


FORM OF ORDER SHEET

Court of _____

Appeal No. 1402/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30-Aug-24	<p>The appeal of Mr. ASAD ZAMAN presented today by Mr. MUJAHID ALI KHAN Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR

S.A. No. 1402 /2024

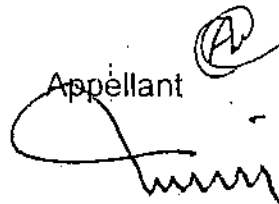
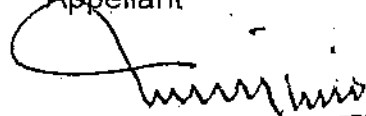
Asad Zaman Appellant

Versus

Secretary Health, Govt. of Khyber Pakhtunkhwa and others
..... Respondents

I N D E X

S.No.	Description of documents.	Annex	Pages.
1)	Memo of Service Appeal.		1-5
2)	Affidavit.		6
3)	Addresses of the parties.		7
4)	Copy of appointment order dated 15.12.2022	A	8
5)	Copy of arrival report	B	9
6)	Copy of medical certificate.	C	10
7)	Photocopy of the registration card	D	11
8)	Copy of attendance sheet	E	12-26
9)	Copy of payroll	F	27-28
10)	Copies of departmental appeal and written intimation on behalf of respondent No.2	G-H	29-30
11)	Wakalatnama.		31

Appellant 
Through 
Mujahid Ali Khan
Advocate Supreme Court

Dated: 28.08.2024

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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR

S.A.No. 1402 /2024

Asad Zaman son of Akhtar Zaman

Ward Attendant BPS-4

R/o Akram Abad Khatali Tehsil and District Nowshera....Appellant

Versus

- 1) Secretary Health, Govt. of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
- 2) Director General Health, Khyber Pakhtunkhwa Judicial Complex, Peshawar.
- 3) District Health Officer, District Nowshera..... Respondents

**SERVICE APPEAL UNDER SECTION 4 OF
THE SERVICES TRIBUNAL ACT, 1974
FOR RELEASE OF PAY OF THE
APPELLANT.**

Prayer:

It is, therefore, humbly prayed that on acceptance of this Service Appeal;

Firstly, to direct respondents No.2 and 3 to forthwith release the salaries of the appellant along with arrears of pay w.e.f. 15th December, 2022 till onwards;

Secondly, to declare the act of respondents regarding stoppage of salaries of the appellant as null and void, without lawful authority, and ineffective upon the accrued rights of appellant;

Thirdly, to take action against the concerned officer for stopping the salary of the appellant in the light of reported judgment in 1997 PLC (CS) 666.

Any other relief which this Hon'ble Tribunal deems appropriate in the circumstances of case and to whom the appellant found entitled may kindly also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed as Ward Orderly (BPS-4) after fulfillment of codal formalities vide appointment order No.4350-54/ DHO/ NSR dated 15.12.2022 issued by office of District Health Officer, Nowshera.

(Copy of appointment order is Annex: "A").

- 2) That the appellant was posted for official duty at Civil Dispensary Khatkali District Nowshera.

It is pertinent to mention that the appellant submitted his arrival report for resumption of his duty on 30.05.2023 on the post of Ward Orderly in view of the appointment order as referred to in the above paras and after assuming charge the appellant still performing his duties efficiently.

(Copy of appointment arrival report is attached as Annex: "B").

- 3) That the appellant also submitted his medical certificate and accordingly service book was also issued showing his entry and arrival report in service.

(Copies of medical certificate is Annex: "C").

- 4) That the respondent No.3 also confirmed the registration from the office of Employment Exchange District Nowshera.

(Photocopy of the registration card is Annex: "D").

- 5) That the appellant was regularly performing his duties, the attendance sheet is Annex: "E" likewise the payroll has also been prepared by the concerned office which is also Annex: "F").

- 6) That since joining/ appointment/arrival, the salary of the appellant has not yet been released.
- 7) That the respondents without assigning any reason or cause did not release the salaries of the appellant till date and in appellant filed departmental appeal in the office of respondent No.2, but in vain, rather the respondent No.2 asked from the respondent No.3 regarding the no vacant post in the said dispensary.

(Copies of departmental appeal and written intimation on behalf of respondent No.2 are Annex: "G" & "H").

