


19.05.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Ghulam Sarwar Assistant for the respondents present.

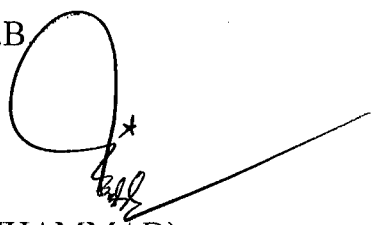
Written reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time for submission of written reply/comments. Granted. To come up for written reply/comments 15.07.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

15.07.2022

Learned counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Ghulam Sarwar on behalf of official respondents present. Private respondent No. 5 in person present. None present on behalf of private respondent No. 4 & 6.

Reply/comments on behalf of official respondent No. 1 submitted which is placed on file. Reply/comments on behalf of officials respondents No. 2, 3 and private respondents No. 4 to 6 are still awaited. Learned Additional Advocate General for official respondents No. 2, 3 and private respondent No. 5 seeks time to submit reply/comments. Notice be issued to private respondents No. 4 & 6 for submission of reply/comments. Adjourned. To come up for reply/comments on 16.09.2022 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER(E)

*Notice was not issued to the respondent due to non-availability of postal tickets*

08.11.2021

Appellant present in person.

Memorandum of Appeal and documents annexed therewith perused. The appellant is aggrieved of seniority of private respondents and from the promotion order issued on the basis of seniority in which the appellant purportedly was not placed on right place. Subject to all just and legal objections including that of limitation, this appeal is admitted for full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 02.03.2022 before the D.B.

Appellant Deposited  
Security & Process Fee

2-3-2022

  
Chairman

Due to retirement of the Honorable  
Chairman the case is adjourned to come  
up for the same as before on  
19-5-22

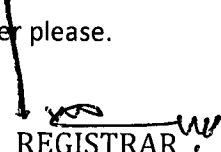

  
Reater

Form- A

### FORM OF ORDER SHEET

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

Case No.- 7409 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/09/2021	<p>The appeal of Mr. Muhammad Ali presented today by Mr. Muhammad Arif Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

7409  
Service Appeal No. \_\_\_\_\_/2021

Muhammad Ali Ward Orderly (BPS-4)..... Appellant

VERSUS

Medical Superintendent & others..... Respondents

**INDEX**

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5.	Copies of Appointment order and salary slip	A & B	8-10
6.	Copy of letter dated 29-08-2013	C	11
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Through

  
APPELLANT

Muhammad Arif Jan

Advocate Peshawar

(1)

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

Service Appeal No. \_\_\_\_/2021

Muhammad Ali Ward Orderly (BPS-4) at DHQ Hospital, Nowshera.

..... Appellant

VERSUS

1. Medical Superintendent, District Head Quarters Hospital, District Nowshera.
2. Secretary Health, Govt. of Khyber Pakhtunkhwa Health Department, Peshawar.
3. Director General, Health Services Khyber Pakhtunkhwa Health Department, Peshawar.
4. Mr. Naeem Khan Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.
5. Mr. Ikram Jan Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.
6. Mr. Zulfiqar Ali Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.

..... Respondents

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNE FINAL SENIORITY LIST OF CLASS IV FOR THE POST OF JUNIOR CLERK, DHQ NOWSHERA AGAINST WHICH DEPARTMENTAL APPEAL HAS BEEN FILED VIDE DAIRY NO-19301 DATED 04-06-2021 BUT THE SAME HAS NOT BEEN DECIDED WITHIN THE PRESCRIBED STATUTORY PERIOD.**

**Respectfully Sheweth:**

1. That the appellant was initially appointed as Mali in BPS-1 at Health Department vide order dated 04.11.2009 and was posted at DHQ Nowshera. The appellant performing his duties with full zeal and zest and to the entire satisfaction of his superiors. (Copies of Appointment order and salary slip are attached as ANNEX-A & B respectively).

