


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1004/2024

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 19/07/2024 | <p>The appeal of Mr. Sikandar Khan presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing, before Single Bench at Peshawar on 23.07.2024. Barcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

Appeal No. 1004 of 2024

Sikander Khan

VERSUS

Medical Superintendent DHQ Hospital Nowshera

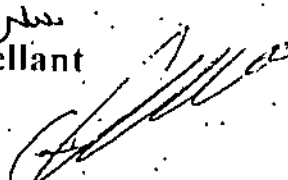
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Dated 19/07/2024


Appellant

Through


Kabir Ullah Khattak
Advocate High Court,
Peshawar.

①
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 1004 of 2024.

Sikander Khan Chowkider BPS-3 DHQ Hospital Nowshera

..... Appellant

VERSUS

Medical Superintendent DHQ Hospital Nowshera.

..... Respondent

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, FOR THE ADJUSTMENT/ALLOWING THE APPELLANT FOR PERFORMING HIS OFFICIAL DUTY WITH RESPONDENT DEPARTMENT AS THE APPELLANT WAS RESTRAINED ILLEGALLY AND WITHOUT ANY REASON FOR PERFORMING HIS OFFICIAL DUTY BY THE PETITIONER AGAINST WHICH THE APPELLANT FILED DEPARTMENTAL APPEAL DATED 10/04/2024 WHICH WAS NOT DECIDED WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

Prayer:

On acceptance of the instant service appeal, that the appellant may kindly be treated in accordance to law and rules by adjusting/allowing the appellant to perform his official duty with respondent Department alongwith all back benefits.

FACTS

The appellant respectfully submits as under:

1. That the appellant was appointed as Chowkider (BPS-03) at DHQ Hospital Nowshera on 17.01.2023 after fulfilling the codal formulates for the said post. (Copy of appointment order, Medical certificate, minutes of meeting of appointment committee, Academic documents and domicile are attached as Annexure A, B, C, D & E).
2. That the appellant submitted his arrival report with respondent department on 18.01.2023. (Copy of arrival report is attached as annexure- F)
3. That after appointment the appellant performed his official duty with full devotion and hard work and no compliant whatsoever has been made against the appellant.
4. That while performing his official duty with respondent department the appellant was illegally and without any reason restrained from his official duty w.e.f 05.04.2024 till now.
5. That the appellant submitted Departmental appeal for adjustment/allowing his official duty on 10.04.2024 to respondent department which was not responded within statutory period of ninety days. (Copy of Departmental appeal is attached as Annexure-G).
6. That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

GROUND

(3)

- A. That the appellant is a Civil Servant with respondent Department which has been clarified from the appointment order, medical certificate, and minutes of the meeting for appointment and arrival report.
- B. That the appellant has never been removed nor meaning there by that the appellant is still on the strength of respondent Department.
- C. That no charge sheet no statement of allegation and no show cause notice has been issued against the appellant.
- D. That no proceeding/explanation has been received to the appellant by the respondent Department.
- E. That there is no illegality on part of the appellant.
- F. That any other grounds will be raised at the time of arguments with the prior permission of this Hon' able court.


It is therefore most humbly prayed that on acceptance of the instant service appeal, that the appellant may kindly be treated in accordance to law and rules by adjusting/allowing the appellant to perform his official duty with respondent Department alongwith all back benefits.

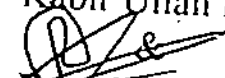
Any other remedy which this august tribunal deems fit that may also onward granted in favor of appellant.

Dated 19/07/2024


Appellant

Through


Kabir Ullah Khattak


Reeda Khan

Advocates, High Court,
Peshawar.

(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____ of 2024

Sikander Khan

VERSUS

Medical Superintendent DHQ Hospital Nowshera

ADDRESSES OF THE PARTIES

Sikander Khan Chowkider BPS-3 DHQ Hospital Nowshera

Appellant

Medical Superintendent DHQ Hospital Nowshera.

Respondents

Dated 19/07/2024

Appellant

Through

Kabir Ullah Khattak

&
Roeda Khan
Advocates, High Court,
Peshawar.

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____ of 2024

Sikander Khan

VERSUS

Medical Superintendent DHQ Hospital Nowshera.

AFFIDAVIT

I, Sikander Khan Chowkider BPS-3 DHQ Hospital Nowshera do hereby solemnly and oath that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court.


Deponent

5 A (b)

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

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

No. _____ / DHQ NSR

Date: ____ / ____ / 2023

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 17-01-2023, Mr. Sikandar Khan S/O Qaisar Khan is hereby appointed as Chowkidar BPS-03 against the vacant post of Chowkidar BPS-03 at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
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 fund forged / 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 issued by the Govt. from time to time.
6. 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.
7. 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.

