


### FORM OF ORDER SHEET

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

Case No.- 1197/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/08/2022	<p>The appeal of Dr. Haider resubmitted today by Uzma Syed Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>02/08/2022</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>


The appeal of Mr. Hair Ali Senior Medical Officer Type-D Hospital Kakki Bannu received today i.e. on 01.07.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Memorandum of appeal may be got signed by the appellant.
- 5- Affidavit may be got attested by the Oath Commissioner.
- 6- Copy final seniority list and departmental appeal against it mentioned in para-2 of the memo of appeal (Annexure-A&B) are not attached with the appeal which may be placed on it.
- 7- Copy of promotion order dated 15.11.2017 mentioned in par-3 of the memo of appeal (Annexure-C) is not attached with the appeal which may be placed on it.
- 8- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 9- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2138 /S.T,

Dt. 04/7 /2022

Uzma Syed Adv.  
High Court Pesh.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Sir,

requested that please kindly give

me some time for removal of objections

21/07/2022

Resubmit after removal of

all objections within one week

Uzma Syed  
Advocate

for Registrar  
21/7/22

Sir

all objections (1 to 9) were removed & resubmitted the file  
again - Uzma Syed  
29-7-2022

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1197 /2022

Dr. Haider

V/S

Goyt Of KP

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S.NO.	Documents	Annexure	Page No.
1.	Memo of appeal		01-05
2.	Copy of promotion order	---A---	06-12
3.	Copy of departmental appeal	---B---	13
4.	Copy of impugned order	---C---	14-15
5.	Copy of departmental appeal	---D---	16-18
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APPELLANT

DR. Haider

THROUGH

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

  
&  
(UZMA SYED)  
ADVOCATE HIGH COURT.

(1)

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. \_\_\_\_\_/2022

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 590

Dated 01-7-2022

Haider Ali, Senior Medical Officer (BPS-18),  
Type -D Hospital Kakki, District Bannu.

(APPELLANT)

VERSUS

1. The Govt Of KP, through Chief Secretary, Civil Secretariat Peshawar, Government of Khyber Pakhtunkhwa.
2. The Chief Secretary, Civil Secretariat Peshawar, Government of Khyber Pakhtunkhwa.
3. The Secretary Health Deptt., Khyber Pakhtunkhwa, Peshawar.

(Respondents)

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APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974  
AGAINST THE ORDER DATED 02.FEBUARY 2022,  
WHEREBY THE APPELLANT WAS PROMOTED TO THE  
POST OF SMO (BPS-18), WITH IMMEDIATE EFFECT, NOT  
FROM THE DATE JUNIOR WAS PROMOTED AND  
AGAINST NOT DECIDED DEPARTMENTAL APPEAL  
WITHIN STATUTORY PERIOD OF 90 DAYS.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THIS SERVICE APPEAL, THE  
IMPUGNED ORDER MAY PLEASE BE MODIFIED TO THE  
EXTENT OF APPELLANT AND THE APPELLANT MAY BE  
ALLOWED ANTI-DATED PROMOTION ON REGULAR  
BASIS FROM HIS DUE DATE JUNIOR WAS PROMOTED  
(DR. FAHAD KHALID UMERZAI) i.e 15.11.2017. WITH ALL  
BACKS AND CONSEQUENTIAL BENEFITS. ANY OTHER  
REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT  
AND APPROPRIATE THAT MAY ALSO BE AWARDED IN  
FAVOUR OF THE APPELLANT.

Filed to-day  
Registrar  
01/07/2022

**RESPECTFULLY SHEWETH:**

(2)

**FACTS:**

The few lines are submitted for your kind and sympatric consideration as under:

1. That appellant was selected through Public Service Commission on 27.10.2011 as Medical Officer BPS-17 and performed duties with full zeal and zest and with entire satisfaction of his superiors. Moreover, the appellant is senior and eligible to be promoted as SMO BS-18.
2. That in the year 2017 the seniority list was issued by the Deptt wherein junior Doctor Fahad Khalid Umerzai shown senior to appellant despite that he is appointed in year 2012 and the appellant is appointed in 2011, the appellant submitted representation against the seniority list for correction but in vain.
3. That in meantime the PSB Meeting was convened and Dr. Khalid Umerzai was promoted on 15.11.2017 whereas appellant was ignored. **Copy of the promotion order is attached as annexure-A**
4. That the appellant filed representation against the seniority and for promotion. After submission appeal the Deptt promoted the appellant to the post of SMO BS-18 vide order dated 02/02/2022 but with immediate effect not from the date junior was promoted, which is illegal, unlawful and against law and facts and needs to be modified as from with immediate effect to his due date or when junior was promoted. **Copy of appeal and promotion order is attached as annexure-B & C.**
5. That the appellant felt aggrieved filed this departmental appeal for anti-dation of promotion, the same was not responded within statutory period of 90 days. Hence the present appeal inter alia on the following grounds. **Copy of departmental appeal is attached as annexure-D.**

**Grounds:**

- A. That order dated 02.02.2022 is against the law, fact, norm of justice and material on record and liable to be modified to the extent of the appellant.
- B. That the appellant was promoted to post of SMO vide order dated 02/02/22 with immediate effect not from the date when junior was promoted. Which is violation of the Para V(d) of the KPK Promotion Policy, 2009.

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C. That the appellant was deprived from his legal right by giving promotion to him from immediate effect, not from his due date when junior was promoted which also suffered appellant's pensionary emolument.

D. That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.

E. That Valuable rights of the appellant have been affected by not granting him, his due promotion from the date of his actual entitlement.

F. That there was no fault on the part of the appellant so the appellant was entitled for antedated promotion from the dated junior was promoted.

G. That the appellant is not treated according to law and rules and has been deprived from his due right and benefits of promotion.

H. That the Supreme Court held in many cases that though the Civil Servant could not claim promotion as matter of right but it was incumbent upon the department/Authority. That when they grant promotion, then in that case the promotion should be granted from the due date of Civil Servant / Availability of post. Thus the appellant is entitled to antedated promotion w.e.f junior was promoted.

A) That the appellant was not treated according to law, rules and norms of justice and thus, deprived from his due right of promotion.

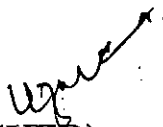
B) That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

  
APPELLANT  
DR. Haider

THROUGH

  
(SYED NOMAN ALI BUKHARD)  
ADVOCATE HIGH COURT,

&  
  
(UZMA SYED)  
ADVOCATE HIGH COURT.

