

02.07.2015

Appellant in person, M/S Yar Gul, Senior Clerk and Zakir Shah, Junior Clerk alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 14.10.2015 before S.B.


Chairman

14.10.2015

Appellant in person, M/S Qibaz Khan, SO and Yar Gul, Senior Clerk alongwith Assistant A.G for respondents present. Para-wise comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 8.2.2016.


Chairman

02.12.2015

Appellant in person present. Appeal requisitioned on his application for withdrawal of appeal today. The same was affirmed by the appellant in Court.

In the light of application and affirmation thereon by the appellant in Court, the appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
02.12.2015


Chairman
02.12.15

4

13.4.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was forcibly retired on 30.6.2014 despite the fact that his date of birth was 1962 as recorded in the medical certificate of the appellant dated 24.9.1986. That the appellant submitted application dated 3.6.2014 for the correction of the date of birth which was rejected vide order dated 13.6.2014 and that the representation of the appellant was also regretted vide order dated 23.7.2014 and hence the instant service appeal on 5.2.2015.

That the incorrect date of birth was not brought into the notice of appellant.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 2.7.2015 before S.B.

Appellant Deposited
Security & Process Fee







Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 202/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10.03.2015	<p>The appeal of Mr. Aurangzeb resubmitted today by Mr. Muhammad Imran Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	25-3-15	<p>This case is entrusted to Bench <u>I</u> for preliminary hearing to be put up thereon <u>30-3-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	30.03.2015	<p>Appellant in person present. Counsel for the appellant is stated indisposed. Adjourned to 13.4.2015 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Aurangzeb son of Muhammad Ramzan r/o Mohallah Bhawandaas Shah Qabool Peshawar received to-day i.e. on 05.03.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of order dated 30.6.2014 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- 4- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

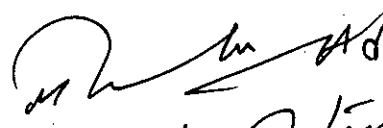
No. 283 /S.T,

Dt. 6/3 /2015.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Imran Khan Adv. Pesh.

1. memorandum of appeal is signed by appellant.
2. Copy of order 30-06-2014 is attached as annexure I which was prepared on 26-06-2014 and provided on 30-06-2014.
3. Application on page No: 13 to 14 are departmental appeal which are attached as annexure E & F.
4. Another copy/set the appeal is also submitted with appeal.


Resubmitted of the
compliance.

1

BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

Appeal no. 202/2015
AURANGZAIB

Appellant

Versus

GOVT OF KPK THROUGH SECRETARY GENERAL HEALTH SERVICES FATA KP
PESHAWAR AND OTHERS

Respondents

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Dated: 04.03.15

Appellant

Through

Muhammad Imran khan

Muhammad Zia Ullah

Advocate High Court,
Peshawar

**BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR,**

Appeal No 202/2015

AURANGZAIB S/O: MUHAMMAD RAMZAN R/O: MOHALLAH
BHAWANDAAS, H.NO: 4877, P.O: SHAH QABOOL,
PESHAWAR.

N.W.F. Province
Appellate Service Tribunal

Diary No 194

dated 05-2-2015

Versus

1. GOVERNMENT OF KHYBER PAKHTUNKHAWA THROUGH SECRETARY GENERAL HEALTH SERVICES FATA KP, PESHAWAR.
2. DEPUTY DIRECTOR EXPANDED PROGRAMME ON IMMUNIZATION, KPK PESHAWAR.
3. DIRECTOR HEALTH SERVICES FATA, PESHAWAR.
4. DIRECTOR GENERAL HEALTH SERVICES, KP PESHAWAR.
5. ASSISTANT DIRECTOR (P-II) DIRECTORATE GENERAL HEALTH SERVICES, KPK, PESHAWAR.
6. SECTION OFFICER-IV HEALTH DEPARTMENT, PESHAWAR.

