


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

254/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	07/02/2024	<p>The appeal of Mr. Ibrar resubmitted today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ibrar received today i.e on 01.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Copy of promotion order mentioned in the memo of appeal is not attached with the appeal be placed on it.
- 4- Appeal has not been flagged/ marked with annexures marks.

No. 217 /S.T.

DL. 2/2 /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kabir Ullah Khattak Adv.
High Court at Peshawar.

Re-submitted
In Response of objection No 1
The appellant is working
as store keeper at DHO
Hospital Nowshera which
has been properly mentioned
objection No 2 has been removed
objection No 3 in Response of objection
No 3 it has been marked as
Annexure "A"
objection No 4 has been removed

Kabir
7-2-24

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 254 /2024

IBRAR

VERSUS

Secretary Health Govt of KPK Health Deptt. Peshawar
and Others

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Petition.		1-6
2.	Affidavit.		7
3.	Addresses of parties		8
4.	Copy of order dated 05.08.2021, service book & minutes of meeting of selection promotion committee	"A, B & C"	9 To 29
5.	Copy of arrival report	"D"	30
6.	Copy of departmental appeal	"E"	
7.	Wakalat Nama		

Dated:31.01.2024

Ibrar
APPELLANT

Through

Kabirullah Khattak
Kabirullah Khattak
Advocate, High
Court Peshawar.

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 254 /2024

Ibrar, S/o Kinar Gul R/o DHQ Hospital Nowshera

....Appellant

VERSUS

1. Secretary Health Govt of KPK Health Deptt.
Peshawar.
2. Director General Health Service, Khyber
Pakhtunkhwa, Peshawar.
3. Medical Superintendent DHQ Hospital District
Nowshehra.
4. District Health Officer District Nowshera.
5. District Account Officer District Nowshera.
6. Account Section DHQ District Nowshera.

...Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 FOR DIRECTING THE RESPONDENTS TO
RELEASE THE MONTHLY SALARIES OF
APPELLANT W.E.F 05/08/2021 TILL DATE AND
ONWARDS AND AGAINST NOT TAKING ANY
ACTION ON THE DEPARTMENTAL APPEAL OF

APPELLANT WITHIN STATUTORY PERIOD OF
NINETY DAYS.

Prayer:-

ON ACCEPTANCE OF THIS APPEAL
THE RESPONDENTS MAY KINDLY BE
DIRECTED TO RELEASE THE
MONTHLY SALARIES OF APPELLANT
FOR THE POST OF STORE KEEPER BPS-
11 FROM 05.08.2021 TILL DATE AND
ONWARDS WITH ALL ARREARS. ANY
OTHER REMEDY WHICH THIS AUGUST
TRIBUNAL DEEMS FIT THAT MAY
ALSO BE ONWARD IN FAVOUR OF
APPELLANT.

Respectfully Sheweth.

1. That the Appellant was initially appointed as ward Ardali BPS-04 at the year of 2013.
2. That after appointment the appellant performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
3. That the appellant has been promoted/ appointed from Ward Ardali to Store Keeper BPS-11 through proper Departmental Selection Committee on 05.08.2021. (Copy of order dated 05.08.2021, service book & minutes of

3

meeting of selection promotion committee are attached as annexure "A, B, C").

4. That the appellant has been properly submitted his arrival report on 05.08.2021 (Copy of arrival report is attached as annexure "D").
5. That although the appellant has been promoted/appointed from Ward Ardali Clause-IV to Store Keeper through selection promotion committee and continuously performed his duty as a Store Keeper still but the respondent department illegally not release the salary of the appellant for the post of store keeper w.e.f 05.08.2021 till now.
6. That the appellant submitted so many application for the release of his salary but in vain.
7. That the appellant submitted departmental appeal on dated 10.10.2023 for the release of salary for the post of store keeper but no response has been given by the respondent department. (Copy of departmental appeal is annexed as annexure "E").

(41)

8. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That not paying monthly salaries to appellant and not taking any action on the departmental appeal of appellant within statutory period of ninety days by Respondents are against the norms of justice, material on record and principles of fair play.
- B. That the appellant has not been treated according to law and rules and has been deprived from his legal right of monthly salaries for the post of store keeper for no good grounds.
- C. That it is evident from the promotion order that the same was passed after proper recommendations of Selection Promotion Committee, therefore appellant submitted arrival report and started his duty as store keeper regularly with the Respondent department.

