

Form-A

FORM OF ORDERSHEET

Case No. 409/2024

Order or other proceedings with signature of judge

3

19.03.2024

As per direction of the Worthy Chairman the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 19.03.2024. The counsel for the appellant has been informed telephonically.


REGISTRAR

Respected Sir,

It is submitted that the present appeal was received on 22.02.2024, which was returned to the counsel for the appellant for removing objections (Flag-A). Today i.e. 27.02.2024 the learned counsel re-filed the appeal partially removing the objection No. 1 (Flag-B).

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

*Be kind to for a
the Bench
14/02/24*

[Signature]
28/2/24
REGISTRAR

The appeal of Mr. Muhammad Junaid Khan received today i.e on 14 .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- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no. 1 & 3 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2- Copies of salary slips mentioned in para-4 of the memo of appeal are not attached with the appeal be placed on it.
- 3- Annexures of the appeal are unattested.
- 4- Memorandum of appeal is not signed by the appellant.

No. 334 /S.T.

DI. 15/02 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muzzammil Khan Mohmand Adv.
High Court Peshawar.

Respected Sir,

Respondant no. 3 is mandatory,
therefore, ~~be~~ humbly requested
not to delete it.

Regards



Muzzammil Khan Advocate

Respected Sir,

~~be~~ It is humbly submitted that ⁹ we have same nature cases ^{M. Rehman vs Health which is fixed for 3/11/2024 S.A. 79/23.} already pending before this Honble Tribunal, in which the respondent department sends letter to issue salary, but the accounts officer does not comply just ~~be~~ pretending that we ~~have~~ are not party to the petition/appeal, nor any specific directions have issued to us, by the Honble Tribunal.
It is therefore requested that Respondant

No. 2 may kindly be retain in the
list of respondents.
Shall be grateful.

Muzammil Khan Advocate

12/03/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 409 /2024

Mr. Muhammad Junaid Khan

.....**APPELLANT**

VERSUS

Health Department

.....**RESPONDENTS**

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Dated: 14/02/2024

THOROUGH:

APPELLANT

MUZZAMMIL KHAN MOHMAND
&

MAHMOOD JAN

KHANZAD GUL
ADVOCATES HIGH COURT

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 409 /2024

**Mr. Muhammad Junaid Khan, Ward Attendant (BPS-04),
DHO Office Nowshera.**

.....**APPELLANT**

VERSUS

- 1- The District Health Officer, District Nowshera.
- 2- The District Accounts Officer, Nowshera.

.....**RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE IMPUGNED INACTION OF THE RESPONDENTS BY NOT
RELEASING THE MONTHLY SALARIES OF THE APPELLANT
W-E-F FEBRUARY, 2023 TILL DATE AND AGAINST NO
ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN THE STIPULATED PERIOD OF NINETY
DAYS.**

PRAYER:

**That on acceptance of this appeal the respondents may
please be directed to release the monthly salaries of the
appellant w-e-f February, 2023 till date. Any other remedy
which this august Service Tribunal deems fit that may also
be awarded in favor of the appellant.**

R/SHEWETH:

ON FACTS:

**Brief facts giving rise to the present appeal are as
under:**

- 1- That the appellant is naturally born bonafide citizen of Pakistan.
Copy of CNIC of appellant is attached as annexure.....A**
- 2- That the appellant was initially appointed as Ward Attendant BPS-
04 through Departmental Selection Committee at D.H.O Office
Nowshera vide order dated: 19/10/2022. Copy of appointment
order is attached as annexure.....B**
- 3- That the appellant was examined by the concerned medical officer
and was found fit and awarded fitness certificate. That the appellant
submitted his arrival report as Ward Attendant in D.H.O office
Nowshera on 20/10/2022. That the service book of the appellant**

was also prepared accordingly. Copies of the medical certificate and arrival report are attached as annexure.....C&D

