

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: **SYED QALANDER ALI SHAH** V/S

HEALTH DEPTT:

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: NOOR MOHAMMAD KHATTAK	✓	
2	Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: **NOOR MOHAMMAD KHATTAK**

Signature: _____

Dated: _____

2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 7765 / 2021

SYED QALANDER ALI SHAH VS HEALTH DEPTT: & OTHERS

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APPLICANT

THROUGH:
NOOR MOHAMMAD KHATTAK
ADVOCATE

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2021

Mr. Syed Qalander Shah, Clinical Technician (Pharmacy) (BPS -12),
Civil Dispensary Gandigar, District Dir Upper.

..... APPELLANT

VERSUS

- 1- The Government of Khyber Pukhtunkhwa through Secretary Health,
Peshawar.
- 2- The Director General Health Services, Khyber Pakhtunkhwa
Peshawar.
- 3- The District Health Officer, District Dir Upper.

..... RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
INACTION OF THE RESPONDENTS BY NOT PLACING THE NAME OF
THE APPELLANT IN THE LIST OF THE QUALIFIED DEGREE HOLDER
AND NOT PROMOTING ON HIS TERM TO THE POST OF PHC
TECHNOLOGIST (BPS-17) HAVING THE REQUISITE
QUALIFICATION AND AGAINST NOT TAKING ACTION ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE
STIPULATED PERIOD OF NINETY DAYS.**

PRAYER:

That on acceptance of this service appeal the impugned inaction of the respondents by not placing the name of the appellant in the list of the qualified degree holder and not promoting on his term to the post of PHC TECHNOLOGIST (BPS-17) may very kindly be set aside and the respondents may please be directed to place the name of the appellant in the list of the qualified degree holder and promote the appellant to the post of PHC TECHNOLOGIST (BPS-17) on his term with all back benefits. Any other remedy which this August Tribunal deems fit that may also be granted in favor of the appellant.

R/SHEWETH:

ON FACTTS:

- 1- That the appellant was appointed as Dispenser (BPS-6) in respondents department vide order dated 29-01-2004 and at present serving as Clinical Technician (Pharmacy) (BPS -12). Copy of the appointment order is attached as annexureA.

2- That after his appointment the appellant submitted his arrival report and started performing his duty with zeal and zest and his service book was accordingly prepared by the responsible officer. Copy of the service book is attached as annexure**B.**

3- That the appellant is a highly qualified in his respective filed of Health and had obtained a professional degree in the B. Sc (Health Medicine) in the year 2008 from a recognized institute under the N.W.F.P Medical & Dental Degree Ordinance, 1982 and also has got the BS (Honours) Paramedical Science from a recognized university. Copies of the degrees and educational testimonials are attached as annexure.**C.**

4- That it is important to mention her that the post of the appellant was once upgraded from BPS-6 to BPS-9 and then to BPS-12.

5- That it is important to mention here that the appellant was placed at serial No. 23 of the provisional seniority list of the Qualified Paramedics Degree Holder PHC (Multi Purpose) according to the date of acquiring of degree. Copy of the provisional seniority list of the Qualified Paramedics Degree Holder PHC is attached as annexure **D.**

6- That it is pertinent to mention her that although appellant name was there in the provisional seniority list of the qualified paramedics degree holder but it was disappear in the final seniority list. That feeling aggrieved the appellant preferred a representation before the respondents through proper channel and the same was forwarded to the competent authority vide letter dated 13-11-2017. Copies of the representation ad forwarding letter dated 13-11-2017 are attached as annexure **E &F.**

7- That it is important to mention here that the appellant is withdrawing his salaries against the post of clinical technician (Multi Purpose). Copy of the pay slip is attached as annexure**G.**

8- That although the appellant is a qualified degree holder and he is supposed to be placed with/ in the seniority list of the qualified degree holder but even then the appellant is kept in the seniority list of the clinical technician (Pharmacy) at the serial No. 1663 of the final seniority list of the clinical technician (Pharmacy), of November, 2020. Copy of the final seniority list is attached as annexure**H.**

9- That feeling aggrieved from the inaction of the respondents by not placing the name of the appellant in the list of the qualified degree holder and not promoting on his term preferred departmental appeal

before the respondents. Copy of the departmental appeal is attached as annexure I.

10- That the respondents promoted many PHC Technician to the post of PHC Technologist (BPS-17) and ignoring the appellant for promotion. Copy of the promotion/ posting order dated 01-09-2021 is attached as annexureJ.

11- That feeling aggrieved from the inaction of the respondents and having no other remedy the appellant preferred the instant appeal on following grounds inter alia.

GROUND:

A- That the impugned inaction of the respondents by not placing the name of the appellant in the list of the qualified degree holder and not promoting on his term to the post of PHC TECHNOLOGIST (BPS-17) is against law, facts, norms of natural justice and material on record hence liable to be set aside.

B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.

C- That the appellant has been discriminated by the respondents while issuing the impugned order dated 01-02-2018.

D- That by not placing in the list of qualified degree holder the respondents have violated their own rules framed in the year 2016 and also violated section-8, and 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 and Rule- 17 of the Khyber Pakhtunkhwa (APT) Rules, 1989.

E- That the respondents acted in arbitrary and mala fide manner while not placing the appellant in the list of qualified degree holders and not promoting to on his term.

F- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

4

APPELLANT


SYED QALANDAR SHAH

THROUGH:


NOOR MUHAMMAD KHATTAK


KAMRAN KHAN


UMAR FAROOQ

& 
SAID KHAN
ADVOCATES

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

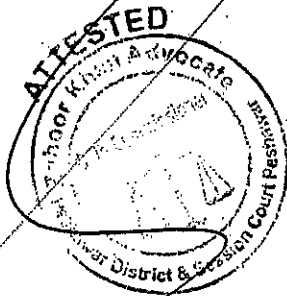
QALANDER ALI SHA

VS

HEALTH DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.




DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.


CERTIFICATION

NOTIFICATION

Date of Appointment 29-01-2004

6

Consequent upon their selection by the Departmental Selection Committee, the District Coordination Officer, Upper Dir has been pleased to appointed following candidates as Dispensers in BPS-6 (Rs. 2160-10,5460) plus usual allowances as admissible under the rules on CONTRACT BASIS and adjusted against the posts of Medical Technicians in Health Department, Upper Dir in the interest of public service in their own pay and scales subject to the following terms and conditions:

ANNEX - A"

