


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **1703/2024**

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. Inam Ullah 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. Inamullah 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. 781 /Inst./2024/KPST,

Dt. 13/9 /2024.

Inamullah
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 annex 'D'

Advocate

J

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

Service Appeal No. 1703 /2024

INAM ULLAH S/O NAWAZ GUL posted at D.H.O Office R.H.C HOSPITAL peer p ai
tehsil Pabi DISTRICT NOWSHEHRA.

.....Appellant

Versus

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


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Appellant

Through

Zafeer gul daudzai

 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. 1703 /2024

INAM ULLAH S/O NAWAZ GUL posted at D.H.O Office R.H.C HOSPITAL peer pai
tehsil Pabi DISTRICT NOWSHEHRA.

.....Appellant

Versus

1. THE D.G HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA
PESHAWAR.
2. THE DISTICT 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. 1703 /2024

INAM ULLAH S/O NAWAZ GUL R/O MOHALLA KHATAK AMAN GHAR P.O ADAM
G PAPER MIL, 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 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. (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.

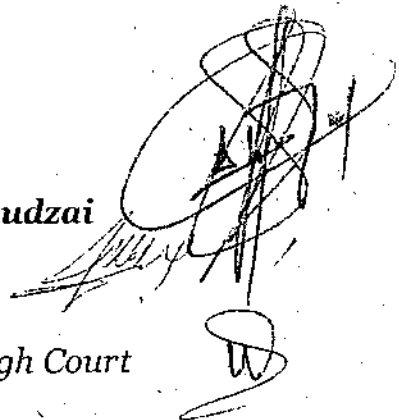
It is, Therefore, most humbly prayed that on acceptance of this instant appeal, Respondents may graciously be directed to release the salaries of the appellant forthwith including the arrears.

Appellant

Through

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

Dated: 09/09/2024



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

Service Appeal No. _____/2024

INAM ULLAH S/O NAWAZ GUL R/O MOHALLA KHATAK AMAN GHAR P.O ADAM
G PAPER MIL, TEHSIL AND DISTRICT NOWSHEHRA.

.....**Appellant**

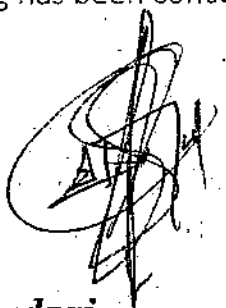
Versus

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

AFFIDAVIT

I, INAM ULLAH S/O NAWAZ GUL R/O MOHALLA KHATAK AMAN GHAR P.O
ADAM G PAPER MIL, 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

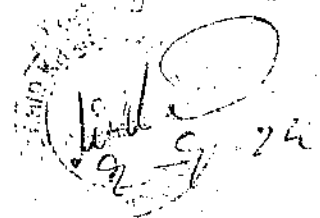
**Zafeer gul daudzai
Advocate, High Court
Peshawar**



DEPONENT

CNIC# 17201-6823503-7

Cell# 035-9263701



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

Service Appeal No. _____/2024

INAM ULLAH S/O NAWAZ GUL posted at D.H.O Office R.H.C HOSPITAL peer pai
tehsil Pabi DISTRICT NOWSHEHRA.

.....Appellant

Versus

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

ADDRESSES OF PARTIES

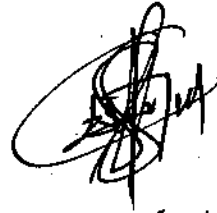
APPELLANT:

INAM ULLAH S/O NAWAZ GUL posted at D.H.O Office R.H.C HOSPITAL peer pai
tehsil Pabi 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

Cell#03349207486

Dated: 09/09/2024



OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA

Phone & Fax: 0923-580759

E-Mail: nowshera.edch@gmail.com

OFFICE ORDER

Order is issued upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose. MR. INAM ULLAH S/O NAWAZ GUL is hereby appointed as Ward Orderly BP9-04 against the vacant post of Ward Orderly 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 with your application to be found false or fabricated, 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

Date: 30 / 11 / 2022

No. 4155-59 / DHO NSR

Copy forwarded to the:

1. Director General Health Services Khyber Pakatunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHO Office Nowshera.
4. Mr. Inam Ullah S/O Nawaz Gul Resident of Mohallah Khattak Aman Garh, District Nowshera.
5. Office Record.