Respondents

**APPEAL U/S: 4 OF THE NWFP SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED:05.06.2014,30.06.2014 AND
23.07.2014, WHEREBY THE ORDER OF FORCIBLE RETIREMENT
FROM SERVICE HAS BEEN PASSED AGAINST THE APPELLANT.**

PRAYER IN APPEAL:

On acceptance of this appeal, the respondents may kindly be directed to correct the wrong entry of date of birth i.e, 01.07.1954 of the appellant in his service book according to correct date of birth i.e, 01.01.1962 mentioned in old NIC and medical certificate issued at the time of appointment and to reinstate him on his service by cancelling retirement order dated: 30.06.14, 05.06.14 and 23.07.14, with all back and future benefits.

Respectfully Sheweth:

The appellant most humbly submits as under:

1. That appellant was appointed as Naib Qasid in BPS-1 plus other allowances on 24.09.1986.

(Copy of appointment order is attached as annexure A)

Filed to-day

[Signature]
Registrar

5/2/15

re-submitted to-day
and filed,

[Signature]
Registrar

10/3/15

2. That at the time of appointment, the appellant provided his old NIC and medical certificate to the appointing authority in which the date of birth of the appellant was correctly mentioned as 01.01.1962.

(Copies of old NIC and Medical certificate are attached as annexure B & C)

3. That appellant served 27 years as Naib Qasid in Directorate of Health Services FATA Secretariat Warsak Road Peshawar and performed his duty efficiently and honestly during the long period of his service.

4. That after long service of 27 years, the appellant was astonished to inform that he is going to retire on 30.06.2014 on the basis of 60 year age as per his service book in which wrong date of birth 01.07.1954 is entered instead of correct date of birth 01.01.1962.

(Copy of service book is attached as annexure D)

5. That on getting information the appellant moved application under diary No: 6297, on 03.06.14 to respondent No: 3 for correction of his date of birth in his service book.

(Copy of application is attached as annexure E)

6. That respondent No: 3 by considering such application under diary No: 6297, dated: 03.06.14 given his remarks and referred the matter under letter No: 10396, dated: 05.06.14 to respondent No: 4 for correction of date of birth of appellant as per his NIC and medical certificate.

(Copy of letter No: 10396 is attached as annexure F)

7. That respondents No: 4 to 6 did not consider the request of respondent No: 3 to make correction in the service book of appellant as per his NIC and medical certificate under letter No: 4422, dated: 13.06.14 and letter No: SOH-IV/4-4/C.IV, dated: 23.07.14.

(Copies of letters No: 4422 and SOH-IV/4-4/C.IV are attached as annexure G & H)

8. That even after moving such application for correction of date of birth of appellant, the respondents forcibly retired the appellant from service on 30.06.14.

(Copy of retirement order is attached as annexure I)

9. That by feeling aggrieved from such illegal act by the respondents the appellant has no other adequate remedy, hence file this appeal on following grounds inter-alia:-

GROUND:

- A. That no codal formalities as enumerated in the concerned laws have been adopted nor any procedure as prescribed in the legal manner has been obeyed by the issuing authority.
- B. That respondents have not acted according to law and have illegally retired the appellant from his service which is his legal and constitutional right. That such forcible retirement is against fundamental rights of the appellant as vested by the constitution of Islamic Republic of Pakistan 1973.
- C. That issuance of impugned order to retire the appellant from his service creates illegality and irregularity in the constitutional right of appellant.
- D. That such illegal and forcible retirement is the result of misuse of powers conferred upon respondents and use of excess of powers.

- E. That such negligent and irresponsible attitude of respondents not only violates the legal and fundamental right of the appellant but also make disturbance in the administrative hierarchy.
- F. That after forcible retirement the petitioner visited A.G office for pension matter but he was refused with objection that his date of birth is incorrect and not in accordance with NIC which needs to be clarified, hence the appellant is suffering from double trouble.
- G. That there is a basic principle of Islam as well as of law that no one should be condemned unheard but such rule has been ruined out by passing one sided Order.
- H. That other ground if any will be raised at the time of arguments with prior permission of this Hon'ble Court.

It is therefore, prayed that on acceptance of this appeal, the respondents may kindly be directed to correct the wrong entry of date of birth i.e, 01.07.1954 of the appellant in his service book according to correct date of birth i.e, 01.01.1962 mentioned in old NIC and medical certificate issued at the time of appointment and to reinstate him on his service with all back and future benefits.