S. #	Name	Father's Name	Address	Place of Posting	Remarks
1	Syed Qalandar Shah	Syed Munir Jan	Bibyawa	BHU Bibyawa	Against Vacant Post of Health Technician
2	Mohammed Mazuddin	Shahabuddin	Tarpata	RHC Patfak	do
3	Pir Salahuddin	Badshah Zada	Tarpata	BHU Batal	do
4	Rahatullah	Mirajuddin	Surbat Payeen	BHU Hattan	do
5	Javed Khan	Gul Nadar Khan	Wari	BHU Kakad	do
6	Abdullah	Mohammad Gran	Almas	RHC Wari	do
7	Shams-ur-Rahman	Said Rahman	Almas	Daskore Bala	do
8	Israruddin	Qadir Khan	Balla	BHU Sundal	do
9	Latifur Rahman	Dilaram Khan	Dir	BHU Doband	do
10	Wazir Zada	Mamoor Khan	Jabber	BHU Tarpata	do
11	Mattur Rahman	Hamidur Rahman	Dir	BHU Janbatai	do
12	Mohammad Jamil Khan	Mohammad Zamin Khan	Chapper	BHU Bara Darra	do
13	Sadfaullah	Wajidullah	Sundrawal	RHC Barawal	do
14	Subhanullah	Sahib Zahir	Bin Payeen	BHU Bin Payeen	do
15	Safiqullah	Sheh Alam	Dir	BHU Qulandi	do
16	Attaullah Shah	Habibullah	Wari	RHC Bandai Nehag	do
17	Fazal Amin	Shams-ur-Rahman	Wari	BHU Dislawar	do
18	Mubarak Zeb	Rahman Zeb	Barawal	BHU Dilachand	do
19	Khalid Hazrat	Gul Hazrat	Awari	RHC Bandai Nehag	do

TERMS AND CONDITIONS:

- The appointments are made on contract basis initially for a period of one year. Contract period will be renewed only with those who have good record/performance and if their services are required to the Department.
- The appointments/adjustment against higher pay scale have been made in accordance with instructions issued by the Govt. of NWFP, Finance Department vide Notification bearing No.FD(SR)16-4/2001 dated 18-1-2002 and Director General Health Services NWFP letter No.26468-94/E/II dated 11-1-2003 subject to the condition that their services will be terminated on completion of the contract period or till the availability of regular incumbents (qualified Medical Technicians) of the posts whichever is earlier.

Contd. P/2

ATTESTED

(For use in Police Department only).

Heirs

1.
2.
3.

Verification Roll No. dated received back

Left thumb-impression.

Qualification	Date	Qualifications
		1- Passed MTRIC Examination Under Roll NO-18522 in the Session 7 Annual Date 1992
English		2- First FAC Examination Under First Arts Roll NO-213 in the Session 4 Supp 1996
Pashtu		B. I. or B. A.
Urdu		3- Passed BA Examination Under Roll NO-34989 in the Pleadershp examination Session 9 Annual 1998
Plan-drawing		4- Training School Final examination Passed July Dispensed Examination
Finger print		Under Roll NO-855 in Other qualifications the Session 4 12/1998 Board
Drill instructing		& NWFPs Medical Faculty PESHAWAR
Court duties		Executive Director
Reserve duties		

N.B.—Line to be drawn under the qualification possessed.

ATTESTED

Note:—The entries in this page should be renewed or re-attested at least every five years and the Signature in lines 9 and 10 should be dated.

1. Name MR: SYED QALANDAR SHAH

2. Race SAYEED MUSLIM PAKISTANI

3. Residence O.F. VILLAGE BIBYWAR TEHSIL AND DISTRICT DIR UPPER

4. Father's name and residence MR: SYED MUNIR JAN

5. Date of birth by Christian era as nearly as can be ascertained 15-09-1976 (According to NIC)

6. Exact height by measurement 5 - 4

7. Personal marks for identification Mole on Right Side of face

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government servant

10. Signature and designation of the Head of the Office, or other Attesting Officer.

Executive Officer (Head) Upper Dir

ATTESTED

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Officer of Government

9

DISPENSER BPS-6 CRS-2160-110-5480			CR 2160/PM			31-01-2006	AK
Contract Basis Three years period at BHU Bibyanwar							

2005

THE ACCOUNTANT GENERAL
N.W.F.P. PESHAWAR
IN THE REVISED BASIC
PAY SCALES

OF RS. 2485-125-6235 (G)
AT RS. 2610 P.M.W.E.F. 1-07-2005
With next increment on 1-12-2005

Accounts Officer
Pay Fixation Party N.W.F.P. Peshawar



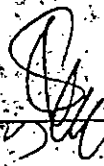

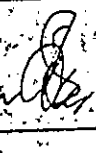
do			CR 2270/PM			1-12-04 (FN)	AK
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BPS-6 (CR 2485-125-6235)							
2610/6	DISPENSER	Pay Revised	CR 2610/PM			1-7-05 (FN)	AK

ATTESTED

Signature and designation of the head of the office or other attesting officer in illustration of columns 1 to 8.	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to recorded punish or censure, or of or praise of Government St
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
Executive District Officer (Health) Upper Dir							
					Appointed as Dispensary in D.P.S-6 (RS-2160-110-5460) on Contract Basis three years period plus usual Allowance Admissible Under the rules vide Selection Committee DCO Office Dir Upper Dir. No. 57583-88/DCO/APPH/Health dt. 29/01/2004. And posted against the vacant post of Health Technician Basic Health Unit Bibyaner DUSH. Dir Upper		
					Reported for duty (on 31/01/2004 PM)		
	30/11/04 (AM)		Executive District Officer (Health) Upper Dir		Annual Increment Service Verified Allowed Rs 1107PM from 31/01/04 to 30/11/04		
Executive District Officer (Health) Upper Dir			Executive District Officer (Health) Upper Dir			Executive District Officer (Health) Upper Dir	
					Pay fixed in Revised Basic pay scale 2005 and pay fixed Rs 2610/PM w.e from 01/07/2005		
			Executive District Officer (Health) Upper Dir				

ATTACHED

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Scr	9 Signature and designation of the officer of the office or attesting officer in columns 1 to 7
BPS-06 OR 2435-125-6235)				P 2610/PM				
Disp/H/Technician								
do		- 20		P 2735/PM		12 (PM) 1/2005		
do		- 20		P 2860/PM		1-12 2006 (PM)		
BPS-9 OR 2770-165-7720				P 2770/PM		2/8/06		
N		~		P 2935/PM		10 1/2006		
TESTED								

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to recorded punish or censure, or to or praise of Government Service
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		

Service regularized vide Estab and Admin department letter no 30/1/ (Regulation) EQ AD/1-13/2005 dt 10-08/2005.