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

u

APPEAL NO. \_\_\_\_\_/2022

Dr. Haider

V/S

Govt Of KP

**CERTIFICATE:**

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

DEPONENT

**LIT OF BOOKS:**

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.

*(Signature)*  
**(SYED NOMAN ALI BUKHARI)**  
**ADVOCATE HIGH COURT**

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

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

Dr. Haider

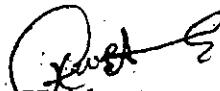
V/S

Govt Of KP

**AFFIDAVIT**

I, Dr. Haider , (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT

  
Haider





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

SA  
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Dated Peshawar, the 15<sup>th</sup> November, 2017

**NOTIFICATION**

**NO.SOH(E-V) 4-22/2017**

The Government of Khyber Pakhtunkhwa on the recommendations of the Provincial Selection Board is pleased to promote the following doctors of General Cadre from BS-17 to BS-18 on regular basis with immediate effect:-

S.No.	NAME OF DOCTOR	S.NO.	NAME OF DOCTOR
1	Dr.Farida Mujahid	28	Dr.Nisar Ahmed
2	Dr.Iqbal Hussain	29	Dr.Sheela Aman
3	Dr.Niaz Muhammad	30	Dr. Zuhra Nasir D/O Nasir Shah
4	Dr.Noor Hanan	31	Dr. Afsan Saleem D/O Muhammad Saleem
5	Dr.Noor Muhammad	32	Dr.Aneela Azam
6	Dr. Muhammad Tahir Jan	33	Dr. Saima Gulam D/O Gulam Khan
7	Dr.Jan Hussain	34	Dr. Saadia Rabbani D/O Muhammad Hussain
8	Dr.Muhammad Khalil Akhtar	35	Dr. Hamida Nasir Shah W/O Dr.Syed Nasir Shah
9	Dr.Akbar Khan	36	Dr. Samina Karim D/O Abdul Karim
10	Dr.Muhammad Naeem	37	Dr. Ghazala Shaheen D/O Syed Muhammad Shah
11	Dr.Aziz Hussain	38	Dr. Sabine Naz D/O Salimullah Khan
12	Dr.Gul Nawaz	39	Dr. Falak Naz D/O Jaffer Khan
13	Dr.Waseem Kashif	40	Dr. Syeda Nusrat Shah D/O Said Badshah
14	Dr.Akhtar Ali Shah	41	Dr. Rabia Mehar(Waheed) D/O Mehar Di Khan
15	Dr.Aminullah	42	Dr. Zakia Abid D/O Abid Ali
16	Dr.Shabir Ahmad	43	Dr. Sofia Khan
17	Dr.Qaiser Zaman	44	Dr. Zahida Parveen D/O Amir Nawaz
18	Dr.Murtaz Muhammad	45	Dr. Zahida Bibi D/O Shamsul Abrar
19	Dr.Muhammad Ayub	46	Dr. Syeda Shahbaz Jabeen D/O Syed Israrullah Shah
20	Dr.Yasir Murad	47	Dr. Muhammad Nazir S/O Muhammad Yousef
21	Dr.Nasir Hussain	48	Dr. Manzoor Ahmad Khan S/O Bahadar Khan
22	Dr.Hamid-ur-Rohman	49	Dr. Liaqat Ali S/O Mir Alam
23	Dr.Abdul Malik	50	Dr. Jamehed Saeed Sherani S/O Saeed Ahmad Shisani
24	Dr.Ihsan-ul-Haq	51	Dr. Fiazal Ghaffoor S/O Muhammad Amin
25	Dr.Syed Gul Syed Hussain	52	Dr. Muhammad Haroon Shahid S/O Hasham Khan
26	Dr.Fazal-ur-Rehman	53	Dr. Syed Tabir Ali Shah S/O Syed Mehtab Hussain
27	Dr.Farazoz	54	Dr. Tariq Muhammad Saeed S/O Muhammad Saeed

55	Dr. Abdul Karim S/O Ahr Abbas Khan	92	Dr. Muhammad Jamil Khan s/o Fazal Mabood
56	Dr. Alamzeb S/O Aurangzeb	93	Dr. Qaidar Khan S/O Abdul Ghaffar
57	Dr. Abdul Hameed S/O Saadullah	94	Dr. Abdur Rehman S/O Abdullah Khan
58	Dr. Gul Nawaz Khan S/O Sarfaraz Khan	95	Dr. Raz Muhammad S/o Mohib Ali Khan
59	Dr. Haroon Zafar S/O Muhammad Zafar	96	Dr. Ejaz Ahmad S/O Muhammad Aslam
60	Dr. Khalid Ur Rehman	97	Dr. Ghulam Farooq S/O Prof. Azir ur Rehman
61	Dr. Nazar Muhammad S/O Bakht Sar	98	Dr. Muhammad Ishaq Khan S/O Junais Khan
62	Dr. Tariq Khan S/O Adalat Khan	99	Dr. Habib Gul S/O Haji Inzar Gul
63	Dr. Rehmat Saleem Khan S/O Khan Muhammad	100	Dr. Rashid Ahmad S/O Haji Taj Muhammad
64	Dr. Alam Khan S/O Feroz Khan	101	Dr. Itikhar Ali S/O Prof. Rehman
65	Dr. Malik Khushi Muhammad S/O Malik Faqir Muhammad	102	Dr. Muhammad Dost Khan s/o Zahir Gul
66	Dr. Riaz Shahid S/O Rahmat Khan	103	Dr. Ghulam Farooq s/o Sultan Jan
67	Dr. Zahir Shah S/O Sarwar Khan.	104	Dr. Muhammad Hayat s/o Meen Akbar
68	Dr. Taj Muhammad S/O Nurab Din	105	Dr. Nasruminallah s/o Sarfaraz Khan
69	Dr. Muhammad Tahir Aziz S/O Azizur Rehman	106	Dr. Syed Touseeq Ali Shah s/o Syed Farman Shah
70	Dr. Khalid Ur Rehman s/o Ali Rehman	107	Dr. Shahid Alam S/O Abdul Hanan.
71	Dr. Inayatullah s/o Khalid Khan	108	Dr. Khakur Rehman S/O Abdul Hamid
72	Dr. Mansoor Ahmad Khan s/o Muhammad Seherab Khan	109	Dr. Sahib Gul Orakzai S/O Malik Deen Orakzai
73	Dr. Shaukat Ali s/o Khan Bahadar	110	Dr. Insanul Haq S/O Samiullah
74	Dr. Naseer Hassan s/o Nazir Hussain	111	Dr. Matullah S/O Fazal-E-Mouie
75	Dr. Jamaluddin s/o Rahim Din	112	Dr. Saib Zaman S/O Bekht Zaman
76	Dr. Muhammad Rehman s/o Bacha Khan	113	Dr. Syed Shaide Hussain Buchari S/O Fida Hussain Shah
77	Dr. Rafiqullah Khan s/o Balqees Khan	114	Dr. Sheikh Muhammad Farooq Azam S/O Sheikh Muhammad Bashir Gohar
78	Dr. Akmal Khan s/o Ayub Khan	115	Dr. Syed Imtiaz Ali Shah S/O Syed Saundar Shah
79	Dr. Fawad Aslam s/o Muhammad Aslam Khan	116	Dr. Zarin Khan S/O Khan Zafar Khan
80	Dr. Imtiaz Khan s/o Aman Khan	117	Dr. Najibullah Khan S/O Zabardast Khan
81	Dr. Niaz Ahmad	118	Dr. Ashfaq Hussain Bangash S/O Khadim Hussain
82	Dr. Mouse Khan	119	Dr. Sheruliah Khan S/O Saibul Wahab
83	Dr. Muhammad Tariq s/o Haleem Khan	120	Dr. Nazir Ahmad S/O Shah Jehan
		121	Dr. Muhammad Ajmal Khalil s/o Khakur Rehman
84	Dr. Naveed Iqbal s/o Muhammad Ghulam	122	Dr. Muhammad Hashim S/O Ghazi Manjan
85	Dr. Wajid Ahmad s/o Rehman Gul	123	Dr. Rafiqullah S/O Haji Khan Zada
86	Dr. Zakariyah Khan s/o Meher Dil	124	Dr. Ejaz Akber S/O Mir Akbar
87	Dr. Muhammad Akmal Rauf s/o Abdur Rauf	125	Dr. Javed Iqbal S/O Muhammad Qasim
88	Dr. Waqar Khattak s/o Asadullah Khattak	126	Dr. Sher Aslam Shah S/O Pir Galan Khan
89	Dr. Khalid Mehmood Akhbar s/o Khan Wali	127	Dr. Jamshed Qadir S/O Mir Qadir Gul
90	Dr. Kamran Durrani s/o Bashir Durrani	128	Dr. Muhammad Sadiq S/O Haji Daraz Gul
91	Dr. Rizwan Ullah Khan s/o Habibullah	129	Dr. Ajmal Khan S/O Sultan Khan