Any other remedy if this Hon'ble court deems fit may graciously be awarded.

Dated: 04.03.15

اورینگز
Appellant
Through
Muhammad Imran Khan
Muhammad Zia Ullah
Advocates, High Court,
Peshawar.

BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

AURANGZAIB

Appellant

Versus

GOVT OF KPK THROUGH SECRETARY GENERAL HEALTH SERVICES FATA KP
 PESHAWAR AND OTHERS

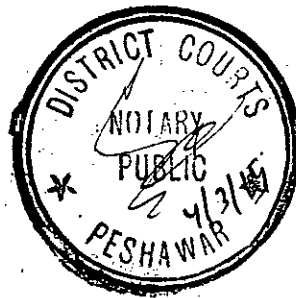
Respondents

AFFIDAVIT

It is verified on oath and do hereby solemnly affirm and declare that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*As per instruction
of my client*

[Signature]
 DEPONENT



BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

AURANGZAIB

Appellant

Versus

GOVT OF KPK THROUGH SECRETARY GENERAL HEALTH SERVICES FATA KP
PESHAWAR AND OTHERS

Respondents

APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH:

The applicant most humbly submits as under:

1. That the instant application is moved along with service appeal before this Hon'ble Court.
2. That applicant is illiterate person and is unaware about the legal formalities regarding service rules and during those days the applicant had faced accident and was on bed due to which after turning down the application of applicant for correction of date of birth, he had not instituted the appeal within stipulated time that's why the service appeal is filed in late stage.

(Copy of medical receipt is attached as annexure J)

It is, therefore, prayed that on acceptance of this application the service appeal may kindly be considered within time.

اورنگزایب

Applicant

Dated: 03.03.15

Through

M. Imran Khan

M. Imran Khan
M. Zia Ullah *M. Zia Ullah*
Advocates High Court,
Peshawar.

**BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.**

AURANGZÁIB

Applicant

Versus

GOVT OF KPK THROUGH SECRATORY GENERAL HEALTH SERVICES FATA KP
PESHAWAR AND OTHERS

Respondents

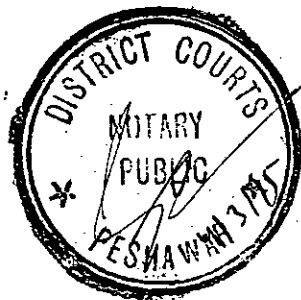
AFFIDAVIT

It is verified on oath and do hereby solemnly affirm and declare that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

*As per instructions
of my clients*



DEPONENT



OFFICE OF THE DEPUTY DIRECTOR, EXPANDED PROGRAMME ON IMMUNIZATION,
NWFP, PESHAWAR.

OFFICE ORDER.

Mr. Aurang-Zaib S/O Mohammad Ramzan, Dinbahar Colony Charsadda Road, Peshawar, is hereby appointed as Naib Qasid in BPS-1 plus other allowances as admissible under the rules purely on temporary basis against the existing vacancy of Naib Qasid under the control of Deputy Director, EPI NWFP, Pesh:

His appointment will be subject to the following terms and conditions.

- 1- He is domicile of N.W.F.P.
- 2- He is declared Medically fit for Govt:services.
- 3- He will be not entitle to any TA/DA for joining his 1st appointment and Medical Examination.
- 4- He will be liable to serve any where in NWFP.
- 5- He will be governed by such rules and orders as may be issued by the Govt: for the category of Govt.
- 6- If he wish to resign any time he will resign in writting by giving a prior notice of one month failing which one month pay will have to be forfeited.
- 7- His appointment in the Health Department is purely on temporary basis and his service are liable to be terminated at any time without any reasons being assigned.
- 8- If he accept the offer on the abover terms and conditions he should report for duty to the Dy:Director EPI NWFP, Peshawar within 15 days after the receipt of this order.

Sd/
Deputy Director,
Expanded Programme on Immunization
N.W.F.P. Peshawar.

No. 2482-03/EPI dated Peshawar the 24-9/1986.