2. That the appellant was then adjusted by modifying the appointment order from Mali to Ward Orderly vide order dated 29.08.2013 against the vacant post at DHQ Nowshera. (Copy of letter dated 29-08-2013 is attached as ANNEX-C).
3. That respondent No-1 maintained seniority list of Class-IV employees for the post of Junior Clerk wherein mistakenly the name of the appellant was placed at S.No-5 instead of at S.No-2 which needs correction but it is worth maintained here that, a DPC was held, wherein the seniority list was violated and Junior most then the appellant, respondents 4-6 were promoted as Junior Clerk vide their respective orders dated 30.11.2019 against which Service Appeal No- 15296/2020 has been filed by one of the employee namely, Hazrat Hussain, who was too promoted as Junior Clerk during pendency of appeal. Similarly entire facts of promotion and violation of seniority list came to the knowledge of the appellant through the above mentioned appeal. (Copies of Seniority list and promotion orders are attached as ANNEX-D & E respectively).
4. That through the above facts and circumstances of the Service Appeal and further proceedings and promotion thereupon, the matter came to the knowledge of the appellant, hence approach before respondent No-3 by filing departmental appeal, but the grievances of the appellant have not been redressed within the prescribed period.(Copy of departmental appeal is attached as ANNEX-F).
5. That the appellant approached to respondent No-1 for provision of final seniority list but of no avail hence challenging the last seniority list which is correctly signed by respondent No-1.
6. That being aggrieved and having no other remedy except to file the instant appeal on the following amongst other grounds.

**GROUND:**

- A. Because, the actions and inactions of the respondents by way of maintaining the final seniority list of Class-IV employees for the post of Junior Clerk under reserved quota (**Herein after impugned up to the extent of appellant**) wherein the appellant has been placed at S.No-5 instead of S.No-2 and further proceeding thereupon as the appellant has been deprived from promotion to the post of Junior Clerk and respondents No-4 to 6 whose are Junior then the appellant were promoted thus all the act, commissions and omissions of the respondents are

patently illegal, unlawful, without lawful authority, of no legal effect and ineffective upon the rights of appellant being false and maintained wrongly, hence the respondents be directed to act in accordance with Law and to revise and finalize the correct and proper seniority list securing the lawful rights of the appellant being the senior most in the seniority list and promote under reserve quota to the post of Junior Clerk without any further delay, reason and justification.

- B. Because, respondents 4-6 are junior most than the appellant and keeping in view this fact and circumstances, the competent authority/ DPC intentionally ignored the appellant and deprived him from his basic right of promotion, which is clear violation of law, rules and regulation governing the subject matter.
- C. Because, the appellant has serving the department for last about 12 years, with unblemished record and is/ was entitled in all respect for the promotion of Junior Clerk under reserve quota, but the authority concerned badly failed to consider him, despite the fact of his eligibility.
- D. Because, the appellant is qualified and passed matriculation moreover also fulfilling all the relevant documents/criteria for promotion to the post of Junior Clerk but the same is/was not considered without any reason and justification.
- E. Because, the respondents themselves violated their own guidelines/policies and directive of high ups on the subject matter, hence intentionally adopted the policy of “**pick and choose**” thus this act of the respondents is against the existing laws and policies, hence this act of the respondents is amounts to abuse of powers/authority which is against the norms of justice.
- F. Because, the respondent No-1 maintained the impugned seniority list in hasty manner, without perusal of relevant record just to show performance to the high ups but in fact, the appellant suffered with irreparable losses which will not be count in shape of coins.
- G. Because any other ground which has not been mentioned may also be permitted to rise at the time of hearing.

4

It is, therefore, most humbly prayed that on acceptance of the instant Appeal,

1. This Hon'ble Tribunal may graciously be please to declare the impugned seniority list illegal, unlawful and to be set aside.
2. Direct the respondents to prepare the correct revised final seniority list placing therein the appellant being senior most against his respective position.
3. The promotion order dated 30-11-2019 of respondents 4-6 may graciously be declared as illegal, unlawful, without lawful authority and to be withdrawn.
4. Direct the respondents to promote the appellant to the post of Junior Clerk with all back benefits
5. Any other relief which this Hon'ble Tribunal deems fit under the facts and circumstances of the case may also be allowed in favor of appellant.