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130	Dr. Muhammad Javed Iqbal S/O Allah Dinys	166	Dr. Miraj Gul s/o Sahib Din
131	Dr. Jamshed Alam S/O Rustam Khan	167	Dr. Syed Awar Hussain s/o Noor Saad Khan
132	Dr. Nayyar-uz-Zaman S/O Makkur Rehman	168	Dr. Daryab Wali Khan s/o Nazar Wali Khan
133	Muhammad Ishaq s/o Taj Ali	169	Dr. Darya Khan s/o Musa Khan
134	Dr. Nasir Jamal S/O Gul Manan	170	Dr. Azizullah Khan s/o Insanullah Khan
135	Dr. Jehanzeb S/O Muhammad Beshir	171	Dr. Ahmad shah Arbab s/o Arbab Humayun Khan
136	Dr. Adil Saidullah S/O Saidullah Jan	172	Dr. Fazal Rabbi s/o Hayr Badshah
137	Dr. Badshah Khan S/O. Rala Khan	173	Dr. Iqbal Hussain s/o Nowsherinwan
138	Dr. Hamidullah S/O Muhammad Sakim	174	Dr. Sultan Mahmood S/O Saad Khilab
139	Dr. Yasir Muhammad S/O Syed Afzal	175	Dr. Fayyaz Ahmad S/O Mirajud Din
140	Dr. Arshad Ali	176	Dr. Iqbal Ahmad S/O Kheista Bacha
141	Dr. Ijaz Ahmad Khan S/O Saad Karim	177	Dr. Subhanullah Khan S/O Abdulla Shah
142	Dr. Khalid Rehman S/O Abdul Rehman	178	Dr. Mahboob Alam S/O Shah Bahadar
143	Dr. Khalid Rehman S/O Abdul Jamil	179	Dr. Niaz Ali Khan S/O Raza Khan
144	Dr. Muhammad Asad Khan S/O Muhammad Ayub Khan	180	Dr. Inayatullah Khan S/O Sheikh Fand Khan
145	Dr. Hamidullah S/O Syed Amin Khan	181	Dr. Shujaat Ali Shah
146	Dr. Mubarak Shah S/O Qadan Khan	182	Dr. Zaheer Muhammad S/O Nasir Muhammad
147	Dr. Shahzad Iqbal S/O Muhammad Iqbal	183	Dr. Muhammad Abil S/O Khwaja Muhammad Khan
148	Dr. Imran Khan S/O Muhammad Siraj	184	Dr. Mansoor Gasim S/O Muhammad
149	Dr. Sajjad Akbar s/o Saad Akbar	185	Dr. Rehmatullah Jan S/O Malik Ghazi Marjan
150	Dr. Shah Jehan s/o Pinda Khan	186	Dr. Muhammad Farooq Gul S/O Gul Muhammad
151	Dr. Munawar s/o Mowli Hassan	187	Dr. Muhammad Younas Khan S/O Abdul Sattar Khan
152	Dr. Muhammad Usman s/o Tajamul Hussain	188	Dr. Zahid Hussain S/O Ali Zaman
153	Dr. Sarfaraz Khan s/o Hajjat Din	189	Dr. Sahib Gul S/O Munir Gul
154	Dr. Ranzan Ali s/o Haji Mirjan Ali	190	Dr. Muhammad Hayat Khan S/O Bad Shah Gul
155	Dr. Shehzada s/o Ahmad	191	Dr. Sardar Ali S/O Mardan Ali
156	Dr. Zafar Iqbal s/o Muhammad Amin	192	Dr. Syed Muhammad Tariq Shah S/O Ghulam Mustafa Shah
157	Dr. Abdul Hadi s/o Mirajuddin	193	Dr. Shuja Ahmad S/O Shaukat Ali
158	Dr. Akhtar Nawaz s/o Muhammad Amir Khan	194	Dr. Habiullah Khan S/O Hamidullah Khan
159	Dr. Karimullah Khan s/o Sakhi Jan	195	Dr. Ashiq Muhammad S/O Muhammad Ishaq
160	Dr. Sanaullah s/o Wasidullah	196	Dr. Sher Zaf S/O Bahadar Khan
161	Dr. Haroon Zafar s/o Zafar Ahmad Shah	197	Dr. Mumtaz Ali S/O Ashraf Khan
162	Dr. Lalzade s/o Bakhtiar Khan	198	Dr. Fida Hussain S/O Haji Khatay Hussain
163	Dr. Muhammad Mamoon s/o Muhammad Usman	199	Dr. Azimullah S/O Darya Khan
164	Dr. Parviz Khan s/o Habibur Rehman	200	Dr. Arshad Hussain S/O Nijat Hussain
165	Dr. Basit Ijaz s/o Ijaz Ahmad	201	Dr. Mumtaz Ahmad S/O Zurbab Khan
		202	Dr. Amir Rafiq S/O Muhammad Rafiq Khattak

