

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**

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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 Pakhtukhwa Service Tribunal

Diary No. 15036

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

Dated 16-08-24

..... **Applicants**

Versus

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

APPLICATION FOR REMIT/REMOVAL THE PENALTY ON ORDER DATED 05/09/2022

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 05/09/2022 set aside, rather, it would offer an opportunity for the applicants 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.

Due non-availability of the specific head of account to pay of the cost of Rs: 2000/- It is therefore humbly prayed that remit the penalty imposed on 05/09/2022 may kindly be set aside in the interest of justice, and applicants please be allowed to file / submit parawise comments.

(Applicants through)



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

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

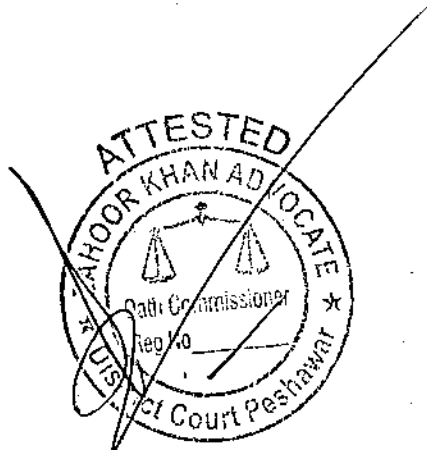
- 1. Director General Health Services Khyber Pakhtunkhwa
 - 2. Agency Surgeon Khurram Parachinar.
- Applicants

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



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.

05th July, 2022

Counsel for appellant present. Mr. Kabir Ullah Khattak,
Additional AG for respondents present.

Respondents have not submitted written
reply/comments. Learned AAG seeks time for submission of
written reply/comments. Last chance is given. To come up for
written reply/comments on 05.09.2022 before S.B.



(Kalim Arshad Khan)
Chairman

05.09.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate
General for respondents present.

Despite last, reply was not submitted. Therefore,
case is adjourned on payment of cost of Rs. 2000/- to be
paid on behalf of respondents. To come up for
reply/comments on 10.10.2022 before S.B.



(Rozina Rehman)
Member(J)



**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**