5

D. That the appellant is still in service and performing his duties continuously as store keeper w.e.f 05.08.2021 till now therefore under section 17 of the civil servants Act 1973 as well as article-11 of the constitution of Islamic of Islamic Republic of Pakistan, the appellant is fully entitled to his claim.

E. That non release /payment of monthly salaries to the appellant for the post of store keeper w.e.f 05.08.2021 and the respondent department without any legal justification not release the monthly salary for the post of store keeper is against the law and rules.

F. That the Respondent department also violated article of 25-A of the Constitution of Islamic Republic of Pakistan.

G. That the Respondent department also violated the well settle principal of law "*work done pay done*".

H. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

6

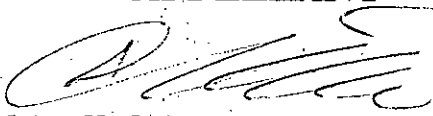
It is therefore, most humbly prayed that on acceptance of this appeal the respondents may kindly be directed to release the monthly salaries of appellant for the post of store keeper bps-11 from 05.08.2021 till date and onwards with all arrears.

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Dated 31.01.2024

Through


APPELLANT


Kabirullah Khattak

&


Roeda Khan

Advocates, High Court
Peshawar.

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.


Advocate.

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

IBRAR

VERSUS


Secretary Health Govt of KPK Health Deptt. Peshawar
and Others

AFFIDAVIT

I, Ibrar, S/o Kinar Gul R/o DHQ Hospital Nowshera, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.


DEPONENT

Identified by:


Roeda Khan
Advocate High Court
Peshawar.

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

IBRAR

VERSUS

Secretary Health Govt of KPK Health Deptt. Peshawar
and Others

ADDRESSES OF PARTIES

PETITIONER.

Ibrar, S/o Kinar Gul R/o DHQ Hospital
Nowshera


ADDRESSES OF RESPONDENTS

1. Secretary Health Govt of KPK Health Deptt.
Peshawar.
2. Director General Health Service, Khyber
Pakhtunkhwa, Peshawar.
3. Medical Superintendent DHQ Hospital District
Nowshera.
4. District Health Officer District Nowshera.
5. District Account Officer District Nowshera.
6. Account Section DHQ District Nowshera.

Dated:31.01.2024


APPELLANT

Through


Roeeda Khan
Advocate, High
Court Peshawar.

'A' (9)



OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ HOSPITAL NOWSHERA
 Phone & Fax: 0923-9246723 E-Mail: dhqnowshera100@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 03-08-2021, MR. IBRAHIM KHAN S/O KINAR GULL is hereby appointed as Store Keeper BPS-07 with pay protection plus usual allowances against the vacant post of Store Keeper BPS-07 at DHQ Hospital Nowshera with immediate effect, with the following terms & conditions:

The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.

The service can be dispensed with during the probation period on unsatisfactory performance.

You will not be entitled to any TADA for Medical Examination and joining the first appointment.

In case of any of the documents submitted by you with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.

The appointment will be governed by such rules and order issued by the Govt. from time to time.

If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.

If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

ABID HAYAT SAHIB
 Civil Judge
 Nowshera

Sd/ _____
 Medical Superintendent
 DHQ Hospital, Nowshera

076-8 MS/DHOH-NSR

Date: 12/12/2021

Copy forwarded to the:

- Director General Health Services Khyber Pakhtunkhwa Peshawar.
- District Accounts Officer Nowshera.
- Accounts Section DHQ Hospital Nowshera.
- Mr. Ibrar Khan S/O Kinar Gull Residence of Nowshera Kotla, Nowshera.
- Office Record.

Received
 MS

[Signature]
 Medical Superintendent
 DHQ Hospital
 Nowshera

[Signature]
 Medical Superintendent
 DHQ Hospital, Nowshera

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BETTER COPY

OFFICE OF THE MEDICAL SUPERINTENDENT
DHO HOSPITAL NOWSHERA

Phone & Fax – 0923-9220023

E-Mail dhqnowshera4306@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 03-08-2021. Mr. **IBRAR KHAN S/O KINAR GUL** is hereby appointed as **Store Keeper BPS-07** with pay protection as usual allowances against the vacant post of Store Keeper BPS-07 at DHQ Hospital Nowshera with immediate effect with the following terms & conditions.