*Executive District Officer
Health Dir Upper*

31/11/2005
(AN)

ANNUAL INCREMENT
ALLOWED RS. 125/100

Service Verified up to
11/11/05 to 30/11/2005

*Executive District Officer
Health Dir Upper*

*Executive District Officer
Health Dir Upper*

*Executive District Officer
Health Dir Upper*

30/11/2006
(AN)

ANNUAL INCREMENT
ALLOWED RS. 125/100

Service Verified up to
11/11/05 to 30/11/06

*Executive District Officer
Health Dir Upper*

*Executive District Officer
Health Dir Upper*

*Executive District Officer
Health Dir Upper*

Allowed BPS 06 to BPS 09
vide Govt. of NWFP Health Deptt:
Notification No. SOH-III/8-6/05
(Paramedic) dt. 5.08.2006 according
to Prescribed policy and pay fixed
EPS 9 (Next Stage) Rs. 2774 dt 25/8/06

*Executive District Officer
Health Dir Upper*

T No 818 dt 31/3/07
Dated 11/11/07
C-746+62-2984
D/AD

ATTESTED

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant	9 Signature Designation of the officer requesting attestation in column 8
BPS-9 3185-190-8885/ Jr. Clinical Techn (Pharmacy)		Pay Revised to 3325/PM				1-7-2007		
do	do		3565/PM			1-12-2007 (PM)		
BPS-09 CL-3820-230-10720/2 Jr. Clinical Techn Pharmacy BHU Bibyan		Pay Revised to 4280/PM				1-7-2008		
do	do		4150/PM			1-12-2008		

3375/907
4280/908

2007
OFFICE OF THE ACCOUNTANT GENERAL
N.W.F.P. PESHAWAR.
PAY FIXTURES - REVISED BASIC
PAY SCALES
OF RS. 3185-190-8885 (9)
AT RS. 3327 P.W.F.P. 1-07-2007
1-12-2007
With next increment

ATTESTED



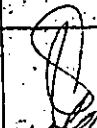
9		10	11	12	13		14	15
Signature and name of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to recorded punishment or censure, or merit or praise of Government Service
					Period	Government to which debitabale		
								14
		Pay Revised B/Pay Scale 2007 (vide Govt. Order NWFP F.I.) Deptt: Notification No FD(XRC)-1-1/2007, dt Peshawar the 20/7/2007						
		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER						
				ANNUAL INCREMENT ALLOWED RS. 1907 RPM		Service Verified up to 11/21/06 to 30/11/2007		
	30/11/2007 (AM)		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER	
						PAY REVISED IN B/PAY SCALE 2008 AND PAY FIXED RS. 4287 RPM W.E. FO: 11-7-08, VDI, GOVT. OF NWFP FINANCE DEPTT: NO. FD(XPC) F-1/08 DATED PESHAWAR THE 10-07-2008		
						Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER		
				ANNUAL INCREMENT ALLOWED RS. 2374 RPM		Service Verified up to 11/21/07 to 30/11/2008		
	30-11-2008 (AM)		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER		Amiranch EXECUTIVE DISTT. OFFICER HEALTH DISTT. DIR UPPER	
							OFFICER IN CHARGE THE ACCOUNTANT GENERAL NWFP PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES I OF RS 3820-230-10720 (9) AT RS 4287 P.M.W.E.F. 1-07-2008 1-12-2008 W/ty Nxtl. Incrment ch ATTESTED Acential Ch. of an Party NWFP PESHAWAR 23/7	

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant	Signature of Designation of the officer attesting the certificate in column 1
BPS-09 3185-190 = 8885 / Revised TR Clinical Technician (Pharmacy)		Pay Revised					(15)	
A 3820 = 230 - 10120 TR CL Technician (PHARMACY)		84240 / PM				1-12-2009 (FN)	[Signature]	EXECUTIVE HEALTH
[Signature]	DO	Account Officer Pay Party N.W.S. - Meshwar	14970 / PM			1-12-2010 (FN)	[Signature]	EXECUTIVE HEALTH
BPS-19 6200-380 = 17600 TR CL Techn Pharmacy		Pay Revised	8100 / PM			1-7-2011 (FN)	[Signature]	EXECUTIVE HEALTH
[Signature]	DO	8100 / PM	18480 / PM			1-12-2011 (FN)	[Signature]	Executive Health D
								Executive Health D

ATTESTED

9 Signature and designation of the head of the office or other attesting officer in columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference in recorded punish or censure, or praise of Government Service
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		
30/11/2009 (AN)		Annual increment Allowed Lt 2307/PM				Service Verified from 1-12/2008 to 30-11/2009	
EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER			EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER			EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER	
30/11/2010 (AN)		Annual increment Allowed Lt 2307/PM				Service Verified from 1-12/2009 to 30-11/2010	
EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER			EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER			EXECUTIVE DISTRICT OFFICER HEALTH DISTRICT DIR UPPER	
Executive District Officer Health Dist: Dir Upper		Pay Revised Basic Pay Scales 2011. Vide Govt. of K.P.K F/D (Regulation wing) No FD (PRC) 1-1/2011 dated Peshawar the 14/07/2011.				Executive District Officer Health Dist: Dir Upper	
30/11/2011 (AN)		Annual increment Allowed Lt 3807/PM				Service Verified from 1-12/2010 to 30/11/2011	
Executive District Officer Health Dist: Dir Upper			Executive District Officer Health Dist: Dir Upper			Executive District Officer Health Dist: Dir Upper	

ATTESTED

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant
15/5-09 CA-6200-385-17600/ J.C.T. Pharmacy			18865/PM			1-12-2012 (PM)	
do - D			29240/PM			12-2013	
do - D			29620/PM			1-12-2014	

~~TESTED~~

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to recorded punishment or censure, or or praise of Government	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
					Period			Government to which debitable.
	30/11/2012 (AN)			ANNUAL INCREMENT ALLOWED RS. 380/- PM		Service Verified up to 11/20/11 to 30/11/2012		
Executive District Officer Health Distt: Dir Upper			Executive District Officer Health Distt: Dir Upper			Executive District Officer Health Distt: Dir Upper		
	30/11/2013 (AN)			Annual Increment Allowed Rs 380/- PM		Service Verified from 1-12/2012 to 30/11/2013		
DISTRICT HEALTH OFFICER DIR UPPER			DISTRICT HEALTH OFFICER DIR UPPER			DISTRICT HEALTH OFFICER DIR UPPER		
	30/11/2014 (AN)			Annual Increment Allowed Rs 380/- PM		Service Verified from 1-12/2013 to 30/11/2014		
DISTRICT HEALTH OFFICER DIR UPPER			DISTRICT HEALTH OFFICER DIR UPPER			DISTRICT HEALTH OFFICER DIR UPPER		

ATTESTED

21

ANNEX "C"

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar Pakistan

This certifies that

Syed Qalandar Shah son of **Syed Muhammad Munir Jan**
having fulfilled all the requirements is hereby admitted to the degree of
Bachelor of Science (Honours) in Paramedical Sciences
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 12th day of February, 2015.

REGISTERED

Roll No: 1080

Session: Annual 2014

Reg. No: 95-D-100



117154

[Signature]

Registrar

[Signature]

M. Ubaidullah
MEDICAL OFFICER
Peshawar, Dir. of, par

[Signature]

Vice Chancellor

S. No. 254

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 357

Reg. No. MF/91/HT/PGPI/LRH

Result Declared on 3/2008



N.W.F.P. Medical Faculty Peshawar (Pakistan)

This is to Certify that

SYED QALANDAR SHAH Son/Daughter of SYED MUHAMMAD MUNIR JAN and a student of
PGPI LRH having passed the prescribed examination held in December, 2007

is this day admitted by the N.W.F.P. Medical Faculty Peshawar To the Degree of

Bachelor of Science in HEALTH (MEDICINE), **Technology**

in the 2nd Division

M. Uddin
Dr. Ubaidullah
MEDICAL OFFICER
RHC, Bibywar, Dir Upper

[Signature]
SECRETARY
NWFP MEDICAL FACULTY
Peshawar (Pakistan)



[Signature]
CHAIRMAN
NWFP MEDICAL FACULTY
/SECRETARY to Govt. of
NWFP Health Department Peshawar

Note: This Two Years Degree is issued under N.W.F.P. Medical & Dental Degree Ordinance XXVI of 1982

Valid for Appointment/Promotion in Health Department NWFP

Dated: 24-02-2009

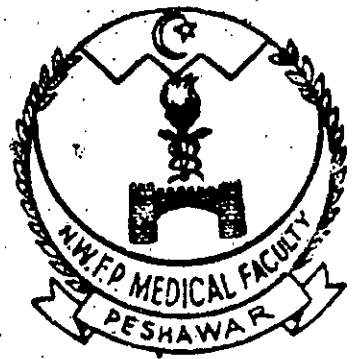
23

18015

Serial No.....

