


# FORM OF ORDER SHEET

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

**Appeal No.** \_\_\_\_\_ **1705/2024**


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. Romanuddin 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. Romanuddin 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. 780 /Inst./2024/KPST,

Dt. 13/9 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Zafeer Gul Daudzai Adv.  
High Court at Nowshera.

*Respected Sir,*

*Objections were removed 1, 2, 4, 5 & 8, 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"*

*Advocate*

*A*

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

Service Appeal No. 1705 /2024

ROMAN UD DIN S/O AMIN UL WAHAB POSTED AT CATEGORY-D HOSPITAL ZIARAT  
KAKA SAHIB DISTRICT NOWSHEHRA.

.....Appellant

Versus

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

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Appellant

Through

Zafeer gul daudzai



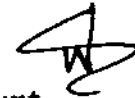
 Abdul malik  
&

Wahid ullah

Advocates, High Court  
Peshawar

Cell#03349207486

Dated: 09/09/2024



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

Service Appeal No. 1705 /2024

ROMAN UD DIN S/O AMIN UL WAHAB POSTED AT CATEGORY-D HOSPITAL ZIARAT  
KAKA SAHIB 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. 1705 /2024

ROMAN UD DIN , S/O AMIN UL WAHAB R/O MOHALLA ALABAD P.O ZIYARAT  
KAKA SAHIB, 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 attendant BPS-4 in the health department on 29.11.2022 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.

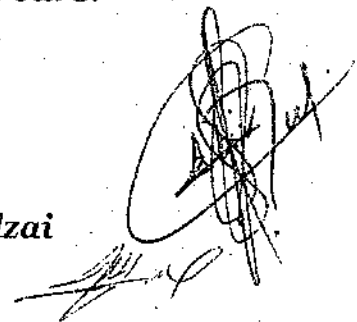
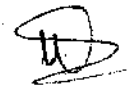
**It is, Therefore, most humbly prayed that on acceptance of this instant appeal, Respondents may graciously be directed to release the salaries of the appellant forthwith including the arrears.**

  
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

ROMAN UD DIN S/O AMIN UL WAHAB R/O MOHALLA ALABAD P.O ZIYARAT  
KAKA SAHIB, TEHSIL AND DISTRICT NOWSHEHRA.


.....**Appellant**

*Versus*

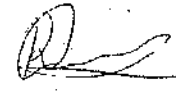
*The D.G health Department, Khyber Pakhtunkhwa Peshawar &  
others*

**AFFIDAVIT**

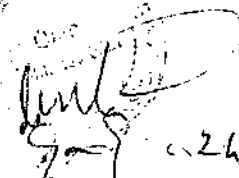
I, ROMAN UD DIN S/O AMIN UL WAHAB R/O MOHALLA ALABAD P.O ZIYARAT  
KAKA SAHIB, TEHSIL AND DISTRICT NOWSHEHRA, do hereby solemnly affirm and  
declare on oath that the contents of the accompanying **Service Appeal** are true and  
correct to the best of my knowledge and belief and nothing has been concealed  
from this Hon'ble Court.

Identified by 

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

  
**DEPONENT**

CNIC# 17201-6733924-9  
Cell# 0333 3549028

  
2024-02-26

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

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

ROMAN UD DIN S/O AMIN UL WAHAB POSTED AT CATEGORY-D HOSPITAL ZIARAT  
KAKA SAHIB DISTRICT NOWSHEHRA.

**Appellant**

*Versus*

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

**ADDRESSES OF PARTIES**


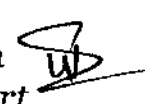
**APPELLANT:**

ROMAN UD DIN S/O AMIN UL WAHAB POSTED AT CATEGORY-D HOSPITAL ZIARAT  
KAKA SAHIB 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



**OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA**

Phone & Fax: 0923-580759  
E-Mail: nowshera.doh@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose, MR. ROMAN UD DIN S/O AMIN UL WAHAB 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 an 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.