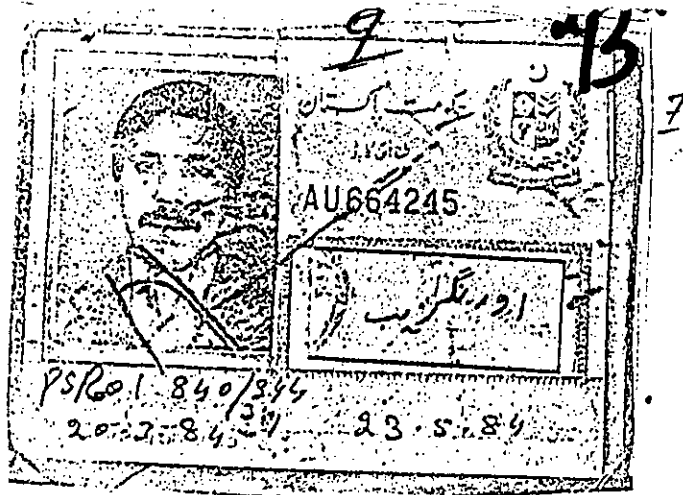
Copy forwarded to the :-

- 1. ✓ Accountant EPI Head Quarter NWFP, Peshawar.
- 2. ✓ Mr. Aurangzeb S/O Mohammad Ramzan Dinbahar Colony Charsadda Road, Peshawar.

for information and necessary action.

Attested
True copy as original
[Signature]

Deputy Director,
Expanded Programme on Immunization,
N.W.F.P. Peshawar.



	3	5	-	8	3	-	4	5	3	0	7	2	
	اورنگ زینب												
	11												
	1973												
	1962												

1

Attested

True copy as original

Attested

MEDICAL CERTIFICATE

0 "C"

Name of official Mr. Aurangzaib
 Caste or race Awan
 Father's name Muhammad Ramzan
 H/No 9877 Jahangir Pura Road Muballah
Behwani Dist Namakmandi Shah Gabor Peshawar
 Date of birth 1962
 Exact height by measurement 5-6
 Personal mark of identification Cut mark on Foythead
وزن 110
 Department of the official _____
 Name of Head of office _____

I do hereby certify that I have examined Aurangzaib a candidate
 for employment in the office of the DDEPI
 and am of opinion that he has no physical infirmities or other constitutional affection or disability
 in any respect None

I do not consider this as disqualification for employment in the office of the DDEPI
 His age according to his own statement 24/25 year and by appearance about
24/25 year

[Signature]
 MEDICAL SUPERINTENDENT,
 CIVIL HOSPITAL, Medical Superintendent
 Civil Hospital
 Peshawar
24/9/86

LEFT HAND THUMB AND FINGER IMPRESSIONS



Accepted
 True copy as original
[Signature]

50/11/86

[Signature]

21/11/86

S.A

9/11

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name M. Aunay Zaid "D"
2. Race AFRICAN
3. Residence Dui Bahar Colony, Charsada Road Per

4. Father's name and residence M. Ghannat Ranzan

5. Date of birth by Christian era as nearly as can be ascertained 1-7-1956

6. Exact height by measurement 5-6

7. Personal marks for identification An old wound scar on the left side of face

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

9. Signature of Government servant.

10. Signature and designation of the Head of the Office, or other Attesting Officer.

Attested

True copy as original

[Signature]

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave or average pay upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of 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 praise of the Government Servant.
<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>			<p>Appointed as Head Clerk in BPs-I with effect from 24.9.86 Order No. 248</p>			<p>Signature</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p>
						<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>	
<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>			<p>Pay fixed in Grade BS-5 (600-13-860) with effect from 22.7.1987, with effect from 1.7.1987</p>			<p>Signature</p>	
						<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>	
	30.11.87		<p>Annual increment allowed</p>			<p>Signature</p>	<p>Service referred up to 24.9.1987 AN</p>
<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>			<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>			<p>Signature</p>	<p>Deputy Director N.W.R.P. Programme N.W.R.P. Peshawar</p>
	30.11.88		<p>Annual increment allowed</p>			<p>Signature</p>	<p>Service referred up to 30.11.1988 AN</p>
<p>Signature</p>			<p>Signature</p>			<p>Signature</p>	<p>Signature</p>