Roll No. 955.....

N.W.F.P. MEDICAL FACULTY,
PESHAWAR.



PROVISIONAL CERTIFICATE

Session..... 12/1998

This is to CERTIFY THAT..... Mr. Syed Qalandar Shah

Son/Daughter of..... Mr. Syed Muhammad Munir Jan

Address..... Vill: & PO: Pibyawar

Teh: & Distt: Dir Bala

and a candidate of..... Dispenser

has passed the said Examination from the N.-W.F.P. Medical Faculty, Peshawar held in 19 98

15-9-1976

His/her Date of birth according to admission form is.....

Seventy Six

One Thousand nine hundred and.....

Prepared by.....

Checked by.....

Date of Issue..... 27-5-1999

Witnessed by
Dr. Ubaidullah
MEDICAL OFFICER
RHC, Bibyawar, Dir Upper

SECRETARY,
N.W.F.P. Medical Faculty,
Peshawar.

24

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar (Pakistan)

SESSION ANNUAL 1998

SYED QALANDAR SHAH

SON

OF SYED MUHAMMAD MUNIR JAN

and a

student of

GOVT DEGREE COLLEGE DIR

having passed the prescribed examination held in AUGUST 1998

is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in THIRD Division

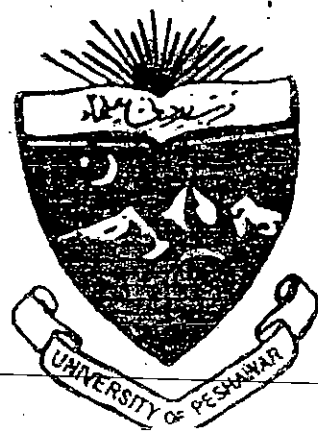
The Examination was taken as ~~whole~~ in parts.

Serial No. 075333

Registration No. 95-D-100

Roll No. 34989

Result Declared on DECEMBER 4, 1998



Attested by
[Signature]

Dr. *[Signature]*
MEDICAL OFFICER
RHC, Biby awar, Dir Upper

[Signature]
Registrar

Countersigned

[Signature]
Vice-Chancellor

S.No

1578

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No 213

26

REVISED

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif, Swat N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

PRE-MEDICAL Group

SESSION 1994 (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT SYED QALANDAR SHAH

Son/Daughter of SYED MOHAMMAD MUNIR JAN

and a student of DISTT: DIR

Registered No 30-B/DIR-1992 has passed the Intermediate Examination of

the Board of Intermediate & Secondary Education, Saidu Sharif, Swat held in

as a Regular/Private candidate. He/She obtained 473

Marks out of 1100 and has been placed in Grade D Representing FAIR

Internal Grade

The Examination was taken as a whole/in parts.

Attested by Dr. M. Baidullah MEDICAL OFFICER RHC, Bibyawar, Dist. Upper

Asstt. Secretary

Secretary

This certificate is issued without alteration or erasure.

S.No 14101

Roll No 18522



REVISED

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif, Swat N.W.F.P. Pakistan
Secondary School Certificate Examination
1992
SESSION (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT SYED QALANDAR SHAH
SYED MOHAMMAD MUNIR JAN
Son/Daughter of
and a student of GOVT: HIGH SCHOOL GANDIGAR DISTT: DIR

has passed the Secondary School Certificate Examination
of the Board of Intermediate and Secondary Education, Saidu Sharif, Swat held in
as a Regular/Private candidate. He/She obtained 520 Marks out
of 850 and has been placed in Grade B Representing VERY GOOD

The Candidate passed in the following subjects:

- 1. English 3. Islamiyat 5. MATHS 7. PHYSICS
2. Urdu 4. Pakistan Studies 6. CHEMISTRY 8. BIOLOGY

Internal Grade

Date of birth according to admission form is FIFTEENTH SEPTEMBER
one thousand nine hundred and SEVENTY SIX (15-09-1976)

Asstt. Secretary

This certificate is issued without alteration or erasure.

Attested by Secretary
Dr. Albaidullah
MEDICAL OFFICER
RHC, Bibyawar, Dir Upper

Provisional Seniority list of Qualified Paramedics Degree Holders PHC (Multi Purpose). v

Sl. No.	Name	Father Name	Date of Appointment	Date of Passing Degree	Total Obtained Marks & Division	Age	Board/ University/ Institution	Present Posting	Domicile	Date of Birth	Date of Retirement	Remarks / Requirements
1	2	3	4	5	6	7	8	9	10	11	12	13
1	Abdul Karim	Darpani Khan	21.06.1983	2011-Annual	3612/5000	72.24	University of Peshawar	DHO Peshawar	Peshawar	01.03.1961	28.02.2021	Verification required
2	Abdul Razaq	Muhammad Younis	01.08.1984	2011-Annual	3510/5000	70.20	University of Peshawar	DHO Haripur	Haripur	15/05/1965	14/05/2025	Verification required
3	Fazal Haq	Lajpat	27.06.1983	2011-Annual	3423/5000	68.46	University of Peshawar	DHO Haripur	Abbottabad	30.03.1964	29.03.2024	Verified
4	Muhammad Iqbal	Kamran Gul	09.02.1984	2011-Annual	3238/5000	64.76	University of Peshawar	DHO Peshawar	Peshawar	01.05.1963	30.04.2023	Verification required
5	Zameer Ahsan	Ijaz Khan	16.10.1985	2011-Annual	3109/5000	62.18	University of Peshawar	DHO Abbottabad	Abbottabad	12.06.1963	12.03.2016	Verification required
6	Sarfraz Ali	Sardar Ali	21.11.2006	2011-Annual	3076/5000	61.52	University of Peshawar	AS Kurram	Kurram	15/9/1972	14.09.2032	Verification required
7	Iqbal Muhammad	Noy-shad Khan	25.06.1983	2011-Annual	3099/5000	61.98	University of Peshawar	DHO Dir Lower	Dir Lower	17.11.1961	16.11.2023	Verification required
8	Muhammad Saeed	Fazle Malik	11.12.1985	2011-Annual	3026/5000	60.52	University of Peshawar	DHO Lower Dir	Charsadda	03.01.1958	02.01.2018	Verification required
9	Amir Khan	Khan Bar	11.04.1995	2011-Annual	2978/5000	59.46	University of Peshawar	BHU Tooda Chima	Khy: Agy.	04.04.1962	03.04.2022	Verification required
10	Shahid Haq	Habibul Haq	13.03.1986	2014-Annual	3516/5000	70.32	University of Peshawar	DHO Charsadda	Charsadda	14.04.1966	13.04.2026	Verification required