1. The appointment shall be subject to the Medical Fitness initially on probation for a period of 02-year.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is final forge/fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issues by the Govt. from time to time.
6. If you wish to resign from service, your will have to submit resignation in written one month in advance OR deposit one month pay in the Govt treasury.
7. If the above term & conditions are acceptable to you then you should report to DHQ Hospital Nowshera with 07-days after the receipt of this appointment order.

Sd. _____
Medical Superintendent
DHOQ Hospital Nowshera

DH-NSR

Date 05/08/2021

to the:

for General Health Services Khyber Pakhtunkhwa Peshawar.

Accounts Officer Nowshera.

Section DHQ Hospital Nowshera.

Khan S/o Kinar Gul Resident of Nowshera Kalan Nowshera.

Medical Superintendent



B" (11)

**OFFICE OF THE MEDICAL SUPERINTENDENT,
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

MINUTES OF MEETING OF SELECTION / PROMOTION COMMITTEE

A meeting of the said committee held under chairman ship of Medical Superintendent DHQ Hospital Nowshera on 3rd August 2021 attended by the following members:

1. Dr. Muhammad Tahir D.M.S Member
2. Dr. Afzal Asghar M.O Member of Admin Dept.
3. Dr. Muhammad Shoaib Medical Superintendent Chairman

Attendance sheet attached.

The Selection / Promotion Committee agreed on the following action points:

1. The Selection / Promotion Committee agreed on the appointment/promotion of the following staff w.e.f 1st September 2021.
2. The appointments were made as per requirement of the Hospital Services.
3. Their performance was also kept in view while making their appointments.
4. The committee unanimously agreed for the appointments of the staff in hospital interest as well as public interest.
5. All those who are appointment to new cadre will be liable for Pay Protection.

S.No	Name	From	To
1	Tashfeen Khan S/O Pervaiz Khan	Ward Orderly	Store Keeper
2	Ibrar Khan S/O Kinar Gull	Behishti	Store Keeper

1. Dr. Muhammad Tahir

(Member)

2. Dr. Afzal Asghar

(Member)

3. Dr. Muhammad Shoaib

(Chairman)

ABID HAYAT SAKI
Civil Judge

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C^s

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SERV ICE BOOK

OF

Mr.

Mr. Harar Khan

S/o

Kinac Gul

Designation

Behishit

Department

DHS Hospital Nowshera

Rs: 50/=

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The entries on this page should be renewed or re-attested at least every five years and the Signature in lines 9 and 10 should be dated.

Name: MR. Ibrar Khan

Race: Afghan

Residence: Banda P/O Nizampur
Tehsil & District Nowshera


Father's name and residence: MR. Kinar Gul


Date of birth by Christian era as nearly as can be ascertained: 04-02-1891

Exact height by measurement: 5-4


Personal marks for identification: nil

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

Ring Finger: 

Middle Finger: 

Fore Finger: 

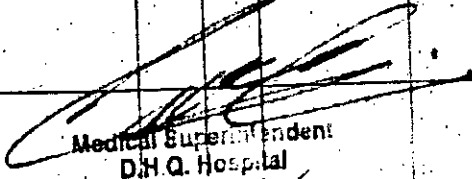
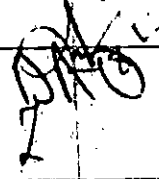
Thumb: 

Signature of Government Servant: Ibrar

0. Signature and designation of the Head of the office, or other Attesting Officer.

(14)

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether substan- tive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature Government
<u>BPS-cl</u>							
<u>4800-156-9300</u>							
<u>Behishti</u>						<u>30/9/2013</u>	<u>Huss</u>

9 Name and Designation of head of the office of attesting officer (columns 1 to 3)	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or remark or praise of the Government Service
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government		
<p>Appointed as Behishti BRL-01 at D.H.Q Hospital Nowshera vide order No 8513-16/DHO NSK. dt. 27/09/2013.</p>							
 Medical Superintendent D.H.Q. Hospital Nowshera							
<p>TR 11216 dt 8/5/214 Drawn Amount of pay & allow v... 30/9/213 to 31/2/214 Rs. 4922/-</p> 							

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature Government
BPS-01 <u>Gen-150-9300</u> Behisht			Pay: 4950/PM			07/2/14 FN	
els.			Pay 5100/PM			01/12/14 FN	

9 Name and Designation head of the office or attesting officer columns 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to an recorded punishment or cessure or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		

one Procarture increment allowed
d.t. 1-7-2014 vide Govt of G.P.R.
Revenue Dept. modification no.
FO (S.O-1) 2-123/2014 dt. 14.7.14.

[Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera

30/11/2014 AN

Annual increment
allowed

Service verified
upto 30/11/2014 AN


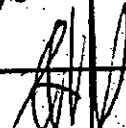



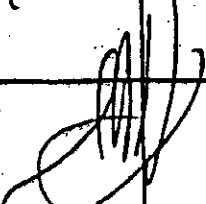
[Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera

[Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera

[Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera

TR A/224 dt 10/2/15
Drawn Area of an adu.
inc w/c 7/14 to 1/15 A-13/2
[Signature]
7/11/15

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government
BPS-01- 6210-195- Behishki	12060		Pay B. 6600/-			1 $\frac{7}{2015}$ R.M	
do.			Pay B. 6795/-			1 $\frac{7}{2015}$ R.M	
do.			Pay B. 6990/-			1 $\frac{12}{2015}$ R.M	
BPS-03 6535-260- Behishki	14335		Pay B. 7315 Pay B. 7055/-			02 $\frac{12}{2015}$ R.M	

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave on average pay upto three months for which leave salary is payable to another Government		
		Signature of the head of the office or other attending officer	Reference to any record of punishment or censure, or award or prize of the Government servant				
					Pay Fixed as Per Revised		
					Pay Scale 1-7-2015		
					 Medical Superintendent D.H.Q HOSPITAL NOWSHERA		
					one premature increment allowed w.e.f 1.7.2015		
					 Medical Superintendent D.H.Q HOSPITAL NOWSHERA		
	30/11/2015	AN	Annual increment allocated		Service confirmed up to 30.10.2015		
				 Medical Superintendent D.H.Q HOSPITAL NOWSHERA		 Medical Superintendent D.H.Q HOSPITAL NOWSHERA	 Medical Superintendent D.H.Q HOSPITAL NOWSHERA
					Upgraded From BPS-01 to BPS-03		
					vide notification no PD/SO (AR) 7-20/2015 dt. 30.6.2015		
					 Medical Superintendent D.H.Q HOSPITAL NOWSHERA		

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
BPS-03							
8040-325	177A0		Pay Rs. 8690	PM		01/07/2016	FN
Behishti				90150			
BPS-03							
66007/15							
90157/316							
<p>Office of the Accountant General, Khyber Pakhtun Khwa Peshawar</p> <p>Pay Fixed in the Revised Basic Pay Scale 6710-115-12060 11</p> <p>Pay Fixed @ Rs. 66007/07-015 66007/07-015</p> <p>R.B.P. 8040-325-177A0 8040-325-177A0 13</p> <p>Pay Fixed @ Rs. 90150 90150/02-2015</p> <p>Date of Next increment is on 01-12-2015</p> <p><i>(Signature)</i> Pay 02-12-2015</p>							

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9 Name and Designation of head of the office or attesting officer (columns 1 to 8)	10 Date of termination or appointment	11 Reason of termination (such as Promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Nature and duration of leave taken	Allocation of period or leave on average pay upto four months for which leave salary is debtible to another Government			
					Period			Government to which debtible
		Pay fixed as Per Revised Pay Scale						

Medical Superintendent
D.H.C. Hospital
Nowshera

TL 564 02/11
 PE - PE 03/16
 CP 5200 - BK 03
 10/10 2/16
 [Signatures]

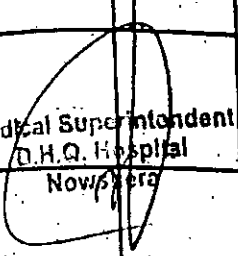
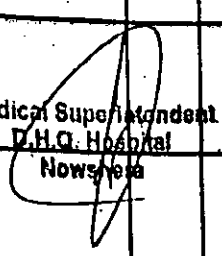
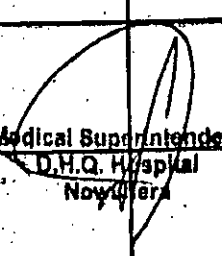
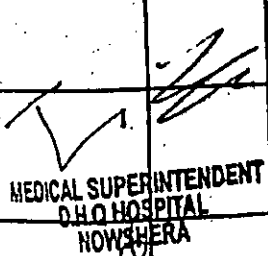
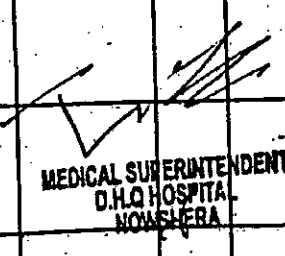
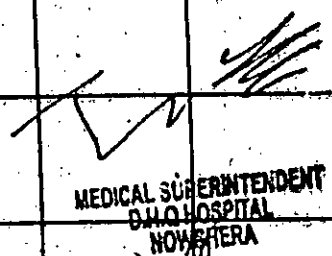
22