Copy as original

مدیت صدف ڈاٹ کام پبلشر ضلعی سر دفتر فائنل

13

صدف عالی

6297

Letter to Respondent No: 3

جو بیان گزارش ہے کہ میں خرچہ 27 سال سے

آپ کے زیر نفاذ ہو کر سہرا انجام دے رہا ہوں۔ خرچ

مدیت ہے کہ میری سروس تک میں میری تاریخ پیدائش

غلطی سے 1954 خرچ ہے۔ جبکہ میری درست تاریخ پیدائش

1962 ہے۔ جو کہ میرا شناختی کارڈ اور میرے میڈیکل ریکارڈ

میں 1962 سے 1954 تک حساب سے ٹیکہ جو ابلی کو میری

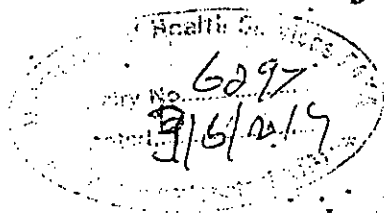
ایئر کرڈنٹ ہو جائے گی۔ جبکہ 1962 کے حساب سے

ابھی میرا 8 سال باقی ہیں۔ میرا پیدائشی سر ڈنٹنگ

کے درست پتے جانے کو میری سروس جاری رہے

میں ڈیف فریب آدھی ہوں اور کوئی فریڈم انکم نہیں ہے۔

تمام رقم دیکھا گیا ہے



انٹارلس

آئیڈیا بنانا

ادراگز پبلسٹیشن

حرفہ 06:2014-03

4/6/14
O.S.
immediat
N.A. pl.

Attested
True copy as original

Ad

DIRECTORATE OF HEALTH SERVICES FATA

FATA SECRETARIAT WARSAK ROAD PESHAWAR

Phone: 091-9210212, 9212207

Fax: 091-9212110

NO/0396/DHS/FATA/ADMIN

DATED: 5/06/2014

14/01
~~02~~

"F"

To

The Director General Health Services,
Khyber Pakhtunkhwa.

16288
09/06/14 05/6/14

Subject:-

CHANGE IN THE RECORDED DATE OF BIRTH IN THE SERVICE BOOK.

Sir,

I have the honor to forward herewith an application along with its enclosures in respect of Mr. Aurangzeb presently working in this Directorate as Naib Qasid on the subject noted above for favor of further necessary action.

The above named official was appointed by Deputy Director EPI vide office order No. 2482-83/EPI dated 24.09.1986. At the time of appointment his age as per medical certificate attached with application was 24/25 years and his date of birth mentioned therein is 1962. However, his date of birth entered in the service book is 01.07.1954 and on the basis of the same, he is going to be retired from service on 01.07.2014.

It is worth mentioning that the date of birth mentioned in the National Identity Card of the official concerned is 01.01.1962 (copy of which is also enclosed herewith for ready reference).

It is therefore requested that this Directorate may kindly be advised as to whether the change in the service book at this belated stage is admissible under the rules or otherwise.

[Signature] 5/6/14
Director Health Services
FATA, Peshawar

Attested

True copy as original

[Signature]

[Signature] 4/6/14
O.S.
M. A. P.P.



DIRECTORATE GENERAL HEALTH SERVICES, GOVT. OF KHYBER PAKHTUNKHWA, PESHAWAR.
NO. _____ /PERSONNEL
DATED 10/06/2014

"G"

1076
30/6/14

To,

The DHS (FATA)
Khyber Pakhtunkhwa Peshawar.

Subject: CHANGE IN THE RECORDED DATE OF BIRTH IN THE SERVICE BOOK.

Dear Sir,

I am directed to refer to your letter No. 1039/DHS/FATA/Admn dated 05.06.2014, on the subject noted above.

It is to inform you that date of birth once recorded in the Service Book can only be altered within two years of appointment, after proper enquiry.

However at this belated stage date of birth cannot be changed.

Thus the applicant may be informed accordingly.

ASSISTANT DIRECTOR (P-II)
DIRECTORATE GENERAL HEALTH SERVICES, K.P.K PESHAWAR

Hafiz S.M Ali Shah

ASB
Pl. look into this

Attested

True copy as original

DS II
SO III

24/6/14

24/6/2014
Process No

24/6/14

S.A.