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205	Dr. Khatim Jan S/O Abdul Ghaffar Khan	242	Dr. Masood Jalal S/O. Khushlim Khan
206	Dr. Tikko Khan Orakzai S/O Gula Khan	243	Dr. Saghir Ahmad S/O Noor Elahi
207	Dr. Ali Shah S/O Fazli Ghaffoor	244	Dr. Jamaluddin S/O Muhammad Din
208	Dr. Mujahid Hussain Bangash S/O Iqbal Hussain Bangash	245	Dr. Khalid Mehmood S/O Rehmatullah
209	Dr. Shakeel Ahmad S/O Ghulam Murlaza Tahir	246	Dr. Yousaf Jan s/o. Karam Khan
210	Dr. Gul Nazar S/O Samandar	247	Dr. Bakht Zada S/O Gul Muhammad
211	Dr. Jamshed Ali S/O Liaqat Ali	248	Dr. Fazal Subhan S/O Ghulam Nabi
212	Dr. Nadar Khan S/O Qadar Khan	249	Dr. Bakht Zamin S/O Wali Dad
213	Dr. Muhammad Faheem S/O Muhammad Shafiq	250	Dr. Ajmal Khan s/o. Zulqadar Khan
214	Dr. Sanaulah Khan S/O Shawar Khan	251	Dr. Sharifullah s/o Muhammad Zaman Khan
215	Dr. Abdul Wahab S/O Abdul Ghaffar (late)		
216	Dr. Pir Muhammad S/O Habibur Rehman	252	Dr. Kamran Yousaf s/o Yousaf Khan
217	Dr. Farman Ali S/O Muhammad Nasim	253	Dr. Khairun Nabi
218	Dr. Muhammad Sayyar S/O Mukaram Shah	254	Dr. Amjad Ali Shah S/O Mian Muhammad Ali Shah
219	Dr. Muhammad Noman Yousaf S/O Muhammad Yousaf	255	Dr. Tahir Hussain S/O Ghulam Hussain
220	Dr. Saood Anwar S/O Shah Hussain	256	Dr. Muhammad Tariq S/O Wazir Jang
221	Dr. Muhammad Tufail S/O Sahib Jan	257	Dr. Mustafa S/O Behramand
222	Dr. Muhammad Zaib S/O Haji Said Ghani	258	Dr. Muhammad Noor S/O H.M. Islam Khan
223	Dr. Sajjad Ahmad S/O Waheedullah	259	Dr. Ibrahim Iqbal S/O Saleh Khan, MBBS
224	Dr. Saeedur Rehman S/O. Haji Fazli Rehman	260	Dr. Zaffar Ali Shah s/o Said Badshah
225	Dr. Muhammad Tahir Khan S/O Faiz Muhammad Khan	261	Dr. Fida Muhammad S/O Zarin Khan, MD
226	Dr. Aminullah S/O Bawar Khan	262	Dr. Aziz Khan s/o Jaffar Khan
227	Dr. Ghani Khan S/O Abdul Qayyum	263	Dr. Rab Nawaz S/O. Muhammad Nawaz
228	Dr. Inayat Khan S/O Sarwar Khan	264	Dr. Muhammad Kamal S/O Muhammad Sharif
229	Dr. Amir, Sher S/O Pir Muhammad Khan	265	Dr. Sher Jan s/o Musharraf Khan
230	Dr. Muhammad Arif Khan S/O Gulbar Khan	266	Dr. Riaz Ali S/O Ser Bahadar
231	Dr. Anwar Ali Khan S/O Sardar Ali Khan	267	Dr. Muhammad Parvez Khan s/o Muhammad Nasir
232	Dr. Ijaz Ahmad S/O Bashir Ahmad	268	Dr. Noor Muhammad s/o Ahmad Saeed
233	Dr. Nadar Ali Shuja S/O Shujaud Dullah	269	Dr. S.M. Taimur Shah s/o Pir Feroz Shah
234	Dr. Naz Ahmad S/O Bakhtyar	270	Dr. Sajid Khan s/o Ghulfoor Khan
235	Dr. Ikramullah Khan S/O Khude Bakhsh	271	Dr. Muhammad Azhar Shah S/O Israrul Arifeen
236	Dr. Muhammad Zubair S/O Ghuncha Gul	272	Dr. Farid Hassan S/O Wazir Hassan
237	Dr. Muhammad Shafiq Afridi S/O Haji Fazal Karim	273	Dr. Izzat Khan S/O Rasool Khan
238	Dr. Rehmat Elahi S/O Muhammad Qarib	274	Dr. Muhammad Zahid s/o Qaiser Ahmad
239	Dr. Fazalur Rehman Bangash S/O Abdul Rehman Banosh	275	Dr. Abdul Jalil S/O Mohibullah

