

18.05.2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Granted. To come up for reply/comments as well as preliminary hearing on 22.07.2022 before S.B.

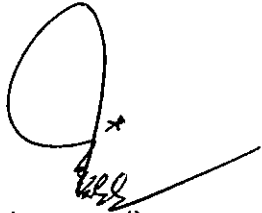
A handwritten signature in black ink, consisting of a large, stylized 'M' followed by a horizontal line and some scribbles below it.

(Mian Muhammad)  
Member (E)

17.12.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant argued and contended that the appellant is aggrieved of the inaction of respondent-department by not adjusting the appellant in the Management cadre irrespective of the fact that the appellant has acquired the requisite qualification. Learned counsel for the appellant was confronted with a logical question with regard to the main appeal of the Management cadre bearing No. 209/2019 titled Fahad Iqbal which is pending for adjudication in the Service Tribunal. Learned counsel for the appellant could not further argue and requested that pre-admission notice may be issued in the instant service appeal. Let pre-admission notice be issued to the official respondents to submit their reply/parawise comments and assist the Tribunal. Adjourned. To come up for preliminary hearing on 22.02.2022 before S.B.

  
(Mian Muhammad)  
Member(E)

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.

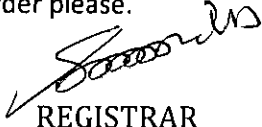
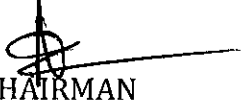
  
Reader

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 7817/2021 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/12/2021	<p>The appeal of Dr. Zia-ur-Rehman 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>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>17/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Case Title: **DR ZIA UE REHMAN**

V/S

**HEALTH DEPTT:**

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <b>NOOR MOHAMMAD KHATTAK</b>	✓	
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**

SERVICE APPEAL NO. 7817 /2021

DR ZIA UR REHMAN

V/S

HEALTH DEPTT:

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Dated:       12.2021

**APPELLANT**

Through:

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**  
**0345-9383141**

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

**APPEAL NO. \_\_\_\_\_/2021**

Dr. Zia-ur-Rehman, Management Cadre (BPS-17), Presently serving as  
Medical Superintendent, Category "D" Hospital, Nahaqi, District Peshawar.

.....**APPELLANT**

**VERSUS**

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa Health  
Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Health Services, Khyber Pakhtunkhwa,  
Peshawar.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
INACTION OF THE RESPONDENTS BY NOT ADJUSTING THE  
APPELLANT IN THE MANAGEMENT CADRE (ORIGINAL/OWN  
CADRE OF THE APPELLANT) IRRESPECTIVE OF THE FACT  
THAT APPELLANT HAS THE REQUISITE QUALIFICATION AND  
AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL  
APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD**

**PRAYER:**

That on acceptance of this appeal the impugned inaction of  
the respondents by not adjusting the appellant in the  
management cadre may please be declared as illegal,  
unlawful and ineffective upon the rights of the appellant.  
That the respondents may please be directed to adjust the  
appellant in the management cadre along with all back  
benefits including seniority. Any other remedy which this  
august Tribunal deems fit that may also be awarded in favor  
of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as  
under:-**

- 1- That appellant while performing his duties was regularized vide office order dated 25-04-2017 in pursuance of the notification of the provincial government. Copy of the office order dated 25-04-2017 is attached as annexure..... **A.**
- 2- That during service the appellant was posted as Medical Superintended (BPS-18) in Category "D" Hospital Nahaqi, Peshawar vide office order dated 12-03-2020. Copy of the office order dated 12-03-2020 is attached as annexure ..... **B.**
- 3- That it is pertinent to mention here that vide notification dated 15-07-2021 all the management cadre doctors were upgraded from BPS-17 to BPS-18. Copy of the Notification dated 15-07-2021 is attached as annexure..... **C.**
- 4- That astonishingly the name of the appellant was illegally and mala fide not mentioned in the mentioned notification for his upgradation to BPS-18 and feeling aggrieved from this inaction by not enlisting the name of the appellant in the mentioned notification preferred departmental appeal/ representation vide dairy no. 11294. Copy of the departmental appeal/ representation is attached as annexure..... **D.**
- 5- That it is important to mention here that vide notification dated 10-05-2017 the provincial government amended the Khyber Pakhtunkhwa, Health (Management) Service Rules, 2008 whereby two year cushion period was given to the general cadre officers of the health department holding the post of management cadre. Copy of the notification dated 10-05-2017 is attached as annexure ..... **E.**
- 6- That the appellant is will qualified and have obtained the requisite qualification of the management cadre. Copies of the educational testimonials are attached as annexure ..... **F.**
- 7- The while performing his duties as the Medical Superintended (BPS-18) in the category "D" Hospital Nahaqi, the appellant was illegally relived vide order dated 06-09-2021 w-e-f 15-09-2021. Copy of the order dated 06-09-2021 is attached as annexure ..... **G.**
- 8- That appellant feeling aggrieved from the impugned order dated 06-09-2021 preferred Departmental appeal followed by service appeal No.7671/2021 and vide order sheet dated 2.11.2021 this august Tribunal issued interim relief by suspending the operation of the order dated 6.9.2021. Copies of the Departmental appeal, memo of

appeal and order sheet dated 2.11.2021 are attached as annexure ..... **H, I and J.**

9- That feeling aggrieved from the inaction of the respondents by not adjusting the appellant in the management cadre the appellant filed Departmental appeal but no reply has been received so far. Hence the instant appellant having no other remedy preferred the instant service appeal on the following grounds amongst the others. Copy of the Departmental appeal is attached as annexure ..... **K.**

**GROUND:**

A- That the order dated 06-09-2021 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 impugned inaction of the respondents by not adjusting the appellant in the management cadre is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.

