

15th June 2022

Appellant with counsel present.

Security and process fees are not deposited. The learned counsel seeks permission to deposit security and process fees. Appellant is directed to deposit the same within 02 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 03.08.2022 before S.B.

Rs-700/-
Appellant Deposited
Security & Process Fee >

A. Arshad Khan
16/6/22



(Kalim Arshad Khan)
Chairman

11.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 15.06.2022 before S.B.


(Rozina Rehman)
Member (J)

11.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 15.06.2022 before S.B.

(Rozina Rehman)
Member (J)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S. Appeal No. SS7/2022

Dr Umar Islam S/O Muhammad Ali

APPELLANT

VERSUS

The Government of KP through Chief Secretary & others

RESPONDENTS

INDEX OF DOCUMENTS

S. NO	PARTICULARS	ANNEXURE	PAGES
01	Memo of Appeal		01 – 05
02	Affidavit & Addresses of parties		06 – 07
03	Seniority lists	A – B	08 – 20
04	Copy of Letter	C	21
05	Impugned Notification	D	22 – 23
06	Departmental Appeal with receipt	E	24
	Wakalatnama		

Umar Islam
Appellant

Through:

Rehman Ullah Shah, Zeeshan Khan & Shumaila Nazli
M.A. LLM M.A. LLM

Advocates

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Phone & Fax # 091- 570 2021
infoila56@gmail.com

①

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S. Appeal No. ____P/2022

Dr Umar Islam S/O Muhammad Ali
House 35, Street 5, Phase III, Hayatabad
Ex Principal Medical Officer Category "C", Hospital Wari, Dir Upper
_____APPELLANT

VERSUS

1. The Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat, Khyber Road, Peshawar
2. The Secretary Establishment KP, Secretariat, Khyber Road, Peshawar
3. The Secretary Health KP, Secretariat, Khyber Road, Peshawar
4. The Director General Health Service Khyber Pakhtunkhwa, Secretariat,
Khyber Road, Peshawar
5. The Section Officer, Provincial Selection Board,
Establishment Department KP, Secretariat, Khyber Road, Peshawar
_____RESPONDENTS

APPEAL UNDER SECTION 04 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, AGAINST THE ORDER/ NOTIFICATION OF RESPONDENT NO. 3, DATED JANUARY 24, 2022 WHEREBY THE APPELLANT WAS NOT PROMOTED TO THE POST OF THE CHIEF MEDICAL OFFICER {BPS 20} BY THE RESPONDENTS IN VIOLATION OF THE LAWS.

PRAYER IN APPEAL:

On acceptance of this appeal, the Hon' ble Tribunal may very graciously be pleased to direct Respondents for proforma promotion of the Appellant in BPS 20 {as Chief Medical Officer BPS 20} w.e.f. from the date of promotion of juniors in the seniority list with all financial and other back benefits

Respectfully submitted as under:

Summary facts that resulted into filing the instant appeal are as under:

1. That Appellant is Doctor by Profession and bonafide citizen of Pakistan, and belongs to a respectable family of lower Dir. He has served the Health Department for a considerable long period of almost 33 years of service with no single dot during his service.
2. That the Appellant being appointment 02.09.1990 in (BPS-17) as Medical Officer, thereafter Promoted on 10.09.2009 (BPS-18) as Senior Medical Officer, and Perform his duties to the entire satisfaction of their Immediate Officers with no complaint during the service.
3. That based on seniority cum fitness, Appellant was then promoted on 26.09.2017 (BPS-19) as Principal Medical Officer where he has performed his duties and responsibilities towards the said post with full efficiency and commitment till his retirement on February 21, 2021.
{Copy of Seniority List confirming employment of Appellant as annex A}
4. That prior to retirement, the appellant met the requirement, and was eligible to be promoted to the next grade; however, due to the malafide and ill-will of the Respondents, Appellant was deprived of his lawful promotion to the next higher grade in his professional life.
{Copy of another seniority list is annex for consideration as annex B}
5. That during the period of services, the Appellant forwarded a letter to the Secretary Health for promotion from BS-19 to BS-20, dated 22-01-2021. It is pertinent mention that the Health Department 'announced' final seniority list of Chief Medical Officer BSP-20, the official list stood on 15-05-2020 as 21 out of 75 seats of Chief Medical Officers of above list has been retired before 21ST Feb 2021.
6. {Copy of the letter is annexed as C }
7. That the Appellant being eligible for the said post has forwarded aforementioned letter dated 21-01-2021 for promotion to the concerned authority for consideration. It is worth to mention that the total seats of BPS- 20 are 75 seats regardless only 21 of the total posts retired against the

said post while remaining 18 seats left un-occupied/ not filled in since long. It is submitted that the total occupied posts were 19.

8. That Respondents while ignoring the seniority of the Appellant in BPS 19, through impugned Notification dated January 24, 2022 promoted juniors to the Appellant to the next higher grade/posts in utter violation of principle of merit and transparency as envisaged by the law as enshrined in Constitution of Islamic Republic of Pakistan, 1973 as well as in other laws.
{Copy of impugned Notification is annex as D}
9. It is worth to mention that Respondents were duty bound to process the promotion of the appellant without any delay, however, due to malafide intention; the Respondents did not timely process the matter of the appellant just to deprive the appellant from his lawful benefits in term of promotion to the next grade.
10. The appellant feeling aggrieved of the Notification dated January 24, 2022 preferred Departmental Appeal dated February 09, 2022 to Respondent No. 1 being the competent authority, however till date no response/ reply.
{Copy of Departmental Representation/ appeal is annex as E}
11. Hence no any other effective or alternate remedy, the appellant prefer the instant appeal for redressal of his grievances on the following amongst other grounds inter alias:

Grounds for Consideration:

- A. That the acts of the Respondents while not considering the appellant for promotion is unlawful, illegal, void ab-initio and in disregard of law applicable to the matter.
- B. That the Appellant being appointment 02.09.1990 in (BPS-17) as Medical Officer, thereafter Promoted 10.09.2009 (BPS-18) as Senior Medical Officer and Perform his duty with no complaint, and thereafter appellant was promoted 26.09.2017 (BPS-19) is entitled for promotion to the next higher grade/ scale however due to the ill-will of the Respondents he has been deprived of his lawful right. This Hon' ble Tribunal has got ample powers to direct the respondents for proforma promotion of the appellant in the best interest of justice and fair play without any more delay.



4

That there is most specific provision which precludes or debars the board to consider the case of Appellant for promotion after his retirement, moreover, the promotion of the appellant was due before his retirement, and was also recommended for promotion to BPS 20, however, due to the negligence of the Respondents, the meeting was not held timely. Therefore negligence on the part of Respondents can't be attributed to the appellant.