- 8) That since no written orders with regard to stopping salaries of the appellant has been passed by the respondent No.2, the appellant having no alternate and efficacious remedy, constrained to approach this Hon'ble Service Tribunal for redressal of his grievance on the following amongst other grounds:

GROUNDS

- a) That the act of respondents to stop the salary of the appellant is against the law, facts and material available on record.
- b) That the act of respondents is violative of Article 4, 9, 11, 25 and various other Articles of the Constitution of Pakistan as well as judgments rendered by the august Supreme Court of Pakistan that departmental authorities under law having no power to stop the salaries of their employees and that too without adhering/ adopting due process of law, which amounts to force labour, hence violative of Article 11 of the Constitution of Pakistan.
- c) That the Hon'ble High Court categorically held in a reported judgment 1997 PLC (CS) 666

"that strict action be taken against an officer who stopped the salary of an employee".

Even otherwise it is also settled law that:

- d) That the Hon'ble Peshawar High Court, Peshawar categorically held in 2017 PLC (CS) note 14 p.14 that salary on pretext of irregular appointment order was declared to be held illegal. Department was directed to release the pay of appellant from the date of its stoppage.

It is pertinent to mention that no limitation runs in matters relating to pay and pension. (1991 SCMR 1041, 2005 PLC (CS) 1439, 2006 PLC (CS) 489, 2002 PLC (CS) 1388, 1990 PLC (CS) 95).

If case has merit limitation may not be a hurdle in the way of appellant. (PLD 2002 (SC) 84, 2004 SCMR 527, PLJ 2004 (SC) 306, PLD 2013 SC 724 (k)

- e) That the act of respondents has exposed not only the appellant but his ailing parents to risk of not getting proper care and treatment as the appellant was the only source of income of his family, hence suffering a lot of hardships by illegally stopping his salaries without assigning any reason or cause.
- f) That it is settled law that salary of an employee is no more a State bounty.

Keeping in view, what has been stated above it is, therefore, humbly prayed that on acceptance of this Service Appeal

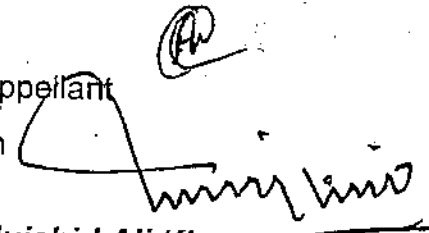
Firstly, to direct respondents No.1 to 4 to forthwith release the salaries of the appellant along with arrears of pay w.e.f. 15th December, 2022 till onwards;

Secondly, to declare the act of respondents regarding stoppage of salaries of the appellant as null and void, without lawful authority, and ineffective upon the accrued rights of appellant;

Thirdly, to take action against the concerned officer for stopping the salary of the appellant in the light of reported judgment in 1997 PLC (CS) 666.

Any other relief which this Hon'ble Tribunal deems appropriate in the circumstances of case and to whom the appellant found entitled may kindly also be granted.

Appellant
Through


Mujahid Ali Khan
Advocate Supreme Court

Dated: 28.08.2024

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR

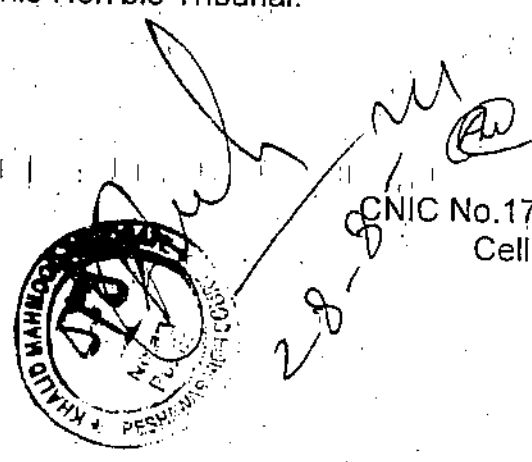
S.A. No. _____ /2024

Asad Zaman Appellant
Versus

Secretary Health, Govt. of Khyber Pakhtunkhwa and others
..... Respondents

AFFIDAVIT

I, Asad Zaman son of Akhter Zaman, Ward Attendant BPS-4 R/o Akram Abad Khatali, Tehsil and District Nowshera (appellant) do hereby affirm and declare on oath that the contents of accompanying Appeal are true and correct and nothing has been concealed from this Hon'ble Tribunal.