  
APPELLANT

Through

  
Muhammad Arif Jan

Advocate Peshawar

#### AFFIDAVIT

I, Muhammad Ali Ward Orderly (BPS-4) at DHQ Hospital, Nowshera do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed.

  
DEPONENT



5

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

Service Appeal No. \_\_\_\_/2021

Muhammad Ali Ward Orderly (BPS-4)..... Applicant

VERSUS

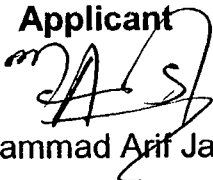
Medical Superintendent & others..... Respondents

**APPLICATION FOR RESTRAINING THE RESPONDENTS FROM**  
**MAKING FURTHER APPOINTMENTS/PROMOTIONS AGAINST**  
**THE POST OF JUNIOR CLERK TILL THE FINAL DISPOSAL OF**  
**THE INSTANT APPEAL.**

Respectfully Sheweth;

1. That the above titled appeal is being filed today which is yet to be fixed for hearing.
2. That the facts and grounds taken in the body of main appeal may kindly be treated as integral part of this application which making out an excellent prima facie case in favor of the appellant/applicant against the respondents.
3. That all the three ingredients like strong prima facie case, balance of convenience and irreparable losses are in favor of the appellant.

It is, therefore, humbly submitted that the application may graciously be allowed in the interest of Justice.

Applicant  
Through   
Muhammad Arif Jan  
Advocate Peshawar.

6

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

Service Appeal No. \_\_\_\_\_/2021

Muhammad Ali Ward Orderly (BPS-4)....., Appellant

VERSUS

Medical Superintendent & others..... Respondents

AFFIDAVIT

I, Muhammad Ali Ward Orderly (BPS-4) at DHQ Hospital, Nowshera do hereby solemnly affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed.

  
DEPONENT

7

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

Service Appeal No. \_\_\_\_/2021

Muhammad Ali Ward Orderly (BPS-4)..... Appellant

VERSUS

Medical Superintendent & others..... Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT**

Muhammad Ali Ward Orderly (BPS-4) at DHQ Hospital, Nowshera.

**RESPONDENTS**

1. Medical Superintendent, District Head Quarters Hospital, District Nowshera.
2. Secretary Health, Govt. of Khyber Pakhtunkhwa Health Department, Peshawar.
3. Director General, Health Services Khyber Pakhtunkhwa Health Department, Peshawar.
4. Mr. Naeem Khan Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.
5. Mr. Ikram Jan Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.
6. Mr. Zulfiqar Ali Junior Clerk (BPS-11) District Head Quarters Hospital, District Nowshera.

Through

**APPELLANT**



Muhammad Arif Jan

Advocate Peshawar

8

Annex - A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH NOWSHERA.

OFFICE ORDER.

As per recommendation of Honourable Minister for Health NWFP Peshawar, as well as local MPA Minister for Excise & Taxation, Mr. Muhammad Ali S/O Murad Ali resident of Village Moh: Sahibzadgan Dagi Khel P/O Nowshera Kalan District Nowshera is hereby provisionally appointed as Mali BPS - 01 (Rs. 2970 - 90 - 5670) at DHQ Hospital Nowshera, plus usual allowances as admissible under the rules on contract basis, in the interest of public as per terms and conditions laid down recruitment procedure pertaining to Class-IV appointment.

Sd  
Executive  
District Officer Health  
Nowshera


No. 8069-74 EDO (H) NSR Dated. 4 11 /2009.

Cc,

1. PS to Minister for Health, NWFP, Peshawar with reference to his recommendation dated. 06.05.2009.
2. PS to Minister for Excise & Taxation NWFP, Peshawar for information with reference to his DO No. PS/Min: E&T/2009/1/4 dated. 04.05.2009.
3. Medical Superintendent, DHQ Hospital Nowshera.
4. Senior District Account Officer, Nowshera.
5. Account Section.
6. Mr. Muhammad Ali S/O Murad Ali, Village Mohallah Sahibzadgan Dagi Khel P/O Nowshera Kalan District Nowshera.
7. Office record.