Sd _____
Medical Superintendent,
DHQ Hospital, Nowshera
Date: 2 / 1 / 2023

No. 838-42 / DHQ NSR

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Sikandar Khan S/O Qaisar Khan Rashakai Tehsil and District Nowshera.
5. Office Record.

Medical Superintendent
DHQ Hospital
Nowshera

Medical Superintendent,
DHQ Hospital, Nowshera
Medical Superintendent
DHQ Hospital



S A (b)

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

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

No. _____ / DHQ NSR

Date: ____/____/2023

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5. The appointment will be governed by 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 in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. 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.

Sd _____
Medical Superintendent,
DHQ Hospital, Nowshera
Date: 17/1/2023

No. 738-12 / DHQ NSR

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Sikandar Khan S/O Qaisar Khan, Rashakai Tehsil and District Nowshera
5. Office Record.

Medical Superintendent
DHQ Hospital
Nowshera

Medical Superintendent,
DHQ Hospital, Nowshera
Medical Superintendent
D.H.

"B" 7

D.H.Q. Hospital, Nowshera
Medical Certificate

NIC No: 117201-3183520-1



Name of Official: Sikandar Khan

Caste of Race: Muslim

Father's Name: Qasim Khan

Residence: Nowshera

Date of Birth: 10-03-2001

Exact height by measurement: 5'6"

Personal mark of identification: Nil

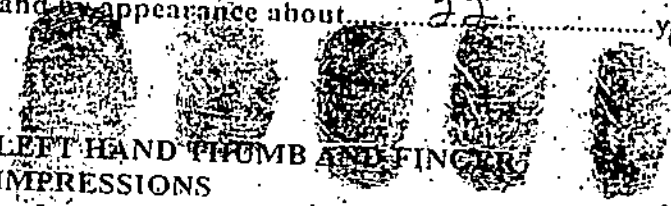
Signature of Official: [Signature]

Signature of head of officer: [Signature]

Head of Office [Signature]
Medical Superintendent
D.H.Q. Hospital
Nowshera

I do hereby certify that I have examined Mr. Sikandar Khan a candidate for employment in the Office of the M.S. DHQ Hospital Nowshera and could not discover that he had any disease communicable or other constitutional affection or bodily infirmity except Fit

I do not consider this as a disqualification for employment in the office of the As. Asst. His age according to his own statement 22 year and by appearance about 22 year.



LEFT HAND THUMB AND FINGER IMPRESSIONS

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

Medical Superintendent
D.H.Q. Hospital
Nowshera

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



(C) (8)

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

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com


MINUTES OF MEETING OF APPOINTMENT COMMITTEE

A meeting of Departmental Selection / Appointment Committee DHQ Hospital Nowshera for (recruitment purpose) comprising of the following officers of DHQ Hospital Nowshera

- | | | | |
|----|-------------------|--------------------------|----------|
| A. | Dr. Mujtaba Ali | (Medical Superintendent) | Chairman |
| B. | Dr. Sadeeq ullah | (PMO) | Member |
| C. | Dr. Afzaal Asghar | (DMS) | Member |

is hereby held at the Office of the undersigned on 17-01-2023 to scrutinize the application along with relevant documents i.e Employment Exchange Card, Domicile & CNIC in R/O Mr. Sikandar Khan S/O Qaisar Khan for appointment against the vacant post of "Chowkidar BPS-03" under the control of DHQ Hospital Nowshera.

After scrutinizing relevant documents in R/O above named official, the Chairman and Members of Departmental Selection / Appointment Committee are in the opinion to appoint Mr. Sikandar Khan S/O Qaisar Khan against the vacant post of "Chowkidar BPS-03" at DHQ Hospital Nowshera on need and urgency basis in the interest of public.

- | | | | |
|----|-------------------|----------|---|
| A. | Dr. Mujtaba Ali | Chairman |  |
| B. | Dr. Sadeeq ullah | Member | _____ |
| C. | Dr. Afzaal Asghar | Member | _____ |

Medical Superintendent
DHQ Hospital
Nowshera

Medical Superintendent
DHQ, Hospital
Nowshera

Medical Superintendent
DHQ, Hospital
Nowshera

Medical Superintendent,
DHQ Hospital, Nowshera
Medical Superintendent
D.H.C. Hospital

D 9

Government Higher Secondary School



RASHAKAI NOWSHERA

SCHOOL LEAVING CERTIFICATE

S. No. 791 File No. 549 EMIS Code 26264 Adm. No. 8445

Student's Name Sikandar Khan

Father's Name Qaisar Khan

Date of Birth (in figures) 02/01/2001 In words 10th March 2001

Class in which he was reading 8th A Class to which he was promoted 8th

Date of Admission 08-04-2013 Date of Withdrawal 31-03-2017

Dues Paid upto 31-03-2017 Conduct Good

Incharge [Signature]
Date of Issue 09/09/2023

[Signature]
Principal
GHSS Rashakai
Nowshera

Medical Superintendent,
DHQ Hospital
Nowshera

[Signature]
Medical Superintendent,
DHQ Hospital, Nowshera



10

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN**
Khyber Pakhtunkhwa, Pakistan

