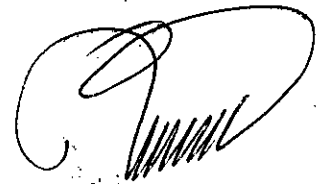


Cost of Rs. 5000/- received in Service Appeal No. 1913/2023

Titled Jamal Shah VS. Health

in the office of Superintendent Vide Order 22/2/2024

Dated: 21/4 /2024.



SUPERINTENDENT
Khyber Pakhtunkhwa
Service Tribunal Peshawar
SUPERINTENDENT
Khyber Pakhtunkhwa
Service Tribunal Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1913/2023

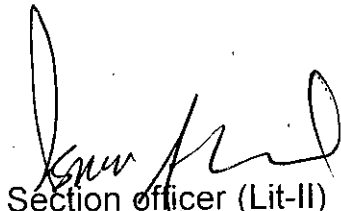
Dr. Jamal Shah (Appellant)

Versus

Government of Khyber Pakhtunkhwa through Secretary Health
..... (Respondent)

INDEX.

S.No.	Description of documents	Annexure	Page
01	Parawise Comments		01-02
02	Office order dated 09 th July 2008	A	03
03	Supreme Court judgment dated 21.10.2020	B	4-9
04	Affidavit	C	10
05	Authority Letter	D	11



Section officer (Lit-II)
Govt: of Khyber Pakhtunkhwa
Health Department

02-04-24
Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

SERVICE APPEAL NO. 1913 OF 2023

Diary No. 12054

Dated 02-04-24

Dr. Jamal Shah.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 01 TO 04

Respectfully Sheweth:

Preliminary Objections:-

1. That the appellant has got no cause of action or locus standi to file the instant appeal.
2. That the appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant appeal is against the prevailing Law and Rules.
4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
6. That the appellant has not come to this Honorable Tribunal with clean hands.
7. That the appeal is barred by law and limitation.
8. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
9. That the appellant has been conditionally re-instated till final decision of the Apex Court which is still pending however, the Apex Court vide its judgment reported as 2021-PLC (CS) SC 341 and 2022 SCMR 406 wherein similar nature cases of regularization appeals of the provincial government have been allowed.

ON FACTS:

1. Incorrect. The appellant was appointed by a registered company Sarhad Rural Support Program for a program namely People's Primary Healthcare Initiative (PPHI) under the sign of District Support Manager and not by the Provincial Government. (Annex-A).
2. Subject to proof.
3. Correct to the extent of WP No. 945-P/2017 which was allowed by the Peshawar High Court however, besides the WP No. 945-P/2017 so many other employees also filed WPs which were allowed and the Provincial Government filed appeals before the Apex Court wherein the Apex Court has

4. already allowed the appeals of the Provincial Government vide various judgments in which some of the judgments have been reported as 2021 PLC (CS) SC 341 and 2022 SCMR 406 wherein the Apex Court has clearly mentioned that company employees has no right to be regularized. It is worth to mention that cases of the appellant along with other 78 appeals are pending before the Apex Court for adjudication. (*Copies of some of the judgments of August Supreme Court of Pakistan are annexed as Annex-B*).
5. As in preceding para. However, it is worth to mention that the replying respondents have already an opinion of law department Khyber Pakhtunkhwa rendered in similar nature matter wherein the law department has clearly mentioned that there is no provision in the Khyber Pakhtunkhwa Civil Servant Pension Rules 2021 for counting of temporary services towards regular for the purpose of pension. Moreover, he was not the employee of the Provincial Government.
6. As in preceding para.
7. Incorrect. No vested right of the appellant has been violated by the replying respondents.