- D. That there is no cavil with the settled law that the promotion be included proforma promotion cannot be claimed as of right, however, to be considered for promotion by the Board especially once the appellant has met the requirement for promotion. If there is delay on the part of the department while conducting PSB, appellant may not be suffers for the wrong of others.
- E. That much before retirement of the petitioner, the Respondent a working paper was prepared by the department with regard to the promotion but the matter was delayed without any justification reason in the meanwhile the petitioner attend the age of superannuation, the petitioner cannot made suffer on account of departmental lapse and the petitioner would not punished/ deprived by the act and conduct of the department which is liable to the declared illegal and the respondents be directed to promote the Appellant in BPS 20 from the date when juniors to the appellant have been promoted.
- F. That after consequent upon the above mentioned PSB meeting and recommendation Respondent No 1 issued a final promotion list on dated 24/01/2022 the Appellant was much prior retired from his service and the name of petitioner is not entitled for the promotion, which is against law, facts and circumstances and liable to be declared void ab initio.
- G. That the impugned inaction of the respondents is actually denying the appellant's vested right, and keeping his promotion case pending for an unreasonable length of time is a clear violation of the policy on the subject. Appellant has been suffered at the hands of Respondents for no reasons. Hence the Hon' ble Tribunal may direct the respondents for proforma promotion of the appellant.

5

H. That appellant has been discriminated as juniors to appellants have been promoted and the appellant has been ignored. Hence the Tribunal may pass an order in favour of the appellant to meet ends of justice.

- I. Further grounds may be argued at the time of arguments with the permission of the Hon' ble Tribunal, and once the stance of the Respondents comes fourth.

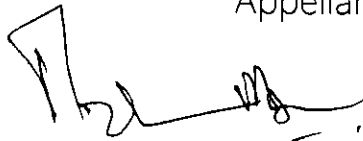
In view of the foregoing facts and grounds, it is therefore most respectfully submitted that on acceptance of the instant appeal, Respondents may very graciously be directed to promote the appellant (Proforma Promotion) to the next grade/ scale i.e. BPS 20 {as Chief Medical Officer BPS 20} w.e.f. from the date of promotion of juniors in the seniority list with all financial and other back benefits.

Any other relief which this Hon' ble court deem fit and appropriate in the facts and circumstances of the case may also be granted.



Appellant

Through:



Rehman Ullah Shah, Zeeshan Khan & Shumaila Nazli

M.A. LLM

M.A. LLM

Advocates

Ibn e Abdullah Law Associates

11 Azam Tower University Road, Peshawar

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BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S. Appeal No. ____P/2022

Dr Umar Islam S/O Muhammad Ali

APPELLANT

VERSUS

The Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat, & others

RESPONDENTS

AFFIDAVIT

I, Dr Umar Islam S/O Muhammad Ali, House 35, Street 5, Phase III, Hayatabad, Ex Principal Medical Officer Category "C" Hospital Wari, Dir Upper do hereby solemnly affirm and declare that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon' ble Tribunal.

Identified By:

Rehman Ullah Shah

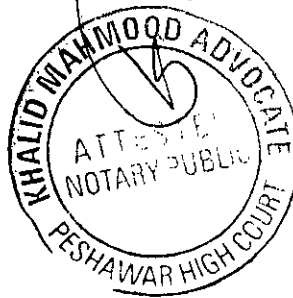
Advocate Supreme Court

Deponent

Dr. Umer Islam

15304-5435649-9

Mob. 0301 8811089



7

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S. Appeal No. _____P/2022

Dr Umar Islam S/O Muhammad Ali

_____APPELLANT

VERSUS,

The Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat, & others

_____RESPONDENTS

Addresses of the parties

APPELLANT:

Dr Umar Islam S/O Muhammad Ali

House 35, Street 5, Phase III, Hayatabad

Ex Principal Medical Officer Category "C" Hospital Wari, Dir Upper

RESPONDENTS :

1. The Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat, Khyber Road, Peshawar
2. The Secretary Establishment KP, Secretariat, Khyber Road, Peshawar
3. The Secretary Health KP, Secretariat, Khyber Road, Peshawar
4. The Director General Health Service Khyber Pakhtunkhwa, Secretariat,
Khyber Road, Peshawar
5. The Section Officer, Provincial Selection Board,
Establishment Department KP, Secretariat, Khyber Road, Peshawar

Appellant

Through:

Rehman Ullah Shah, Zeeshan Khan & Shumaila Nazli

M.A. LL.M

M.A. LL.M


Advocates

7

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S. Appeal No. ____P/2022

Dr Umar Islam S/O Muhammad Ali

_____APPELLANT

VERSUS

The Government of Khyber Pakhtunkhwa,
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Addresses of the parties

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House 35, Street 5, Phase III, Hayatabad

Ex Principal Medical Officer Category "C" Hospital Wari, Dir Upper

RESPONDENTS :

1. The Government of Khyber Pakhtunkhwa,
Through Chief Secretary, Civil Secretariat, Khyber Road, Peshawar
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4. The Director General Health Service Khyber Pakhtunkhwa, Secretariat,
Khyber Road, Peshawar
5. The Section Officer, Provincial Selection Board,
Establishment Department KP, Secretariat, Khyber Road, Peshawar

Appellant

Through:

Rehman Ullah Shah, Zeeshan Khan & Shumaila Nazli

M.A. LL.M

M.A. LL.M


Advocates

A

PROVISIONAL SENIORITY LIST OF PRINCIPAL MEDICAL OFFICERS (BPS-19) OF THE HEALTH DEPARTMENT AS STOOD ON 01.01.2021

Sl. No.	Name of Officer/Official with Academic qualification.	Date of Birth and Domicile	Date of 1st entry into Govt. Service	Regular appointment/promotion to the present post.			
				Date of promotion	BPS	Method of Recruitment/ Appointment	Present Appointment with date.
	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Dr.Javed Shah, MBBS	10.09.1961 Mardan	6.12.1987/B-17	i) 18.9.97 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	KTH Peshawar
2.	Dr.Muhammad Ajmal Khan s/o Muhammad Afzal Khan	15.03.1961 DI Khan	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached to DHO, DIKhan.
3.	Dr.Muhammad Khalid Khan s/o Abdul Hamid Khan,	29.01.1961 Peshawar	06.12.1987	18.09.1997 22.05.2018	BS-18 BS-19	By Promotion By Promotion.	PMO Sarhad Hosp: for Psy, Pesh (Mental)
4.	Dr.Huma Sherin, MBBS	5.4.1961	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWPMO LRH, Peshawar
5.	Dr.Shamim Afzal s/o Amir Afzal, MBBS	1.6.1961/ Mansehra	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached to DHO, Mansehra
6.	Dr.Sajjad Muhammad s/o Ghulam Muhammad, MBBS	22.4.1961 /Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Kohat
7.	Dr.Nisar Muhammad s/o Mir Zaman, MBBS	1.11.1961/ Mardan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO BKMC Mardan.
8.	Dr.Zaffar Ali Shah s/o Muhammad Amin Shah.	20.4.1961/ SW Agency	23.1.1988/B-17	i)20.8.2001 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, DIKhan
9.	Dr.Sajjad Ahmad Malik s/o Muhd Ihsan Malik, MBBS	4.6.1961/ Peshawar	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOLRH, Peshawar
10.	Dr.Abdur Rashid s/o Karim Khan MBBS	15.2.1961 DI Khan	23.1.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, DIKhan
11.	Dr.Tajul Haq s/o Shah Rasool, MBBS	10.12.1962/ Mardan	23.1.1988/B-17	16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, Peshawar

4 A
Annex

(8)

12.	Dr.Durre Afshan, MBBS	31.1.63/ Peshawar	23.1.1988/B-17	18.9.1997 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Abbottabad
13.	Dr.Shabir Ahmad s/o Abdul Sattar, MBBS	03.01.1961 Khy.Agy	23.1.1988/B-17	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO ID Children Hosp: Peshawar.
14.	Dr.Inayatullah s/o Daulat Khan, MBBS	22.8.1962/ Kohistan	27.10.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO. Office, Kohistan
15.	Dr.Fauzia Shahdaza, D/O Shahzada, MBBS	25.02.1963/ Makd. Agy:	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO NKBMH, Peshawar
16.	Dr.Bibi Hajira, MBBS	01.06.1964 Swat	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	SGTH Swat
17.	Dr.Muhammad Essa Khan s/o Shah Afzal, MBBS	Mkd.Agency/ 21-04-1963	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Batkhela
18.	Dr.Jehanzeb s/o Shah Baroz Khan, MBBS	28.10.1961 NW Agency	12.4.1989	10.09.2009 22.05.2018	BS-18 BS-19	By Promotion By Promotion.	PMOAHQH, Miranshah
19.	Dr.Muhammad Shakoor s/o Farid Khan, MBBS	20.04.1963/ Swat	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOSGTH, Swat
20.	Dr.Ibrar Ali s/o Ghulam Mustafa, MBBS	Abbottabad/ 24.02.1961	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOBBTH, Abbottabad
21.	Dr.Muhammad Tahir s/o Gul Jabbar, MBBS	02.12.1962/ Swat	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH, Daggar Buner.
22.	Dr.Azizur Rehman s/o Nadir Khan, MBBS	S.W.Agency/ 02.02.1961	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO. Office, DIKhan
23.	Dr.Sahib Dad Khan s/o Hayadad Khan, MBBS	01.12.1961 Khyber Agy	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO. Office, Peshawar.
24.	Dr.Mirdad Khan s/o Gul Mand, MBBS	18.03.1961 Khyber Agy	12.4.1989	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO CD, Nothia, Peshawar
25.	Dr.Muhammad Saeed s/o Ghulam Jillani, MBBS	15.11.1961 Abbottabad	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO CH, Rehana Haripur.
26.	Dr.Sher Abdullah Khan s/o Sher Afzal Khan, MBBS	01.04.1962 Buner	12.4.1989	i)16.04.2008 ii) 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO Office Buner.

27.	Dr.Fazal Rehman s/o Ali Zaman. MBBS	28.07.1962/ Kurram Agy	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Kohat.
28.	Dr.Khan Badshah s/o Abdur Rahim, MBBS	22-04-1962/ Bajaur Agy	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO Type-D Hosp: Samar Bagh ,L/Dir,
29.	Dr.Abid Khan s/o Sultan Muhammad, MBBS	Mansehra/ 1.1.1962	12.4.1989	i)23.11.2009 ii) 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO KATH, Mansehra
30.	Dr.Zahirullah Khan s/o Nawab Khan, MBBS	Mohmand A 08-05-1962	12.4.1989	i)10.09.2009 ii)14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO TIQH, Shabqadar, Charsadda,
31.	Dr.Jamilur Rehman s/o Noor Sada Khan, MBBS	25.04.1964/ NW Agency	12.4.1989	i)10.09.2009 ii)14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, Bannu
32.	Dr.Nighat Yasmin, MBBS	05.05.1963 Abbottabad	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Abbottabad
33.	Dr.Rashida Parveen, MBBS	06.07.1962 Abbottabad	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMODHQH Abbottabd
34.	Dr.Rehana Zubra. MBBS	01.03.1961 Swat	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMOSGTH Swat.
35.	Dr.Sirajul Munir s/o Hafiz Muhd Saddiq. MBBS	11.9.1962/ Peshawar	4.11.1989	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO attached to DHO, Nowshera
36.	Dr.Masoodur Rehman s/o Gul Rehman. MBBS.	12.3.1964/ Peshawar	4.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO HMC, Peshawar
37.	Dr.Ghulam Mustafa s/o Ghulam Murtaza, MBBS	18.9.1961/ Peshawar	5.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO GNKBM Hospital Kohat Road Peshawar
38.	Dr.Hamid Azam Khan s/o M Azam Khan. MBBS	15.7.1961/ Abbottabad	6.11.1989	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH, Abbottabad.
39.	Dr.Aslam Khan Mohmand S/O Adam Khan. MBBS.	08.09.1963/ Peshawar	18.11.1989	23.11.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, KMC. Peshawar
40.	Dr.Ashraf Ali s/o Imdadullah. MBBS	1.1.1961 Swat	21.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOLRH, Peshawar
41.	Dr.Zubaida Ashraf, D/O Haji Muhammad Ashraf. MBBS	26.06.1964/ Peshawar.	16.01.1990	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWMO Molvi Amir Shah Hosp Peshawar

