


## FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No. 1699/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/10/2024	<p>The appeal of Mr. Muhammad Ikram resubmitted today by Mr. Zafeer Gul Daudzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 04.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Ikram received today i.e on 12.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant and respondent no.2 are incomplete be completed according to Khyber Pakhtunkhwa Service Tribunal Rules 1974.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Copy of stoppage of salary (impugned) order is not attached with the appeal be placed on it.
- 4- Annexures of the appeal are not in sequence.
- 5- Necessary party be made in the heading of appeal.
- 8- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos.1 & 4 are unnecessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.

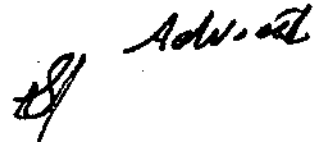
No. 788 /Inst./2024/KPST,

Dt. 13/9 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Zafeer Gul Daudzai Adv.  
High Court at Nowshera.

Respected Sir,  
objection no 1, 2, 4, 5 & 8 were removed while application for providing order regarding stoppage of salary was not answered nor any reply to the application was given. the application is annexed as annexure 'D'.



**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,**  
**PESHAWAR**

Service Appeal No. 1699 /2024

MUHAMMAD IKRAM S/O RAZEEM KHAN Posted At Civil Dispensary Zando Banda  
Post Office Risalpur DISTRICT NOWSHEHRA.

.....Appellant

Versus

The D.G health Department, Khyber Pakhtunkhwa Peshawar &  
others



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Appellant

Through

Zafeer gul daudza

 Abdul malik  
&  
Wahid ullah   
Advocates, High Court  
Peshawar  
Cell#03349207486

Dated: 09/09/2024

BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR

Service Appeal No. 1699 /2024

MUHAMMAD IKRAM S/O RAZEEM KHAN Posted At Civil Dispensary Zando Banda  
Post Office Risalpur DISTRICT NOWSHEHRA.

.....Appellant

Versus

1. THE D.G HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA  
PESHAWAR.
2. THE DISTRICT ACCOUNT OFFICER NOWSHERA.
3. DISTRICT HEALTH OFFICER NOWSHERA

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 for release of the  
salary to the appellants.

**Prayer in Appeal:-**

**On acceptance of the instant appeal, the respondents  
may kindly be directed to release the salary of  
appellant along with back benefits .**

**Any other remedy which this August Tribunal deems  
fit that may also be awarded in favour of the appellant.**

**Respectfully Sheweth:**

**Brief Facts:-**

1. That appellant was appointed as ward orderly BPS-4 in the health department on 13.10.2022 at District nowshera and started her duty quite efficiently and up to the entire satisfaction of her superiors. (Copies of the appointment order annexed as Annexure "A").
2. That salary for the month of October and November were duly issued to the appellant. (Copy of pay slip is annexed as Annexure "B").

BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR

Service Appeal No. 1699 /2024

MUHAMMAD IKRAM S/O RAZEEM KHAN R/O MOHALLAH TARKANANU, P.O  
RISALPUR, ZANDA BANDA, TEHSIL AND DISTRICT NOWSHEHRA.

.....Appellant

Versus

1. The D.G health Department, Khyber Pakhtunkhwa Peshawar.
2. The ACCOUNT OFFICE NOWSHERA Khyber Pakhtunkhwa,  
Peshawar.
3. Accountant general Khyber pakhtunkhwa

.....Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 FOR RELEASE OF  
THE SALARY TO THE APPELLANTS.**

**Prayer in Appeal:-**

**On acceptance of the instant appeal, the respondents  
may kindly be directed to release the salary of  
appellant along with back benefits .**

**Any other remedy which this August Tribunal deems  
fit that may also be awarded in favour of the appellant.**

**Respectfully Sheweth:**

**Brief Facts:-**

1. That appellant was appointed as chokidar BPS-3 in the health department on 30.06.2022 at District Nowshera and started her duty quite efficiently and up to the entire satisfaction of her superiors. (Copy of the appointment order annexed as Annexure "A").
2. That salary for the month of October and November were duly issued to the appellant. (Copy of pay slip is annexed as Annexure "B").