ON GROUNDS:

- A. Incorrect. The replying respondents acted in accordance with law, rules and principles of natural justice.
- B. Incorrect. Already replied in the preceding paras.
- C. Pertains to Court record. The Apex Court has held in a report judgment 2010 PLC CS 924 "Every case has different facts and circumstances, needs to be decided on its own merit".
- D. As above in para C.
- E. As per para 04 of the facts. As the West Pakistan Civil Servant pension Rules is not applicable to the appellant after notifying the Khyber Pakhtunkhwa Civil Servant Pension Rules 2021.
- F. As per preceding paras.
- G. Answering respondents also seek prior permission of this Honorable Tribunal to adduce additional grounds at the time of final arguments.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant appeal of the appellant may very graciously be dismissed with costs.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department
(Respondent No. 01)

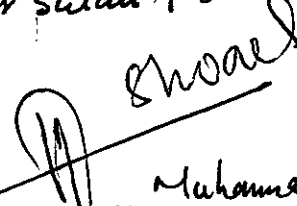
Mehmood Aslam



Director General Health Services
Khyber Pakhtunkhwa
(Respondent No. 03)
Shauket Ali

Secretary to Govt. of Khyber Pakhtunkhwa
Finance Department
(Respondent No. 02)

Amer Sutan Tareen



District Health Officer Nowshera
(Respondent No. 04)

District Health Officer Nowshera

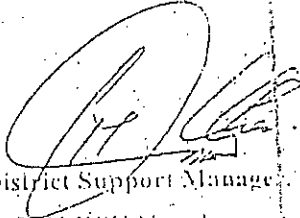


People's Primary Healthcare Initiative (PPHI)
District Support Unit Nowshera

Letter No. 619-21/MON/DSU/NSR Dated, 9th July 2008

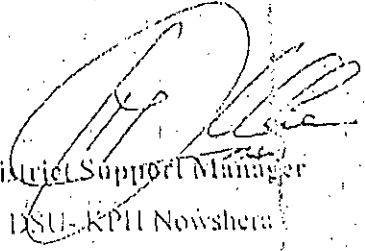
Office Order

No. 619-21/MON/DSU/NSR. On the recommendation of the selection committee and upon the acceptance of the offer of appointment given by PPHI/DSU Nowshera, Mr. Jamal Shah is hereby appointed as Medical Officer in BHU, Wazir Garhi District Nowshera according to the terms & conditions of the contract signed by him with this office with immediate effect in the public interest.

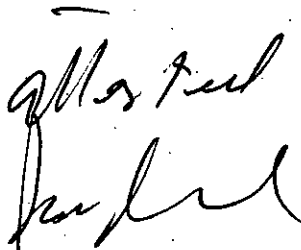

District Support Manager
DSU-KPH Nowshera

Copy to:

1. Program Director, PPHI NWFP/FATA.
2. District Coordination Officer Nowshera.
3. Executive District Officer (Health) Nowshera.
4. Personal Secretary to District Nazim (Nowshera)
5. Executive (F&A) DSU Nowshera.
6. Official Concerned.


District Support Manager
DSU-KPH Nowshera

Attached to Sarhad Rural Support Program (Regd. under section 42 of Companies Ord., 1984)
Village Papat Nowshera
Telephone No. 0923-580414, Fax No. 0923-580978
E-mail dsu_nsr@yahoo.com



BETTER COPY



**People's Primary Healthcare Initiative (PPHI)
District Support Unit Nowshera**

Letter No. 619-21/MON/DSU/NSR dated 09th July, 2008

Office Order

No. 649-21/MON/DSU/NSR: On the recommendation of the selection committee and upon the acceptance of the offer of appointment given by KPH/DSU Nowshera, Mr. Jamal Shah is hereby appointed as Medical Officer in BHU Wazir Garhi District Nowshera according to the terms & conditions of the contract signed by him which this office with immediate effect in the public interest.

-----Sd-----
District Support Manager
DSU-KPH Nowshera

Copy to:

1. Program Director PPHI NWFP/FATA
2. District Coordination Officer Nowshera
3. Executive District Officer (Health) Nowshera
4. Personal Secretary to District Nazim (Nowshera)
5. Executive (F&A) DSU Nowshera
6. Official Concerned

District Support Manager
DSU-KPH Nowshera

Attached to Sarhad Rural Support Program (Regd. Under section 42 of companies Ord. 1984)

Village Pirpai Nowshera

Telephone No. 0923-580414 Fax No. 0923-580978

Email: dsu_nsr@yahoo.com

*Attested
Jamal Shah*

IN THE SUPREME COURT OF PAKISTAN
(APPELLATE JURISDICTION)