4- It is pertinent to mention here that the salary of the appellant was released after verification of his educational antecedents but astonishingly the salary of the appellant for the month of February was stopped by the respondents and till date the salaries of the appellant w.e.f. February, 2023 have been withheld by the respondents without any clear justification and any rhyme. Copies of salary slips are attached as annexure..... E

5- That till date the appellant is performing his duties regularly and with devotion but despite of that the salaries of the appellant have been withheld by the respondents. Copy of the attendance register is attached as annexure..... F

6- It is also pertinent to mention here that the appellant is highly qualified individual and having degree of Bachelor of Business Administration (BBA Honors).Copies of educational testimonials are attached as annexure.....G

7- That appellant feeling aggrieved from the inaction of the respondents by not releasing the monthly salaries of the appellant w.e.f. February, 2023 till date preferred departmental appeal but the same has not been decided within the stipulated period of ninety days. Copy of the Departmental appeal is attached as annexure H

8- That feeling aggrieved from the inaction and having no other efficacious remedy, the appellant filed the instant appeal on the following grounds inter alia.

GROUND:

- A- That the inaction of respondents by not releasing the monthly salaries of the appellant w-e-f February, 2023 till date is against the law, facts, norms of natural justice and materials on record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not releasing the monthly salaries of the appellant w-e-f February, 2023 till date and as such the inaction of the respondents is violative of law and rules.

- D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eyes of law.
- E- That as per the numerous judgments of the Apex Court of Pakistan work done must be paid. Keeping in view this principle the respondents are bound to release the monthly salaries of the appellants.
- F- That under Article 11 of the Constitution of Pakistan, 1973 read with Section-17 of the Civil Servant Act, 1973 the respondents are bound to release the pay of the appellants w.e.f. February, 2023 till date.
- G- That appellants seek permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the instant appeal of the appellants may kindly be accepted as prayed for.

Dated: 14/02/2024

THROUGH:

APPELLANT

MUZZAMMIL KHAN MOHMAND
&

MAHMOOD JAN

KHANZAD GUL
ADVOCATES HIGH COURT

AFFIDAVIT

I, **Mr. Muhammad Junaid Khan**, Ward Attendant (BPS-04), DHO Office Nowshera, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

DEPONENT

(4) (A) (3)

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Muhammad Junaid Khan**
محمد جنید خان

Father Name: **Alamgir Khan**
الامگیر خان

Gender: **M** Country of Stay: **Pakistan**

Identity Number: **17201-8974807-9** Date of Birth: **01.05.1989**

Date of Issue: **25.09.2019** Date of Expiry: **25.09.2029**

Holder's Signature

17201-8974807-9

502601169319

محمد جنید خان، طارق نوشہرہ

محمد جنید خان، طارق نوشہرہ

Registrar General of Pakistan

گمشدہ کارڈ ملے پر قریبی لیڈ بکس میں ڈال دیں

(5) (B) 300



OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA

Phone & Fax: 0923-580759

E-Mail: nowshera.edoh@gmail.com

OFFICE ORDER

Consequent upon / approval recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose. MR. Muhammad Junaid Khan S/O Alamgir Khan is hereby appointed as Ward Attendant BPS-04, against the vacant post of Ward Attendant under the control of this office with immediate effect, with the following terms and conditions.

1. The appointment shall be subject to the Medical fitness and initially on probation for a period of 02-years.
2. The services can be dispensed with during the probation period on unsatisfactory performance.
3. You will not entitle to any TA / DA for medical examination in joining the 1st appointment.
4. In case if 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 proceedings.
5. The appointment will be governed such rules and order issued by the Govt: from time to time.
6. If you wish to resign from service, you will have to submit resignation on writing One month in advance or deposit One Month pay in the Govt: Treasury.
7. If the above Terms & Conditions are acceptable to you than you should report to DHO Office Nowshera within 07-days after the receipt of this appointment order.