28-8-24

Deponent
CNIC No.17201-5110239-1
Cell: 0313-5777122



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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

S.A. No. _____/2024

Asad Zaman Appellant
Versus

Secretary Health, Govt. of Khyber Pakhtunkhwa and others
..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

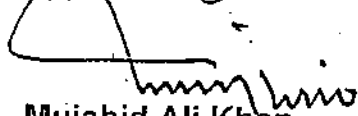
Asad Zaman son of Akhtar Zaman
Ward Attendant BPS-4
R/o Akram Abad Khatali Tehsil and District Nowshera

RESPONDENTS:

- 1) Secretary Health, Govt. of Khyber Pakhtunkhwa, Civil Secretariat Peshawar.
- 2) Director General Health, Khyber Pakhtunkhwa Judicial Complex, Peshawar.
- 3) District Health Officer, District Nowshera

Through

Appellant 


Mujahid Ali Khan
Advocate Supreme Court

OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA

Phone & Fax: 0923-580759

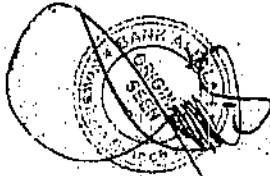
E-Mail: nowshera.edoh@gmail.com

OFFICE ORDER

A 8

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose, MR. ASAD ZAMAN S/O AKHTAR ZAMAN is hereby appointed as Ward Attendant BPS-04 against the vacant post of Ward Attendant under the control of this office 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 services 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 if any of the documents submitted by you, with your application is found 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 DHO Office Nowshera within 07-days after the receipt of this appointment order.



SAEED KHAN
Branch Operations Manager
BANK AL-FALAH LTD.
Branch (0234)
0923-580759

Sd _____
District Health Officer
Nowshera

No. 4350-84 / DHO NSR

Date: 15/12 /2022.

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHO Office Nowshera.
4. Mr. Asad Zaman S/O Akhtar Zaman, Mohallah Akramabad, Khat Kelay, District Nowshera.
5. Office record.

District Health Officer
Nowshera

MOIC CD Khat Khat
Dr. Uday Kumar
Health Department / Government of KPR
accepted in reference to letter no. 3096/DHO MSR
at CD Khat Khat on 29/5/2023 in afternoon is

Annual report of Mr. Abad Ramesh (W.H.A.R.F.)
C-10

Asst. Director
C-10

30/5/23

Asst. Director
C-10

Annual Report

Kindly accept my annual report and
I will be very thankful to you for your
on 30/5/2023 P.M.

So kindly I submit my annual report

MSR / Date 29.5.2023

I have been posted as Ward Assistant
at C-10 Khat Khat area with order no 7596/DHO

With respectful
signature

Annual Report

The
C-10
Asst. Director
B

B

B




D.H.Q. Hospital, Nowshera

Medical Certificate



NIC No: 11-201-5110239-11

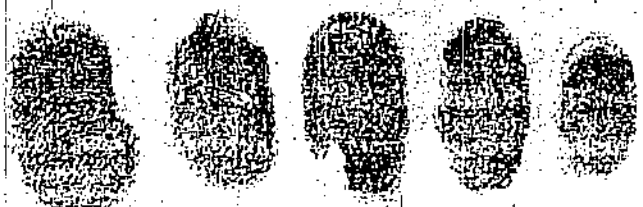
C
10

Name of Official Asad Zaman
 Casto of race Muslim
 Father's Name Alhtas Zaman
 Residence Moh. Akkam Abad Icheet Kalay Nowshera
Teh. Dist. Nowshera
 Date of Birth 01-04-1988
 Exact height by measurement 5'8"
 Personal mark of identification Nil
 Signature of Official 
 Signature of head of Officer

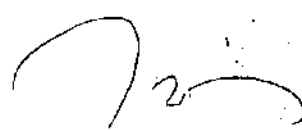
Head of Office

I do hereby certify that I have examined Mr Asad Zaman a candidate for
 employment in the Office of the District Health Officer Nowshera
 and can not discover that he had any disease communicable or other constitutional affection or
 bodily infirmity except Fit

I do not consider this as disqualification for employment in the office of the
As Adm His age according to his own statement 35 year
 and by appearance about 35 year.