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276	Dr. Gulab Khan S/O Inayatullah	313	Dr. Nasroon Haidor D/O Haidor Khan
277	Dr. Muhammad Mehdi s/o Sardar Ali Khan	314	Dr. Niaz Ali S/O Fazal Hadi
278	Dr. Muhammad Ayub Khan s/o Bedshah Gul	315	Dr. Gul Sanga Inyon D/O Matkullah Nashad
279	Dr. Muhammad Karim S/O Samkullah Khan	316	Dr. Muhammad Saleem Khan S/O Sarfaraz Khan
280	Dr. Hanif Alzal S/O Sher Alzal	317	Dr. Nadia Ashiq D/O Muhammad Ashiq Khan
281	Dr. Wali Muhammad S/O Gul Ghanir Khan	318	Dr. Muhammad Tariq Kamal S/O Sheikh Abdul Moqit
282	Dr. Rozat Shah S/O S. Mursala Shah	319	Dr. Mustafa Abbas S/O Talib Ali
283	Dr. Azizur Rehman S/O Shah Tareen	320	Dr. Sadaf Zahoor D/O ghoor ul Haq Aziz
284	Dr. Jamil Ahmad S/O Abdullah	321	Dr. Shamsul Gamar D/O Muhammad Hanif
285	Dr. Saïd Muhammad S/O Ali Bat Khan	322	Dr. Zibullah S/O Aman Ullah
286	Dr. Tasneem Fatima d/o Muhammad Aslam Malik	323	Dr. Tararum Taj D/O Rahmat Jee
287	Dr. Zaffar Ali S/O Amir Ghawas	324	Dr. Sara Gutar D/O Asaullah Jan
288	Dr. Tehmina Jali d/o Abdul Jali	325	Dr. Shaikat Saleem Khan S/O Saleem Khan
289	Dr. Muhammad Gul S/O Rehmat Gul	326	Dr. Roqia Karim D/O Fazal Karim
290	Dr. Aurangzeb Afridi S/O Ghulam Hussain	327	Dr. Muhammad Ishaq S/O Abdul Karim
291	Dr. Murtaz Hussain S/O Asghar Hussain	328	Dr. Jatal Mohyuddin S/O Ghulam Mohyuddin
292	Dr. Muhammad Jawad s/o Ihtihar Khan		
293	Dr. Farkhanda d/o Fahim Dil	329	Dr. Nabeela Mehmood D/O Mehmood Khan Khattak
294	Dr. Muhammad Riaz S/O Muhammad Aslam	330	Dr. Muhammad Haseel S/O Mushtaq Ahmad Dar
295	Dr. Habib-ur-Rehman S/O Abdul Aziz	331	Dr. Sher Bahadar S/O Fazal Ahmad
296	Dr. Inayatullah S/O Saifullah Khan	332	Dr. Fahad Ajmal S/O Muhammad Ajmal
297	Dr. Abbas Khan S/O Ajab Khan	333	Dr. Muhammad Ali Khan S/O Saib Muhammad Malik
298	Dr. Muhammad Munib S/O SHis Ali Khan	334	Dr. Rabal Ara D/O Ghulam Jan
299	Dr. Akram Khan S/O Arbab Khan	335	Dr. Ghareebullah S/O Yaqub Khan
300	Dr. Nawab Khan S/O Aslam Khan	336	Dr. Tariq Jali S/O Abdul Jali Shaheed
301	Dr. Azam Khan Afridi S/O Abdul Aziz	337	Dr. Abdul Hameed Khan S/O Abdul Majeed Khan
302	Dr. Shan Kamin S/O Nowserawan	338	Dr. Fauzia Habib D/O Habib ur Rehman Khattak
303	Dr. Rahim Nawaz S/O Mir Dani Khan	339	Dr. Musa Khan S/O SHazada
304	Dr. Azhar Azeem	340	Dr. Mushtaq Ahmad S/O Haji Fazal Khan
305	Dr. Muhammad Shafiq	341	Dr. Tariq Aziz S/O Shakrullah
306	Dr. Muhammad Shah Rawan	342	Dr. Walayat Khan S/O Kamin Badshah
307	Dr. Zill-e-Huma D/O Ajab Khan	343	Dr. Syeda Uzma Saeed D/O Syed Saeedul Hoq
308	Dr. Aya Khan S/O Jamal Din	344	Dr. Muhammad Yesser Sharif S/O Muhammad Shanif
309	Dr. Fazal wahab S/O Abdul Ghaffar	345	Dr. Muhammad Kashif Bilal S/O Muhammad Bilal
310	Dr. Muhammad Shoab S/O Shamin Khan	346	Dr. Sahibzada Hilal Ahmad S/O S. Naseer Ahmad
311	Dr. Sumaira Sardar D/O Sardar ul Islam	347	Dr. Zarshad Ahmad S/O Pir Muhammad
312	Dr. Abullah Khan S/O Arif Ullah Khan	348	Dr. Hassan Nasir S/O SHis Akbar Shah

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349	Dr. Salman Ahmad s/o Ajab Khan	386	Dr. Wazir Khan S/O Rukam Khan
350	Dr. Nusrat Afa D/O Abdqilah Jan	387	Dr. Munir Taj S/O Taj Malook
351	Dr. Azmat Ali S/O Muhammad Afzal	388	Dr. Muhammad Salman Khan S/O Muhammad Akbar Khan
352	Dr. Manzoor Ahmad S/O Rustam Khan	389	Dr. Zulfiqar Ali S/O Ijaz Hussain Awan
353	Dr. Ali Bashir S/O Bashir Hussain	390	Dr. Mohabat Ali Khan S/O Abdul Baqi
354	Dr. Shabir Ahmad S/O Juma Khan	391	Dr. Syed Munqadullah S/O Syed Mahidullah
355	Dr. Shafiqat Younas Tenooli S/O Muhammad Younas	392	Dr. Liaqat Ali S/O Shah Bani Jan
356	Dr. Muhammad Ibrahim Khan S/O Abdul Halim Khan	393	Dr. Jehanzeb S/O Munawar Khan
357	Dr. Shaukat Hussain S/O Bagh Zamin	394	Dr. Farmanullah Khan S/O Jamil Ullah Khan
358	Dr. Muhammad Naeem S/O Habibullah Khan	395	Dr. Muhammad Tahir Iqbal S/O Muhammad Iqbal
359	Dr. Tariq Masood S/O Sher Azam Khan	396	Dr. Qazi Yasir Imdad S/O Qazi Imdad Hussain
360	Dr. Muhammad Saldar Qureshi S/O Muhammad Sarwar Quresh	397	Dr. Roshan Zada S/O Syed Latif
361	Dr. Noorheen Rehman D/O Qazi Zia Ur Rehman	398	Dr. Shahid Mehmood S/O Sardar Muhammad Aslam
362	Dr. Najeebullah s/o Mehboobur Rehman	399	Dr. Samiullah s/o Naqeebullah
363	Dr. Akhtar Munir S/O Murad Khan	400	Dr. Lal Badshah S/O Pirzad Gul
364	Dr. Naheed Akhtar D/O Khums Gul	401	Dr. Shafiqullah S/O Muhammad Gul
365	Dr. Anjum Afroz D/O Muhammad	402	Dr. Haroon Nasir Khattak S/O Rab Nawaz
366	Dr. Kamran Ali S/O Abdul Hameed	403	Dr. Gohar Zaman S/O Minhajuddin
367	Dr. Erum Qayyum S/O Syed Qayyum	404	Dr. Abdul Wali S/O Izzat Khan
368	Dr. Gohar Zaman S/O Muhammad Zaman	405	Dr. Mumnoos Elahi S/O Muhammad Khurshid
369	Dr. Mazhar Hayat S/O Malik Hazrat Mir	406	Dr. Rafiqullah S/O Arsala Jan
370	Dr. Shah Baraz Khan S/O Gulzar Khan	407	Dr. Afif Jan S/O Amir Jan
371	Dr. Rubina Bangash D/O Jan Hussain Bangash	408	Dr. Sir biland Khan S/O Ghulam Gifari
372	Dr. Reza Ali Orakzai S/O Liaqat Ali Orakzai	409	Dr. Zahiddin s/o Yousef Khan
373	Dr. Syeda Nargis Jabeen D/O Israrullah Shah	410	Dr. Rab Nawaz Khan Afridi s/o Haji Said Jan Afridi
374	Dr. Sheraz Ahmad S/O Rashid Ahmad	411	Dr. Sardeep Kumar s/o Hukamchand
375	Dr. Muhammad Zamin Khan S/O Hayat Khan	412	Dr. Khalida Yasmeen D/O Haji Ali Hussain
376	Dr. Lubna Rasool D/O Abdul Rasool	413	Dr. Robina Wazir D/O Haji Muneer
377	Dr. Arshiya Ilyas D/O Muhammad Ilyas	414	Dr. Rowish d/o Ahmad Jan
378	Dr. Sadia Asif D/O Muhammad Asif	415	Dr. Muhammad Riaz S/O Ghulam Rasool
379	Dr. Fazal Gul S/O Haji Muta Khan	416	Dr. Noshaba Nahad D/O Manzoor Ahmad
380	Dr. Lubna Hayat D/O Fazal Hayat Taj	417	Dr. Muhammad Anif s/o Chand Badshah
381	Dr. Muhammad Amin Khan S/O Muhammad Usman Khan	418	Dr. Asif Rahim s/o Abdul Rahim
382	Dr. Nouman Khan S/O Nasir Khan	419	Dr. Abdullah Khan s/o Abdul Mastan
383	Dr. Muhammad Zubair S/O Iftikhar Ahmad Bhatti	420	Dr. Riaz Muhammad s/o Badshah Muhammad
384	Dr. Muhammad Ismail S/O Saif Muhammad	421	Dr. Fazal Waheed s/o Khan Gul
385	Dr. Sultan un Nisa D/O Hafiz Muhabat Khan	422	Dr. Mushtaq Ahmad s/o Badshah Malik