Sd/ _____

District Health Officer

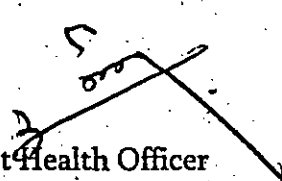
Nowshera

Date: 19 / 10 / 2022.

No. 3206-70 / DHO NSR

Copy forwarded to the:

1. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer, Nowshera.
3. Accounts Section DHO office Nowshera.
4. Mr. Muhammad Junaid Khan S/O Alamgir Khan Mohallah Naib Baba Pabbi, District Nowshera.
5. Office record.


District Health Officer
Nowshera

(6) (C)



D.H.Q. Hospital, Nowshera

Medical Certificate



NIC No:

1	7	2	0	1	8	9	7	4	8	0	7	-	9
---	---	---	---	---	---	---	---	---	---	---	---	---	---

Name of Official Muhammad Junaid Khan

Caste of race Muslim

Father's Name Mr. Alamgir Khan

Residence Nair's Babi Pabbi

..... Tehsil Pabbi District Nowshera

Date of Birth 01-05-1989

Exact height by measurement 5-7

Personal mark of identification

Signature of Official

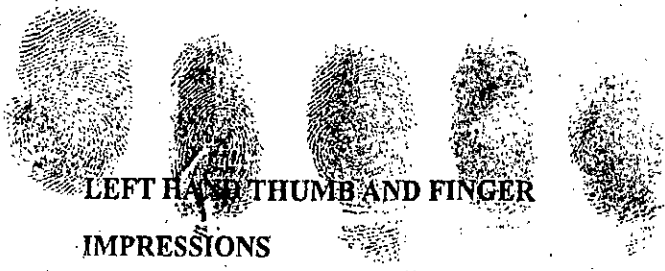
Signature of head of Officer

[Signature]
District Health Officer
Nowshera

[Signature]
Head of Office

I do hereby certify that I have examined Mr. Muhammad Junaid a candidate for employment in the Office of the DHO Nowshera and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except fit

I do not consider this as disqualification for employment in the office of the DHO Nowshera His age according to his own statement year and by appearance about year.



LEFT HAND THUMB AND FINGER IMPRESSIONS

[Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera
19/06/22

(7)

(D)

(S)

To


The DHO NSR


Subject:- Arrival Report

Respected Sir,

With ref. DHO of fire Refer no. 3266-DHO dated 19-10-2022.

I beg to submit my arrival report on 20/10/22.

Yours obediently
Muhammad Juaid Khan
ward attendant 


~~Deputy District Officer~~
Nasirabad

Name: MUHAMMAD JUNAID KHAN
WARD ATTENDANT

CNIC No. 1720189748079

GPF Interest Free

04 Active Temporary

NTN

GPF #:

01d #:

NR4639

PAYS AND ALLOWANCES:

0001-Basic Pay

14,690 00

1001-House Rent Allowance 45%

2,187 00

1210-Convey Allowance 2005

1,785 00

1300-Medical Allowance

1,500 00

2311-Dress Allowance 2021

1,000 00

2312-Washing Allowance 2021

1,000 00

2313-Integrated Allowance 2021

600 00

2341-Dispr Red All 15% 2022KP

1,485 00

2347-Adhoc Ret At 15% 22(PS17)

1,485 00

Gross Pay and Allowances

25,732 00

DEDUCTIONS

GPF Balance 0.00

Subre

830 00

3501-Benevolent Fund

600 00

3534-R Ben & Death Comp Fresh

300 00

(Better copy)

Pers No: 1011681

Name: Muhammad Junaid Khan

EE Group: Active Temporary Per Area Khyber Pakhtunkhwa

EE Sub Group: Grade 04 Cost Center District Health Deptt

Choose: 01-01-1800 to 11012.9999

Start Date	End Date	Act	Action Type	Actt.	Reason of Action
01.02.2023	31.12.9999	10	Leaving	21	Temporary Practice
01.11.2022	31.01.2023	60	Transfer Applicant Data		

- Person
- Collect
- Search
- Free 502

Pers No:
 Name:
 EE group: Active Temporary Full-time Other Part-time
 EE subgroup: Grade 04 Cost Center: District Health Off
 Choose to

Start Date	End Date	Act	Action Type	ActR	Reason for action	C	E
01.02.2023	31.12.9999	10	Leaving	21	Temporary Factive	0	1
01.11.2022	31.01.2023	60	Transfer working data				

10

ایکس۔ایو۔آر) ۶۲

O.P.S.S.