LEFT HAND THUMB AND FINGER IMPRESSIONS


 Medical Superintendent
 D.H.Q Hospital Nowshera
 15/12/22

Medical Superintendent
 D.H.Q Hospital
 Nowshera

Daily Attendance Register of the C-D V. H. A. Co.
DATE AND HOURS

For the Month of June 2024
OF ATTENDANCE

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks	
1	Abdul Ali	Officer	A	A	N	A	A	A	X	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
2	Fayez-110-Div	Officer	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
3	Shahista Toker	Officer	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
4	Imayit	Officer	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
5	Ismail	Officer	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
6	Asad Zameer	Officer	P	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		

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E

Daily Attendance Register of the C-D Khote Valley
DATE AND HOURS

For the Month of March 2024

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1	Abdul Ali	ch-ct plung	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	
2	Fahim Zaidi	EPI Tol	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	
3	Shahid Taskeen	Dan	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	
4	Enayatullah	work num	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	
5	Ismaeel	work safety	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	
6	Muhammad Zameer	work safety	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	X	X	P	P	P	P	P	P	P	P	28	

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15/06/24
Daily Attendance Register of the C-D Khat Kal.
 DATE AND HOURS

For the Month of June 2024
 OF ATTENDANCE

18

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1	Dr. Asim Latif	SP-1	G	X	G	G	G	G	G	X	X	G	G	G	G	G	0
2	Abdul Ali	AB-3	X	X	A	A	A	A	A	X	X	A	A	A	A	A	A
3	Fayyaz Durrani	EPI	X	X	P	P	P	P	P	X	X	P	P	P	P	P	P
4	Shahzad	SP-1	P	X	P	P	P	P	P	X	X	P	P	P	P	P	P
5	Imrat Ullah	SP-1	P	X	P	P	P	P	P	X	X	P	P	P	P	P	P
6	Imrat	SP-1	P	X	P	P	P	P	P	X	X	P	P	P	P	P	P
7	Asad Juma	SP-1	P	X	P	P	P	P	P	X	X	P	P	P	P	P	P

16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
X	X	X	X	G	G	G	X	G	G	D	T	T	T				Checked
X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		Checked
X	X	X	X	L	L	L	X	P	P	P	P	P	P				No. of days
X	X	X	X	P	P	P	X	P	P	P	P	P	P				4 days in
X	X	X	X	P	P	P	X	P	P	P	P	P	P				to be
X	X	X	X	P	P	P	X	P	P	P	P	P	P				to be
X	X	X	X	P	P	P	X	P	P	P	P	P	P				to be

Daily Attendance Register of the C-D Khattak

For the Month of August 2024

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Sr. No.	Name	Rank	DATE AND HOURS																															Total No. of Days	Remarks
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1	DR. ASIA Gul	WMO	G	G	G	X	G	G	G	G	G	X	G	G	X	G	G	G	G	G	G	G	G	G	X	G	G	X	G	G	X				
2	Abdul Kh.	Asst. Station	A	A	A	X	A	A	A	A	A	X	A	A	X	A	A	A	A	A	A	A	A	A	X	A	A	A	A	A	A	X			
3	Fayazuddin	Asst. Insp.	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				
4	Shahista Tas	Dsi	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				
5	Inayatullah	Wakil	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				
6	Ismaeel	Wakil	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				
7	ASad Zaman	Wakil	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				
8	M. Tufail	Asst. Insp.	P	P	P	X	P	P	P	P	P	X	P	P	X	P	P	P	P	P	P	P	P	P	X	P	P	P	P	P	X				

Daily Attendance Register of the CD KHAT KALAY

For the Month of AUGUST 2023

DATE AND HOURS

OF ATTENDANCE

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks	
1	ABDUL ALI	CT FISHING	AB	AB	AB	AB	X	AB	AB	AB	AB	AB	AB	X	X	AB	AB	AB	AB	AB	X	AB	AB	AB	AB	AB	AB	X	AB	AB	AB	AB	AB	AB	AB	
2	USOJ KHAN	WATER OFFICER	U	U	U	U	X	U	U	U	U	U	U	X	X	U	U	U	U	U	X	U	U	U	U	U	U	X	U	U	U	U	U	U	U	
3	FATAZ-UD-DIN	EPI FISHING	F	F	F	F	X	F	F	F	F	F	F	X	X	F	F	F	F	F	X	F	F	F	F	F	F	X	F	F	F	F	F	F		
4	SHAIQA TASKEEN	PRO- FICE	P	P	P	P	X	P	P	P	P	P	P	X	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P		
5	INAYAT	WATER PUMP	P	P	P	P	X	P	P	P	P	P	P	X	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P		
6	ISMAIL	WATER OFFICER	P	P	P	P	X	P	P	P	P	P	P	X	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P		
7	ASAD ZAMAN	WATER OFFICER	P	P	P	P	X	P	P	P	P	P	P	X	X	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	P		