C- 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.

D- That the order dated 06-09-2021 has been issued by the respondents in arbitrary and mala fide manner, hence not tenable and liable to be set aside.

E- That the order dated 06-09-2021 is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.

F- That the impugned inaction of the respondents by not adjusting the appellant in the management cadre is arbitrary and mala fide manner, hence not tenable and liable to be set aside.

G- That the impugned inaction of the respondents by not adjusting the appellant in the management cadre is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.

H- That neither adjusting the appellant in the management cadre nor giving him up gradation at par with his other colleagues is discrimination with the appellant and due to the impugned inaction the appellant is in a hanging position.



- I- That the impugned inaction of the respondents by not adjusting the appellant in the management cadre is nothing but just to harass the petitioner and to accommodate his blue eyed person.
- J- That vide order dated 06-09-2021 the appellant has wrongly been relived for the training course of the general cadre although the appellant belongs to the management cadre, therefore the same is not tenable and liable to be set aside.
- K- That the order dated 06-09-2021 is nothing but just to harass the petitioner and to accommodate his blue eyed person.
- L- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

**APPELLANT** *Zia Rehman*

**ZIA-UR-REHMAN**

**THROUGH:**

*NOOR*  
**NOOR MOHAMMAD KHATTAK**

*Kamran*  
**KAMRAN KHAN**

*Said Khan*  
**SAID KHAN**

*Haider Ali*  
**HAIDER ALI  
ADVOCATES**

5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

SERVICE APPEAL NO. \_\_\_\_\_ / 2021

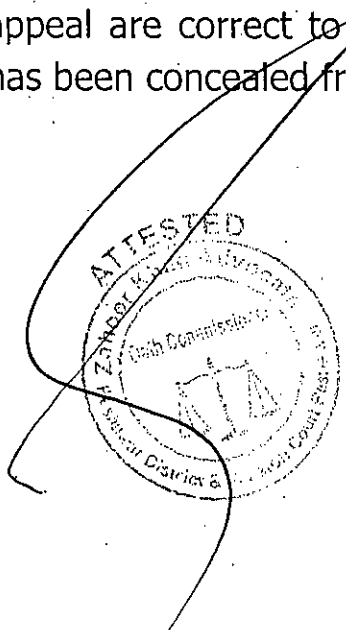
Dr ZIA UR REHMAN

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.



*Zia Rehman*  
**DEPONENT**

**CERTIFICATE:**

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

*Zia Rehman*  
**CERTIFICATION**

DIRECTORATE  
GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

An communication should be  
addressed to the Director  
General Health Services  
Peshawar and not to any official  
by name.

E-Mail Address: dg@kpsc.gov.pk  
Phone: 011-2511700

6

OFFICE ORDER

In pursuance of Government of Khyber Pakhtunkhwa Health Department Notification NO.SO(E)II-II/3-18/2016 dated 20.04.2017, on regularization of their services as MOs/Dental Surgeons [BS-17] under Khyber Pakhtunkhwa GAVI, JICA, ADHOC & CONTRACT EMPLOYEES ACT 2016, the following Medical Officers/Dental Surgeons are hereby posted/adjusted against the vacant posts mentioned against their names in the interest of public service:

Sl #	Name with designation	Place of Posting	Remarks
01.	Dr. Bilal Bahrawar, MO BS-17.	Dy. Director Emergency Preparedness, DGHS Peshawar	Against the Vacant post in his own pay scale.
02.	Dr. Ahmed Tariq, Dental Surgeon BS-17.	Dy. Director (Non Communicable Diseases-I, DGHS Peshawar	Against the Vacant post in his own pay scale.
03.	Dr. Luqman Ali, MO BS-17.	Dy. Director (PHC-I) DGHS, Peshawar.	Against the Vacant post in his own pay scale.
04.	Dr. Majid Khan, Dental Surgeon BS-17.	Dy. Director Communicable Diseases-II, DGHS Peshawar.	Against the Vacant post in his own pay scale.
05.	Dr. Tanveer Inam, MO BS-17.	Dy. Director MCH, DGHS Peshawar.	Against the Vacant post in his own pay scale.
06.	Dr. Zia Ur Rehman, Dental Surgeon BS-17.	Dy. Director (PHC-II) DGHS, Peshawar.	Against the Vacant post in his own pay scale.
07.	Dr. Makhdoom Saifdar MO BS-17.	Dy. Director Nutrition, DGHS Peshawar.	Against the Vacant post in his own pay scale.
08.	Dr. Tariq Hayat Taj Dental Surgeon BS-17.	Dy. Director (Non Communicable Diseases-II, DGHS Peshawar	Against the Vacant post in his own pay scale.