ایمپلائمنٹ رجسٹریشن کارڈ

ضروری

جن امیدواروں کے پاس تعارفی کارڈ (X-3) موجود نہ ہو۔
ان کو دفتر روزگار کا نامزد کردہ تصور نہ کیا جائے۔

SERVICE
UNPAID

رجسٹریشن نمبر / ہاؤسنگ / اکویشن کوڈ نمبر ۵۹۹-۱۵

نام - محمد رفیق خان ولدیت ازدیچت عالمگیر خان
پتہ - نائب سائبر کی نوٹس

شخصی کارڈ نمبر ۹-۸۵۷۸۵۷-۱۷۲۴۴۱

تاریخ تجدید ۱۱/۱۱/۱۱ دستخط منجھرا

تاریخ ہائے تجدید
MANAGER

E. Joyder Exchange
No. 11/11/11

۱۱/۱۱/۱۱ - ۱۱/۱۱/۱۱

ضروری اطلاع برائے امیدوار

جب آپ کو ملازمت مل جائے تو فوراً منسلک جوابی کارڈ پر دفتر روزگار
کو اطلاع کریں۔ اس کارڈ پر ڈاک کا ٹکٹ لگانے کی ضرورت نہیں۔

بخدمت جناب منجھرا صاحب

دفتر روزگار انٹرسون

Handwritten signature and stamp



Employee Master File Creation Form

FORM: PAY01

(Applicable for both Payroll and GP Fund)

Employee ID (To be assigned by office)

--	--	--	--	--	--	--	--	--	--

01 OFFICE OF THE District Health Officer, Nowshera

02 FOR THE MONTH OF: September 2022

03 DDO Code (Cost Center) NR4639 Description 04

PERSONNEL ACTIONS - INFO TYPE 00

05 Date of Entry (DD/MM/YYYY) 20/09/2022

06 Current Govt NR

07 Employee group

08 Employee grade (Sub group) 04

09 Employee NIC Number

10 DOB (DD/MM/YYYY) 01/05/1989

11 Date of entry into Govt service (DD/MM/YYYY) 20/09/2022

12 Reason for action

*TR 965
18/11/22*

PERSONAL DATA - INFO TYPE 0002

13 Title Mr Miss Ms Mrs

14 Last name KHAN

15 First name MUHAMMAD JUNAID

16 Father/Husband name ALAM GIR KHAN

17 District of domicile Nowshera

18 Marital status

19 City of Birth Nowshera

20 Date of Marriage/Since (if applicable) DD/MM/YYYY

21 Province of Domicile KPK

22 No. of dependents

23 Nationality

24 Religion

ORGANISATIONAL ASSIGNMENT - INFO TYPE 0001

25 DDO Code (Cost Centre) NR

26 DDO Code (Fund Centre) NR4639

27 District (Sub area)

28 Contract Government KPK Government Baluchistan Government Punjab Government Sindh Government

29 Position Gazetted Non Gazetted

30 Designation SD/15986 W/A

31 Ministry (Organisational Unit) 60000007 Health

32 Fund Section

33 Payroll Section 99

34 Bucking no (if any)

PRESENT ADDRESS - INFO TYPE 0006

35 C/O Naub BABA Poshan Tehsil DISTRICT NOWSHERA

36 House no / Street

37 Postal Code

38 City

39 District Nowshera

40 Province / Region

41 Contact no

42 Company Housing Yes No

13

(F)