10

42.	Dr. Zarina Gulab, MBBS	21.04.1962/ Kurram Agy:	10-06-1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOAHQH, Parachinar.
43.	Dr.S.Muhammad Zahir Shah s/o S.Abbas Ali Shah.	22.9.1964/ Charsadda	18.6.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOKTH, Peshawar
44.	Dr.Bahre Karam s/o Mir Dad Khan, MBBS	5.6.1963/ Swat	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, KGMC, Peshawar.
45.	Dr.Abdul Wasia s/o Abdur Rehman, MBBS	15.7.1964/ Swat	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, SMC,Swat
46.	Dr.Muhammad Nazir Afridi s/o Gul Man Shah, MBBS	20.3.1961/ Peshawar	18.6.1990	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO Services Hospital, Peshawar.
47.	Dr.Muhammad Noor s/o Mazullah Khan, MBBS	7.7.1961/ Kohat	18.6.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO GNKBM Hospital Kohat Road Peshawar
48.	Dr.Muhammad Irshad s/o Khan Baz Khan, MBBS	13.3.1964/ Abbottabad	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOBBTH, Abbottabad
49.	Dr.Mussarat Shah s/o Syed Rehmat Gul, MBBS	10.4.1965/ Peshawar	2.9.1990	23.11.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOTBC, Nowshera
50.	Dr.Saifur Rehman s/o Gul Muhammad, MBBS	20.4.1961/ Dir	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOTHQH, Takhtbhai, Mardan
51.	Dr.Muhammad Razaq S/O Ajbar Khan, MBBS	25.5.1962 Dir	2.9.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOIKD, Peshawar
52.	Dr.Amanullah s/o Faqir Muhammad, MBBS	4.6.1962/ Swat	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, SMC, Swat.
53.	Dr.Umar Islam s/o Muhammad Ali, MBBS	22.2.1961 Bajaur Agy:	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH, Timergara.
54.	Dr.Muhammad Nazir Khan s/o Bakht Badshah Khan.	2.5.1961 Dir	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOHMC, Peshawar.
55.	Dr.Rehmat Aman s/o Abdul Wahid, MBBS	8.1.1963/ Chitral	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Chitral
56.	Dr.Samin Khan s/o Manfir Khan, MBBS	1.5.1963/ Khyber Agy:	2.9.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO RHC Usterzai Kohat

FINAL SENIORITY LIST OF PRINCIPAL MEDICAL OFFICERS (BPS-19) OF THE HEATH DEPARTMENTAS STOOD ON 15.05.2020

Sl: No.	Name of Officer/Official with Academic qualification.	Date of Birth and Domicile	Date of Ist entry into Govt: Service	Regular appointment/promotion to the present post.			
				Date of promotion	BPS	Method of Recruitment/ Appointment	Present Appointment with date.
	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Dr. Mueen Begum D O Wazir Ali. MBBS	20.12.1961/ Kurram	15.8.1987/B-17	i) 20.9.1995 ii) 02.10.2013	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Kohat
2.	Dr. Javed Shah. MBBS	10.09.1961/ Mardan	6.12.1987/B-17	i) 18.9.97 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	KTH Peshawar
3.	Dr. Muhammad Ajmal Khan s/o Muhammad Afzal Khan	15.03.1961/ DI Khan	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached to DHO, DIKhan.
4.	Dr. Muhammad Khalid Khan s/o Abdul Hamid Khan.	29.01.1961/ Peshawar	06.12.1987	18.09.1997 22.05.2018	BS-18 BS-19	By Promotion By Promotion.	PMO Sarhad Hosp: for Psy, Pesh (Mental)
5.	Dr. Huma Sherin. MBBS	5.4.1961	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWPMO LRH, Peshawar
6.	Dr. Shamim Afzal s/o Amir Afzal. MBBS	1.6.1961/ Manselhra	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	Attached to DHO, Manselhra
7.	Dr. Sajjad Muhammad s/o Ghulam Muhammad. MBBS	22.4.1961/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion. By Promotion	PMO DHQH Kohat
8.	Dr. Nisar Muhammad s/o Mir Zaman. MBBS	1.11.1961/ Mardan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016	BS-18 BS-19	By promotion. By Promotion	PMO BKMC Mardan.
9.	Dr. Zaffar Ali Shah s/o Muhammad Amin Shah.	20.4.1961/ SW Agency	23.1.1988/B-17	i) 20.8.2001 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, DIKhan
10.	Dr. Sajjad Ahmad Malik s/o Muehd Ihsan Malik. MBBS	4.6.1961/ Peshawar	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOLRH, Peshawar
11.	Dr. Abdur Rashid s/o Karim Khan. MBBS	15.2.1961/ DI Khan	23.1.1988/B-17	i) 16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, DIKhan
12.	Dr. Tajul Haq s/o Shah Rasool. MBBS	10.12.1962/ Mardan	23.1.1988/B-17	16.04.2008 ii) 14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, Peshawar

13.	Dr.Durre Afshan, MBBS	31.1.63/ Peshawar	23.1.1988/B-17	18.9.1997 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Abbottabad
14.	Dr.Shabir Ahmad s/o Abdul Sattar. MBBS	03.01.1961/ Khy:Agy	23.1.1988/B-17	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO ID Children Hosp: Peshawar.
15.	Dr.Inayatullah s/o Daulat Khan. MBBS	22.8.1962/ Kohistan	27.10.1988/B-17	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, Kohistan
16.	Dr.Fauzia Shahdaza, D/O Shahzada. MBBS	25.02.1963/ Makd: Agy:	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO NKBMH Peshawar
17.	Dr.Bibi Hajira. MBBS	01.06.1964 Swat	12.4.1989/B-17	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	SGTH Swat
18.	Dr.Muhammad Essa Khan s/o Shah Afzal. MBBS	Mkd.Agency/ 21-04-1963	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Batkhela
19.	Dr.Jehanzeb s/o Shah Baroz Khan. MBBS	28.10.1961 NW Agency	12.4.1989	10.09.2009 22.05.2018	BS-18 BS-19	By Promotion By Promotion.	PMOAHQH, Miranshah
20.	Dr.Muhammad Shakoor s/o Farid Khan. MBBS	20.04.1963/ Swat	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOSGTH, Swat
21.	Dr.Ibrar Ali s/o Ghulam Mustafa. MBBS	Abbottabad/ 24.02.1961	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMOBBTH, Abbottabad
22.	Dr.Muhammad Tahir s/o Gul Jabbar. MBBS	02.12.1962/ Swat	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH, Daggar Buner.
23.	Dr.Azizur Rehman s/o Nadir Khan. MBBS	S.W.Agency/ 02.02.1961	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office. DIKhan
24.	Dr.Sahib Dad Khan s/o Hayadad Khan. MBBS	01.12.1961 Khyber Agy	12.4.1989	i)16.04.2008 ii)14-04-2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO. Office. Peshawar.
25.	Dr.Mirdad Khan s/o Gul Mand. MBBS	18.03.1961/ Khyber Agy	12.4.1989	16.04.2008 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO CD, Nothia. Peshawar
26.	Dr.Muhammad Saeed s/o Ghulam Jilani. MBBS	15.11.1961 Abbottabad	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO CH, Rehana Haripur.
27.	Dr.Sher Abdullah Khan s/o Sher Afzal Khan. MBBS	01.04.1962 Buner	12.4.1989	i)16.04.2008 ii) 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO Office Buner.