1 Name of post	2 Whether substan- tive or officiating and whether permanent or temporary	3 If officiating, state (1) substantive appointment, or (2) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Serv
<u>BPS-03</u> 8040-325-17790			9360/	Pay 119015/PM		12 2016	FN
<u>Behishki</u>							
<u>BPS-03</u> 9610-390-21310				Pay 1170/PM		07 2017	FN
<u>Behishki</u>							

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1	2	3	4	5	6	7	8
Name of post	Whether substan- tive of officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Serv.
375-03 <hr/> 9610-390-21310 <hr/> Behrshah			Pay	11560/PM		1 ¹² / ₂₀₁₇ FN	
du-						1 ¹² / ₂₀₁₈ FN	
du-						1 ¹² / ₂₀₁₉ FN	

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9 Name and Designation of head of the office or attesting officer (Columns 1 to 8)	10 Date of termination or appointment	11 Reason of termination (such as Promotion, transfer, dismissal, etc)	12 Signature of the head of the office or other attesting officer.	13 Leave		Signature of the head of the office or other attesting officer	References to any recorded punishment or censure, or reward or praise of the Government Served	
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government			
					Period			Government to which debtible
	30/11/2017 AN		Annual increment allowed			Service verified upto 30/11/2017 10		
 Medical Superintendent D.H.Q. Hospital Nowshera			 Medical Superintendent D.H.Q. Hospital Nowshera			 Medical Superintendent D.H.Q. Hospital Nowshera		
	30/11/2018 AN		Annual increment allowed			Service verified upto 30.11.2018 A.N		
 MEDICAL SUPERINTENDENT D.H.Q HOSPITAL NOWSHERA			 MEDICAL SUPERINTENDENT D.H.Q HOSPITAL NOWSHERA			 MEDICAL SUPERINTENDENT D.H.Q HOSPITAL NOWSHERA		

(26)

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 Officiating, class (A) substantive appointment, or (B) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant
BPS-03							
9610-390-21310							
Behishat				Pay Rs 12730/PM		12 Feb 2020	
du							
BPS-11							
12570-800-38970							
Store keeper							

(2)

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 G.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
BPS- 11 18650 - 1310 - 57950			Pay Ac. 13960/-	PM		17 th Feb 2022	
Store Keeper							
this			Pay Rs 21270/-	PM		12 th Feb 2022	FN

(29)

9	10	11	12	13		14	15
				Nature and duration of leave taken	Leave		
					Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature and Designation of head of the office or attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as Promotion, transfer, dismissal, etc)	Signature of the head of the office or other attesting officer.	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or prize of the Government servant
			<p><i>Pay fixed as per Revised Pay Scale 1-7-2022. F.W.</i></p>				
			<p><i>[Signature]</i></p> <p>Medical Superintendent D.H.Q Hospital Nowshera</p>				
	30/11/2022		<p><i>Annual increment allowed</i></p>			<p><i>Service rendered upto 4 Nov 30.11.2022 P.W.</i></p>	
			<p><i>[Signature]</i></p> <p>Medical Superintendent D.H.Q Hospital Nowshera</p>			<p><i>[Signature]</i></p>	