3. That after November the salary of the appellant was stopped illegally and unjustly.
4. That the appellant is still serving as a ward attendant and is performing duty with zeal and zest but despite of service on regularly basis the respondents are not issuing salary to the appellant.
5. That the appellant approached the office of worthy D.H.O Nowshehra as well as account office but his grievance was not addressed.
6. That the appellant filed departmental appeal to his department on 05/06/2024 but the same has not been replied yet.
7. That under compelling circumstances having no other remedy to prefer the instant service appeal before this Hon'ble Tribunal inter alia on the following grounds;

**GROUNDS:**

- A. That the act of the respondents is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B. That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

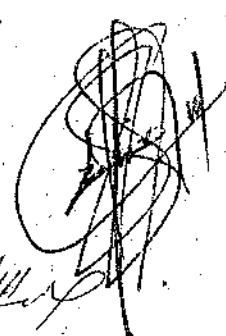

**It is, Therefore, most humbly prayed that on acceptance of this instant appeal, Respondents may graciously be directed to release the salaries of the appellant forthwith including the arrears.**

Appellant

Through

Zafeer gul daudzai  
Abdul malik  
&  
Wahid ullah  
Advocates, High Court  
Peshawar  
Cell#03349207486

Dated: 09/09/2024

3.

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2024

Muhammad ikram S/O razem khan R/O mohallah tarkanan ,p.o risalpur TEHSIL  
AND DISTRICT NOWSHEHRA.

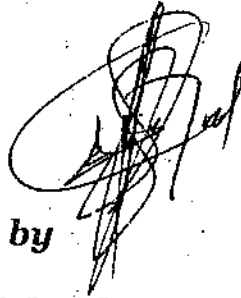
.....Appellant

Versus

The D.G health Department, Khyber Pakhtunkhwa Peshawar &  
others

**AFFIDAVIT**

I, Muhammad ikram S/O razem khan R/O mohallah tarkanan ,p.o risalpur  
TEHSIL AND DISTRICT NOWSHEHRA.do hereby solemnly affirm and declare on oath  
that the contents of the accompanying **Service Appeal** are true and correct to the  
best of my knowledge and belief and nothing has been concealed from this Hon'ble  
Court.



Identified by

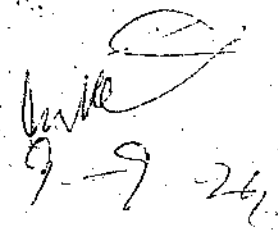
**Zafeer gul daudzai  
Advocate, High Court  
Peshawar**



**DEPONENT**

CNIC# 17201-4748181-7

Cell# 0311 9147522



9-9-24

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2024

MUHAMMAD IKRAM S/O RAZEEM KHAN Posted At Civil Dispensary Zando Banda  
Post Office Risalpur DISTRICT NOWSHEHRA.

.....Appellant

Versus

The D.G health Department, Khyber Pakhtunkhwa Peshawar &  
others

**ADDRESSES OF PARTIES**

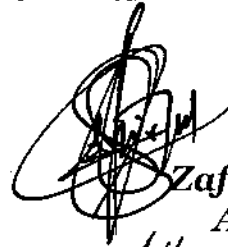
**APPELLANT:**

MUHAMMAD IKRAM S/O RAZEEM KHAN Posted At Civil Dispensary Zando Banda  
Post Office Risalpur DISTRICT NOWSHEHRA.

**RESPONDENTS:**

4. THE D.G HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA  
PESHAWAR.
5. THE DISTICT ACCOUNT OFFICER NOWSHERA.
6. DISTRICT HEALTH OFFICER NOWSHERA

Appellant



Through  
Zafeer gul daudzai  
Abdul malik



&  
Wahid ullah  
Advocates, High Court  
Peshawar



Dated: 09/09/2024

Cell#03349207486





5  
Annexure "A"  
**OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA**

Phone & Fax: 0923-580759

E-Mail: [nowshera.edoh@gmail.com](mailto:nowshera.edoh@gmail.com)

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose, MR. MUHAMMAD IKRAM S/O RAZEEM KHAN is hereby appointed as Chowkidar BPS-03 against the vacant post of Chowkidar at DHO Office 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 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.

Sd \_\_\_\_\_  
District Health Officer  
Nowshera

No. 6366 - 64 / DHO NSR

Date: 30 / 06 / 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. Muhammad Ikram S/O Razeem Khan Resident of Mohallah Tarkanani, Post Office Risalpur, Zando Banda, Tehsil & District Nowshera.
5. Office Record.