			2014 Annual	3163/5000	6316	University of Peshawar	DHO Dera Ismael Khan	Dera Ismael Khan			Provide Service Documents Name not found in the file verification required
			2014 Annual	2134/5000	6268	University of Peshawar	DHO Abbottabad	Peshawar	02.08.1960	01.08.2020	Provide Service Documents Name not found in the file verification required
		26.01.1987 01.03.2012	2014 Annual	3121/5000	6242	University of Peshawar	DHO Mardan	Mardan	03.08.1967	02.03.2027	Verification required
		07.02.2007	2014 Annual	2237/5000	6068	University of Peshawar	DHO Mardan	Mardan	16.03.1984	15.3.2014	Verification required
			2014 Annual	1831/5000	6062	University of Peshawar	DHO Kohat	Kohat			Provide Service Documents Name not found in the file verification required
			2014 Annual	3004/5000	6016	University of Peshawar	DHO Kohat	Kohat			Provide Service Documents Name not found in the file verification required
Sialkot District	Mr. Salam Khan	01.12.1994	Annual-2014	6554/5000	592	Peshawar University	KW Agency	Miranshan	1/9/1965	30/8/2025	Verification required
	Abdul Aziz	07.09.2010	2014 Annual	DMG Records		University of Peshawar	MMNGP DERA ISMAEL KHAN	Dera Ismael Khan	03.03.1985	02.03.2014	Verification required

ATTESTED



10	Muhammad Khan	Gul Zaria	26.12.2006	2014-Annual	3495/5000	69.20	University of Peshawar	Agency Surgeon Bajaur	Bejour Agency	04.01.1981	03.01.2041	Verified
11	Muhammad Khan	Muhammad Tajir	07.12.2006	2014-Annual	3491/5000	69.82	University of Peshawar	DHO Mardan	Mardan	02.04.1984	01.04.2044	verified
12	Zahid Khan	Abul Khad	02.08.2007	2014-Annual	3428/5000	68.56	University of Peshawar	DHO Kohat	Kohat	11.11.1968	10.11.2028	Verified
13	Qasim Khan	Muhammad Hanif	12.02.1986	2014-Annual	3466/5000	68.12	University of Peshawar	DHO Kohat	Kohat	05.10.1963	04.10.2023	Verified
14	Abdur Rahman	Rasander Khan	17.02.1984	2014-Annual	3327/5000	66.54	University of Peshawar	DHO Lower Dir	Dir Lower	16.05.1959	15.05.2019	Verification required
15	Khan (SADQ)	Muhammad Rahque	07.11.1990	2014-Annual	3303/5000	66.16	University of Peshawar	AS PR Kohat	Kohat	12.04.1965	11.04.2025	verified
16	Ali (DHO)	Sabir Haque	23.05.2006	2014-Annual	3266/5000	65.32	University of Peshawar	DHO Battagram	DHO Battagram	14.05.1984	13.05.2044	Verification required
17	Muhammad Din	Dr. Muhammad	13-04-2001	Annual 2014P	3227/5000	64.54	University of Peshawar	DHO Dir	Upper Dir	5/1/1974	4/1/2034	Verification
18	Muhammad Tahir	Sajid Muhammad	14.07.2008	2014-Annual	3200/5000	64.00	University of Peshawar	DHO Manshera	Manshera	06.01.1982	05.01.2042	Verification required
19	Abul Isah	Kachol Bacha	23.02.1982	2014-Annual	3176/5000	63.52	University of Peshawar	DHO Dir Lower	Dir lower	02.02.1959	07/10/2019	Verification required
20	Zahid Ali	Muhammad Shahid	21.02.1985	2014-Annual	3174/5000	63.48	University of Peshawar	DHO Mardan	Mardan	12.01.1964	11.01.2024	Verification required
21	Zahid Hassan	Sahib Dad Khan	05.03.1986 11.05.2012	2014-Annual	3172/5000	63.44	University of Peshawar	DHO Dir Khan	Dir Khan	17.05.1963	16.05.2023	Verified

ATTESTED

?

Dr. Arif Khan	Islamabad		2014			University of Peshawar	DHO Swat	?			Provide Service Documents Name not found in the SI verification required
Dr. Arif Khan	Islamabad		2015 Annual	3261 / 5000	65.02	University of Peshawar	DHO Shangla	Shangla	?	?	Provide Service Documents Name not found in the SI verification required

[Signature]
Director General Health Services
Khyber Pakhtunkhwa, Peshawar

ATTESTED *[Signature]*

ANNEXURE "E"

34

The Dy. (H) K.P.K

pleas add my name in the Final list of Degree Holder paramedics

most respect fully said that, I am a regular servant of Health Department, Apointed as a ~~Assistant~~ and then promoted To Jct pharmacy and working in R.H.C Bibyawar Dist Dir Upper from the last 14 years.

I am passed the Examination of BSc (Hon) in Health Technology from PGPI LRH university Bikaner and my name are preset in the Provisional list of paramedics and my No are 93 in the Health Technology Degree Holders. but unfortunately in the Final list my name are disappear.

pleas add my name in the Final list of Health Technology Degree Holder paramedics. I am very Thankfull to you for this kind act

Thanks

Dated: 13/11/17

yours! Syed Qalander Shah
S/o Syed Muhamad Munir Jan
M.T. R.H.C Bibyawar
Dist Dir Upper.

ATTACHED documents are attached

6/10

/Seniority List District Health Officer,

dated the 13 /11/2017.

The District Health Officer
District Dir Upper

The Director General Health Services
Khyber Pakhtunkhwa Peshawar.

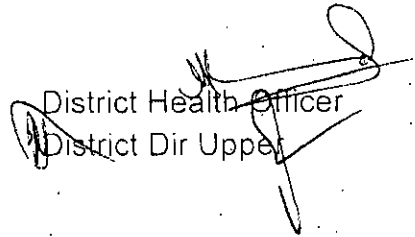
Subject:- PROVISIONAL SENIORITY LIST OF DEGREE HOLDERS PARAMEDICS
OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

FOR:

With reference to your office letter No. 10230-320/AE-VII, dated 22-08-2017 on the subject noted above.

I have the honour to submit herewith Bio Data in respect of Mr. Syed Muhammad Shah S/O Syed Muhammad Munair Jan Clinical Technician Pharmacy BPS- working at Rural Health Center Bibywar District Dir Upper for including in Seniority List for your kind information and further necessary action please.

Enclosed 01 Copy is attached.