Attested
[Signature]

District Health Officer
Nowshera

6

Annexure "B"

Nowshera

P Sec:001 Month:October 2023
NR4661 -Category: D Hospital Nizam
CATEGORY D HOSPITAL NIZAM

Emp # : 01056534 Buckle:

NAME: INAM ULLAH
WARD ATTENDANT

NTN:
GPF #:
Old #:

TRC No. 1720168335027
Interest Free
On Active Temporary
PS AND ALLOWANCES.
PS-Adhoc Relief All 2023 35%

NR4661

5,141.00

Gross Pay and Allowances
DEDUCTIONS

30,787.00

Net Balance 1,230.00

Subro:

WARD ATTENDANT

GPF #:

Total Deductions

2,130.00

28,657.00

D.O.B
01.11.1991

LFP Quota:
THE BANK OF KHYBER SAAD PLAZA NOWSHERA
3004617486

01 Years 04 Months 001 Days

Attested
\$

6A

Nowshera

F Sec:001 Month:October 2023
NR4661 -Category D Hospital Nizamp
CATEGORY D HOSPITAL NIZAM

Roll #: 01056534 Buckle:

NTN:
GPF #:
Old #:

Name: INAM ULLAH

WARD ATTENDANT

SEC No. 1720168335037

PF Interest Free

06 Active Temporary

NR4661

DE AND ALLOWANCES:

75-Adhoc Relief All 2023 35%

5,141.00

Gross Pay and Allowances

30,787.00

DEDUCTIONS:

PF Balance 1,230.00

Subtr:

WARD ATTENDANT

SEC #:

Total Deductions

2,130.00

28,657.00

D.O.B


LFP Quota:

01.11.1991

THE BANK OF KHYBER SAAD PLAZA NOWSHERA

31 Years 04 Months 001 Days

3004617486

Attested


To,
The D.G Health
Khyber Pakhtunkhwa, Peshawar

Annexure 'C', Attested
§.

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 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 and 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: 5/0/24

[Handwritten signature]

Applicant

INAM ULLAH S/O NAWAZ GUL

Signature *[Handwritten 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.**

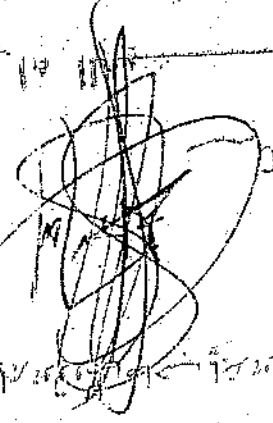
Respected sir,

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.

Dated: 05/06/24


APPLICANT
INAM ULLAH

Accepted
M. J. ...



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

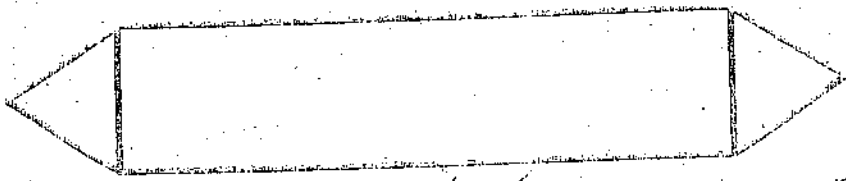
انصار اللہ اولہ نواز علی
اسان کی طرف سے

Am

Handwritten text in Urdu script, possibly a signature or a title, located below the main body of text.

Handwritten text in Urdu script, possibly a signature or a title, located below the main body of text.

Handwritten text in Urdu script, possibly a signature or a title, located below the main body of text.



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2334-9207486

BC-19.124

(19)