PRESENT:
MR. JUSTICE GULZAR AHMED, HCU
MR. JUSTICE FAISAL ARAB
MR. JUSTICE IJAZ UL HASAN

CIVIL APPEAL NOS. 228 TO 306 & 91-P TO 100-P OF 2020

(Against the judgments dated 18.02.2014, 26.06.2014, 26.09.2017, 23.11.2017, 14.10.2014, 17.02.2015, 29.09.2015, 07.10.2015, 12.11.2015, 03.02.2016, 04.02.2016, 09.02.2016, 27.09.2016, 06.09.2016, 20.10.2016, 13.10.2015, 11.01.2017, 02.02.2017, 17.05.2017, 12.04.2017, 04.10.2017, 22.10.2017, 20.11.2017, 23.11.2017, 22.1.2017, 05.12.2017, 25.10.2017, 30.11.2017, 11.01.2017, 17.01.2018, 14.03.2018, 01.03.2018, 17.04.2018, 04.04.2018, 10.04.2018, 15.05.2018, 05.10.2017, 17.07.2018, 04.04.2018, 21.06.2018, 04.09.2018, 11.10.2018, 01.11.2018, 08.11.2018, 14.11.2018, 29.11.2018, 05.12.2018, 28.11.2018, 16.10.2018, 22.01.2019, 12.02.2019, 11.01.2019, 14.03.2019, 02.04.2019, 18.12.2018, 19.06.2019, 30.10.2019, 14.11.2019, of the Peshawar High Court, Peshawar, Abbottabad Bench, D.I. Khan Bench, Bannu Bench & Mingora Bench passed in W.P.1924/2013, W.P.2066-P/2013, W.P.2209-P/2013, W.P.300-P/2012, W.P.1931-P/13, W.P.3029-P/2014, W.P.196-P/2015, W.P.1495-P/2015, W.P.1941-P/2015, W.P.3412-P/2015, W.P.1540-P/2013, W.P.767-P/2016, W.P.382-A/2018, W.P.3451-P/2012, W.P.439-D/2013, W.P.439-D/2013, W.P.440-D/2013, W.P.3288/2016, W.P.3474-P/2016, W.P.977-B/2016, W.P.1088-P/2015, W.P.3958-P/2014, W.P.1298-P/2017, W.P.287-M/2013, W.P.176-B/2017, W.P.37-P/2017, W.P.38-P/2017, W.P.4733-P/2016, W.P.1800/2017, W.P.1600-P/2016, W.P.2234-P/2017, W.P.4801-P/2017, W.P.2643-P/2012, W.P.77/2010, W.P.452-P/2017, W.P.686-P/2012, W.P.320/2009, W.P.451-P/2017, W.P.1008-P/2017, W.P.4645-P/2016, W.P.665-D/2017, W.P.3139-P/2017, W.P.786-A/2016, W.P.787-A/2016, W.P.578-A/2017, W.P.1109-A/2016, W.P.449-P/2015, W.P.1674-P/2016, W.P.120-M/2015, W.P.4490-P/2016, W.P.866-A/2018, W.P.3372-P/2014, W.P.1786-P/2013, W.P.2361-P/2014, W.P.691-P/2018, W.P.5212-P/2017, W.P.3108-P/2018, W.P.1015-A/2018, W.P.3289-P/2017, W.P.1673-P/2018, W.P.5445-P/2018, W.P.9M/2017, W.P.818-B/2017, W.P.3766-P/2014, W.P.4062-P/2015, W.P.4063-P/2015, W.P.4064-P/2015, W.P.4110-P/2015, W.P.4165-P/2015, W.P.4206-P/2015, W.P.836-D/2017, W.P.2498-P/2012, W.P.4869-P/2017, W.P.6347-P/2018, W.P.4272-P/2017, W.P.6462-P/2018, W.P.2223-P/2017, W.P.4039-P/2018, Rev.P.260-P/2018 in W.P.1673-P/2018, W.P.2394P/2019, W.P.2484P/2019, W.P.2535P/2019, W.P.2558P/2019, W.P.2560P/2019, W.P.2589P/2019, W.P.2684P/2019, W.P.2828P/2019, W.P.4671P/2019, W.P.5064P/2019)