3/23  
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423	Dr. Nizamuddin s/o Qasndar Khan	446	Dr. Shahzad Gul s/o Muhammad Sharieeq
424	Dr. Nisar Ahmad s/o Amir Muhammad	447	Dr. Masl Ali Khan s/o Majani
425	Dr. Khizar Hayat s/o Pir Muhammad	448	Dr. Latzada Khan s/o Umar Gul
426	Dr. Rukhsana d/o Malik Farukh Sair Khan	449	Dr. Abdul Aziz s/o Abdur Rashida
427	Dr. Ajab Khan s/o Ismail Khan	450	Dr. Sher Umar Khan s/o Faish Khan
428	Dr. Khalid Javed s/o Zulfiqar Khan	451	Dr. Abdul Haseem Afridi s/o Fazal Shah
429	Dr. Abdul Sattar Khan s/o Rukam Khan	452	Dr. Said Ameen Shah s/o Abdullah Shah
430	Dr. Ayub Khan s/o Umar Gul	453	Dr. Ijaz Ajmal Khan s/o Ajmal Khan
431	Dr. Muhammad Farooq s/o Muhammad Raziq Mahmood	454	Dr. Mursaha d/o Muhammad Afzal
432	Dr. Naeemullah s/o Abdullah	455	Dr. Manzoor Ahmad s/o Abdul Wadood
433	Dr. Khalid Hafeez s/o Hibzur Rahman	456	Dr. Shazia Gul d/o Masood Ahmad
434	Dr. Irshat Jehan d/o Shamsul Wahab	457	Dr. Roobina Gul d/o Badshah Gul
435	Dr. Nazar Wali s/o Syed Awais	458	Dr. Rifaqat Shaheen d/o Qazi Ahmad
436	Dr. Nasseerullah s/o Umar Kabal	459	Dr. Shaheen Mehtab d/o Mumtaz Khan
437	Dr. Muhammad Ayez Khan s/o Haji Amir Nawab	460	Dr. Faridoun Mahmood Khan s/o Mahmood Khan
438	Dr. Saleemuddin s/o Haji Sheh Bakht Rawan	461	Dr. Syed Badshah s/o Musafar Khan
439	Dr. Fazal Hadi s/o Juma Gul	462	Dr. Abdul Ghaloor s/o Badshah Khan
440	Dr. Qasim Abbas s/o Sadur Rehman	463	Dr. Fazal Raziq s/o Fazal Maula
441	Dr. Hakim Zada s/o Purdes Khan	464	Dr. Naheed Sultana d/o Muhammad Akram
442	Dr. Nusrat Begum d/o Qazi Abdul Maleen	465	Dr. Saeedur Rehman s/o Ashtar Khan
443	Dr. Nasreen Begum d/o Awal Saddam	466	Dr. Fayyaz Ali s/o Qasim Khan
444	Dr. Muhammad Shafeeq s/o Raza Khan	467	Dr. Shakirullah s/o Fazal Ghaloor s/o Muhammad Amin
445	Dr. Wali Khan s/o Mameer Khan	468	Dr. Faheem Ali Haq s/o Muhammad Ishaq
		469	Dr. Fahad Khalid Umerzai s/o Khalid Khan Umerzai

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2. In terms of Rule 6 (3) of Civil Servants Act, 1973 and Rule 15 (1) of Appointment, Promotion and Transfer Rules, 1969, they will be on probation for a period of one year extendable for another year.

3. The postings/transfers of the above named doctors shall be notified later on.

SECRETARY HEALTH  
Govt of Khyber Pakhtunkhwa

Endst. No & Date Even.

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Principal Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Govt of Khyber Pakhtunkhwa, Establishment Department.
4. Director General Health Services, Khyber Pakhtunkhwa.
5. Director Health Services FATA, Peshawar.
6. PS to Minister Health, Khyber Pakhtunkhwa, Peshawar.
7. PS Secretary Health, Khyber Pakhtunkhwa, Peshawar.
8. Officers/doctors concerned.

*(Signature)*  
15/Nov/14  
(JIBREEL RAZA)  
SECTION OFFICER (E-V)

B (13)

To

Director General Health Services  
Peshawar.

