

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE**

**TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. 2467 OF 2023**

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department.
2. Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. Director General Health Services Khyber Pakhtunkhwa Peshawar
4. District Health Officer, Charsadda.
5. District Account Officer, Charsadda..... **Applicants**

Versus

Mst. Jameela (Ex-Lady Health Worker) W/O Yousaf Jan R/O Sardheri,  
Charsadda Village Shekho (Sardheri) Tehsil & District Charsadda.....  
..... **Respondent**

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**Deponent**



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

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**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE**

**TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. 2467 OF 2023**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16004

Dated 24-9-24

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department.
2. Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
3. Director General Health Services Khyber Pakhtunkhwa Peshawar
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Charsadda Village Shekho (Sardheri) Tehsil & District Charsadda.....  
..... **Respondent**

**APPLICATION FOR REMITTANCE OF COST IMPOSED DATED**  
**03/06/2024**

Respectfully Sheweth,

1. That the above cite case is pending in the Honorable Tribunal and is fixed for hearing on 27/09/2024.
2. That the applicants received the summon alongwith Service Appeal for submission of reply on 22/12/2023.
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 03/06/2024 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 03/06/2024 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. 2467 OF 2023**

- 1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department.
- 2. Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
- 3. Director General Health Services Khyber Pakhtunkhwa Peshawar
- 4. District Health Officer, Charsadda.
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Versus

Mst. Jameela (Ex-Lady Health Worker) W/O Yousaf Jan R/O Sardheri,  
Charsadda Village Shekho (Sardheri) Tehsil & District Charsadda.....  
.....**Respondent**

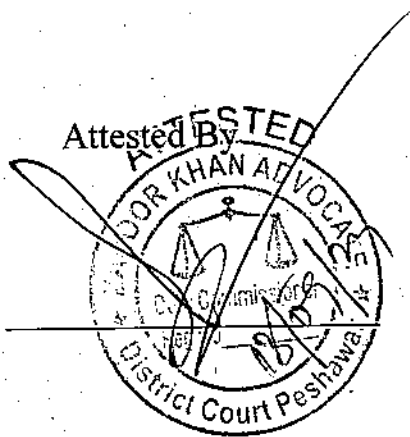
**Affidavit**

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  
(Applicants)



(3)

(P)

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No 2467 /2023

Mst Jameela (Ex-Lady Health Worker) W/o Yousaf Jan,  
R/o Sardheri, Charsadda village shekha (sardheri) .....Appellant  
Tehsil & dist Charsadda.

Versus

1. Secretary to Government of Khyber Pakhtunkhwa, Department of Health, Peshawar.
  2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Peshawar.
  3. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
  4. District Health Officer, Charsadda
  5. District Account Officer, Charsadda
- .....Respondents

**Service Appeal Under Section 4 of Khyber  
Pakhtunkhwa Service Tribunal Act, 1974**

**Respectfully Sheweth,**

Brief but relevant facts of the case are as follows:


1. That the appellant was appointed as Lady Health Worker in the respondent Department on fixed pay by the competent authority in the prescribed manner after fulfilling all the codal formalities vide appointment order dated 02-03-1996. (Copy of the appointment order is appended herewith as Annex-A)
2. That the said contract was extended from time to time. Meanwhile the Government of Khyber Pakhtunkhwa promulgated Khyber Pakhtunkhwa Regulation of lady Health Workers Program and Employees (Regularization and Standardization) Act, 2014 the services of all the contract employees were regularized.
3. That in pursuance of the aforesaid Act the respondents regularized the services of the Appellant and her colleagues vide Office Order dated 24-09-2014. (Copy of Regularization order is appended herewith as Annex-B)
4. That now the appellant has retired from service on attaining the age of superannuation with effect from 31-03-2020 vide Office Order dated 28-04-

15.05.2023 1. Junior to counsel for the appellant present. Mr. Muhammad Jan learned District Attorney alongwith Mr. Yousaf Jamal, Focal Person for respondents present.

2. Written reply on behalf of respondents are still awaited. Representative of respondent sought further time for submission of written reply. Absolute last and final chance is given. To come up for written reply/comments on 03.06.2024 before S.B. P.P given to junior parties.

SCANNED  
KPST  
Peshawar

Kaleemullah

  
(RASHIDA BANO)  
Member (J)

03.06.2024 01. Counsel for the appellant present. Mr. Arshad Azam, Assistant Advocate General alongwith Yousaf Jamal, Assistant for the respondents present.

02. Reply/comments on behalf of the respondents not submitted despite absolute last and final chance. On the request of representative of the respondents another opportunity is granted on payment of cost of Rs. 2000/-. To come up for reply/comments and cost on 26.06.2024 before the S.B. PP given to the parties.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member(E)



**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**