(13)

28.	Dr.Fazal Rehman s/o Ali Zaman, MBBS	28.07.1962/ Kurram Agy	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Kohat.
29.	Dr.Khan Badshah s/o Abdur Rahim. MBBS	22-04-1962/ Bajaur Agy	12.4.1989	i)16.04.2008 ii) 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO Type-D Hosp: Samar Bagh ,L/Dir,
30.	Dr.Abid Khan s/o Sultan Muhammad, MBBS	Mansehra/ 1.1.1962	12.4.1989	i)23.11.2009 ii) 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO KATH, Mansehra
31.	Dr.Zahirullah Khan s/o Nawab Khan, MBBS	Mohmand A 08-05-1962	12.4.1989	i)10.09.2009 ii)14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO THQH, Shabqadar. Charsadda,
32.	Dr.Jamilur Rehman s/o Noor Sada Khan, MBBS	25.04.1964/ NW Agency	12.4.1989	i)10.09.2009 ii)14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHO, Office, Bannu
33.	Dr.Nighat Yasmin, MBBS	05.05.1963 Abbottabad	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMO DHQH Abbottabad
34.	Dr.Rashida Parveen. MBBS	06.07.1962 Abbottabad	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMODHQH Abbottabd
35.	Dr.Rehana Zuhra. MBBS	01.03.1961 Swat	24.9.1989	i) 12.8.2000 ii) 13.05.2016	BS-18 BS-19	By promotion By Promotion	PMOSGTH Swat.
36.	Dr.Sirajul Munir s/o Hafif Muhd Saddiq. MBBS	11.9.1962/ Peshawar	4.11.1989	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO attached to DHO. Nowshera
37.	Dr.Masoodur Rehman s/o Gul Rehman. MBBS.	12.3.1964/ Peshawar	4.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO HMC, Peshawar
38.	Dr.Ghulam Mustafa s/o Ghulam Murtaza, MBBS	18.9.1961/ Peshawar	5.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO GNKBM Hospital Kohat Road Peshawar
39.	Dr.Hamid Azam Khan s/o M Azam Khan. MBBS	15.7.1961/ Abbottabad	6.11.1989	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH, Abbottabad.
40.	Dr.Asiam Khan Mohmand S/O Adam Khan, MBBS.	08.09.1963/ Peshawar	18.11.1989	23.11.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, KMC. Peshawar
41.	Dr.Ashraf Ali s/o Imdadullah, MBBS	1.4.1961/ Swat	21.11.1989	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOLRH, Peshawar
42.	Dr.Zubaida Ashraf, D/O Haji Muhammad Ashraf. MBBS	26.06.1964/ Peshawar.	16.01.1990	i) 12.8.2000 ii) 23.09.2014	BS-18 BS-19	By Promotion By Promotion	PWMO Molvi Amir Shah Hosp Peshawar

(14)

43.	Dr. Zarina Gulab, MBBS	21.04.1962/ Kurram Agy:	10-06-1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOAHQH, Parachinar.
44.	Dr.S.Muhammad Zahir Shah s/o S.Abbas Ali Shah.	22.9.1964/ Charsadda	18.6.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOKTH, Peshawar
45.	Dr.Bahre Karam s/o Mir Dad Khan, MBBS	5.6.1963/ Swat	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, KGMC, Peshawar.
46.	Dr.Abdul Wasia s/o Abdur Rehman, MBBS	15.7.1964/ Swat	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, SMC,Swat
47.	Dr.Muhammad Nazir Afridi s/o Gul Man Shah. MBBS	20.3.1961/ Peshawar	18.6.1990	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO Services Hospital. Peshawar.
48.	Dr.Muhammad Noor s/o Mazullah Khan, MBBS	7.7.1961/ Kohat	18.6.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO GNKBM Hospital Kohat Road Peshawar
49.	Dr.Muhammad Irshad s/o Khan Baz Khan, MBBS	13.3.1964/ Abbottabad	18.6.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOBBTH, Abbottabad
50.	Dr.Mussarat Shah s/o Syed Rehmat Gul, MBBS	10.4.1965/ Peshawar	2.9.1990	23.11.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOTBC, Nowshera
51.	Dr.Saifur Rehman s/o Gul Muhammad, MBBS	20.4.1961/ Dir	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOTHQH, Takhtbhai. Mardan
52.	Dr.Muhammad Razaq S/O Ajbar Khan, MBBS	25.5.1962 Dir	2.9.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMOIKD, Peshawar
53.	Dr.Amanullah s/o Faqir Muhammad, MBBS	4.6.1962/ Swat	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	Demonstrator, SMC, Swat.
54.	Dr.Umar Islam s/o Muhammad Ali, MBBS	22.2.1961/ Bajaur Agy:	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMODHQH. Timergara.
55.	Dr.Muhammad Nazir Khan s/o Bakht Badshah Khan.	2.3.1961/ Dir	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMOHMC, Peshawar.
56.	Dr.Rehmat Aman s/o Abdul Wahid. MBBS	8.1.1963/ Chitral	2.9.1990	10.09.2009 26.09.2017	BS-18 BS-19	By Promotion By Promotion.	PMO DHQH, Chitral
57.	Dr.Samin Khan s/o Mamir Khan, MBBS	1.5.1963/ Khyber Agy:	2.9.1990	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion.	PMO RHC Usterzai Kohat

51

FINAL SENIORITY LIST OF CHIEF MEDICAL OFFICERS (BSP-20) OF THE HEALTH DEPARTMENT AS STOOD ON 15.05.2020

Sl: No.	Name of Officer/Official with academic qualification.	Date of Birth and Domicile	Date of 1st entry into Govt: Service	Regular appointment/promotion to the present post.			
				Date	BPS	Method of recruitment/ appointment	Present appointment with date.
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1.	Dr Gulab Hassain s/o Abul Hussan, MBBS. /DTC/D/MCPS	01.08.1960/ Kurram Ag X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO I/C, CH, Kotla Haripur.
2.	Dr. Mehboob-ur-Rehman S/O Haji Habibullah,	25.09.1960/ Bannu X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Bannu
3.	Dr. Satbar Ghani s/o Rehmat Jee, MBBS	20.11.1960/ Kohistan X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, RHC, Lessan Nawab, Mansehra
4.	Dr. Azizullah s/o Gul Muhammad, MBBS	01.01.1961/ D.I. Khan X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	GMC, DIK on deputation for 3 years
5.	Dr. Alamgir s/o Ghulam Rasool, MBBS	01.08.1960/ D.I. Khan X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Abbottabad.
6.	Dr. Muhammad Javed s/o Shah Zaman Khan, MBBS	01.06.1960/ A. A. Bad X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	MS, KATH, Mansehra.
7.	Dr. Anwar Zada s/o Fazli Rahim MBBS	10.10.1961/ Dir	16.04.1986/B-17	i) 03.04.1995 ii) 25.11.2014 iii) 22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Timergara
8.	Dr. Nasir Muhammad Khan s/o Niaz Muhammad Khan,	16.09.1960/ Mardan X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii) 22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, MMC, Mardan

(16) "B" Anwar
 - Total Seats in-20 = 75
 - Retired before 21st Feb 2021 = 22
 - Remaining = 19
 Total = 22 + 19 = 41

Seniority No in-19 = 49
 Now 49 + 19 = 68

So, my final seniority no in 20 = 68

It will be 68 out of 75 seats in BPS-20.

