


FORM OF ORDER SHEET

Court of _____

Appeal No. 2208/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/10/2024	<p>The appeal of Mr. Shah Mehmood presented today by Mr. Zafeer Gul Daudzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 06.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

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

Service Appeal No. 2208 /2024

MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d
HOSPITAL AKORA KHATTAK Nowshera.

.....Appellant

Versus

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

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7.	Wakalatnama		..

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. 2208 /2024

MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d
Hospital Akora Khatak Nowshera.

.....**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 30.06.2022 at District nowshera and started his duty quite efficiently and up to the entire satisfaction of his superiors. (Copy of the appointment order annexed as Annexure "A").
2. That the appellant is still serving as a ward attendant and is performing duty with zeal and zest but despite of service on

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

Service Appeal No. _____/2024

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Hospital Akora Khatak Nowshera.

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APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
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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:-

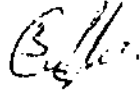
1. That appellant was appointed as ward orderly BPS-4 in the health
department on 30.06.2022 at District nowshera and started his
duty quite efficiently and up to the entire satisfaction of his
superiors. (Copy of the appointment order annexed as
Annexure "A").
2. That the appellant is still serving as a ward attendant and is
performing duty with zeal and zest but despite of service on

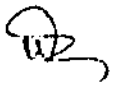
- regularly basis the respondents are not issuing salary to the appellant.
3. That the appellant approached the office of worthy D.H.O Nowshehra as well as account office but his grievance was not addressed.
 4. That the appellant filed departmental appeal to his department on 24/06/2024 but the same has not been replied yet.
 5. 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;

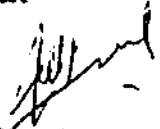
GROUND S:

- 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: 22/10/2024

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

Service Appeal No. _____/2024

MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d
HOSPITAL AKORA KHATTAK Nowshera.

.....**Appellant**

Versus

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

AFFIDAVIT

I, MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d
HOSPITAL AKORA KHATTAK Nowshera, 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.

(Signature)

DEPONENT

CNIC# 17301-07487809

Cell# 03325296273

Identified by

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

(Signature)

(Signature)
23/10/24

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

Service Appeal No. _____/2024

MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d Hospital AKORA KHATAK NOWSHERA.

.....Appellant

Versus

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

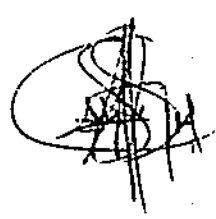
ADDRESSES OF PARTIES

APPELLANT:

MUHAMMAD SALMAN S/O Murad Gul Posted as ward attendant At cat-d HOSPITAL AKORA KHATAK Nowshera.

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 Khan
Sadozai

Advocates, High Court
Peshawar

Cell#03349207486

Dated: 09/09/2024

(5)



OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA

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

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose, MR. MUHAMMAD SALMAN S/O MURAD GUL is hereby appointed as Ward Attendant BPS-04 against the vacant post of Ward Attendant at DHO Office Nowshera with immediate effect in the public interest.

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 unsatisfactory performance.
3. You will not entitle to any TA / DA for Medical Examination and joining the first appointment.
4. The appointment will be governed by such rules and order issued by the Govt. from time to time.
5. 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.
6. 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. 4493-97 / 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 Salman S/O Murad Gul R/O Mohallah Malik Abad, Hakeemabad, District Nowshera.
5. Office record.

30 / 06 / 2022
District Health Officer
Nowshera

[Handwritten Signature]
District Health Officer
Nowshera
ATTESTED

(6)

To,

The D.G Health
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL FOR RELEASE 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 ATTENDAENT in health department on 30-06-2022 (Copy of appointment order is annexed).
3. That the appellant is still serving as ward attendant and is performing duty with zeal and zest but salary has not been stated to the appellant yet.
4. That the appellant approached the office of worthy D.H.O Nowshera as well as the office of District Account Officer but the grievance of appellant was not addressed.
5. That now the appellant approaches your good-self for release of salary.

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

Date : 05.06.2024

Applicant

MUHAMMAD SALMAN S/o MURAD GUL

CNIC: 17301-0748780-9

Signature



Seen

24-6-24

District Health Officer
Nowshera

ATTN

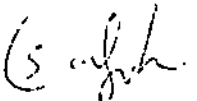
(7)

TO,
The worthy D.H.O
Nowshera

Application for providing copy of order of stoppage of
Salary, source sent for stoppage of salary or for non-issuing 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

date: 5/6/24

ATTESTED

پشاور بار ایسوسی ایشن

(Handwritten signature)

(Handwritten signature)

(Handwritten signature)

تاریخ: 23 / 1 / 2024



پشاور بار ایسوسی ایشن کے صدر اور تمام ممبران کو سلام و تحیات پیش کرتے ہوئے گزارش ہے کہ پشاور بار ایسوسی ایشن کی جانب سے منعقد کی جانے والی بار کونسل کی اجلاس میں شرکت کے لیے درخواستیں جمع کروانے کی تاریخ 23/1/2024 تک ہے۔ اس لیے درخواستیں جلد سے جمع کروانی چاہئیں۔

(Handwritten signature)

(Handwritten signature)

پشاور بار ایسوسی ایشن	
نام: _____ پتہ: _____ تعلقہ: _____ ضلع: _____ صوبہ: _____	پشاور بار ایسوسی ایشن پشاور

پشاور بار ایسوسی ایشن کے صدر اور تمام ممبران کو سلام و تحیات پیش کرتے ہوئے

 	پشاور بار ایسوسی ایشن پشاور
	0304-9495869 19-1343 (پشاور)