ATTESTED

Before joining the above mentioned posts, they will actualize their regularization of service against original posts of MOs/Dental Surgeons (BS-17) in the hospitals mentioned against their names:

- |  |                               |
|--|-------------------------------|
| 1. Dr. Bilal Bahrawar MO (B-17)            | DHQH Charsadda                |
| 2. Dr. Ahmed Tariq Dental Surgeon (B-17)   | Under control of DHO Malakand |
| 3. Dr. Luqman Ali MO (B-17)                | DHQH Charsadda.               |
| 4. Dr. Majid Khan Dental Surgeon (B-17)    | Under control of DHO Malakand |
| 5. Dr. Tanveer Inam MO (B-17)              | DHQH Charsadda                |
| 6. Dr. Zia Ur Rehman Dental Suregon (17)   | Under control of DHO Malakand |
| 7. Dr. Makhdoom Safdar MO (B-17)           | DHQH Charsadda                |
| 8. Dr. Tariq Hayat Taj Dental Surgeon (17) | Under control of DHO Malakand |

Sd/-X.X.X.X.  
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR

No. 9903-15/E.I

Dated Peshawar the 28/04/2017.

Copy forwarded to the:-

- 01- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 02- Additional Director General Health Services, DGHS, Peshawar.
- 03- Director HRM, DGHS Peshawar.
- 04- Director PH, DGHS Peshawar.
- 05- Director Curative Services, DGHS, Peshawar.
- 06- Director MCH, DGHS Peshawar.
- 07- Director Nutrition, DGHS, Peshawar.
- 08- DHO Malakand.
- 09- MS DHQH Charsadda.
- 10- DAO, Malakand & Charsadda.
- 11- PS to Secretary Health Govt of KP Peshawar.
- 12- PA to DGHS, Peshawar.
- 13- Doctor concerned.

For information and necessary action.

*Shahin*  
DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR  
*Shahin*  
28/4

ATTESTED



**ANNEXURE**

**5**

**(8)**

**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. Mail Address: P.O. Box 100,  
Warsak Road Kababian (Old FATA Secretariate Peshawar)

**OFFICE ORDER**

In pursuance of Govt. of Khyber Pakhtunkhwa Health Department Notification No. SOH(HD)E-V/2-2/2020 dated 06.03.2020, Dr. Zia-Ur-Rehman BPS-17 (Management Cadre) posted at the disposal of DGHS, Khyber Pakhtunkhwa Peshawar is hereby posted against the vacant post of Deputy Medical Superintendent (BPS-18) in Category "D" Hospital Nahaqi (District Peshawar) in his own pay scale in the best interest of public service.

Sd/xxxxxxxxxxxx  
DIRECTOR GENERAL HEALTH  
SERVICES, Khyber Pakhtunkhwa  
PESHAWAR

No. 3714-19/E-I,

Dated Peshawar the: 12/3/2020

Copy forwarded to the:

1. Secretary to Govt. of KP Health Department.
2. Account General, Khyber Pakhtunkhwa Peshawar.
3. District Health Officer, Peshawar.
4. Medical Supdt. Category "D" Hospital Nahaqi (Peshawar).
5. PA to DGHS, KP Peshawar.
6. Doctor concerned.

For information and necessary action.

*M/W*  
Add: DIRECTOR GENERAL (H.R.M.)  
DIRECTORATE GENERAL HEALTH SERVICES,  
KHYBER PAKHTUNKHWA PESHAWAR

12/3/2020

**ATTESTED**



ANNEXURE C  
Government of Khyber Pakhtunkhwa,  
Health Department

(9)

Dated Peshawar the July 15, 2021

**NOTIFICATION**

NO. SOH (E-V)/M.Cadre/4-4/Up-gradation/2021 In pursuance to approval by the Competent Authority (Chief Minister, Khyber Pakhtunkhwa), on a summary, and in consultation with Establishment and Finance Departments of Khyber Pakhtunkhwa, sanction is hereby accorded to the up-gradation of the following incumbents of the posts of Member of Service (BS-17) of the Management Cadre doctors, with immediate effect-

S/No	Nomenclature of the post	Current Posting	From	To
1.	Dr. Abdul Qayyum	DD IMU Health	BS-17	BS-18
2.	Dr. Hamid Muhammad Afridi	Deputy DHO, FR Peshawar	BS-17	BS-18
3.	Dr. Mehreen Aziz Khan	PHSA Peshawar	BS-17	BS-18
4.	Dr. Shams-Ur-Rehman	N-STOP officer/ MO at the disposal of DHO, Khyber	BS-17	BS-18
5.	Dr. Attaullah	Deputy Chief, HSRU	BS-17	BS-18
6.	Dr. Kifayatullah	N-STOP officer, Swat MO, THQ Matta Swat	BS-17	BS-18
7.	Dr. Inayat ur Rehman	DHO, Kurram (Lower)	BS-17	BS-18
8.	Dr. Fahad Iqbal	DHIS Coordinator, DHO, Office, Mardan.	BS-17	BS-18
9.	Dr. Hamza Abbas Khan	DMS, DHQ Mardan	BS-17	BS-18
10.	Dr. Liaqat Ali	EPI Coordinator, Swat	BS-17	BS-18
11.	Dr. Muhammad Bilal Khan	DD Public Health DGHS	BS-17	BS-18
12.	Dr. Shaima Malik	DM Aids Program	BS-17	BS-18
13.	Dr. Halizullah Khan	Provincial N-STOP officer	BS-17	BS-18
14.	Dr. Shabnum Khawas	EOC, Peshawar	BS-17	BS-18
15.	Dr. Muhammad Hayat	DHO, Mohmand	BS-17	BS-18
16.	Dr. Fazal Qayum	MO, THQ Hospital Samarbagh Lower Dir	BS-17	BS-18
17.	Dr. Pir Zada	Coordinator EPI, Kohistan	BS-17	BS-18