Attested  
[Signature]

[Signature]  
District Health Officer  
Nowshera

Attested

D.O.B: 31.03.2000  
 LFB Quota: THE BANK OF NETHER SAAD ELBA NOMSHERA  
 5009627325

28,990.00

2,000.00

14,260.00  
 2,120.00  
 1,785.00  
 1,500.00  
 1,000.00  
 1,000.00  
 600.00  
 1,442.00  
 1,442.00  
 50,140.00  
 1,150.00  
 600.00  
 300.00

Subject:

2 sec:001 Month:October 2023  
 NR4661 -Category D Hospital Nizamp  
 CATEGORY D HOSPITAL NIZAM  
 NAME:  
 SER #:  
 OLD #:

NO. NO. 17301914011  
 5 Interest Free  
 03 Active Temporary  
 08 AND ALLOWANCES  
 01-Basic Pay  
 01-House Rent Allowance 45%  
 10-Convey Allowance 8000  
 00-Medical Allowance  
 11-Travel Allowance - 2023  
 12-Washing Allowance 3021  
 13-Integrated Allowance 2131  
 14-Disp. Red All 15% 2023  
 15-Adhoc Rel All 15% 22(PST)  
 16-Cross Pay and Allowances  
 17-Gratuity  
 18-Leave Encashment  
 19-Death Benefit & Death Comp.  
 20-Gratuity Fund  
 21-Balance 1,150.00

NOMSHERA  
 BRANCH:  
 NAME: NIZAMPAL NIZAM  
 SER # 0000000  
 BUDGET:

6

Signature B

To,  
The D.G Health  
Khyber Pakhtunkhwa, Peshawar

7.  
Attested

§

Annexure 'D'

DEPARTMENTAL APPEAL FOR RELEASE OF SALARY OF APPELLANT

Respected sir,

1. The appellant is law abiding citizen of Pakistan and is permanent resident of district Nowshera.
2. That the appellant was appointed as MALI in health department on 30.06.2022. (copy of appointment order is annexed).
3. That salary for the month of October and November 2023 were issued to the appellant. (Copy of pay roll is annexed)
4. That after November the salary of the appellant was stopped illegally and unjustly.
5. That the appellant is still serving as MALI and is performing duty with zeal and zest.
6. That the appellant approached the office of worthy D.H.O Nowshera as well as the office of account officer but the grievance of appellant was not addressed.
7. That now the appellant approaches your good self for release of salary.

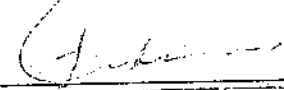
It is therefore requested that on acceptance of instant departmental appeal the salary of the appellant may kindly be released

Date: 5/8/24

Applicant

MUHAMMAD IKRAM-S/O AZEEM KHAN

Signature



8

TO,

The worthy D.H.O

Nowshera

Annexure 'D'

**Application for providing copy of order of stoppage of  
Salary or source sent for stoppage of salary.**

Respected sir,

It is stated that I am an employe in your department and still serving with zeal and zest but my salary has been stopped since long and no order of stoppage of salary or any source sent for stoppage of salary has been given to me.

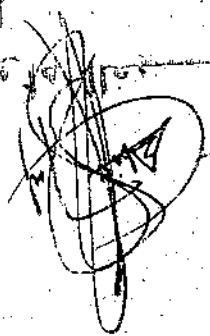
So it is very humbly submitted that a copy of order for stoppage of salary or source may kindly be provided to me.

  
APPLICANT

Dated: 05/06/2024

Mohammad Ikram

Accepted  
R. Williams



20

Handwritten text in Urdu script, appearing to be a list or a set of instructions. The text is somewhat faded and difficult to read in detail.

Handwritten text in Urdu script, possibly a signature or a title.

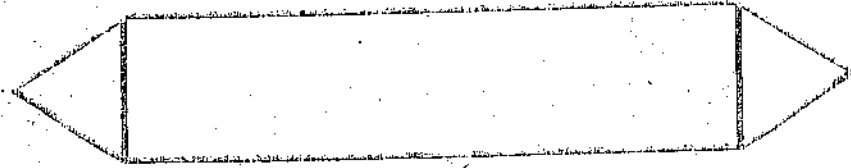
Handwritten text in Urdu script, possibly a date or a reference number.

Handwritten text in Urdu script, possibly a name or a title.

Handwritten text in Urdu script, possibly a list of items or a table.

Handwritten text in Urdu script, possibly a name or a title.

Handwritten text in Urdu script, possibly a name or a title.



Handwritten text in Urdu script, possibly a signature or a title.

BC-19-1124  
2 at car gul 0310@gmail.com  
0334-9a07486

Handwritten signature or text on the left margin.

Handwritten text in Urdu script on the left margin.