16 ~~16~~



**GOVERNMENT OF KHYBER
PAKHTUNKHWA
HEALTH DEPARTMENT**

"H"

No.SOH-IV/4-4/C.IV
Dated Pesh: the 23-7-2014

To:

Mr. Aurangzeb S/O Muhammad Remzan,
Naib Qasid, Directorate of Health Services, FATA,
Resident of Shah Qabool District Peshawar.

SUBJECT: CHANGE IN THE RECORDED DATE OF BIRTH IN THE SERVICE BOOK.

I am directed to refer to your application on the subject noted above and to inform you that your request for the change in the recorded date of Birth in the service book has been regretted.

SECTION OFFICER-IV
HEALTH DEPARTMENT

Copy to :

- 1. PS to Secretary Health.
- 2. PA to Special Secretary Health.

[Signature]
SECTION OFFICER-IV

e/c

Re
[Signature]
23/7/14

Attested

True copy as original

[Signature]

17

18

DIRECTORATE OF HEALTH SERVICES FATA
FATA SECRETARIAT WARSAK ROAD PESHAWAR.

OFFICE ORDER

Sanction is hereby accorded to the grant of 365 days encashment in lieu of LPR in favor of Mr Aurangzeb Naib Qasid of this Directorate.

He will be stand retired from service on 30.06.2014 (After noon) on attaining the age of superannuation.

Sd/-----

Director Health Services
FATA, Peshawar

No. 158-2-6 /DHS/FATA/Admn

Dated: 26 / 06 / 2014

Copy forwarded to the:

1. ADPR Sub Office Peshawar.
2. Deputy Director (Admn) DHS FATA.
3. Accountant local office Peshawar.
4. Official concerned.

Director Health Services
FATA, Peshawar.

Attested

True copy as original



Lady Reading Hospital Peshawar

Out-Patients Department

RS-10/-

570 1870212 54 11-SEP-14 11:40:50
 Yearly NCFMS FEB Date:
 Name: OPD: Age 45Y

فری ایجوکیشن سروس کیلئے 137 پر کال کریں۔

CT Scan Nose
and PNS

Rx

Pb: ~~referral~~ request ^{40%}
in D

Pb: Dengan Dr

- Pb: Acabel 28 (10)
in

ref to Dental OPD

Lt Lygonally bone & arch.

Adv

Conservative management

R₂

Lab Argentini 1900 (12) -

17/19

Lab & Present 500mg (10)

17/1

~~Lab 500mg~~

Lab Buprenorphine (10)

17/1

Ⓢ

Adv X-ray OPG

Ⓢ

KHYBER COLLEGE OF DENTISTRY, PESHAWAR
Out-Patients Department

Rs. 10/-



S. No. _____

FREE *Adm HBS*
MW
Lee

Patient ID: 52999
 Patient Name: AURANGZEB
 Sex: Male Age: 52
 Date & Time: 18-SEP-14 10:09:43

- Hx of Fall
 Trauma to
 upper jaw left side
 Ref. to Surg - I

Adm
~~*15/5*~~
 Digital
 OTC

Refer to NOS
 For EXT 4.5

Apical impaction at 1st
 Hx of trauma - 1 month

Adv.
 Periapical
 Xray 4.5
23

Trauma

Rx:-

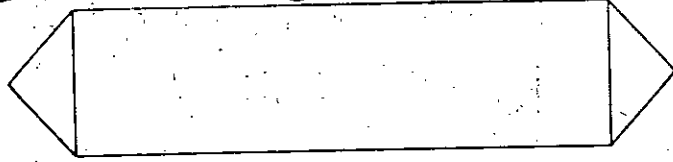
1- Cap: keto cof 500mg
1+1+1 - 0.56

2- Tab: Flagyl 400mg
1+1 - 0.56

3- Tab: ceftam 50mg
1+1+1
1+1+1

Jamun

بعدالت و دسترس سروس ٹر- بیوریل 12PLA



ساحل

2015 پنجاب

اور نگرین بنام

Service Appeal

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی وکل کاروائی متعلقہ

آن مقام لیسٹہ کیلئے محمد عمران خان و محمد ضیاء اللہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ پر حلف دیے جواب دی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و رڈ پیار مرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا ایبل کی برآمدگی

اور منسوخی نیز دائر کرنے ایبل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی 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 مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے

سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

2015

مارچ

بہ

03

المرقوم

اور نگرین

کے لئے منظور ہے۔

Accepted

[Signature]

[Signature]

Accepted

BEFORE SERVICE TRIBUNAL PESHAWAR.