ATTESTED

Section Officer (E-V)  
Health Department  
Khyber Pakhtunkhwa

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18.	Dr. Muhammad Sohail Farooqi	DD Public Health DGHS	BS-17	BS-18
19.	Dr. Faisal Malik	MO, HMC MTI	BS-17	BS-18
20.	Dr. Shumaila Malik	WMO, Moolvi Jee Hosp. Peshawar.	BS-17	BS-18
21.	Dr. Bilal Bahrawar	PM IDSR DGHS	BS-17	BS-18
22.	Dr. Makhdoom Saifdar	DD EPI, DGHS Office, Peshawar	BS-17	BS-18
23.	Dr. Tanveer Inam	DD MCH, DGHS Office, Peshawar	BS-17	BS-18
24.	Dr. Tariq Hayat Taj	Waiting for posting	BS-17	BS-18
25.	Dr. Majid Khan	N-STOP officer, Kohat	BS-17	BS-18
26.	Dr. Salra Jabeen	DD PHSA	BS-17	BS-18
27.	Dr. Majid Saleem	TSO RDSU, D.I.Khan	BS-17	BS-18
28.	Dr. Muhammad Israrul Haq	Attached to DHO Bannu	BS-17	BS-18
29.	Dr. Adnan Khan	DHO, Orakzai	BS-17	BS-18
30.	Dr. Humera Samab	Attached to DHO, Mansehra	BS-17	BS-18
31.	Dr. Muhammad Muddassir Iqbal Khan	DD Public Health DGHS	BS-17	BS-18
32.	Dr. Attaullah	DHO, Kurrani Uper	BS-17	BS-18
33.	Dr. Iqramullah	DDHO, Mardan.	BS-17	BS-18
34.	Dr. Irfanuddin	DMS, DHQH, Baskhela	BS-17	BS-18
35.	Dr. Muhammad Kashif Shahid Khan	Demonstrator, Gajju Khan Medical College, Swabi.	BS-17	BS-18
36.	Dr. Naseeb Gul	DMS, AHQH, Bajaur.	BS-17	BS-18
37.	Dr. Muhammad Wajid Ali	EPI Coordinator, Shangla	BS-17	BS-18
38.	Dr. Fayyaz Ali Roomi	DD EPI DGHS	BS-17	BS-18
39.	Dr. Zeeshan	N-STOP Mardan/ Type-D Hospital, Madian Swat	BS-17	BS-18
40.	Dr. Sherin Muhammad	MO, Attached to DHO L/Dir	BS-17	BS-18
41.	Dr. Fakhre Alam	Incharge MO, Cat-D Hospital, Barikot Swat	BS-17	BS-18
42.	Dr. Muhammad Alangir	Attached to DHO, Charsadda	BS-17	BS-18
43.	Dr. Khalid Khan	DMS, DHQH, U/Dir.	BS-17	BS-18
44.	Dr. Muhammad Arif Khan	Attached to DHO Swabi.	BS-17	BS-18
45.	Dr. Saleem Khan	DD, AMC, Abbottabad.	BS-17	BS-18

Dr. Muhammad Iqbal Khan  
Specialist  
Khyber Pakhtunkhwa

ATTESTED

46.	Dr. Irshad Ali	DDHO, Dir Lower	BS-17	BS-18
47.	Dr. Muhammad Sajjad	MO, DHQH Alpurai.	BS-17	BS-18
48.	Dr. Noor Islam	MO, DHO Swabi	BS-17	BS-18
49.	Dr. Syed Rahmat Ali	Coordinator DHO office, Swat	BS-17	BS-18
50.	Dr. Waqar Ahmad	Coordinator LHW Programme Swabi.	BS-17	BS-18
51.	Dr. Shafiqat Ullah	Attached to DHO Lakki Marwat	BS-17	BS-18

2. Moreover, the following members of Service (BS-17), presently on deputation/ Extra Ordinary Leave, will be upgraded to BS-18 upon their arrival/ report back to this department w.e.f that date:-

S/No	Nomenclature of the post	Current Posting	From	To	Remarks
1.	Dr. Rajwal Khan	On deputation	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from deputation
2.	Dr. Syed Nayyar Raza Kazmi	EOL	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL
3.	Dr. Ziaullah Khan Dawar	EOL	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL
4.	Dr. Imtiaz Ali Shah	1825 days EOL w.e.f from 01.05.2011 to 30.04.2016	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL
5.	Dr. Haris Mustafa	On deputation	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from deputation
6.	Dr. Syed Irfan Ali Shah	Deputation to WHO w.e.f 22.02.2021	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from deputation
7.	Dr. Ahmad Tariq	On deputation WHO	BS-17	BS-18	He will actualize up-gradation to BS-18

Section Officer (EY)  
Health Department  
Khyber Pakhtunkhwa

ATTACHED



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					after reporting back to Health Department from deputation
8.	Dr. Sufian Khan	On deputation WHO	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from deputation
9.	Dr. Sheraz Ahmad Khan	EOL study leave	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL
10.	Dr. Sohrab Ali	EOL 24.04.2020 to 23.04.2022	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL
11.	Dr. Bakht Beland	EOL	BS-17	BS-18	He will actualize up-gradation to BS-18 after reporting back to Health Department from EOL


Section Officer (EV)  
 Health Department  
 Khyber Pakhtunkhwa

**Secretary Health  
Government of Khyber Pakhtunkhwa**

Endst. Of even No. & Date.