ATTENDANCE ROLL FOR

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
64. Mawana Kiron	X	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
65. Burendulch	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
66. Saimonishan	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
67. Mawana Kiron	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
68. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
69. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
70. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
71. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
72. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

MONTH OF

20

	21	22	23	24	25	26	27	28	29	30	31										
64. Mawana Kiron	X	P	P	P	P	P	P	P	P	P	P										
65. Burendulch	X	P	P	P	P	P	P	P	P	P	P										
66. Saimonishan	X	P	P	P	P	P	P	P	P	P	P										
67. Mawana Kiron	X	P	P	P	P	P	P	P	P	P	P										
68. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P										
69. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P										
70. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P										
71. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P										
72. Shaker Ali	X	P	P	P	P	P	P	P	P	P	P										

Shaker Ali

ATTENDANCE ROLL FOR THE MONTH OF

7/2001 20

	MONTH OF											
	1	2	3	4	5	6	7	8	9	10	11	12
46 Sharif Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
47 Mansoor Subit W/A	P	P	P	P	P	P	P	P	P	P	P	P
48 Nigam Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
49 Zahir Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
50 Alwar Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
51 Saeed Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
52 Shahid Ali Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
53 Sahib Patwari W/A	P	P	P	P	P	P	P	P	P	P	P	P
54 Nasir W/A	P	P	P	P	P	P	P	P	P	P	P	P
+ 55 Muzikam W/A	P	P	P	P	P	P	P	P	P	P	P	P
56 Shaja												
57 Syed Wasim Ali W/A	P	P	P	P	P	P	P	P	P	P	P	P
58 Naveed W/A	P	P	P	P	P	P	P	P	P	P	P	P
59 Saeed Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P
60 Javed Khan W/A	P	P	P	P	P	P	P	P	P	P	P	P

(50)

(51)

11/11/11

MONTH OF		ATTENDANCE ROLL FOR	
1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	

(16)

17

46	Abul Kalam	PPPPP	PPPPP	PPPPP	PPPP
47	Muhammad Ishtiaq Belushi	PPPPP	PPPPP	PPPPP	PPPP
48	Usman Ali	PPPPP	PPPPP	PPPPP	PPPP
49	Shahid Khan	PPPPP	PPPPP	PPPPP	PPPP
50	Muhammad Akhtar Mali	PPPPP	PPPPP	PPPPP	PPPP
51	Muhammad Samir	PPPPP	PPPPP	PPPPP	PPPP
52	Fahim Samir	PPPPP	PPPPP	PPPPP	PPPP
53	Ziaul Karim	PPPPP	PPPPP	PPPPP	PPPP
54	Umar Samir Khan	PPPPP	PPPPP	PPPPP	PPPP
55	Fahim Samir Khan	PPPPP	PPPPP	PPPPP	PPPP
56	Muhammad Akhtar	PPPPP	PPPPP	PPPPP	PPPP
57	Muhammad Akhtar	PPPPP	PPPPP	PPPPP	PPPP
58	Muhammad Akhtar	PPPPP	PPPPP	PPPPP	PPPP
59	Muhammad Akhtar	PPPPP	PPPPP	PPPPP	PPPP

Serial No. 009574

Registration No. 091-08-13629



Iqra University

Islamic Republic of Pakistan

Be it known that

Muhammad Junaid Khan S/o Alamgir Khan

having satisfied in full the requirements for the degree of

Bachelor of Business Administration (Honors)

has been admitted to that degree on Thirty First day of December, 2012

with all the rights, privileges, and honours pertaining thereto.

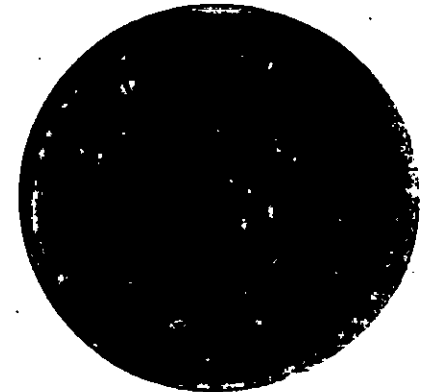
In witness whereof, this degree is granted bearing the following signatures and the seal of the University.