District Health Officer
District Dir Upper


ATTESTED

Dist. Govt. KP-Provincial
District Accounts Office Dir Upper
Monthly Salary Statement (August-2021)

ANNEX - 9



36

Personal Information of Mr SYED QULANDAR SHAH d/w/s of SYED MUNIR JAN

Personnel Number: 00278010 CNIC: 1570112206577 NTN:
Date of Birth: 15.09.1976 Entry into Govt. Service: 29.01.2004 Length of Service: 17 Years 07 Months 004 Days

Employment Category: Active Permanent

Designation: CLINICAL TECHNICIAN (MULT 80814150-DISTRICT GOVERNMENT KHYBE

DDO Code: DP6191-EDO(H) DIR UPPER(RHC)

Payroll Section: 001 GPF Section: 001 Cash Center: 00

GPF A/C No: Interest Applied: Yes GPF Balance: 329,181.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 12 Pay Stage: 13

Wage type	Amount	Wage type	Amount
0001 Basic Pay	25,800.00	1001 House Rent Allowance 45%	2,940.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1548 Rural Compensatory Allowa	50.00	1551 Spl Conveyance to Disable	3,000.00
1923 UAA-OTHER 20%(1-15)	1,000.00	1985 Health Professional Allow	15,000.00
2148 15% Adhoc Relief All-2013	481.00	2199 Adhoc Relief Allow @10%	356.00
2211 Adhoc Relief All 2016 10%	1,834.00	2224 Adhoc Relief All 2017 10%	2,580.00
2247 Adhoc Relief All 2018 10%	2,580.00	2264 Adhoc Relief All 2019 10%	2,580.00
2309 Adhoc Relief All 2021 10%	2,580.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3012 GPF Subscription	-2,220.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-761.00	4004 R. Benefits & Death Comp:	-600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	150,000.00	-4,166.00	4,190.00

Deductions - Income Tax

Payable: 9,131.15 Recovered till AUG-2021: 1,522.00 Exempted: 0.05 Recoverable: 7,609.20

Gross Pay (Rs.): 65,137.00 Deductions: (Rs.): -8,947.00 Net Pay: (Rs.): 56,190.00

Payee Name: SYED QULANDAR SHAH

Account Number: 010-0770-4

Bank Details: UNITED BANK LIMITED, 211785 BIBYAWAR BIBYAWAR,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIR

City: DIRPROPER

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: Email: qalandarshah180@gmail.com

ATTACHED

System generated document in accordance with APPM 4.6.12.9(281554/25.08.2021/v3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/31.08.2021/14:01:53)

**Seniority List of Clinical Technician (Pharmacy) BS-12 in the Health Services
Khyber Pakhtunkhw. November.2020**

Name/ Father's Name	a) Old Nomenclature With BPS b) New Nomenclature with BPS	Date of Joining Govt: Service/ Promotion/ Up-gradation	Place of Present Posting	Date of Birth Domicile	Date of Retirement /Remarks.
Khalid Mehmood S/O Ghulam Sarwar	JCT(Pharmacy)B-9 CT(Pharmacy)B-12	20.08.2003 11.08.2015	DHO DI Khan	01.01.1971 DI Khan	31.12.2030
Muhammad Arif S/O Shah Nawaz	JCT(Pharmacy)B-9 CT(Pharmacy)B-12	22.08.2003 11.08.2015	DHQ D.I Khan	01.01.1966 D.I Khan	31.12.2025
Muhammad Bilal S/O Abdur Rashid	JCT(Pharmacy)B-9 CT(Pharmacy)B-12	22.08.2003 11.08.2015	DHQ D.I Khan	12.12.1966 D.I Khan	11.12.2026
Ghulam Ali S/O Muhammad Gul	JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.10.2004 11.08.2015	DHO D.I Khan	24.08.1969 D.I Khan	23.08.2029
Muhammad Yousaf S/O K Mir Abdullah Shah	EEG Tech; BS-09 CT(Pharmacy)B-12	05.12.2005 11.08.2015	KGNT Hosp: Bannu	01.06.1966/ Bannu	31-05-2026
Mujeeb Ur Rahman S/O Fazal Ur Rahman	Dispenser B-07 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	28.03.1995 10.05.2006 11.08.2015	DHO Khyber	10.04.1965 Khyber	09.04.2025
Sirajul Haq S/O Ghulam Sarwar	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	20.07.1982 10.05.2006 11.08.2015	DHO Dir Lower	28.02.1961 Dir Lower	27.02.2061
Muhammad Khurshid S/O Abdur Rehman	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.08.1982 10.05.2006 11.08.2015	DHO Abbottabad	12.02.1964 Abbottabad	11.02.2024 Forgone his promotion vide letter No. 9064/ Estab dated 06.11.2012
Fazli Wahab S/O Sher Bahadar	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	10.03.1983 10.05.2006 11.08.2015	DHO Buner	21.02.1962 Swat	20.02.2022
Siraj Hussain S/O Sher Ali	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	19.05.1983 10.05.2006 11.08.2015	AS Kurram Agency	07.01.1962/ Kurram	06-01-2022
Abdur Rashid S/O Gohar Rehman	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	27.06.1983 10.05.2006 11.08.2015	DHO Mansehra	06.01.1965/ Mansehra	05-01-2025
Sain Muhammad S/O Rahimullah	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.07.1983 10.05.2006 11.08.2015	DHO Mansehra	01.02.1964 Mansehra.	31.01.2024
Hamidullah S/O Khair Muhammad	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	19.07.1983 10.05.2006 11.08.2015	DHQ Hosp; Bannu	12.12.1961 Bannu	11.12.2021
Wiqar Ahmad S/O Lawar Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.08.1983 10.05.2006 11.08.2015	LRH Peshawar	12.04.1964 Charsadda	11.04.2024
Misbahullah S/O Ahmad Jan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.08.1983 10.05.2006 11.03.2015	LRH Peshawar	13.05.1964 Charsadda	12.05.2024
Mehboob ur Rahman S/O Muhammad Shamas	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.08.1983 10.05.2006 11.08.2015	FC H Shabqadar	27.11.1965 Charsadda	26.11.2025
Kiramatullah S/O Abdur Rahim	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.08.1983 10.05.2006 11.08.2015	KTH Peshawar	---	---
Ismail Khan S/O Junia Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	22.08.1983 10.05.2006 11.08.2015	AS Mohmand	21.09.1963 Charsadda	20.09.2023
Dost Ali S/O Salani Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	03.09.1983 10.05.2006 11.08.2015	FR Bannu	01.04.1961 Bannu	31.03.2021