Copy to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PSD to Chief Secretary, Khyber Pakhtunkhwa.
4. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
5. Director General PHSA, Khyber Pakhtunkhwa.
6. Director General Drugs, Khyber Pakhtunkhwa.
7. Chief HSRU, Health Department, Khyber Pakhtunkhwa.
8. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
9. All District Health Officer, Khyber Pakhtunkhwa.
10. All Medical Superintendent, Khyber Pakhtunkhwa.
11. All Hospital Director MTIs, Khyber Pakhtunkhwa.
12. All District Accounts Officers, Khyber Pakhtunkhwa.
13. Manager Government Printing Press, Peshawar for Gazette notification.
14. PS to Minister for Health Department, Khyber Pakhtunkhwa.
15. PS to Secretary Health Department, Khyber Pakhtunkhwa.
16. All Doctors concerned.

  
 (Laff-Ur-Rehman)  
 SECTION OFFICER (E-V)

Section Officer (EV)  
 Health Department  
 Khyber Pakhtunkhwa

**ATTESTED**

15-7-21

# ANNEXURE D

DAIRY NO: 11294

DATE 3.8.21

(13)

The Secretary to Govt of Khyber Pakhtunkhwa  
Health Department Peshawar.

Subject: Representation against Notification NO.SOH (E-V)/M.Cadre/4-4/Up-gradation/2021

Respected Sir,

1. undersigned were appointed on contract basis as district epidemiologist (BS-17) dated 23.01.2014 (Attached)
2. Later on my services was regularized under regularization Act (GAVI, JICA, ADHOC & contract employees Act 2016 and I got Appointed as Deputy Director (PHC-II) DGHS, Peshawar under Departmental Notification NO.SO(E)H-II/3-18/2016 Dated 20.04.2017 (Annex-I)
3. Consequently I was posted in Management cadre wide Notification No.SOH(HD)E-V/2-2/2020 Dated 06.03.2020 as Deputy Medical Superintendent IN Category D Hospital Nahaqi District Peshawar (Annex-II)
4. In 2021 The post of the member of Service (BS-17) of the management Cadre Doctors has been upgraded Wide competent authority Notification NO.SOH (E-V)/M.Cadre/4-4/Up-gradation/2021, where in my name has erroneously ignored in the attached notification (Annex-III)

In view of the above position, it is kindly requested to include my name in the list of management cadre officers in para 4 above and also upgrade my post from BS-17 to BS-18 mentioned and save the undersigned from mental worries and depression please.

Yours's Sincerely

*Zia Ur Rehman*

Dr. Zia Ur Rehman

Deputy Medical

Superintendent

Emergency Satellite

Hospital Nahaqi

Peshawar

Dated 03.08.2021

*Handwritten signature*

**ATTESTED**

EXTRAORDINARY  
GOVERNMENT

REGISTERED NO. PIII

GAZETTE

## KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, MONDAY, 29<sup>th</sup> May, 2017.GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

## NOTIFICATION

Dated: 10<sup>th</sup> May, 2017.

NO.SOH(E-V)4-20/2017. In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII of 1973), the Chief Minister of the Khyber Pakhtunkhwa is pleased to direct that, in the Khyber Pakhtunkhwa Health (Management) Service Rules, 2008, the following amendments shall be made, namely:

## AMENDMENTS.

1. In rule 10, in sub-rule (2), the full stop appearing at the end of the first proviso shall be replaced by colon and thereafter, the following second proviso shall be added, namely:

"Provided further that for a period of two years, from the date of issuance of this amending Notification, the officers of the General Cadre, who are in regular and continuous service and holding posts as such, shall be required to improve their qualification as per the Khyber Pakhtunkhwa Health (Management) Service Rules, 2008 to exercise the option under this rule."

2. In Schedule III,-

- (a) at serial No.3, for the figures "350", "300" and "150", the figures "250", "200" and "100" shall respectively be substituted;
- (b) serial No.4, shall be deleted; and
- (c) under the heading "General Compulsory subject" (350 marks), in the table, for serial No.5 and 6, the following shall be substituted, namely:

5.	"Pakistan Affairs and Islamiyat".	100.
----	-----------------------------------	------

3. In schedule-IV, in heading "Topics" for the existing entries, the following shall, respectively, be substituted, namely:

## "Topics"

- Communication and advocacy in Health.
- Existing Health Policies;
- Health system in Pakistan and its Challenges;
- DHIS Roles and responsibilities of Secretariat, Director General and DHO/MS;
- Role of Government and district government's in context of Local Government Act;

ATTESTED

15

- Monitoring and supervision;
- Primary and Healthcare, Hospital Management, Waste disposal quality Management.
- Vertical programs and their linkages within the Health System.
- Rules of Business.
- Auditing and Accountant, General Financial Rules, ESTA Code etc; and
- The Khyber Pakhtunkhwa Civil Servant Act, 1973 "Fundamental rules and supplementary rules".

SECRETARY TO  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT.

Printed and published by the Manager,  
State P.C. Dept., Khyber Pakhtunkhwa, Peshawar.

