerned was reported by the Health Manager MERF at DHQ: Hospital Wana SWTD Lower on account of his irregularity, misbehavior with the Hospital staff and involvement in propaganda against the hospital vide his office letter No. 1096-98/ Paramedics / Admn: Dated 30-01-2023 & No. 1126-29/DHO/Admn: Dated 11-02-2023. Copies attached for ready reference.

Keeping In view of the above, he is hereby relieved from DHQ: Hospital Wana SWTD to your good office for further posting at Tank/D Khan or nearby district as he is resident of District Tank

*[Signature]*  
DISTRICT HEALTH OFFICER  
South Waziristan Lower at Wana

Cc:-

- 1- The Regional Director General (South Regions) KPK Peshawar.
- 2- The Deputy Commissioner South Waziristan Lower at Wana.
- 3- The Assistant Commissioner Wana, South Waziristan Lower.  
For information please.
- 4- The Health Manager MERF at DHQ: Hospital Wana SWTD, for information and w/r to his office letters No. cited above.
- 5- The District Account Officer SWTD at Tank for information and with the request to stop his pay and issue his LPC please. (Source-II Form is attached).
- 6- Official concerned cited above is directed to report to the Director General Health Services Khyber Pakhtunkhwa Peshawar for further posting with immediate effect.

*[Signature]*  
DISTRICT HEALTH OFFICER  
South Waziristan Lower at Wana

Attested  
*[Signature]*  
AH



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# وکالت نامہ

<p>قیمت ایک روپیہ</p>	<p>کورٹ فیس</p>
---------------------------	-----------------

بعدالت جناب فہمید کنگواں سرویس ٹریڈنگ کمپنی، لاہور کے مندرجہ ذیل صاحب  
 منجانب ساجد  
 بنام فہمید کنگواں  
 دعویٰ یا جرم  
 تفصیل دعویٰ یا جرم سرور اس ایبل

## باعث تحریر آنگہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی کی جو ایک ہی کوائف یا تصفیہ مقدمہ ہوتا ہے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص کو بروعدالت حاضر ہوتا ہوں گا۔ اور ہر وقت ہمارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بخاندہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل سامنتہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراءے ڈگری و نظر ثانی اپیل و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے میان دینے اور اس پر غامشی یا راضی نامہ و فیصلہ بر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از پکھری صدر پیروی مقدمہ مذکورہ نظر ثانی و اپیل و گرانہ و برآمدگی مقدمہ یا منسوخی ڈگری یا طرف یا درخواست حکم انتہائی یا ترقی یا اگر تازی مل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ جتانہ پیروی کا اختیار ہوگا اور تمام سامنتہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرانہ یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا ہیرٹرو کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے  
 مورخہ 29 مارچ 2023ء 2023

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

Alleged and Accepted  
 عثمان غنی  
 سیدنا ابونبی  
 CNR 2157-1674 2389  
 M.No 0300590 0279