CTC



  
Executive  
District Officer Health  
Nowshera

9

OFFICE OF THE MEDICAL SUPERINTENDENT, DHQ, HOSPITAL, NOWSHERA.

OFFICE ORDER.

Reference EDC(Health)Nowshera Office order NO. 8069-74/EDO(H)NSR dated 4.11.2009.

Mr. Muhammed Ali S/O Murad Ali ~~Khan~~ Mali-BPSO is hereby adjusted against the newly created post of Ward ~~Ward~~ orderly for the purpose of pay and allowances ~~on~~ on his own pay ~~scale~~ scale till further orders.

Sd/-  
MEDICAL SUPERINTENDENT,  
D.H. HOSPITAL, NOWSHERA.

NO. 188-90 /DHQ, Hospital dated BER: the

11/10/2010.

Copy forwarded to the:-

1. Executive District Officer (Health) Nowshera.
2. District Accounts Officer Nowshera.
3. Accounts Clerk DHQ, Hospital, Nowshera.

for information and further n/action.


MEDICAL SUPERINTENDENT,  
D.H. HOSPITAL, NOWSHERA.

CTC

*[Handwritten signature]*

Government of Khyber Pakhtunkhwa  
District Accounts Office Nowshera  
Monthly Salary Statement (February-2020)

to  
Ameer B'



**Personal Information of Mr MUHAMMAD ALI d/w/s of MURAD ALI**

Personnel Number: 00549259 CNIC: 1720122807835 NTN:  
Date of Birth: 02.02.1976 Entry into Govt. Service: 04.11.2009 Length of Service: 10 Years 03 Months 027 Days

**Employment Category: Active Permanent**

Designation: WARD ORDERLI 80814324-GOVERNMENT OF KHYBER PAKH  
DDO Code: NR4306-District Headquarter Hospital Nowshera  
Payroll Section: 001 GPF Section: 001 Cash Center:  
GPF A/C No: Interest Applied: Yes **GPF Balance:** 80,874.00  
Vendor Number: -  
**Pay and Allowances:** Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 04 Pay Stage: 9

Wage type		Amount	Wage type		Amount
0001	Basic Pay	13,860.00	1000	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	296.00	2199	Adhoc Relief Allow @10%	206.00
2211	Adhoc Relief All 2016 10%	1,050.00	2224	Adhoc Relief All 2017 10%	1,386.00
2247	Adhoc Relief All 2018 10%	1,386.00	2264	Adhoc Relief All 2019 10%	1,386.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-830.00	3501	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 0.00 Recovered till February-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

**Gross Pay (Rs.): 24,313.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 22,732.00**

Payee Name: MUHAMMAD ALI  
Account Number: 0010028480080015  
Bank Details: ALLIED BANK LIMITED, 250286 CAVALRY ROAD CAVALRY ROAD,

Leaves: Opening Balance: Aailed: Earned: Balance:

**Permanent Address:**

City: NOWSHERA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
Temp. Address: City: Email:

CTC  
[Signature]

(19)

Amma 'C'

**OFFICE OF THE DISTRICT HEALTH OFFICER NOWSHERA**

**OFFICE ORDER**

As approved by the appointment committee, Mr. Muhammad Ali (Mali) BPS-01 working at DHQ Hospital Nowshera is hereby appointed as *Ward Orderly* in BPS-02 @ Rs. 4900-170-10000 against the vacant post at DHQ Hospital Nowshera.

Sd \_\_\_\_\_

District Health Officer  
Nowshera

No. 7413-16 / DHO NSR

Date: 29/08 /2013

Copy forwarded to the:

1. Senior District Account Officer Nowshera.
2. Medical Superintendent DHQ Hospital Nowshera.
3. Accounts Section DHO Office Nowshera.
4. Official concerned.