BISE MARDAN
MARDAN

S.No.MB 002040

Roll No: 82024
Enrolment No: _____
Group: HUMANITIES



DUPLICATE

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(Part-I) 9Th
Session 2018 (Annual)

Sikandar Khan Son / Daughter of Qaiser Khan
of Institution/District: Nowshera
has secured the marks shown against each subject in the Secondary School Examination (9th)
held in the month of March/April as Private Candidate.

| Subject | Marks | MARKS OBTAINED | | | |
|-----------------------|-------|----------------|-----------|-------|--------------|
| | | Theory | Practical | Total | In Words |
| 1. English | 75 | 7 | - | | |
| 2. Urdu | 75 | 30 | - | 30 | Thirty Only |
| 3. Islamiyat (Correl) | 50 | 18 | - | 18 | Eighteen |
| 4. Pakistan Studies | 50 | 6 | - | | |
| 5. Maths | 75 | 10 | - | | |
| 6. General Science | 75 | 38 | - | 38 | Thirty-Eight |
| 7. Islamic Studies | 75 | 27 | - | 27 | Twenty-Seven |
| 8. Pashio | 75 | 33 | - | 33 | Thirty-Three |

Total 550

Remarks

E.I.P.S.(M)

Date of Birth: 10th March 2001

Prepared by: _____ Result Date: 04-07-2018

Checked by: _____ Issue Date: 08-09-2020

Note: - Errors & Omissions are excepted. Any mistake in above particulars must be intimated within 30 days after declaration of result

Asadullah
Controller of Examinations
BISE, Mardan

Medical Superintendent
DHQ Hospital
Nowshera

1 2 3
Medical Superintendent,
DHQ Hospital, Nowshera
Medical Superintendent
DHQ Hospital

Rs :20/- (Twenty Rupees Only)



CERTIFICATE OF DOMICILE

The Pakistan Citizenship Act, 1951 (Act, II of 1951)
Rules made there under (vide rule No.23)

I Sikandar Khan Son/Daughter/Wife of Qasir Khan

Declare that I was born of parents who are permanently domiciled in Khyber Pakhtunkhwa Province, having belonged to it by birth/settled in it.

I belong to Village / Mohallah Mayava Khal Rashakai

UC Rashakai VC No. 2

Tehsil Nowshera District Nowshera

Name in Block Letters Sikandar Khan Signature/Thumb Impression of Applicant

Dated 08-09-2023

Contact No. 0315-9378266

Pursuance to the declaration dated 08 filled by

Mr./Mrs./Miss Sikandar Khan S/o, D/o, W/o Qasir Khan

CNIC No 17201-3183520-1 Domiciled in the Khyber Pakhtunkhwa

Province, it is hereby certified that the said Sikandar Khan

is born of parents who are permanent residents of Khyber Pakhtunkhwa Province having

belonged to it by birth / settled in it I have satisfied over leaf verification/ through my

relevant sources that the above declaration is true and duly certified overleaf.

No 7583 DB/DC Nowshera Date 11/09/2023

Assistant Commissioner
Assistant Commissioner
Nowshera

COUNTER SIGNED BY

Deputy Commissioner
Nowshera
Deputy Commissioner
Nowshera

SECRETARIAT OF THE GOVERNMENT OF INDIA

173-1-5-213-9

0331-3131452

SECRETARIAT
OFFICE OF THE
SECRETARY

Handwritten signature and name: *Secretary*

172-1-8-213-4

0315-408315

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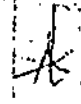
To

Medical Superintendent,
DHQ Hospital Nowshera.


Subject: ARRIVAL REPORT
Sir.

With reference Office Order No 838-42 NSR date 17/01/2023 on account of appointment as chowkidar BPS-03. I hereby submit my arrival report for official duty today on 18/01/2023.

Please accept my arrival report. I shall be thankful to you for this act of kindness.


Yours Obediently
Sikandar khan S/o Qaisar khan.

Date: 18/01/2023.


Medical Superintendent
D.H.Q Hospital
Nowshera

Medical Superintendent
DHQ, Hospital
Nowshera

13
13
13

DHO

Adjustment / allowing

171

2023
171

171

171

171

10-4-24

171

Acceptance

کے لئے
 میں نے اس پر غور کیا ہے اور اس پر اتفاق کیا ہے کہ اس کے لئے
 جو چیزیں درکار ہیں وہ سب فراہم کی جائیں گی اور اس کے لئے
 جو رقم درکار ہے وہ بھی فراہم کی جائے گی۔

مستحق

ان کے لئے

مستحق

مستحق

مستحق

مستحق

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