ATTACHED

72/92

Serial No.: 09496/552

Reg. No.: 2003-KCD-661  
Session: Supplementary 2007

KHYBER MEDICAL UNIVERSITY  
PESHAWAR, PAKISTAN.

*has conferred upon*

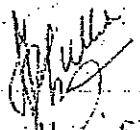
ZIA UR REHMAN s/o SHAMS UR REHMAN

of Khyber College of Dentistry, Peshawar

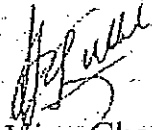
*the degree of*

BACHELOR OF DENTAL SURGERY

*Given this fourth day of March two thousand and nine*

  
Controller of Examinations

  
Registrar

  
Vice-Chancellor

ATTESTED

16

ANNEXURE - F

Serial No. 011657

# Abdul Wali Khan University Mardan



Reg No. 18-AU-MIS-M-38  
Roll No. 40293

Session Spring 2018-19

The University in recognition of the fulfillment of prescribed requirements has awarded

Mr. ZIA UR REHMAN S/O Mr. SHAMS UR REHMAN

The Degree of

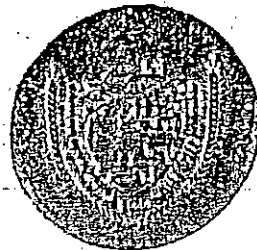
**MASTER OF PUBLIC HEALTH**

Together with all honors, rights and privileges belonging to the degree.

In witness whereof this degree is granted.

Controller of Examinations

Registrar



Vice Chancellor

Result Declaration Date. 10-09-2020

ATTESTED

Scanned with CamScanner

17

# PAKISTAN MEDICAL & DENTAL COUNCIL

18

C-1024, Muzo Area, Islamabad  
Website: www.pmdc.org.pk



## CERTIFICATE OF FULL REGISTRATION ON THE REGISTER OF DENTISTS

### Licence to Practice

Registration Number : 9798-D  
Name : ZIA UR REHMAN  
Father Name : SHAMS UR REHMAN  
Present Address : VILLAGE AND P/O HATHIAN  
TEHSIL TAKHT BHAI DISTRICT MARDAN.  
Permanent Address : VILLAGE AND P/O HATHIAN  
TEHSIL TAKHT BHAI DISTRICT MARDAN.



Registration Date : 12/11/2009 Name Retained Upto 31/12/2024

Qualification & Date	Institute/University	Year
1 B.D.S. (BASIC DENTAL QUALIFICATION)	[PESHAWAR UNIVERSITY] [KHYBER COLLEGE OF DENTISTRY, PESHAWAR]	2009

*It is hereby certified that the above is a true copy of the entries in the Register of the said Council and that the holder of this certificate is entitled to practice in the field of dentistry specified therein. He/she is authorized to practice in the field of dentistry specified therein and will be considered a specialist of the level mentioned and in the field of which any additional qualifications are registered.*

IMPORTANT NOTICE



**ATTESTED**



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 Ph: (091) 221-2220 Peshawar Fax: (091) 221-2220

19

OFFICE ORDER

**ANNEX - 5**

In partial modification of this Directorate office order bearing endorsement No. 12892-218/E-I dated 27/08/2021 Dr. Zia Ur Rehman Dental Surgeon (BS-17) attached to Cat-D Hospital Nahaqi Peshawar may be read as MMC Mardan instead of Khyber College of Dentistry Peshawar. He will be considered as relieved of his duties w.e.f. 15/09/2021 to join 02-months training at MMC Mardan.

S.No	Name of Doctor/Place of Posting	Name of Training Institution
1.	Dr. Zia Ur Rehman Dental Surgeon (BS-17) attached to Cat-D Hospital Nahaqi Peshawar.	MMC Mardan

Sd/xxxxxx  
Director General Health,  
Services Khyber Pakhtunkhwa

No. 13604-09/E-I, Peshawar the Dated 06/09/2021

- Copy forwarded to the:
1. Hospital/Medical Directors, KTH Peshawar and Mardan
  2. Dean Khyber College of Dentistry Peshawar
  3. Medical Superintendent MMC Mardan
  4. District Health Officer Peshawar.
  5. Doctor concerned.

For information & necessary action. It is requested that after completion of training a certificate may be issued reporting completion of his two months training, so that his promotion case is taken up with Govt.

ADDL DIRECTOR GENERAL (HRM)  
DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

**ATTESTED**



The Secretary, Govt: of K.P. Health Department, Peshawar.

Subject: Two (02) Months Mandatory Training at MMC Marabon.

Reference: DGHS Office Order Nos. 13604-09/E-1 dated 6-9-2021

Dear Sir,

with great reverence, it is submitted that

the undersigned was nominated for

(two) months training at Marabon Medical

campus (MMC) Wala District

General Health Services Order No. 13604-

09/E-1 dated 6-9-2021. Copy enclosed

likewise to say that the subject

training is mandatory for promotion

of Doctors of General Course

it is worth to mention, that the under-

signed belong to management course as

revealed from Notification No. 3714-17/E-1

dated 17-03-2020 (copy enclosed) and have

P.T.O.

performed my duties at various positions  
in management of my supervisors since my  
induction in health Department. It is  
further added that the post of manager  
element case was upgraded vide  
competent Authority Notification No.  
SOH(E-V)/M. cadre/4-4/1994 (gradation/10),  
wherein the name of the undersigned  
was erroneously excluded in this regard.  
I had already submitted application  
for induction in management cadre  
bearing Diary No. 11294 dated 03-08-2011.  
Forgoing in view, it is humbly prayed  
that any previous application may  
be taken into account and subsequent  
Office order No. 13604-09/E-1 may be  
withdrawn please.