Govt. of KPK through Secretary Higher Education Archives & Libraries Department, Peshawar etc. In C.As. 228, 234 & 267/2020

Govt. of KPK through Chief Secretary, Peshawar etc. In C.As. 229, 230, 236, 238, 244, 245, 251, 255, 256, 257, 258, 263, 266, 273, 274, 276, 283, 286, 287, 301, 303, 305, 306, 91-P to 100-P/2020

Deputy Director, Finance & Administration FATA through Additional Chief Secretary, FATA Peshawar etc. In C.A. 231/2020

Director, Human Resource Development, Peshawar etc. In C.A. 232/2020

ATTESTED
attested
for

Additional Chief Secretary FATA, FATA Secretariat, Warsak Road, Peshawar etc.	In C.As. 233, 261, 262, 264, 279, 281, 290, 291, 292, 293, 294, 295, 296, 297 & 299/2020
Secretary, Government of KPK Agriculture, Livestock & Dairy Development Cooperatives & Fisheries, Peshawar etc.	In C.A. 235/2020
Govt. of KPK through Secretary Health, Peshawar etc.	In C.As. 237, 241, 242, 243, 247, 248, 252, 253, 254, 265, 269, 270, 271, 277, 280, 284, 300 & 302/2020
Govt. of KPK through Secretary Public Health Engineering Peshawar	In C.A. 239/2020
Govt. of KPK through Secretary Industries, Commerce & Technical Education, Manpower Training Department, Peshawar etc.	In C.As. 240, 259 & 272/2020
Govt. of KPK through Secretary Agriculture, Livestock & Cooperative Department, Peshawar etc.	In C.As. 246, 249, 282, 285 & 289/2020
District Officer (DO) On-Farm Water Management, Dir Lower etc.	In C.A. 250/2020
Govt. of KPK through Secretary Higher Education, Peshawar etc.	In C.A. 260/2020
Govt. of KPK through Secretary Administration Department, Peshawar etc.	In C.A. 268/2020
Deputy Commissioner, Upper Dir etc.	In C.A. 275/2020
Directorate of Livestock & Dairy Development FATA through its Director, FATA Secretariat, Peshawar etc.	In C.A. 278/2020
Govt. of KPK through Secretary Energy & Power Peshawar etc.	In C.A. 288/2020
Govt. of KPK through Secretary Elementary & Secondary Education Peshawar etc.	In C.A. 298/2020
Secretary Health Service, FATA Secretariat Warsak Road, Peshawar etc.	In C.A. 304/2020

...Appellant(a)

ATTESTED

Attested
[Signature]

Disc

VERSUS

Sher Ali etc.
Mst. Mehrun Nissa etc.
Mst. Nahita Adil etc.
Dr. Lal Marjan & another
Sher Aman
Sher Farooq
Qismat Gul etc.
Barkat Ali etc.
Lal Rehman etc.
Dr. Asadullah etc.
Syeda Humaira Sultana etc.
Abdul Manan etc.
Shahzad Iqbal etc.
Muqadar Shah etc.
Nazcerullah etc.
Muhammad Farooq and another
Nacem Khan etc.
Dr. Muhammad Ishraq etc.
Zain ul Abedin etc.
Kamran Khan etc.
Jawad Ali etc.
Saeed ul Hassan etc.
Shahzada
Sher Bahadar etc.
Inamullah etc.
Fazal Rabbi etc.
Shafiq ur Rehman etc.
Muhammad Imran Hamayun Khan
Muhammad Waris Khan
Muhammad Yasir Jamshed etc.
Muhammad Younas etc.
Rehmat Gul etc.
Umar Muhammad Farooq etc.
Bilal Ahmed and another
Gul Wali Shah etc.
Salih Shah & another
Riaz & another
Samiullah etc.
Irshad Hussain etc.
Muhammad Asif Mehmood
Liaqat Ali
Nisar Ahmad
Recma Bibi
Babar Sultan
Muhammad Asif & another
Muhammad Irfan & another
Ijaz Ali Shah etc.
Mst. Nusrat Begum
Muhammad Iqbal etc.
Mumtaz Hussain & another
Dr. Sajjad ur Rehman
Farzan Ullah etc.
Ishfaq Bacha
Zaheer Ud Din
Syed Muhammad Iqbal etc.