75 - 5
 19
 66

(17)

9.	Dr.S.Chiragh Hussain s/o S.Irshad Hussain, MBBS	12.07.1961/ Orakzai	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii)22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO , Bacha Khan Medical Complex, Swabi.
10.	Dr.Ikramullah Khan S/O Farman Ali Khan.	11.10.1960/ Peshawar X	16.04.1986/B-17	i) 03.04.1995 ii) 06.12.2008 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHQH, Abbottabad.
11.	Dr.Samina Hayat D/O Muhammad Hayat Khan,	11.08.1960/ Peshawar X	17.4.1987/B-17	i)20.09.1995 ii) 02.10.2013 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO attached to DHO, Haripur
12.	Dr.Nargis Mumtaz D/O Mumtaz Akbar, MBBS	3.8.9161/ Mardan	17.4.1987/B-17	i)20.09.1995 ii) 02.10.2013 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, KTH, Peshawar (LPR)
13.	Dr.Bushra Halimi d/o Syed Tasneemul Haq,	23.06.1960 Mardan X	15.8.1987/B-17	i) 20.09.1995 ii)13.05.2016 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH Mardan
14.	Dr.Sultana Azmat Birlas D/O Qaisar Hussain Birlas,	25.12.1960 Peshawar X	15.8.1987/B-17	i)20.09.1995 ii) 23.09.2014 iii)22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, Maternity Hospital, Peshawar.
15.	Dr.Farhat Saeed D/O. Saeed Hamiduddin,	25.02.1962 Bannu	15.8.1987/B-17	i) 20.09.1995 ii)13.05.2016 iii)22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO At disposal DHO, Bannu.
16.	Dr.Farrukh Anwar D/O Muhd: Anwar uddin, MBBS	19.08.1960 Bannu X	15.8.1987/B-17	i) 20.09.1995 ii) 02.10.2013 iii)22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, Naserullah Babar Hosp: Pesh
17.	Dr.Farhat Jabeen D/O Matiullah, MBBS	04.04.1962 DI Khan	15.8.1987/B-17	i) 20.09.1995 ii) 23.09.2014 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHQH. DIKhan
18.	Dr.Shazia Hafiz D/O Syed Yousaf Ali Shah.	19.12.1961 Peshawar	15.8.1987/B-17	i) 20.9.1995 ii)13.05.2016 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO LRH, Peshawar

19.	Dr.Naeema Saadia D/O Muhammad Hanif, MBBS	27.10.1961 DI Khan	15.8.1987/B-17	i)20.9.1995 ii)14.04.2017 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHO Office, DI Khan
20.	Dr.Muhammad Shuaib S/O Muhammad Ajab	20.06.1964 Mansehra	6.12.1987/B-17	i) 18.9.97 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Mansehra
21.	Dr.Muhammad Iqbal Hussain s/o Habib-ur- Rehman, MBBS	25.04.1962 Mardan	06.12.1987/B-17	i) 18.9.97 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, MMC, Mardan.
22.	Dr.Muhammad Mushtaq s/o Haji Gul Baz, MBBS	12.06.1960/ Peshawar X	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHQH Nowshera.
23.	Dr.Saifur Rehman s/o Abdul Qadeer,	20.08.1963 Kohat	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO Attached DHO, Kohat
24.	Dr.Qazi Faiz ud Din s/o Qazi Mir Sahib, MBBS	9.9.1960/ Bannu X	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Bannu
25.	Dr.Muhammad Israr Khan s/o Bakht Jamal;	7.10.1960/ Swabi X	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014 iii)26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Swabi.
26.	Dr.Niaz Muhammad s/o Khalil-ur-Rehman, MBBS	27.02.1962/ Mansehra	06.12.1987/B-17	i) 21.09.1998 ii) 23.09.2014 iii)22.05.2018	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	ADG(Admn) DGHS Office, Peshawar.
27.	Dr.Muhammad Tahir Khan s/o Abdur Rehman Khan,	Mardan 10-05-1962	6.12.1987/B-17	i) 12.08.2000 ii) 23.09.2014 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO ATH, Abbottabad.
28.	Dr.Arshad-ul-Islam s/o Sahib Din, MBBS	19.08.1961 Peshawar	06.12.1987/B-17	i) 18.09.1997 ii) 13.05.2016 iii)08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHQH, Nowshera

(21)



29.	Dr. Shah Jehan s/o Ghulam Nabi, MBBS	09.09.1960/ D.I.Khan	06.12.1987/B-17	i) 21.09.1998 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO THQH Parawa DiKhan
30.	Dr. Syed Asghar Ali s/o Syed Quresh. MBBS	15.07.1961/ Mardan	06.12.1987/B-17	i) 21.09.1998 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO Bacha Khan Medical Complex, Swabi..
31.	Dr. Nehar Noor D/O S. Ajab Noor, MBBS	24.06.1961/ Peshawar	21.12.1987/B-17	i) 20.09.1995 ii) 23.09.2014 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, HMC, Peshawar
32.	Dr. Jehan Ara. MBBS D/O Pir Fazal Khaliq. MBBS	01.06.1962/ Mardan	23.1.1988/B-17	i) 18.09.1997 ii) 23.09.2014 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, Mardan.
33.	Dr. Shamim Ara d/o Muhammad Sherin, MBBS	17.10.1961	23.1.1988/B-17	i) 12.08.2000 ii) 23.09.2014 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO MMC Mardan.
34.	Dr. Ikramullah Khan s/o Ajab Khan, MBBS	8.8.1960/ Peshawar	23.1.1988/B-17	i) 12.08.2000 ii) 23.09.2014 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, ESH, Nahaqi, Peshawar
35.	Dr. Rahim Khan s/o Nadir Khan, MBBS	1.9.1961/ Karak	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014 iii) 26.09.2017	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH, KDA, Kohat
36.	Dr. Nagina Parveen, MBBS.	15.2.1961	23.1.1988/B-17	i) 12.8.2000 ii) 23.09.2014 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO DHQH, Haripur
37.	Dr. Aziz Muhammad s/o Syed Afzal. MBBS	1.10.1960/ Bajaur Agy:	23.1.1988/B-17	i) 20.8.2001 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	THQH, Dargai Malakand.
38.	Dr. Abdul Ghaffar s/o Ghulam Sardar Khan,	2.1.1961/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	DHO Lakki Marwat

