

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR
SERVICE APPEAL NO. 16406 OF 2020**

C.M. NO. 914/2024

1. Director General Health Services Khyber Pakhtunkhwa
2. Agency Surgeon Khurram Parachinar.

..... Applicants

Versus

Zeenat Ali S/O Ameer Gul Ex-Electrician Agency Head Quarter Hospital
Parachinar..... Respondent

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Deponent



(Dr. Muhammad Saleem)
Director General Health Services
Khyber Pakhtunkhwa

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 16406 OF 2020

Khyber Pakhtunkhwa Service Tribunal

C.M. No. 914/24

Diary No. 15034

Dated 16-8-24

- 1. Director General Health Services Khyber Pakhtunkhwa
- 2. Agency Surgeon Khurram Parachinar.

..... Applicants

Versus

Zeenat Ali S/O Ameer Gul Ex-Electrician Agency Head Quarter Hospital Parachinar..... Respondent

APPLICATION FOR PERMISSION TO SUBMIT JOINT PARAWISE COMMENTS, SETTING ASIDE DEFENSE STRUCK OF ORDER DATED 10/10/2022

Respectfully Sheweth,

- 1. That the above cite case is pending in the Honorable Tribunal and is fixed for hearing on 30/09/2024.
- 2. That the applicants received the summon alongwith Service Appeal for submission of reply on 16/06/2020.
- 3. That the absence of the representative of the applicants was not intentional or will-full but due to busy in some others routine cases in the Honorable Tribunal.
- 4. That no prejudice will be cost to the respondent if orders dated 10/10/2022 set aside rather it would offer an opportunity for the appellants to put forth their side of facts before this Honorable Tribunal. So that this Honorable Tribunal may reach at the just and proper decision of the case.

It is therefore humbly prayed that the Defense Struck Of order dated 10/10/2022 may kindly be set aside in the interest of justice, and applicants please be allowed to file / submit parawise comments.

(Applicants through)

(Dr. Muhamimad Saleem)
Director General Health Services
Khyber Pakhtunkhwa

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR
SERVICE APPEAL NO. 16406 OF 2020**

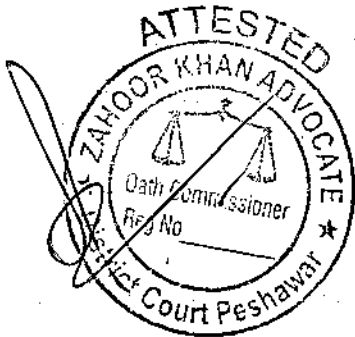
- 1. Director General Health Services Khyber Pakhtunkhwa
 - 2. Agency Surgeon Khurram Parachinar.
- Applicants

Versus

Zeenat Ali S/O Ameer Gul Ex-Electrician Agency Head Quarter Hospital Parachinar.....Respondent

Affidavit

I, Dr. Muhammad Saleem, Director General Health Services, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm that the contents of the Application is true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.




Deponent

(Dr. Muhammad Saleem)
Director General Health Services
Khyber Pakhtunkhwa

Respondent NO. 1 & 2



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 16406 /2020

Zeenat Ali S/o Ameer Gul Ex-Electrician
Agency Head Quarter Hospital Parachinar.

.....(Appellant)

VERSUS

1. The Director General Health Services KP Peshawar.
2. The agency Surgeon Khurram Parachinar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER OF RESPONDENT NO. 1 DATED 16.12.2020 WHEREBY, DEPARTMENTAL APPEAL OF THE APPELLANT AGAINST THE TERMINATION ORDER DATED 02.12.2008 HAS BEEN REJECTED FOR NO VALID GROUNDS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 16.12.2020 AND 02.12.2008 MAY PLEASE BE SET ASIDE BEING VOID-AB-INITIO AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

10th Oct, 2022

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Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Neither written reply/comments on behalf of the respondents submitted nor cost of Rs. 2000/-, therefore, their right for submission of written reply/comments is struck off. To come up for arguments on 07.12.2022 before D.B.


(Kalim Arshad Khan)
Chairman

Late Diary
10th Oct, 2022

*Noted for
Counsel
14/11/22*

Despite direction for fixation of the cases for the shortest possible dates, the office has fixed this case for a longer date. The Reader of the court is waned to be careful in future. The date fixed in this case is accelerated to 25/11/2022. Notices be issued to the parties and their counsel for the date fixed.



(Kalim Arshad Khan)
Chairman

25.11.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 31.01.2023 before the D.B.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)



(5)

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

*All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name
Office # 091-9210269 Fax # 091-9210230*

AUTHORITY LETTER

Muhammad Yousaf Jamal Focal Person Litigation Section Directorate General Health Services Khyber Pakhtunkhwa is hereby authorized to attend/defend the court cases and file Parawise Comments / Reply on behalf of the undersigned before the Honorable Khyber Pakhtunkhwa Service Tribunal and its Camp Courts.

**Director General Health Services
Khyber Pakhtunkhwa, Peshawar**