District Health Officer  
Nowshera

CAC



12 17

Annex D

Seniority List of Class IV For the post of Junior Clerk DHQ Hospital Nowshera

Anx-D

12

S.No	Name	Father Name	Date of Birth	Matric Passing Year	Date Of Appointment	Basic SSC		
						1st	2nd	3rd
✓ 1	Hazrat Hussain	Sardar hussain	15-04-1966	1984	1994			328
✓ 2	Naeem khan	Raheem khan	13-12-1975	1991	03-07-11		414	
X 3	Ikram Jan	Muhammad saleem	04-10-73	1991	08-01-11		392	
4	Muhammad Tahir	Syed Bad Shah	23-08-1977	1994	(10-09-07)		477	
5	Muhammad ali	Murad Ali	02-02-76	1994	04-11-09			318
6	Intehab Gul	Mamoor Gul	16-11-1976	1994				352
7	Fayaz Muhammad	Fida Muhammad	17-02-1977	1995	20-07-2017		403	
8	Meer Bashar Khan	Ajmeer khan	25-08-1981	1996				330
✓ 9	Zulfiqar Ali	Abdus Sattar	14-09-1978	1998	15-02-2008			375
10	Ijaz Ahmad khan	Haya Muhammad	26-08-1985	2002			393	

CTC

Medical Superintendent  
DHQ Hospital Nowshera



13

Annex-E



**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, MR. NAEEM KHAN S/O RAHEEM KHAN is hereby appointed as Junior Clerk BPS-11 (33% Reserved Quota for Class IV) plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
Medical Superintendent,  
DHQ Hospital, Nowshera

No. 7197-7200, DHQ NSR

Date: 30/11/2019

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Naeem Khan S/O Raheem Khan Resident of Marhati Banda, Post Office Akora Khattak, Tehsil & District Nowshera.
5. Office Record.

*CJC*

*[Handwritten signature]*

*[Handwritten signature]*  
Medical Superintendent,  
DHQ Hospital, Nowshera



14

**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, MR. IKRAM JAN S/O MUHAMMAD SALEEM is hereby appointed as Junior Clerk BPS-11 (33% Reserved Quota for Class IV) plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is fund forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.


Sd \_\_\_\_\_  
Medical Superintendent,  
DHQ Hospital, Nowshera

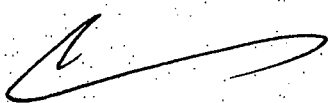
No. 7192-86 / DHQ NSR

Date: 30/11/2019

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Ikram Jan S/O Muhammad Saleem Resident of Mohallah Zwani Khel, House No. 127, Nowshera Kalan, Tehsil & District Nowshera.
5. Office Record.

  
Medical Superintendent,  
DHQ Hospital, Nowshera



To,

Director General,  
Health Services,  
Civil Secretariat, Peshawar.

15

Amended - F

19301 - Per

4-6-21

**Subject: DEPARTMENTAL APPEAL**

Respected Sir;

1. That the appellant was initially appointed as Mali in BPS-1 at Health Department vide order dated 04.11.2009 and was posted at DHQ Nowshera.
2. That the appellant was then adjusted by modifying the appointment order from Mali to Ward Orderly vide order dated 29.08.2013 against the vacant post at DHQ Nowshera.
3. That it is worth mention here that, a DPC was held, wherein, the seniority list was violated and Junior most then the appellant Mr. Naeem Khan S/o Rahim Khan Ward Attendant was promoted as Junior Clerk vide order dated 30.11.2019 against which Service Appeal have been filed by one of the employee namely, Hazrat Hussain, who was promoted to Junior Clerk. Similarly the promotion of Ikram Jan S/o Muhammad Saleem and Zulfiqar were kept intact.
4. That through the above facts and circumstances of the Service Appeal and further proceedings and promotion thereupon, the matter came to the knowledge of the present appellant, hence approach before District Health Officer, but the grievances of the appellant have not been redressed.
5. That the above Naeem Khan S/o Rahim Khan is junior most than the petitioner and keeping in view this fact and circumstances, the competent authority/ DPC intentionally ignored the appellant and deprived him from his basic right of promotion, which is clear violation of law, rules and regulation governing the subject matter.