5

39.	Dr. Riaz Ahmad s/o Sahib-e-Haq, MBBS	13.05.1962/ Peshawar	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	Attached DHO Nowshera.
40.	Dr. Kiramatullah s/o Inayatullah MBBS	25.04.1962/ DI Khan	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	CMO, DHQH. DI Khan
41.	Dr. Shafiqullah s/o Asari Gul, MBBS	12.12.1960/ Bannu	23.1.1988/B-17	i) 16.04.2008 ii) 13.05.2016 iii) 08.05.2019	BS-18 BS-19 BS-20	By Promotion BY Promotion By Promotion	DHQH, Tank

CERTIFICATE

Certified that the above seniority list is final and un-disputed.

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

20



21

Annex B

**OFFICE OF THE DISTRICT HEALTH
OFFICER DISTRICT DIR UPPER**

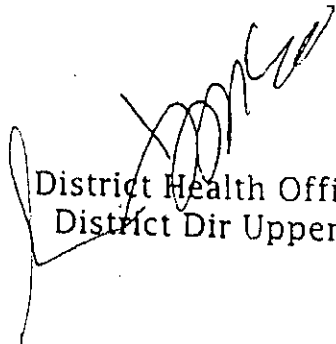
No 794-95 /G.F, the 22/11 /2021.
(Off: 0944-880808 & 0944-881075) Email: admn6066@gmail.com

To, The Honourable Secretary Health
Government of Khyber Pakhtunkhwa Peshawar.

Subject:- REQUEST FOR PROMOTION FROM BS-19 TO BS-20.
R/Sir,

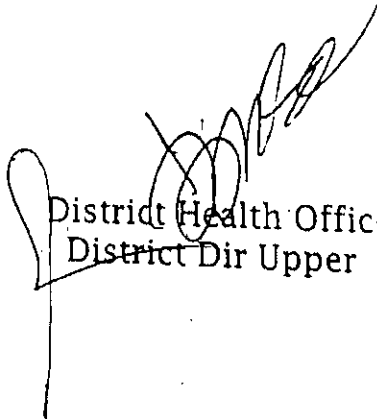
Enclosed please find herewith an application in respect of Dr. Umar Islam Principal Medical Officer BS-19 working at Category "C" Hospital Wari Dir Upper which is self-explanatory.

In this connection, his application is hereby submitted for favorable consideration under the rules please.


District Health Officer
District Dir Upper

No. & date even:-
Copy for information to:-

1. Dr. Umar Islam Principal Medical Officer/Medical Superintendent
Category "C" Hospital Wari Dir Upper w/r to his application refer above.


District Health Office
District Dir Upper



(22)

"D" Ammal

Government of Khyber Pakhtunkhwa
Health Department

Dated Peshawar the January 24, 2022

NOTIFICATION

NO. SOH(E-V)/2-2/2022/244. The Competent Authority on the recommendations of Provincial Selection Board, in its meeting held on 02.12.2021, is pleased to promote the following Principal Medical Officers (BS-19) to the post of Chief Medical Officers (BS-20) on regular basis, with immediate effect:-

S.NO	NAME OF DOCTOR	S.NO	NAME OF DOCTOR
1	Dr. Tajul Haq	40	Dr. Naila Tarranum
2	Dr. Durra Afshan	41	Dr. Shaista Yousof
3	Dr. Inayatullah	42	Dr. Samina Tabassum
4	Dr. Fauzia Shahzada	43	Dr. Shaheen Ibrahim
5	Dr. Bibi Hara	44	Dr. Tahira Bibi
6	Dr. Muhammad Essa Khan	45	Dr. Bakhtawar Shah
7	Dr. Muhammad Shakoor	46	Dr. Mohibullah Jan
8	Dr. Muhammad Tahir	47	Dr. Sohail Aslam
9	Dr. Sher Abdullah Khan	48	Dr. Altafur Rehman
10	Dr. Fezal Rehman	49	Dr. Imtilaz Ali
11	Dr. Khan Badshah	50	Dr. Shabir Ahmad
12	Dr. Abid Khan	51	Dr. Mujeebur Rehman
13	Dr. Zahirullah Khan	52	Dr. Gul Muhammad
14	Dr. Jamilur Rehman	53	Dr. Ghulam Murteza Shah
15	Dr. Nighat Yasmin	54	Dr. Samiullah Jan
16	Dr. Rashida Parveen	55	Dr. Waheedur Rehman
17	Dr. Sirajul Munir	56	Dr. Muhammad Naeem Akhtar
18	Dr. Masoodur Rehman	57	Dr. Hamid Ahmad
19	Dr. Aslam Khan Mohmand	58	Dr. Ghulam Rasool
20	Dr. Syed Muhammad Zahir Shah	59	Dr. Fazli Subhan
21	Dr. Bahre Karam	60	Dr. Muhammad Nawaz Khan
22	Dr. Abdul Wasia	61	Dr. Ismail Iqbal
23	Dr. Muhammad Irshad	62	Dr. Muhammad Jehangir Khan
24	Dr. Musarat Shah	63	Dr. Muhammad Iqbal
25	Dr. Muhammad Razaq	64	Dr. Bawar Shah
26	Dr. Amanullah	65	Dr. Anwarul Haq
27	Dr. Rehmat Aman	66	Dr. Khan Saeed
28	Dr. Samin Khan	67	Dr. Fazli Rabbi
29	Dr. Amanullah Khan	68	Dr. Muhammad Faraz Khan
30	Dr. Khial Muhammad	69	Dr. Muhammad Rafique
31	Dr. Jan Alam	70	Dr. Muhammad Aslam Khan
32	Dr. Muhammad Samiullah	71	Dr. Muhammad Ikram
33	Dr. Sajjad Ahmad Khan	72	Dr. Shafiq Ahmad
34	Dr. Nabeela Anwar Raza	73	Dr. Ijaz Ahmad
35	Dr. Noreen Shah	74	Dr. Ziauddin Khan
36	Dr. Shahida Yousof	75	Dr. Mukamil Khan
37	Dr. Seema Dilawaiz	76	Dr. Muhammad Rauf Khan
38	Dr. Rukhsana Parveen	77	Dr. Ahmad Rafi
39	Dr. Kausar Inayat	78	Dr. Mehmood Jan