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Daily Attendance Register of the CD KHAT KALLAY

For the Month of OCTOBER 2023

DATE AND HOURS

OF ATTENDANCE

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1.	ABDUL ALI	CT P/2022	X	A	A	A	A	A	A	X	A	A	A	A	A	A	X	A	A	A	A	A	X	A	A	A	A	A	A	A	A	A	A		
2.	URRUT KHAN	MDRCL OFFICER	X	L	U	U	U	U	U	X	U	U	U	U	U	U	X	U	U	U	U	U	X	U	U	U	U	U	U	U	U	U	U		
3.	FAYAZ-UD-DIN	CPJ P/2022	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P		
4.	SUMAYYA TAsKEEN	MDRKE	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P		
5.	INAYAT	WATCH- MAN	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P		
6.	ISMAIL	WARD- STEEL	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P		
7.	ASAD ZAMAN	WARD STEEL	X	P	P	P	P	P	P	X	P	P	P	P	P	P	X	P	P	P	P	P	X	P	P	P	P	P	P	P	P	P	P		

24

(Handwritten signatures and dates)
 5/10/2023

Daily Attendance Register of the C-D= Khat Kaly

For the Month of November 2023

DATE AND HOURS

OF ATTENDANCE

Sr. No.	Name	Rank	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total No. of Days	Remarks
1	Abdul Ali	SP Acad	M	A	A	A	X	A	A	A	X	A	A	A	X	A	A	A	A	X	A	A	A	A	A	A	A	X	A	A	A	A			
2	Fayaz-UD-DIN	SP Tech	P	P	P	X	P	P	P	X	P	P	X	L	L	L	X	P	P	X	P	P	P	P	P	P	X	P	P	P	P				
3	Shahista Taskeen	SP Acad	P	P	P	X	P	P	P	X	P	P	X	P	P	P	X	P	P	X	P	P	P	P	P	P	X	P	P	P	P				
4	Imrat	SP Acad	P	P	P	X	P	P	P	X	P	P	X	P	P	P	X	P	P	X	P	P	P	P	P	P	X	P	P	P	P				
5	Ismael	SP Acad	P	P	P	X	P	P	L	X	P	P	X	P	P	P	X	P	P	X	P	P	P	P	P	P	X	P	P	P	P				
6	Asad Zaman	SP Acad	P	P	P	X	P	P	P	X	P	P	X	P	P	P	X	P	P	X	P	P	P	P	P	P	X	P	P	P	P				

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To

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

G

29

Subject: DEPARTMENTAL APPEAL.

Sir,


With due respect it is stated that I, Asad Zaman have been appointed as Ward Attendant (BPS-04) under the control of DHO Nowshera at Civil Dispensary Khat Kaley on 15.12.2022.

Since my arrival (15.12.2022), I did not received salaries as I am regularly performing my duties in the above health facility.

It is therefore, requested that the competent authority (DHO Nowshera) may kindly be directed to take action in this regard and release my salaries with arrears.

Thanks.

Dated. 21.06.2024


Sincerely yours,

Asad Zaman Ward Attendant
CD Khat Kaley Nowshera

Copy forwarded to the:

1. District Health Officer, Nowshera.

105
21/6/24

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR



General Address: (Institutional) (Post office) P.O. 001-9210260 (Exchange) 001-9210187, 9210196 Fax: 001-9210230

No. 6355 / Personnel

Dated: 23 / 08 / 2024

(H)

To:

The District Health Officer ✓
Nowshera

30




Subject:
Memo

DEPARTMENTAL APPEAL

Reference to your letter No. 3293/DHONSr dated 02.08.2024 on the subject noted above.

Please intimate as to why the applicant was appointed when no vacant post was available.

DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

قسط 50	48816	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
ایڈویکٹ: محابد علی خان	Asc.	PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: Bc. 11-1778			
رابطہ نمبر: 03347676099			

بجالات جناب:

مخاطب:	دعویٰ:
	علت نمبر:
	موضوع:
	جرم:
	تھانہ:
بی نام	
باعت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی کاروائی متعلقہ

آن مقام _____ کیلئے _____ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم بیروی یا ڈگری یکطرفہ یا ایبل کی برآمدگی اور منسوخی، نیز دائر کرنے ایبل گمرانی و نظر ثانی و بیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ بیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: _____ / 20 _____

العبد العبد العبد العبد العبد العبد

مقام _____ کے لیے منظور ہے۔

Accepted by
Jumay hani

نوٹ: اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