Given this Fifteenth day of July, 2013

Chancellor.

Registrar

President



(87)
(157)

S: No. 069751

Roll No.

37531

Group.

Pre-Engineering



Board of Intermediate and Secondary Education
Mardan N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION

SESSION 2008- ANNUAL

This is to certify that MUHAMMAD JUNAID KHAN *son of* ALAMGIR KHAN
and student of JINNAH MEMORIAL COLLEGE NOWSHERA CANTT. *Registration No.* 61-B/JMCN-2006
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education,
Mardan held in May/June, 2008 *as a* Regular *candidate. He Obtained* 572 *Marks out*
of 1100 and has been placed in Grade C *Representing* Good *The Examination was*
taken as a whole

Rashid
Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

S.No. 101771

Roll No. 5368

Group. Science



Board of Intermediate and Secondary Education

Mardan N.W.F.P. Pakistan

SECONDARY SCHOOL CERTIFICATE

SESSION 2006 - ANNUAL

This is to certify that MUHAMMAD JUNAID KHAN Son of ALAMGIR KHAN
and student of Ceena Public School Pabbi Nowshera has passed the Secondary School
Certificate Examination of the Board of Intermediate & Secondary Education Mardan, held in March/April, 2006 as a Regular candidate.
He obtained 631 marks out of 1050 and has been placed in Grade B representing Very Good. The candidate passed the following subjects:
1. English 2. Urdu 3. Islamiyat (Comp) 4. Pakistan Studies 5. Mathematics 6. Physics 7. Chemistry 8. Biology
His date of birth according to admission form is (in Figures) 01.05.89 (in Words) 1st May N/H Eighty Nine

Rashid Khan

Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure.

(H)

(90)

To

The Worthy
District Health Officer,
District Nowshera.

Subject:- DEPARTMENT APPEAL AGAINST NOT RELEASING THE MONTHLY SALARIES OF THE APPELLANT w.e.f FEBRUARY, 2023.

Respected Sir,

- 1) That the appellant was initially appointed as Ward Attendant BPS-04 through Departmental Selection Committee at D.H.O Office Nowshera vide order dated: 19/10/2022.
- 2) That the appellant was examined by the concerned medical officer and was found fit and awarded fitness certificate. That the appellant submitted his arrival report as Ward Attendant in D.H.O office Nowshera on 20/10/2022.
- 3) That the service nook of the appellant was also prepared accordingly.
- 4) It is pertinent to mention here that the appellant was taking his monthly salary on regular basis till January, 2023, but all of a sudden his salary stopped without any cogent and lawful reason.
- 5) That till date the appellant is performing his duties regularly and with devotion and upto the entire satisfaction of high ups.
- 6) It is also pertinent to mention here that the appellant is highly qualified individual and having degree of Bachelor of Business Administration (BBA Honors).
- 7) That since that very time the appellant has left no stone unturned and knocked every door of the respondent department, but in vain.

It is therefore, most humbly prayed that the salaries alongwith arrears of the appellant may kindly be released w-e-f February, 2023.

Dated: 27/10/2023


APPELLANT

Muhammad Junaid Khan,
Ward Attendant (BPS-04), DHO
Office Nowshera

بعدالت

خیبر پختونخواہ سروس ٹرانسپونل
کلباؤر

2 مخانب
بنام

موزخہ 14-02-2024

مقدمہ
دعویٰ سروس ایپل

جرم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
 آن مقام کے لئے سینئر لیٹل جنرل محمد نواز خان کیلئے۔
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلقہ دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا ایپل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار 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 مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب 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 سند ہے۔

محمد نواز خان
سینئر لیٹل جنرل

المرقوم 14-02-2024 ماہ 20

واہ العباد

کے لئے منظور ہے۔
14/02/2024

بمقام