Section Officer (P.M.O.)
Health Department
Khyber Pakhtunkhwa

PDA KPK

23

79	Dr. Muhammad Sabir	87	Dr. Tahir Mehmood
80	Dr. Muhammad Naeem Khan	88	Dr. Fida Muhammad
81	Dr. Arshad Sohail	89	Dr. Waqar Ahmad
82	Dr. Daraz Khan	90	Dr. Yahya Khan
83	Dr. Hazrat Ali Mian	91	Dr. Shaheen Mehtab
84	Dr. Khalid Rehman	92	Dr. Rubina Sadiq
85	Dr. Khalid Zamir	93	Dr. Syeda Rains
86	Dr. Muhammad Saleem	94	Dr. Rubina Habib

2 The Officers promotion will remain on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3 The posting/ transfer notifications in respect of the above named officers will be issued later on

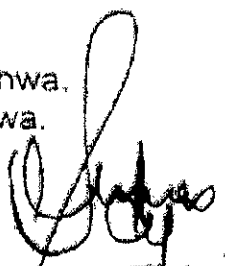
**SECRETARY HEALTH
GOVERNMENT OF KHYBER PAKHTUNKHWA**

Endst. Of even No. & Date.

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Principal Secretary to Government, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa.
6. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
7. Director General, Provincial Health Services Academy Peshawar.
8. Section Officer (PSB), Establishment Department.
9. Deputy Director (IT), Health Department.
10. PS to Minister for Health Department, Khyber Pakhtunkhwa.
11. PS to Secretary Health Department, Khyber Pakhtunkhwa.
12. PS to Special Secretary Health, Khyber Pakhtunkhwa.
13. All concerned doctors.

PDA KPK


 24/1/2022
(TEHMAS AYYUB)
SECTION OFFICER (E-V)

Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

24

Peshawar dated Feb, 09, 2022

The worthy Chief Secretary Khyber Pakhtunkhwa
Office of Chief Secretary, Civil Secretariat, Khyber Road, Peshawar

By: Courier Service/ Registered Post

Subject: Departmental appeal against Notification dated 24/01/2022 while not considering appellant for promotion to BPS 20 {Chief Medical Officer}

Esteemed Sir,

Most respectfully it is submitted that I made application through Distt Health Officer, Distt Dir Upper bearing No. 794-95/GF, dated 22/01/2021 addressing the worthy Secretary Health, Khyber Pakhtunkhwa for promotion to BPS 20 as Chief Medical Officer. However, my application has not been entertained, and resultantly, I have not been considered for promotion, and during the period got retired.

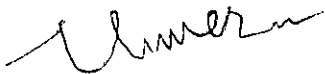
It is worth mentioning that juniors to me have been promoted, and I have been ignored deprived of my lawful right to be promoted to the next grade without assigning any reasons. During my professional life for last 33 years (almost) there is no any single complaint whatsoever against me. However, my promotion to the next grade has not been considered despite the fact that vacant posts existed and I met the criteria as well. Prior to my retirement, seniority list maintained by the Department entitled me to be promoted as many seats of Chief Medical Officers exist vacant.

In view of the above facts and circumstances, I was eligible for promotion however to negligence on the part of Department; my promotion case has not timely been processed despite letter from Distt Health Officer, Dir Upper.

It is therefore most respectfully submitted that in view of the above facts, I may kindly be given proforma promotion since date of promotion of juniors to me have been promoted with all financial and other service benefits in the best interest of justice.

(Copy retained)

Yours sincerely,



Dr Umar Islam S/O Muhammad Ali

Ex Principal Medical Officer Category "C" Hospital Wari, Dir Upper
House 35, Street 5, Phase III, Hayatabad

(25)

WAKALATNAMA

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Dr. Umar Islam S/o Muhammad Ali

Appellant

Versus

The Govt of KP through Chief Secretary & others

Respondents

I, Dr Umar Islam S/o Muhammad Ali, Appellant in the above titled suit, do hereby appoint Rehman Ullah Shah, Advocate in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct prosecution or defence of the said case at all its stages.
3. To receive payment of and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

And hereby agree: -

- a). That the advocate shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this 2021.

Attested & Accepted by:

(Subject to the term regarding payment of fee)

Signature of Executant/

Rehman Ullah Shah Advocate Supreme Court

LL.M

BC No. 10-0541

Ibn e Abdullah Law Associates

11, Azam Tower, University Road, Peshawar

Ph & 091 570 2021, 0333 4593948

infoila56@gmail.com

"A"

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

S.B

No.

APPEAL No.....557..... of 20 22

Dr. Umar Islam

Appellant/Petitioner

Versus

Through chief Secy Pesh:

RESPONDENT(S)

Respondents 3
Notice to Appellant/Petitioner The Secretary Health KPK
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 3/8/2022 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

(copy is attached)

26/7/22

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“A”

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

No.

APPEAL No..... 557 of 20²² .

Dr Umar Islam

Appellant/Petitioner

Versus

Through chief Secy Pesh.

RESPONDENT(S)

Respondents No. 4
Notice to Appellant/Petitioner The Director General Health
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 3/8/2022 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
Copy is Attached

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.



"A"

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

No.

APPEAL No. 557 of 2022.

Dr Umar Islam

Appellant/Petitioner

Versus

Through chief Secy Kp Pesh.

RESPONDENT(S)

Respondents No. 5
Notice to Appellant/Petitioner The Section officer, Provincial
Selection Board Establishment Dept.
Kpk Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 3/8/2022 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.

Reply
for Reply
(Copy is Attached)

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Received
26.7.2022

"A"

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

51

No.

APPEAL No.....557..... of 2022

Dr. Umair Islam

Appellant/Petitioner

Versus

Through chief Secy Pesh.

RESPONDENT(S)

(Respondent No 1)

Notice to Appellant/Petitioner The Govt. of KPK Through
Chief Secy KPK Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing,
replication, affidavit/counter affidavit/record/arguments/order before this Tribunal
on 3/8/2022 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
Copy is Attached)

[Signature]
26-7-22

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 557 of 20²².

Dr. Umar Islam

Appellant/Petitioner

Versus

through chief Secy Pesh.

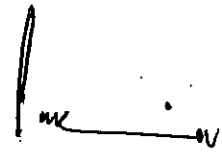
RESPONDENT(S)

Respondent No 2 The Secretary Establishment
Notice to Appellant/Petitioner
KPK Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 3/8/2022 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 1
Copy is Attached



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

26-7-22
