

BEFORE THE LEARNED CHAIRMAN SERVICES TRIBUNAL
KHYBER PAKHTUNKHA PESHAWAR

IN Execution Petition _____/2024

Muhammad Jamil

Appeal No- 948/14

Khyber Pakhtunkhwa
Service Tribunal

Slary No. 13168

Dated 04-06-24

..... Petitioner

VERSUS

Govt of KPK etc

..... Respondent

CIVIL MISC APPLICATION FOR

1. To transfer instant execution petition to Peshawar.
2. To suspend operation of impugned order of Nomination of inquiry committee No. 8266-71/AE-6 dated 27.05.2024.

Respectfully Sir

1. That instant execution petition in Service appeal No 948/2014 decided on 18.10.2023, is pending adjuration Before camp court of this learned court at Dera Ismail Khan on 20.08.2024.

2. That as according to the order of this honorable court dated 18/10/2023, respondent authority was directed to conduct inquiry if any within 90 days, but decides conducting or concluding inquiry with in stipulated time period, respondent authorities has omitted to implement order of this Hon' able Court and yet the petitioner is still not being reinstated.

3. That as this Hon' able Court due to Eid and summer vacations, will be unavailable at its camp Court DI Khan, while the respondent authorities taking illegal benefit of the situation has ordered a second inquiry

20-08-24

committee after conclusion of a prior inquiry conducting by Dr Arif Mehmood principal PIMT DI Khan compliance order of the DG Health for conducting inquiry in respect of order of this Hon' able Court.

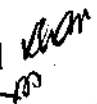
In such type of circumstances, when the respondent authorities has omitted to implement the order of this Hon' able Court in letter and spirit and now are conducting inquiry in abeyance/violation of order of this Hon' able Court, petitioner has no other appropriate remedy, but to approach to this Hon' able court as prayer for,

PRAYER

In view of submission made above it is humbly prayed that on acceptance the petition in hand execution petition titled above be transferred and fixed at Peshawar, for its implementation, as well as in the meanwhile impugned order for conducting inquiry may graciously be suspended till disposal of the main petition.

Dated 04/06/2024

Petitioner.

Muhammad Jamil 

Through


Counsel

Muhammad Idrees
Advocate DI Khan

BEFORE THE LEARNED CHAIRMAN SERVICED TRIBUNAL
KHYBER PAKHTUNKHA PESHAWAR

IN Execution Petition _____/2024

Muhammad Jamil

..... Petitioner

VERSUS

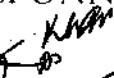
Govt of KPK etc

..... Respondent

AFFIDAVIT

It is solemnly affirmed on declare on oath that the application is true and correct and nothing has been concealed from this Hon' able Court

DEPONENT

Through 

Counsel



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: dgshs@kpk.gov.pk Office Ph: 091-9210169 Exchange: 011-9210187, 9210196 Fax: 091-9210230

OFFICE ORDER

In partial modification of this Directorate office order bearing Endst; No. 570-73/AE-VI the following enquiry Committee is hereby constituted to conduct an Inquiry in the Service Appeal No. 948/2014 titled Muhammad Jameel versus Govt. of Khyber Pakhtunkhwa and others Judgement of Khyber Pakhtunkhwa Service Tribunal Camp Court D.I.Khan announced on 18.10.2023 in respect of Mr. Muhammad Jameel S/O Muhammad Ibrahim District D.I.Khan and submit report alongwith recommendation within 14-days positively :-

1. Mr. Zia Ullah Dy: Secretary (Legal) Health Department Khyber Pakhtunkhwa (Chairman).
2. Dr. Muhammad Sohail Khattak Director (Litigation) DGHS Office (Member).

Sd/xxxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, Khyber Pakhtunkhwa,
PESHAWAR.

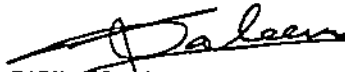
No. 8266-71 / AE-VI

Dated 9/7/5/2024

Copy forwarded to the-

1. Mr. Zia Ullah Dy: Secretary (Legal) Health Department Khyber Pakhtunkhwa.
2. Dr. Muhammad Sohail Khattak Director (Litigation) DGHS Office. (Enclosed attached)
3. Dr. Arif Mehmood PMO BS-19 Principal Paramedical Institute D.I.Khan.
4. M.S DHQ Hospital D.I.Khan with the request to produce all relevant record to the enquiry officer.
5. Assistant Director (Litigation-II) DGHS Office Peshawar w/r to his letter No. 5457-62/Lit dated 15.11.2023.
6. Mr. Muhammad Jameel S/O Muhammad Ibrahim attached to DHQ Hospital D.I.Khan with the direction to appear before the enquiry officer on the date time and place to be fixed by the enquiry officer.

For information and necessary action.


DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.



Allied Institute of Provincial Health Services Academy KP
Paramedical Institute of Medical Technologies
Dera Ismail Khan
Phone & Fax 0966-7470 Email pimt@pimt.gov.pk

No. /PIMT/DIK/Admin-Affairs/2024/ 726-30 Date: 10/05/2024

To,
Muhammad Jamil S/O Muhammad Ibrahim
DHQ (MTI) DI Khan.

Subject: INQUIRY MR. MUHAMMAD JAMIL S/O MUHAMMAD IBRAHIM VS GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH CHIEF SECRETARY PESHAWAR AND OTHERS.

R/Sir,

Reference Directorate General Khyber Pakhtunkhwa Office Order No. 570-73/AE-VI Dated. 19/01/2024, I have visited DHQ (MTI) on 27/04/2024, 03/05/2024, 07/05/2024, 08/05/2024, 15/05/2024. During these visits the undersigned directed you many repeatedly to provide/record statement on your concerns, if any, but till today no any statement/concern has been provided to undersigned by yourself.

It is therefore, once again and finally directed to provide relevant record/statement (attested) if any till 16/05/2024 before COB, so as to proceed further into the matter.

DR. ARIF MEHMOOD
INQUIRY OFFICER
PRINCIPAL, PIMT DI KHAN.

Cc:

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Director Hospital DHQ (MTI) Dera Ismail Khan.
3. Director Litigation, Directorate General Health Services, Khyber Pakhtunkhwa, Peshawar.
4. Director HRM, Directorate General Health Services, Khyber Pakhtunkhwa, Peshawar.

DR. ARIF MEHMOOD
INQUIRY OFFICER
PRINCIPAL, PIMT DI KHAN.