Dr. Za-ur-Rehman  
Deputy Medical Superintendent  
(DMS)

With respectful regards

100

To

The Secretary, Government of Khyber Pakhtunkhwa  
Health Department  
Peshawar.

DAIRY NO. 11732  
DT. 16-9-21  
P. 11

Subject: TWO (02) MONTHS MANDATORY TRAINING AT MMC MARDAN  
Reference: DGHS office order No. 13604-091/E-I dated 06-09-2021

Dear Sir,

With great reverence, it is submitted that the undersigned was nominated for two (02) months training at Mardan Medical Complex (MMC) vide Directorate General Health Services, office order No. 13604-091/E-I dated 06-09-2021 (copy enclosed). Needless to say, that the subject training is mandatory for promotion of Doctors of General cadre.

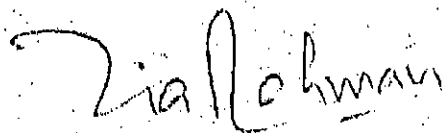
It is worth to mention, that the undersigned belong to management cadre as revealed from Notification No. 3714-19/E-I dated 12-03-2020 (Copy enclosed) and have performed my duties at various positions in management cadre to the entire satisfaction of my superiors, since my induction in Health Department. It is further added that the post of management cadre was upgraded vide competent authority Notification No. SO1101-V/M.cadre/E-I/upgrade/2021, wherein the name of the undersigned was erroneously excluded. In this regard, I had already submitted application for induction in management cadre bearing Diary No. 11294 dated 03-08-2021 (copy attached).

Foregoing in view, it is humbly prayed that any previous application may be taken into account and subsequent office order No. 13604-091/E-I may be withdrawn, please.

With profound regards,

Encl: As Above

Dated: 16-09-2021



Dr. Zia Ur Rehman  
Deputy Medical Superintendent (DMS)  
Emergency Satellite Hospital Nahaqi, Peshawar  
Cell# 03169120123

Copy to Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

**ATTESTED**



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

**APPEAL NO. 7671 /2021**

Diary No. 7788  
Dated 22/10/2021

Dr. Zia-ur-Rehman, Management Cadre (BPS-17), Presently serving as Medical Superintendent, Category "D" Hospital, Nahaqi, District Peshawar.

**.....APPELLANT**

**VERSUS**

- 1- The Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary to Government of Khyber Pakhtunkhwa Health Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

**..... RESPONDENTS**

**APEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER DATED 06-09-2021 WHEREBY THE APPELLANT HAS ILLEGALLY BEEN TRANSFERRED/RELIEVED FOR THE GENERAL CADRE COURSE IN UTTER VIOLATION OF RULES AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD.**

filed to-day  
Registrar

**PRAYER:**

That on acceptance of this appeal the impugned office order dated 06.09.2021 may very kindly be set aside and the appellant may not be transferred/relieved from the post of Medical Superintendent Cat-D Hospital, Nahaqai, Peshawar. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**ATTESTED**

**R/SHEWETH:  
ON FACTS:**

**Brief facts giving rise to the present appeal are as**

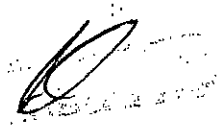
**under:-**

- 1- That appellant while performing his duties was regularized vide office order dated 25-04-2017 in pursuance of the notification of the provincial government. Copy of the office order dated 25-04-2017 is attached as annexure..... **A.**

Received to  
and filed  
21/10/21  
Registrar

- 2- That during service the appellant was posted as Medical Superintended (BPS-18) in Category "D" Hospital Nahaqi, Peshawar vide office order dated 12-03-2020. Copy of the office order dated 12-03-2020 is attached as annexure ..... **B.**
- 3- That it is pertinent to mention here that vide notification dated 15-07-2021 all the management cadre doctors were upgraded from BPS-17 to BPS-18. Copy of the Notification dated 15-07-2021 is attached as annexure..... **C.**
- 4- That astonishingly the name of the appellant was illegally and mala fidely not mentioned in the mentioned notification for his upgradation to BPS-18 and feeling aggrieved from this inaction by not enlisting the name of the appellant in the mentioned notification preferred departmental appeal/ representation vide dairy no. 11294. Copy of the departmental appeal/ representation is attached as annexure..... **D.**
- 5- That it is important to mention here that vide notification dated 10-05-2017 the provincial government amended the Khyber Pakhtunkhwa, Health (Management) Service Rules, 2008 whereby two year cushion period was given to the general cadre officers of the health department holding the post of management cadre. Copy of the notification dated 10-05-2017 is attached as annexure ..... **E.**
- 6- That the appellant is will qualified and have obtained the requisite qualification of the management cadre. Copies of the educational testimonials are attached as annexure ..... **F.**
- 7- The while performing his duties as the Medical Superintended (BPS-18) in the category "D" Hospital Nahaqi, the appellant was illegally relived vide impugned order dated 06-09-2021 w-e-f 15-09-2021. Copy of the impugned order dated 06-09-2021 is attached as annexure ..... **G.**
- 8- That appellant feeling aggrieved from the impugned order dated 06-09-2021 preferred Departmental appeal before the appellant authority but the same has not been responded/ decided till date. Copy of the Departmental appeal is attached as annexure ..... **H.**
- 9- That the appellant having no other remedy preferred the instant service appeal on the following grounds amongst the others.