Subject: Representation against seniority  
Through proper channel.

Dear Sir,

It is submitted that I was selected through public service commission in Date 27-10-2011 (Appr. No. 750). Subsequently a seniority list was issued by the Department on 2017, Dr. Fahd Khalid umerzai who was junior to me (appointed in 2012) was shown senior in the said seniority list.

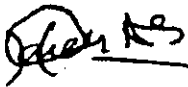
I made a representation at that time and I was told that it was a clerical mistake and will be corrected in due course of time. The said Dr. Fahd Khalid umerzai was promoted BPS-18 on (15-11-2017) whereas I was ignored.

Now, a fresh seniority list of BPS-18 has been issued on June 18-2021 (Appr. No. 750) in which Dr. Fahd Khalid umerzai is shown as senior and is supposed to be promoted to BPS-19. Whereas I am still working in BPS-17.

It is therefore requested that seniority list may please be corrected, and I may please be placed serial no 750 And Dr. Fahd Khalid umerzai be shown as junior to me as it was erroneously promoted to BPS-18.

Thanking you in anticipation


Yours sincerely



Dr Haidar ali khan.

Medical officer TDH kakki

Forwarded to DSHS  
for rectification

  
29/6/2021





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Peshawar the 2<sup>nd</sup> February, 2022

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NOTIFICATION

NO.SOH(E-II)/1-1/2022/1203-15 The Competent Authority on the recommendations of Provincial Selection Board, in its meeting held on 02.12.2021, is pleased to promote the following Medical Officers (BS-17) to Senior Medical Officer (BS-18) on regular basis, with immediate effect:-

S#	Name of Doctor	S#	Name of Doctor
1.	Dr. Muhammad Ayub S/O Muhammad Yousaf	2.	Dr. Muhammad Tahir Jadoon S/O Ajun Khan Jadoon
3.	Dr. Alamzeb S/O Haji Gulzar Ali	4.	Dr. Fatima Humera D/O Abdullah Khan
5.	Dr. Muhammad Ali S/O Lal Khan	6.	Dr. Muhammad Ali Khan Jadoon S/O Abdul Rashid
7.	Dr. Anwar Ali S/O Abdur Rehman	8.	Dr. Faizullah S/O Lasha Dar
9.	Dr. Humayun S/O Anwar-Baig	10.	Dr. Muhammad Ajmal Khan S/O Zarin Khan
11.	Dr. Bin Yamin Afridi S/O Khaista Khan	12.	Dr. Sarfaraz Khan S/O Abdul Sattar Khan
13.	Dr. Bakhtiar Ahmad Afridi S/O Sharbat Khan Afridi	14.	Dr. Tanveer Ahmad S/O Gul BadShah
15.	Dr. Tamana Gul D/O Khan Sahib	16.	Dr. Shafiq Khyal D/O Khayal Nawaz
17.	Dr. Naimat ullah khan S/O Malik Sarwar Khan	18.	Dr. Sadaf Qazi D/O Qazi Naseerud Din
19.	Dr. Fauzia Nawaz D/O Mir Nawaz	20.	Dr. Muhammad Nisar S/O Wali Jan
21.	Dr. Muhammad Wajid S/O Dawa Khan	22.	Dr. Pervez Khan S/O Said Alam
23.	Dr. Humera Tabassum D/O Abdul Wadood Jan	24.	Dr. Inamul-Haq S/O Bakht Zamin
25.	Dr. Mushtaqul Muik S/O Alamgir Khan	26.	Dr. Rizwanira Irum D/O Kifayatullah
27.	Dr. Rafi Ullah S/O Feroz Khan	28.	Dr. Shabana Fida D/O Muhammad Fida
29.	Dr. Neelam Naseema D/O Tila Muhammad	30.	Dr. Shah Bano D/O Prof. Shah Alam Khan
31.	Dr. Nisarullah S/O Sher Habib Jan	32.	Dr. Sahibzada Muhammad Khalid S/O S. M. Faridoon
33.	Dr. Dost Muhammad S/O Abdul Samad Khan	34.	Dr. Sajida Nasreen D/O Rasool Khan
35.	Dr. Reshmaan Tabassum D/O Fazli Malik	36.	Dr. Ibrahim Jumma Orakzai S/O Jumma Gul Orakzai
37.	Dr. Shahid Afridi Khan S/O Akbar Khan Afridi	38.	Dr. Liaqat Hussain Bangash S/O Ali Hussain
39.	Dr. Muhammad Idrees Wañvi S/O Khanzada	40.	Dr. Khan Mehmood Khan S/O Malik Mir Aslam Khan
41.	Dr. Inamullah Shah S/O Muhammad Subhan Shah	42.	Dr. Hassan Nasir S/O Abdul Malik
43.	Dr. Qamar Zeb Khan S/O Gul Shamsheer Khan	44.	Dr. Said Muhammad S/O Zarif Khan
45.	Dr. Jayyad Wahid S/O Abdul Wahid Khan	46.	Dr. Ilyas Hussain Shah S/O Karam Ali Shah
47.	Dr. Faiqa Farah D/O Muslim Khan	48.	Dr. Wagma Nisar D/O Nisar Muhammad Khan

49.	Dr. Muhammad Zahid S/O Muqarrab Khan	50.	Dr. Muhammad Ibrahim S/O Muhammad Ismail
51.	Dr. Asad Ullah S/O Samiullah Khan	52.	Dr. Shaista Ilyas D/O Syed Ilyas Shah
53.	Dr. Maria Lodhi D/O Attaurehman Lodhi	54.	Dr. Muhammad Amir D/O Ghulam Sarwar
55.	Dr. Muhammad Farooq S/O Abdul Qadir	56.	Dr. Shandana Nawaz D/O Muhammad Nawaz
57.	Dr. Seema Israr D/O Israr Muhammad	58.	Dr. Lal zari Begum D/O Prof. Muhibullah
59.	Dr. Sara Yahya D/O Ghulam Yahya	60.	Dr. Shaikat ullah S/O Amir Zada
61.	Dr. Nadia Mehmood D/O Mehmood Shah	62.	Dr. Muhammad Saqil khan S/O Salat Khan
63.	Dr. Bushra Noreen D/O Ziaullah Khan	64.	Dr. Syed Hamid Ali Shah S/O Syed Mubarak Shah
65.	Dr. Abdul Ghaffar Babar S/O Abdul Sattar	66.	Dr. Uzma Noreen D/O Rahim Khan
67.	Dr. Umar Naseer S/O Umar Khan	68.	Dr. Faiza D/O Muhammad Sana-UI-Haq
69.	Dr. Ambreen Shams D/O Shamsuddin	70.	Dr. Haider Ali S/O Abdul Hafiz
71.	Dr. Farzana Ijaz D/O Aziz ur Rehman	72.	Dr. Ihtisham Ali S/O Isa Khan
73.	Dr. Haroon Rashid S/O Abdul Rashid	74.	Dr. Waqar Ahmad S/O Asmat Khan
75.	Dr. Muhammad Azeem khan S/O Muhammad Irshad	76.	Dr. Fahrneeda Jamil D/O Muhammad Jamil
77.	Dr. Yasir Hussain S/O Sarwar Hussain	78.	
79.	Dr. Zafar Iqbal S/O Maqbool Khan		