654	Muhammad Tajmir Khan S/O Muhammad Zamin Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	01.06.1974 Dir Upper	31.05.2034
655	Israruddin S/O Qadeer Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	02.01.1975 Dir Upper	01.01.2035
656	Mubarak Zeb S/O Rahman Zeb	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	04.04.1975 Dir Upper	03.04.2035
657	Attallah Shah S/O Habibullah	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	22.07.1976 Dir Upper	21.07.2036
658	Subhanullah S/O Sahib Zarin	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	10.12.1976 Dir Upper	09.12.2036
659	Rahatullah S/O Mirajuddin	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHQ Hosp; Dir Upper	21.04.1978 Dir Upper	20.04.2038
660	Khalid Hazrat S/O Gul Hazrat	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	30.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	02.01.1979 Dir Upper	01.01.2039
661	Mati ur Rahman S/O Hamid ur Rahman	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	31.01.2004 11.05.2006 11.08.2015	LRH Peshawar	06.05.1964/ Dir upper	05.05.2024
662	Shams-ur-Rahman S/O Said Rahman	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	31.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	15.05.1974 Dir Upper	14.05.2034
663	Syed Qalandar Shah S/O Syed Munir Jan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	31.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	15.09.1976 Dir Upper	14.09.2036
664	Wazir Zada S/O Mamoor Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	31.01.2004 11.05.2006 11.08.2015	DHO Dir Upper	07.05.1980 Dir Upper	06.05.2040
665	Farooq Khan S/O Sardar Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	07.02.2004 11.05.2006 11.08.2015	AS Kurram Agency	03.06.1973 Kurram	02.06.2033
666	Abdur Rauf S/O Abdul Baqi	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	20.02.2004 11.05.2006 11.08.2015	DHO Tank	25.12.1975 Tank	24.12.2035
667	Abdur Raziq S/O Malik Gamin	Embalmer BS 05 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	01.03.2004 10.05.2006 11.08.2015	Gomal MC DIKhan	03.10.1982 DIKhan	02.10.2042
668	Abdul Shakoor S/O Abdul Wahab	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHQ Hosp: Lakki Marwat	04.02.1971 Lakki Marwat	03.02.2031
669	Latif Ullah Khan S/O Nawaz Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Lakki Marwat	14.01.1972 Lakki Marwat	13.01.2032
670	Haroon Rashid S/O Awal Dar Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Lakki Marwat	07.03.1972 Lakki Marwat	06.03.2032
671	Sarang Zeb S/O Shah Nazool Bacha	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Dir Upper	23.03.1972 Dir Upper	22.03.2032
672	Samiullah S/O Aman Ullah	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Lakki Marwat	25.02.1973 Lakki Marwat	24.02.2033
673	Saifullah S/O Fateh Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	City Hosp; Lakki Marwat	01.03.1973 Lakki Marwat	28.02.2033
674	Wilayat Shah S/O Muhammad Shah	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Lakki Marwat	15.02.1974 Lakki Marwat	14.02.2034
675	Ali Zaman S/O Badshah Khan	Dispenser BS 06 JCT(Pharmacy)B-9 CT(Pharmacy)B-12	12.03.2004 11.05.2006 11.08.2015	DHO Lakki Marwat	22.05.1974 Lakki Marwat	21.05.2034

TO,

ANNEX "I"

The Secretary Health
K.P.K Peshawar

39

Sir,

most respectfully said that, I am appointed
as a dispenser against medical Tech, on dated
-29-01-2004 Dt-0-Div Upper

I belong to a hard area of Dist Div Upper, and
I am a disable person having the disability

of post polio paralysis having these cerebral
problems, I am completed the higher education

of paramedics, through proper channel
by Govt, expenses and salary

but unfortunately the dispenser goes to Dying
Cader and the Govt shifted us to the

-pharmacy cader, but unfortunately the pharmacy
cader having no higher education - So

Health Technology are interrelated. So I am

admitted in Health Technology in P.G.P.I - LRH -

Peshawar and I am completed the BSc (Hons)
in Health Technology six year ago.

I am requested you to give me promotion
on qualification on the basis of degree

holder paramedics, take mercy on him,

save my future from darkness and give
me insaff.

Copy to:

Thanks

Dated: 20-7-2021

Yours: Syed Qalandar Shah

1) C.M. K.P.K.

2) Health Minister K.P.K.

3) DG Health K.P.K.

1/c. G. Gandigar

D.H.O. Div Upper

cell No: 03128054224

03078054224

ATTESTED



Shipper's Account #

Consignment #

40

Sales Tax Invoice

DOMESTIC

1910 02136360

Origin: DIR Destination: ResL

Pieces: Weight:

Shipper Information

Name: W. S. NEW

Address: 1572

Tel: _____

Consignee Info

Name: J.P. W.

Address: 1572

Tel: 1572

Length (cm): _____

Width (cm): _____

Height (cm): _____

Total Weight: _____

This is a non-negotiable consignment note subject to the terms and conditions set forth on the reverse of shipper's copy in forwarding this shipment. Shipper agrees that M&P shall not be liable for special incidental for consequential delays or damages arising from carriage hereof. M&P disclaims all warranties expressed or implied with respect to this shipment. The shipment under this consignment note if not insured by the shipper, will be insured "on shipper's risk" alone.

Insurance: Do You Require Coverage? YES NO

Overnight:

Special Handling:

Second Day:

Same Day:

Sunday/Holiday:

Other:

Shipment Contents: _____

I confirm & affirm that I have understood and agree on all the rates, rules and terms and conditions stated hereafter and that all details given herein are true and correct.

Shipper's Signature: 1572

Consignment Note - Non Negotiable

Ins. Premium: _____

Declared Value: _____

Collection by: _____

Code: 10794 Date: 29/7/02

Time: _____

CASH	
CHEQUE	
Charged Rates	
Other Charge	
Taxes	
Total Amount	

Former Care: +(92-21) 111 202 202 | contact@mulphilog.com



Dated Peshawar, the 01st September, 2021

NOTIFICATION

ANNEXURE - J

SOH-1/B-6011/2021 (PHC Technologist BS-17): In pursuance of this Departments Notification of even number dated 24-08-2021, the Competent Authority, is pleased to order posting of the following PHC Technologist (MP) (BS-17) against the vacant posts mentioned their names, with immediate effect in the public interest.

S.NO	Name with Father Name	From	To
1.	Murad Ali S/O Sher Bahadar	DHO Malakand	DHO Malakand
2.	Khalid Farooq S/O Muhammad Raffique	DHO Peshawar	At the disposal of DG PHSA Peshawar
3.	Hidayat Ullah S/O Sahib-ul-Flag	DHO Battagram	DHO Battagram
4.	Ghulam Rabbani S/O Hajat Mand	DHO Shangla	DHO Shangla
5.	Misbahuddin S/O Dost Muhammad	DHO Dir Upper	DHO Dir Upper
6.	Saif Ullah Khan S/O Muhammad Pervesh	DHO Swat	DHO Swat
7.	Zia-ul-Hasan Khan S/O Sahib Dad Khan	DHO D.I Khan	DHO D.I Khan
8.	Miraj uddin S/O Umar Din	DHO Mardan	DHO Mardan
9.	Muhammad Tahir S/O Saif Muhammad	DHO Mansehra	DHO Mansehra
10.	Sarfaraz Ali S/O Sardar Ali	DHO Kurram	DHO Kohat
11.	Miraj Ali S/O Fazal Dad	DHO Mardan	DHO Mardan
12.	Abdul Jalil S/O Abdul Aziz	MMTH D.I.Khan	DHO D.I Khan
13.	Ghulam Taunsaivi S/O Mir Salan Khan	DHO NW	DHO D.I Khan
14.	Mumtaz Ali S/O Ahmad Ali	DHO Kurram	DHO Kohat
15.	Haroon Zaman S/O Mian Zaman Khan	DHO Swabi	DHO Swabi
16.	Muhammad Waseem Iqbal S/O Muhammad Iqbal	DHO Peshawar	At the disposal of DG PHSA Peshawar
17.	Bahadar Zeb S/O Muhammad Jan	DHO Bajaur	Dir Lower
18.	Faheem Ur Rahman S/O Fazale Hakeem	DHO Mardan	DHO Mardan
19.	Usman Ali S/O Mir Ahmad Khan	DHO Lakki Marwat	DHO Lakki Marwat
20.	Saeed Ur Rahman S/O Sultan Wazir	DHO Peshawar	DHO Peshawar
21.	Muhammad Anwar Zeb S/O Syed Jahanzeb	DHO Peshawar	DHO Peshawar
22.	Saleem Yousaf S/O Muhammad Yousaf	DHO Battagram	DHO Battagram
23.	Muhammad Waseem S/O Muhammad Islam	DHO Peshawar	DHO Peshawar
24.	Saeed Rehman S/O Sahib Noor	DHO Karak	DHO Karak
25.	Sahib Alam S/O Ghulam Qasim Shah	MM Hosp: D.I Khan	DHO D.I Khan
26.	Muhammad Tahir S/O Khan Saeed	DHO Hosp: Bajaur	DHO Bajaur