In C.A. 228/2020
In C.A. 229/2020
In C.A. 230/2020
In C.A. 231/2020
In C.A. 232/2020
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In C.A. 276/2020
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In C.A. 278/2020
In C.A. 279/2020
In C.A. 280/2020
In C.A. 281/2020
In C.A. 282/2020

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[Signature]

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Muhammad Nawaz etc.	In C.A. 283/2020
Raheel Zeb etc.	In C.A. 284/2020
Iltaf	In C.A. 285/2020
Saida Rehman	In C.A. 286/2020
Muhammad Tahir Afridi	In C.A. 287/2020
Irshad Ahmad etc.	In C.A. 288/2020
Matiullah	In C.A. 289/2020
Ijaz Hussain & another	In C.A. 290/2020
Alipur Khan	In C.A. 291/2020
Qimat Khan	In C.A. 292/2020
Sher Alam etc.	In C.A. 293/2020
Naikdar Khan	In C.A. 294/2020
Yousaf Khan etc.	In C.A. 295/2020
Wali Khan	In C.A. 296/2020
Saifur Khan & another	In C.A. 297/2020
Mrs. Nayyar Nazir Zaidi	In C.A. 298/2020
Nazir Gul etc.	In C.A. 299/2020
Nadeem Ahmad etc.	In C.A. 300/2020
Muhammad Arif	In C.A. 301/2020
Faizan Rashid & another	In C.A. 302/2020
Sonia Nawab etc.	In C.A. 303/2020
Muhammad Zada & another	In C.A. 304/2020
Naik Amal Shah etc.	In C.A. 305/2020
Mst. Saeeda Rehman	In C.A. 91-P/2020
Khan Zeb and others	In C.A. 92-P/2020
Mushtaq and others	In C.A. 93-P/2020
Zulfiqar Ahmad and others	In C.A. 94-P/2020
HC Muhammad Ashraf and others	In C.A. 95-P/2020
HC Muhammad Ramzan and others	In C.A. 96-P/2020
HC Khewa Din and others	In C.A. 97-P/2020
Munir Khan and others	In C.A. 98-P/2020
HC Shirreen Khan and others	In C.A. 99-P/2020
Dauod Jan and others	In C.A. 100-P/2020
Gul Khan and others	... Respondent(s)

IN ATTENDANCE:
CIVIL APPEAL NOS. 248, 252, 253, 254, 268, 269, 270, 271, 277, 280, 284 & 302 OF 2020 (CATEGORY-I)

For the Appellants: Barrister Qasim Wadood, Addl. A.G. KP
 Mr. Atif Ali Khan, Addl. A.G. KP
 (In all cases)

For the Respondents: Mr. Muhammad Shoaib Shaheen, ASC
 Syed Rifaqat Hussain Shah, AOR
 (For respondents 1-3, 5, 6, 8-25 in CA 248/2020)

Nemo
 (For respondents 4, 7, 25 in CA 248/2020)

Mr. Mukhtar Ahmed Muneri, ASC
 (For respondents 1, 3, 7, 8, 11, 13, 14, 16, 19-21 in CA 252/2020, for respondents 3, 5, 7, 10, 15 in CA 265/2020, and for respondent 2 in CA 304/2020)

ATTESTED

Attested
[Signature]

For the Respondents:

Mr. Khalid Rehman, ASC
Mr. Muhammad Shouib Shauheen, ASC
Mr. Afnan Karim Kundi, ASC
Mr. Abdul Qayum Qureshi, ASC
Hafiz S.A. Rehman, Sr. ASC
Mr. Saleem Ullah Rana, ASC
Mr. Nasir Mehmood, ASC
Mr. Muhammad Asif Yousafzai, ASC
Barrister Adnan Khan, ASC
Mr. Waseem ud Din Khattak, ASC
Mr. Muzamil Khan, ASC
Mr. Alif Ahmed, ASC
Mr. Muhammad Anwar Khan, ASC
Mr. Muhammad Munir Paracha, ASC
Mr. Asad Jan, ASC