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SECRETARY HEALTH  
HEALTH DEPARTMENT

Endst. No. Even & date:

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa
2. Director General, Health Services, Khyber Pakhtunkhwa.
3. All the concerned DHOs / MSs, Khyber Pakhtunkhwa.
4. All the concerned District Account Officers, Khyber Pakhtunkhwa.
5. PS to Secretary Health, Khyber Pakhtunkhwa.
6. PS to Special Secretary (E&A/B&D) Health Department.
7. PS to Additional Secretary (E&A/B&D) Health Department.
8. PA to Deputy Secretary (Estab), Health Department.
9. Deputy Director-IT, Health Department.
10. Section Officer (E-V), Health Department.
11. Personal files of all the doctors concerned
12. Master file.

(Dr. Syed Yasir Ali Shah)  
SECTION OFFICER (E-II)

To

The District Health Office,  
District Bannu.

Through proper channel:

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 02 FEBRUARY 2022, WHEREBY THE APPELLANT WAS PROMOTED TO THE POST OF SMO (BPS-18), WITH IMMEDIATE EFFECT INSTEAD OF FROM HIS DUE DATE.

Prayer in appeal:

ON ACCEPTANCE OF THIS DEPARTMENTAL APPEAL THE IMPUGNED ORDER MAY PLEASE BE MODIFIED TO THE EXTENT THAT THE APPELLANT MAY BE ALLOWED ANTE-DATED PROMOTION ON REGULAR BASIS FROM HIS DUE DATE AS WAS THE CASE OF APPELLANT'S JUNIOR PROMOTION (DR. FAHAD KHALID UMERZAI) IN 15.11.2017, WITH ALL BACKS AND CONSEQUENTIAL BENEFITS.

RESPECTFULLY SUBMITTED:

The few lines are submitted for your kind and sympathetic consideration as under:

1. That appellant was selected through Public Service Commission on 27.10.2011 as Medical Officer BPS-17 and performed duties with full zeal and zest and with entire satisfaction of his superiors. Moreover, the appellant is senior and eligible to be promoted as SMO BS-18.
2. That in the year 2017 the seniority list was issued by the Deptt wherein junior Doctor Mr. Fahad Khaiid Umerzai shown senior to appellant despite that he was appointed by provincial Government in the year 2012, whereas the appellant was appointed in 2011, the appellant submitted representation against the seniority list for correction but in vain.
3. That the PSB Meeting was convened on 15.11.2017 wherein Dr. Fahad Khaiid Umerzai was promoted while the appellant was ignored.
4. That the appellant filed representation against the seniority and for promotion on 30.06.2021 (copy attached) but in vain. In the meantime the Deptt promoted the appellant to the post of SMO BS-18 vide order dated 02/02/2022 but with immediate effect not from the date (copy attached) whereby his junior was promoted, which is illegal, unlawful and against law and facts and needs to be modified as from with immediate effect to his due date or when junior was promoted.
5. That the appellant filed departmental appeal for antedation of promotion inter alia on the following grounds.

Grounds:

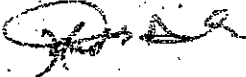
- A. That orders dated 02.02.2022 is against the law, fact, norm of justice and material on record and liable to be modified to the extent of the appellant.

OS  
Put up to DGHS please

31/3/2022

- B. That the appellant was promoted to post of SMO vide order dated 02/02/22 with immediate effect not from the date when junior was promoted. Which is violation of the Para V(d) of the KP Promotion Policy; 2009.
- C. That the appellant was deprived from his legal right by giving promotion to him from immediate effect in the order dated 02.02.2022 not from his due date when junior was promoted which also suffered appellant's pensionary entitlement.
- D. That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.
- E. Those Valuable rights of the appellant have been affected by not granting him his due promotion from the date of his actual entitlement.
- F. That there was no fault on the part of the appellant so the appellant was entitled for antedated promotion from the date junior was promoted.
- G. That the appellant is not treated according to law and rules and has been deprived from his due right and benefits of promotion.
- H. That the Supreme Court held in many cases that though the Civil Servant could not claim promotion as matter of right but it was incumbent upon the department/Authority. That when they grant promotion, then in that case the promotion should be granted from the due date of Civil Servant / Availability of post. Thus the appellant is entitled to antedated promotion w.e.f. junior was promoted.

It is, therefore, most humbly prayed that the impugned promotion order dated 02.02.2022 may be modified and consider the appellant for promotion from his due date i.e. when the junior mate was promoted.

  
Yours obediently,

HAIDER ALI  
OPS officer (BS-18)  
Cell No: 0313-9129397  
Date: 03/03/2022



Office of the Director General  
No. 1330-31 / Dated Bannu the 03 / 03 / 2022

To,

The Director General,  
Health Services, Khyber Pakhtunkhwa,  
Peshawar.

(1)

Subject: -  
Dear Sir,

**RE PRESENTATION AGAINST SENIORITY**

I have the honour to enclose herewith an application received from Dr. Haider Ali Khan Senior Medical Officer BPS-(18) attached to Type D Hospital Kakki, which is self explanatory, for favour of information and further necessary action. Please

  
District Health Officer,  
Bannu

Cc:-

1. Doctor Concerned for information with reference to his application.

\_\_\_\_\_  
District Health Officer,  
Bannu

**VAKALATNAMA**

NO. \_\_\_\_\_ /20

IN THE COURT OF K.P. Service Tribunal Peshawar

Dr. Haider Ali

Appellant  
Petitioner  
Plaintiff

VERSUS

Health

Respondent (s)  
Defendants (s)

I/WE Dr. Haider Ali

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE \_\_\_\_\_ /20

Haider Ali

(CLIENT)

ACCEPTED

Noman Ali Bukhari

**SYED NOMAN ALI BUKHARI  
ADVOCATE HIGH COURT**

CELL NO: 0306-5109438