گورنمنٹ ہسپتال ڈی ایچ او ہسپتال منڈال نوشہرہ

Annual Report گزار

ضابطہ عالی

عنوان گزارش ہے کہ میں آج شام 05/8/2021

کو ایک دستاویز پیش کر رہا ہوں جس میں

Annual Report لکھا گیا ہے

میں نے اس پر دستخط کیے ہیں تاریخ 03-08-2021 حوالہ نمبر 80/MS/DHO/11/2021-076

میں نے دستاویز پیش کیا ہے

اس لیے اس پر عملدرآمد ہو جائے گا

Annual Report آج شام 05/8/2021 میں لکھا گیا ہے

نوٹس سرکاری

الحمد للہ

ایف ایچ او ڈی ایچ او ہسپتال ڈی ایچ او ہسپتال منڈال نوشہرہ

05/8/2021

دستاویز

Dr. A. Chaudhary

Medical Superintendent

DHO Hospital, Nowshera

بخدمت جناب میڈیکل سپرنٹنڈنٹ DHQ ہسپتال نوشہرہ

ڈیپارٹمنٹل اہل برائے جاری کرنے تجاوا برائے پوسٹ سٹور کیمرہ از مورخہ

05.08.2021 تا حال اور آئندہ بھی

جناب عالی! سائل حسب ذیل عرض رہا ہے۔

- 1- یہ کہ سائل ایک معزز شہری ہے اور ضلع نوشہرہ کا مقامی رہائشی و پیدا کنٹی باشندہ ہے۔
- 2- یہ کہ سائل وارڈ اردو سال 2013ء میں DHQ ہسپتال ضلع نوشہرہ میں بھرتی ہوا۔
- 3- یہ کہ سائل کو پراپر پروموشن بذریعہ سلیکشن پروموشن کمیٹی / اشتہار سائل کو وارڈ اردو سے سٹور کیمرہ پر پروموشن دے دی گئی۔ (نقل سلیکشن پروموشن کمیٹی لف ہے)۔
- 4- یہ کہ سائل کا پراپر پروموشن نوٹیفیکیشن 05.08.2021 کو سٹور کیمرہ کا آرڈر جاری کر دیا گیا اور مردس بک میں پراپر سٹور کیمرہ کا اندراج کیا گیا۔ (نقل پروموشن آرڈر 05.08.2021 اور مردس بک لف ہے)۔
- 5- یہ کہ سائل نے چارج لینے کے بعد اپنی ڈیوٹی پوری ایمانداری سے سرانجام دی ہے اور تا حال سائل سٹور کیمرہ کے پوسٹ پر اپنی خدمات سرانجام دے رہا ہے۔
- 6- یہ کہ اگرچہ سائل کو باقاعدہ طور پر وارڈ اردو سے سٹور کیمرہ پر ترقی دی گئی اور سائل سے سٹور کیمرہ کی ڈیوٹی بھی لے رہا ہے لیکن تا حال سال 05.08.2021 سے لیکر سائل کو سٹور کیمرہ کی بجائے وارڈ اردو کی تجاوا جاری ہے جو کہ خلاف قانون ہے کیونکہ سائل سٹور کیمرہ کی ڈیوٹی سرانجام دے رہا ہے۔ لیکن تا حال سائل کی تجاوا بمطابق سٹور کیمرہ جاری نہیں کی گئی ہے۔
- 7- یہ کہ سائل نے اس سے پہلے بھی درخواستیں متعلقہ محکموں کو پیش کی ہے لیکن تا حال اس پر کوئی عمل درآمد نہیں ہوئی۔

لہذا استدعا ہے کہ سائل کی تجاوا بابت سٹور کیمرہ از مورخہ 05.08.2021 سے تا حال اور

آئندہ بھی جاری کرنے کے احکامات صادر فرمائی جائے۔

المرقوم: 10-10-23

ایڈوانس: ابرار ولد کینار گل سٹور کیمرہ DHQ ہسپتال نوشہرہ

ہسپتال

بعد الت صا...
بعد الت صا...
بعد الت صا...



2020ء مختاب اساتذہ

بنام صا...

سرورین اساتذہ
اساتذہ

موزعہ

مقدمہ

دعویٰ

جرم

باعث تخریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہات دہی وکل کارروائی متعلقہ

آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز اس کے

ذکیل صاحب کو راضی نامہ کرنے کی تقریر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعوئی اور اس کے

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یا کٹرفہ یا اپیل کی برابری

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظرنانی و بیرونی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ بر ہو یا حد سے باہر ہو تو وکیل صاحب باند ہوں گے۔

کہ بیرونی مذکور کریں۔ لہذا اذکالت نامہ لکھ دیا کہ سند ہے۔

2020ء

ماہ اگست

المرقوم

العبد
العبد
العبد