Official respondents:

Mr. Asif Khan, I.O, HED Department, KP
Mr. Nadeem Akhtar, DS Litigation (HED)
Department, KP
Ms. Irum Shauheen, Deputy Director, HED
KPK
Mr. Lajbar Khan, SDO, FHE
Mr. Ziaullah, I.O Health Department, KP
Mr. Muhammad Saeed, Dy. Director, PSC
Mr. Asif Ali, Dy Secretary, PSC
Department
Ms. Sheema Ayb, AD(I) PEDO
Mr. Ghazab Taji, AD Chief Settlement,
FATA

Date of Hearing:

21.10.2020

ORDER

GULZAR AHMED, C.J.

CIVIL APPEAL NOS. 248, 252, 253, 264, 265, 269, 270, 271,
277, 280, 284 & 302 OF 2020

We have heard learned counsel for the parties and have also gone through the record of the case. For reasons to be recorded later, all these appeals are allowed and the impugned judgments are set aside.

CIVIL APPEAL NOS. 276, 305, 91-F to 100-P/2020

2. By consent of the learned counsel for the parties, the impugned judgments dated 21.06.2018, 19.06.2019 & 14.11.2019 are set aside and Writ Petition Nos. 4490-P/2016, 4039-P/2018, 2394-P/2019, 2484-P/2019, 2535-P/2019, 2558-P/2019, 2560-P/2019, 2589-P/2019, 2684-P/2019, 2828-P/2019, 4671-P/2019

Attested
Asim

ATTENDED

& 5064-P/2019 are dismissed. The respondents shall, however, avail remedy pursuant to call up letters if and when cause of action arises to them and at the same time the appellant shall consider the letters and take appropriate measures regarding the respondents in accordance with law. The appeals are allowed in terms noted above.

CIVIL APPEAL NO. 288/2020

3. At the outset, learned counsel for the respondents admits that the High Court in the impugned judgment dated 16.10.2018 has wrongly relied upon the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2018. He contends that this very law was not applicable to the case of the respondents as they were governed by statute namely Pakhtunkhwa Energy Development Organization Act, 1993 and the rules framed thereunder. In this view of the submission made by the learned counsel for the respondents, the impugned judgment is set aside and the matter is remanded to the High Court for deciding Writ Petition No. 09-M/2017 of the respondents afresh in accordance with law. The appeal in the above terms stands allowed.

CIVIL APPEAL NO. 268/2020

4. Respondent seeks time to engage a counsel. Adjourned to a date after two weeks.

REMAINING CASES

5. Rest of the appeals are adjourned for a date after two weeks.

Sd/-HCJ
Sd/-J
Sd/-J

Certified to be True Copy

PREM

Attested
[Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1913/2023

Dr. Jamal Shah (Appellant)

Versus

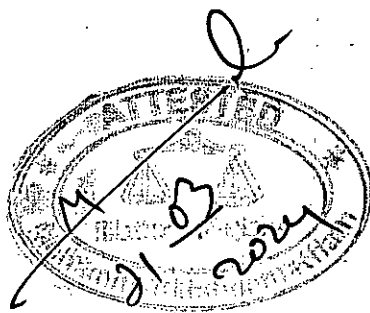
Government of Khyber Pakhtunkhwa through Secretary Health
..... (Respondent)

AFFIDAVIT

I Mehmood Aslam, Secretary Health Govt. of Khyber do hereby solemnly affirm and declare on oath that the contents of the joint parawise comments are true and correct to the best of my knowledge, belief and that nothing has been concealed from this Hon'ble Court.

Secretary Health,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

attested
by





**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

AUTHORITY LETTER

Mr. Safi Ullah, Focal Person (Litigation-II), Health Department, Civil Secretariat is hereby authorized to attend/defend the Court Cases and file comments on behalf of Secretary Health Government of Khyber Pakhtunkhwa before the Service Tribunal and lower Courts.

(MAHMOOD ASLAM)

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department
Secretary to Govt. of
Khyber Pakhtunkhwa
Health Department

Attested
[Signature]
Section Officer (Lit-II)
Health Department
Khyber Pakhtunkhwa

9/15/23