**GROUND:**



A- That the impugned order dated 06-09-2021 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 the impugned order dated 06-09-2021 has been issued by the respondents in arbitrary and mala fide manner, hence not tenable and liable to be set aside.

D- That the impugned order dated 06-09-2021 is based on discrimination, favoritism and nepotism, hence not tenable in the eye of law.

E- That vide impugned order dated 06-09-2021 the appellant has wrongly been relived for the training course of the general cadre although the appellant belongs to the management cadre, therefore the same is not tenable and liable to be set aside.

F- That the impugned order dated 06-09-2021 is nothing but just to harass the petitioner and to accommodate his blue eyed person.

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

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

APPELLANT  
*Zia Rehman*  
ZIA-UR-REHMAN

THROUGH:  
NOOR MOHAMMAD KHATTAK

*Kamran Khan*  
KAMRAN KHAN

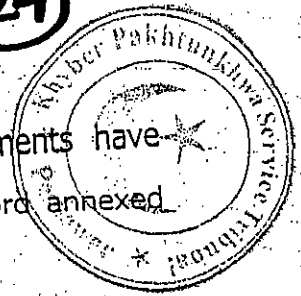
*Said Khan*  
SAID KHAN

*Haider Ali*  
HAIDER ALI  
ADVOCATES

*[Handwritten mark]*

02.11.2021

Counsel for the appellant present. Preliminary arguments have been heard. Memorandum of appeal and the copies of record annexed there with has been perused.



According to the learned counsel for the appellant, the appellant is an officer of BS-17 (Management Cadre) and he is aggrieved of the impugned order dated 06.09.2021 whereby his earlier order dated 27.08.2021 was modified and he was relieved w.e.f 15.09.2021 to join two months training at MMC Mardan. The appellant preferred departmental appeal on 16.09.2021 on which no order of the appellate authority is arrived; hence, the instant service appeal filed in the Service Tribunal on 22.10.2021. Learned counsel for the appellant was confronted with a pertinent question regarding the order dated 27.08.2021 which is not available with the connected documents. Learned counsel for the appellant replied that it has not been communicated to the appellant and being member of management service he has already acquired the requisite qualification. It was further observed that the name of the appellant does not appear in the notification of up-gradation from BS-17 to BS-18 of Management Cadre dated 15.07.2017. He replied that the issue has been challenged through another service appeal in this Tribunal. Learned counsel for the appellant vehemently argued that valuable rights of the appellant would certainly effect if he is relieved to join the training basically meant for general cadre doctors whereas the appellant is a doctor of management cadre. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 03.12.2021 before the D.B.

The appeal is also accompanied by an application seeking the suspension of the impugned order dated 06.09.2021 till final decision of the appeal. Notice of said application be also given to the respondents for the date fixed. The operation of impugned order is suspended till date fixed.

Certified to be true copy -

Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

(Mian Muhammad)  
Member(E)

Appellant Deposited  
Security Process Fee

3/11/21

DAIRY NO: 11286  
DATE 3.8.21  
HEALTH DEPARTMENT

The Secretary to Govt of Khyber Pakhtunkhwa  
Health Department Peshawar

Subject: Representation against Notification NO.50H (E-V)/M.Cadre/4-4/Up-gradatlon/2021

Respected Sir,

1. undersigned were appointed on contract basis as district epidemiologist (BS-17) dated 23.01.2014
2. Later on my services was regularized under regularization Act (GAVI, JICA, ADHOC & contract employees Act 2016 and I got Appointed as Deputy Director (PHC-II) DGHS, Peshawar under Departmental Notification NO.50(E)H-II/3-18/2016 Dated 20.04.2017 (Annex-I)
3. Consequently I was posted in Management cadre wide Notification No.50H(HD)E-V/2-2/2020 Dated 06.03.2020 as Deputy Medical Superintendent IN Category D Hospital Nahaqi District Peshawar (Annex-II)
4. In 2021 The post of the member of Service (BS-17) of the management Cadre Doctors has been upgraded Wide competent authority Notification NO.50H (E-V)/M.Cadre/4-4/Up-gradatlon/2021, where in my name has erroneously Ignored In the attached notification (Annex-III)

In view of the above position, It is kindly requested to include my name in the list of management cadre officers in para 4 above and also upgrade my post from BS-17 to BS-18 mentioned and save the undersigned from mental worries and depression please.

Yours's Sincerely

*Zia Ur Rehman*

Dr. Zia Ur Rehman

Deputy Medical

Superintendent

Emergency Satellite

Hospital Nahaqi

Peshawar

Dated 03.08.2021

Contract no



**VAKALATNAMA**

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

\_\_\_\_\_ OF 2021

Dr. Zia-Ur-Rehman

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Health Deptt. :

(RESPONDENT)  
(DEFENDANT)

I/We Dr. Zia-Ur-Rehman

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



**CLIENT**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**

**KAMRAN KHAN**

**&**

**UMAR FAROOQ MOHMAND**

**SAID KHAN**

**HAIDER ALI  
ADVOCATES**

**OFFICE:**

Flat No.4, 2<sup>ND</sup> Floor, Juma khan plaza near  
FATA secretariat, warsak road Peshawar City. Mobile No.0345-9383141