Appeal No. 202/2015

Mr. Aurangzeb Naib Qasid.....Appellant.

Versus.

Government of Khyber Pakhtunkhwa & Others.....Respondents.

Parawise comments on behalf of respondent No.1 & 4.

Preliminary Objections:-

1. That the appellant has no cause of action.
2. That the appeal is not maintainable and also time barred.
3. That the appeal is bad for mis joinder and non joinder of necessary parties.
4. That the appellant has no locus standi and also estopped by his own conduct.
5. That the appellant has not come to the Tribunal with the clean hands.

FACTS.

1. Pertain to record needs no comments.
2. Pertain to record needs no comments.
3. Pertain to record needs no comments.
4. Incorrect. The DHS (FATA) Peshawar was informed by this Directorate vide letter No. 4422/Personnel dated 12.06.2014, Date of birth once recorded in the Service Book can only be altered within two years of appointment , after proper enquiry. However, at this belated stage date of birth cannot be changed (Copy attached at Annexure-A).
5. As in Para 4 above.
6. As in Para 4 above.
7. As in Para 4 above.
8. Pertain to record No comments.
9. Pertain to record No comments.

GROUND:

- A. Incorrect, proper codal formalities as per laid down procedure were adopted and after fulfillment all procedure the official was retired from service i.e. on attaining the age of superannuation (60 years).
- B. Incorrect. As in Para A above.
- C. Incorrect. As in Para A above.
- D. Incorrect. As in Para A above.
- E. Incorrect. As in Para A above.

F. Incorrect. As in Para 4 above.

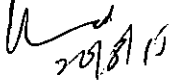
G. No comments.

H. No comments.

It is therefore, most humbly requested and prayed that the appeal in hand may please be dismissed with cost.



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 4)



Secretary to
Government of Khyber Pakhtunkhwa
Health Department, Peshawar.
(Respondent No.1).

07

OFFICE OF THE DEPUTY DIRECTOR, EXPANDED PROGRAMME ON IMMUNIZATION,
NWFP, PESHAWAR.

OFFICE ORDER.

Mr. Aurang-Zaib S/O Mohammad Ramzan, Dinbahar Colony Charsadda Road, Peshawar, is hereby appointed as Naib Qasid in BPS-1 plus other allowances as admissible under the rules purely on temporary basis against the existing vacancy of Naib Qasid under the control of Deputy Director, EPI NWFP, Pesh:

His appointment will be subject to the following terms and conditions.

1. He is domicile of N.W.F.P.
2. He is declared Medically fit for Govt: services.
3. He will be not entitle to any TA/DA for joining his 1st appointment and Medical Examination.
4. He will be liable to serve any where in NWFP.
5. He will be governed by such rules and orders as may be issued by the Govt: for the category of Govt.
6. If he wish to resign any time he will resign in writting by giving a prior notice of one month failing which one month pay will have to be forfeited.
7. His appointment in the Health Department is purely on temporary basis and his service are liable to be terminated at any time without any reasons being assigned.
8. If he accept the offer on the above terms and conditions he should report for duty to the Dy: Director EPI NWFP, Peshawar within 15 days after the receipt of this order.

Sd/
Deputy Director,
Expanded Programme on Immunization
N.W.F.P. Peshawar.

No. 2482-03/EPI dated Peshawar the 24-9 /1986.
Copy forwarded to the :-

1. ✓ Accountant EPI Head Quarter NWFP, Peshawar.
2. ✓ Mr. Aurangzeb S/O Mohammad Ramzan Dinbahar Colony Charsadda Road, Peshawar.

for information and necessary action.