SD

District Health Officer  
Nowshera

Date: 29/11/2022

(copy forwarded to the:

No. 11418/44/DHO NSR

1. Director General Health Services Khyber Pakhtunkhwa Peshawar

2.

District Accounts Officer Nowshera

3.

Accounts Section DHO Office Nowshera

4.

Mr. Roman Ud Din S/O Amin Ul Wahab, Resident of Mohallah Ala Abad, Ziarat

Kaka Sahab, District Nowshera

5.

Office record

District Health Officer  
Nowshera

*Signature*



5

Government of Khyber Pakhtunkhwa  
District Accounts Office Nowshera  
Monthly Salary Statement (November-2023)

6



Annexure B

Personal Information of Mr ROMAN-UD- DIN d/o/s of AMIN-UL-WAHAB

Personnel Number: 01056543

CNIC: 1720167339249

NTN:

Date of Birth: 10.04.1989

Entry into Govt. Service: 06.12.2022

Length of Service: 00 Years 11 Months 026 Days

Employment Category: Active Temporary

Designation: WARD ATTENDANT

81277150-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4661-

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

GPF Interest Free

GPF Balance:

2,460.00. (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil - BPS: 04

Pay Stage: 0

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,590.00	1001	House Rent Allowance 45%	2,187.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	1,485.00
2347	Adhoc Rel AI 15% 22(PS17)	1,485.00	2378	Adhoc Relief All 2023 35%	5,141.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-1,230.00	3501	Benevolent Fund	-600.00
4004	R. Benefits & Death Comp:	-300.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00

Recovered till NOV-2023:

0.00

Exempted: 0.00

Recoverable:

0.00

Gross Pay (Rs.):

30,873.00

Deductions: (Rs.):

-2,130.00

Net Pay: (Rs.):

28,743.00

Payee Name: ROMAN-UD- DIN

Account Number: 50817902055503

Bank Details: HABIB BANK LIMITED, 220222 CANTT BRANCH, NOWSHERA. CANTT BRANCH, NOWSHERA, NOWSHERA

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address:

City: nowshera

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: romanuddin512@gmail.com

Attested  
Shehryar

System generated document in accordance with APPM 4.6.12.9(132584/24.11.2023A/3.0)

All amounts are in Pak Rupees

Errors & omissions excepted (SERVICES/12.12.2023/01:03:50)

7

Attested  
[Signature]

To,  
The D.G Health  
Khyber Pakhtunkhwa, Peshawar

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 **WARD ATTENDENT** in health department on 29.11.2022.(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 class 4 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: 5/6/24

Attested  
[Signature]

Applicant  
ROMAN UDDIN S/O AMIN UL WAHAB

Signature \_\_\_\_\_

[Signature]

8.

TO,

The worthy D.H.O

Nowshera

**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: 5/6/24

(R)

APPLICANT

ROMAN UDDIN

Black & White  
Photography



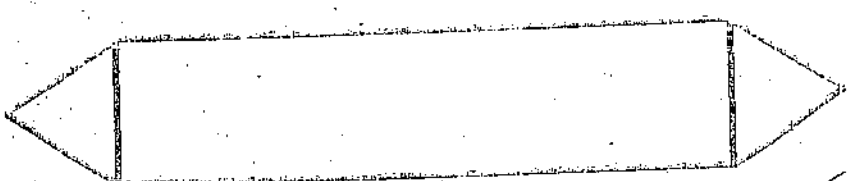
Handwritten text in Urdu script, appearing to be a list or a series of notes. The text is somewhat faded and difficult to read in detail.

Handwritten text on the left margin, possibly a name or address.

Handwritten text at the top of the main content area, possibly a title or header.

Handwritten text in the middle of the page, possibly a date or a specific note.

Handwritten text on the right side of the page, possibly a signature or a name.



Handwritten text below the pencil drawing, possibly a name or a signature.

0334-929486  
22ceer@pud0300@gmail.com  
B.C-19-1124