16

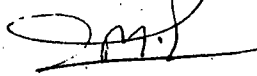
6. That the appellant have served the department for about 12 years, which unblemished record and is/ was entitled in all respect for the promotion of Junior Clerk under reserve quota, but the authority concerned badly failed to consider him, despite his eligibility.
7. That the appellant submitted all the relevant documents before DPC concerned well within time, but the same are not been considered without any reason and justification.

It is, therefore, humbly prayed that, on acceptance of the instant departmental appeal, the promotion order of Mr. Naeem Khan vide promotion order dated 30.11.2019 may graciously be declared illegal, unlawful, without lawful authority, being junior most then the appellant and the appellant may kindly be promoted to the post of Junior Clerk retrospectively.

Any other relief deemed fit may also be graciously granted in favour of the appellant.

Enclosed: All necessary documents

Appellant



**Muhammad Ali**

S/o Murad Ali

R/o DHQ Hospital Nowshera.

Cell: 0317-1959052

03/06/2021

CSC



BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR.

Writ petition No. 7409 of 2021

Muhammad Ali .....Petitioner

VS

Medical Superintendent DHQ Hospital Nowshera .....Respondents

S.No	Description of Documents	Annex	Pages
1	Para Wise Comments on behalf of respondents		1
2	Advertisement	A	2
3	Appointment Order	B	3-6
4	Minutes of Meeting	C	7
5	Seniority List	D	8
6	Authority Letter	E	9



Medical Superintendent,  
DHQ Hospital, Nowshera.

Medical Superintendent,  
DHQ, Hospital  
Nowshera

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR.

Appeal No. 7409 of 2021.

Muhamamd Ali .....Petitioner

VS

Medical Superintendent DHQ Hospital Nowshera .....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth,


Preliminary Objections;

1. Correct.
2. Correct.
3. Incorrect. Six post of Junior Clerks were vacant and properly filled as per rule. Two Junior clerks were appointed/Promoted against the quota. (copy of their order attached).
4. Incorrect. His name was included in seniority list serial No. 05 (copy attached). Further, he has not been approached for any appeal of department level.
5. The final seniority list is available in this office, which is available for all employee (Copy attached).
6. Incorrect. His case was referred to higher authority for guidance (copy of the letter attached). In case of any response his case will be dealt accordingly.

GROUND:

- A. Incorrect. The promotion was made on the basis of final seniority list as per rule in vague. No junior employee was promoted in this case.
- B. Incorrect. No discrimination was noted in this case and promotion was made as per rule on the basis of sonority list.
- C. Incorrect. The promotion of junior clerk under reserve quota was made as per rule on the basis of final seniority list.
- D. Incorrect. As Above (c).
- E. Incorrect. No pick and choose was done and the promotion of junior clerks was made on the merit as per rule.
- F. Incorrect. The promotion was made on the basis of final seniority list as per record of this office which is available for verification anytime.
- G. The obligation of the appellant (Muhamamd Ali) are not based on fact, thus his writ petition may be dispose off.

It is therefore humbly prayed that writ petition may kindly be dismissed with cost.

  
Respondent  
Medical Superintendent,  
DHQ, Hospital  
Nowshera.



**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, **MR. NAEEM KHAN S/O RAHEEM KHAN** is hereby appointed as **Junior Clerk BPS-11 (33% Reserved Quota for Class IV)** plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect. with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
*Medical Superintendent,  
DHQ Hospital, Nowshera*

No. 7197-7200 / DHQ NSR

Date: 30/11/2019

**Copy forwarded to the:**

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Naeem Khan S/O Raheem Khan Resident of Marhati Banda, Post Office Akora Khattak, Tehsil & District Nowshera.
5. Office Record.