Attested.
[Signature]
Deputy Director (Personnel),
D.G Health Services
Peshawar.

[Signature]
Deputy Director,
Expanded Programme on Immunization,
N.W.F.P. Peshawar.

MEDICAL CERTIFICATE

Name of official: Mr. Aizang Zakh
 Caste or race: Afghan
 Father's name: Muhammad Panzai
 Residence: H.No. 4877, Dargah Para Road, Muziblar
Babwan, Dist. Nowsheerabad, Subd. Qabul, Peshawar
 Date of birth: 1917
 Exact height by measurement: 5-6
 Personal mark or identification: Red Mark on Forehead
 Signature of the official: [Signature]
 Signature of Head of office: _____

Seal of office

I do hereby certify that I have examined Mr. Aizang Zakh a candidate
 for employment in the Office of the D.D.E.P.I.
 and cannot discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except None

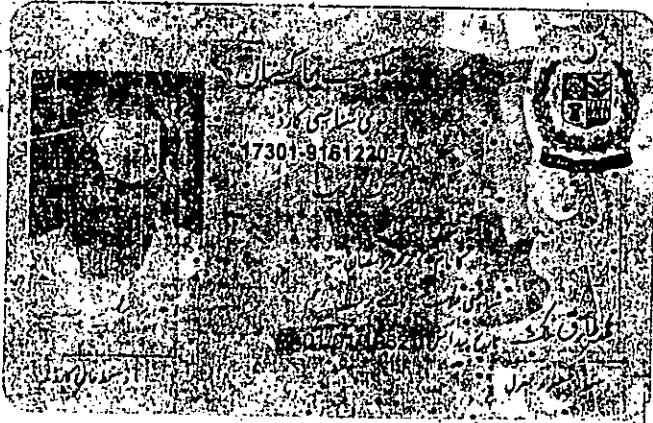
I do not consider this as disqualification for employment in the office of the D.D.E.P.I.
 His age according to his own statement 24/25 year and by appearance about
 year 24/25

[Signature]
 MEDICAL SUPERINTENDENT
 CIVIL HOSPITAL, Peshawar
24/9/56

Attested

LEFT HAND THUMB AND INDEX IMPRESSIONS
[Signature]
 Deputy Director (Personnel)
 U.G. Health Services
 Peshawar



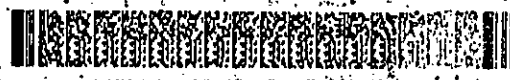


Attested.

Deputy Director (Personnel)
D.G. Health Services
Peshawar.

UR2 15 نامی سہرا 17301-9161220-7
پروفیشنل گھرانہ، پشاور
4877 گھرانہ سہرا، پشاور

07/05/2023 07/05/2013
پروفیشنل گھرانہ سہرا، پشاور



1358946807

Notes—This series of forms should be renewed or reattached at least every five years and the values in items 9 and 10 should be dated.

1. Name *William Earl*
2. Race *AFRICAN*
3. Residence *211 Baker Colony, Charleston, S.C.*

4. Father's name and residence *Michael R. King*

5. Date of birth by Christian era as nearly as can be ascertained *1-7-1954*

6. Exact height by measurement *5-5*

7. Physical marks for identification *No other marks seen on this subject.*

8. Left hand thumb and finger impressions of (non-gaused) officer

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant

10. Signature and designation of the Head of the Office, or other Attesting Officer

97

10	11	12	13		14
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government	
Signature and stamp of the head of the office or other attesting officer in station of columns 1 to 3	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Government to which debit	Refer to recorded or Government of the (So)
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Appointed as Joint Qand in B.P. I with Special Director B.P. SWPP Peshawar 24.9.1987</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Appointed as Joint Qand in B.P. I (Co-12-B) FD-(PRC)-178 22.7.1987</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Deputy Director N.W.F.P. Peshawar</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Deputy Director (Personnel) D.L. Health Services Peshawar</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Deputy Director N.W.F.P. Peshawar</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Deputy Director N.W.F.P. Peshawar</p>		
<p>Deputy Director N.W.F.P. Peshawar</p>			<p>Deputy Director N.W.F.P. Peshawar</p>		