ATTACHED

42

27.	Nasem Khan S/O Anwar Khan	DHO Peshawar	DHO Peshawar
28.	Wajid Ali S/O Ali Baz Khan	DHO Peshawar	DHO Peshawar

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst of even No and Date.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Director General, Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer, concerned.
5. Hospital Director, MTL concerned.
6. Medical Superintendent, DHQ Hospital, concerned.
7. District Accounts Officer, concerned.
8. The Deputy Director (I.T) Health Department.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.
11. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
12. PA to Deputy Secretary (Admn) Health Department.
13. Officers concerned.

FILED

Naseer Ahmad
 (Naseer Ahmad)
 SECTION OFFICER-III

43

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: _____ OF 2021

Syed Qalander Ali Shah (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

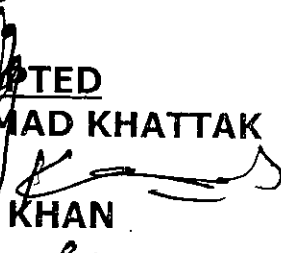
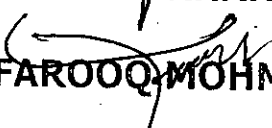
Health Deptt. (RESPONDENT)
(DEFENDANT)

I/We Syed Qalander Ali Shah
Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021



CLIENTS

ACCEPTED
NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

UMER FAROOQ MOHMAND

&

SAID KHAN
ADVOCATES

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

Appeal No. 7765 of 20 21
Syed Qalandar Shah Appellant/Petitioner

Regd
Versus
The Govt. of KPK through Secy. Health Respondent
Respondent No. 3

Notice to: —

The Distt. Health Officer Distt.
District Upper.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

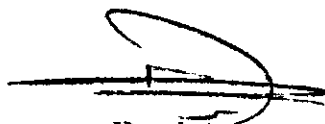
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 24th

Day of Jan 20 22

(for Reply)



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

Appeal No. 7765 of 20 21
Syed Qalandar Shah Appellant/Petitioner

the Govt of KPK through Secy. Health Respondent
2

Respondent No. 2
the Director General Health Services
KPK Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 24th Day of Jan 22 20 ..

(For Reply)
[Handwritten signature]

[Handwritten signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, 8B
PESHAWAR.

No.

Appeal No. 7765 of 20 21

Syed Qalandar Shah Appellant/Petitioner

Versus

The Govt. of KPK through Secy. Health Respondent

Respondent No. 1

Notice to: —

The Govt. of KPK through Secretary
Health Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 26/1/22

Day of Jan 20 22

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

3/12/22

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 7765 of 2021 . SB

Mr. Syed Qaender Shah

Appellant/Petitioner

Versus

through secy Health, Peshawar.

RESPONDENT(S)

Notice to Appellant/Petitioner ^{Revised Cont (1)} Court of KP through
secy Health, Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

on 21/07/2022 at Peshawar

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

15/7/2022
copy not available

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No..... 7765 of 2021. SB

..... Mr. syed Qalandar shah

Apellant/Petitioner

Versus

..... through sery Health, Peshawar.

RESPONDENT(S)

Notice to ^{Respondent (2)} Appellant/Petitioner The Director General
..... of service, KPK Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 21/07/2022 at 9:00 am.....

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

[Signature]

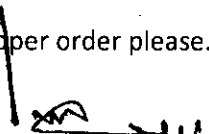

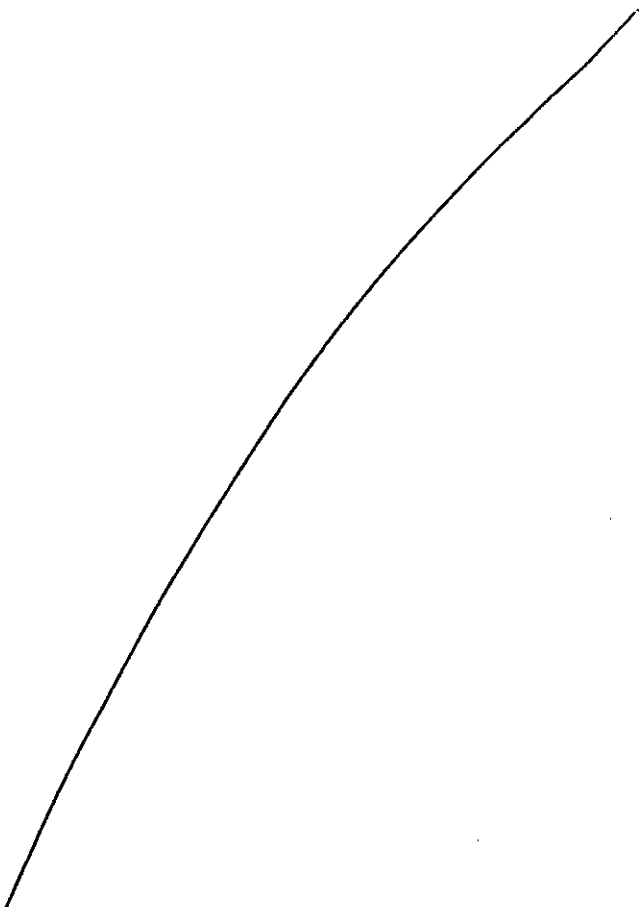
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7765/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/11/2021	<p>The appeal of Mr. Syed Qalandar Ali Shah presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>10/01/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

10.01.2022

Mr. Noor Muhammad Khattak, Advocate, for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 15.03.2022 before the S.B.

Appellant Deposited
Security & Process Fee

14/1/22


(Salah-Ud-Din)
Member (J)

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.6.2022. for the same as before.


Reader.

06.06.2022

Clerk to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present. Nemo for respondent Department.

Reply on behalf of respondents is still awaited. Notice be issued to all the respondents for submission of comments. To come up for reply/comments on 21.07.2022 before S.B.


(Rozina Rehman)
Member (J)