*Medical Superintendent  
DHQ, Hospital  
Nowshera*

*Medical Superintendent,  
DHQ Hospital, Nowshera*



**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 10-05-2021, **MR. HAZRAT HUSSAIN S/O SARDAR HUSSAIN** is hereby appointed as **Junior Clerk BPS-11 (33% Reserved Quota for Class IV)** plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is fund forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
*Medical Superintendent,  
DHQ Hospital, Nowshera*

No. 002-006 /MS/DHQH- NSR

Date: 17/05/2021

**Copy forwarded to the:**

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Hazrat Hussain S/O Sardar Hussain Resident of Kabal River, Tehsil & District Nowshera.
5. Office Record.

*Medical Superintendent,  
DHQ Hospital, Nowshera*

*Medical Superintendent  
DHQ, Hospital  
Nowshera*





**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 10-05-2021, **MR. ZULFIQAR ALI KHAN S/O SATTAR KHAN** is hereby appointed as **Junior Clerk BPS-11 (33% Reserved Quota for Class-IV)** with pay protection plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is fund forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
*Medical Superintendent,  
DHQ Hospital, Nowshera*

No. 007-011 /MS/DHQH- NSR

Date: 17/05/2021

**Copy forwarded to the:**

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Zulfiqar Ali Khan S/O Sattar Khan Resident of Flat No. 2, DHQ Hospital Nowshera.
5. Office Record.

*Medical Superintendent  
DHQ, Hospital  
Nowshera*

*Medical Superintendent,  
DHQ Hospital, Nowshera*



**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, **MR. IKRAM JAN S/O MUHAMMAD SALEEM** is hereby appointed as **Junior Clerk BPS-11 (33% Reserved Quota for Class IV)** plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
**Medical Superintendent,  
DHQ Hospital, Nowshera**

Date: 30/11/2019

No. 7192-86 / DHQNSR

**Copy forwarded to the:**

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Ikram Jan S/O Muhammad Saleem Resident of Mohallah Zwani Khel, House No. 127, Nowshera Kalan, Tehsil & District Nowshera.
5. Office Record.

*[Signature]*  
**Medical Superintendent,  
DHQ, Hospital  
Nowshera**

*[Signature]*  
**Medical Superintendent,  
DHQ Hospital, Nowshera**



**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**MINUTES OF MEETING OF SELECTION / PROMOTION COMMITTEE**

A meeting of the said committee held under chairman ship of Medical Superintendent DHQ Hospital Nowshera on various dates i.e. 30<sup>th</sup> November 2019 attended by the following members:

- |                        |                        |                       |
|------------------------|------------------------|-----------------------|
| 1. Dr. S. M Tariq Shah | P.M.O                  | Member                |
| 2. Dr. Muhammad Tahir  | D.M.S                  | Member                |
| 3. Dr. Afzal Asghar    | M.O                    | Member of Admin Dept. |
| 4. Dr. Muhammad Shoaib | Medical Superintendent | Chairman              |

The committee agreed on the following action points.

The following criteria was the baseline for selection of candidates:

1. The Seniority List of Class-IV was scrutinized.
2. All the original documents of the candidates were scrutinized.
3. All the relevant experience was scrutinized subjected to computer (typing) literacy.
4. Appointment will be subjected to the documents verification.

The Selection Committee agreed on the recommendation of the selected candidates for the appointment in the interest of Public and Hospital.

S. No	Name	To	From
1	Naeem Khan S/O Raheem Khan	Ward Attendant	Junior Clerk
2	Ikram Jan S/O Muhammad Saleem	Ward Orderly	Junior Clerk

1. Dr. S. M. Tariq Shah

(Member)

2. Dr. Muhammad Tahir

(Member)

3. Dr. Afzal Asghar

(Member)

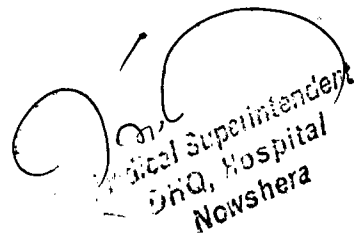
4. Dr. Muhammad Shoaib

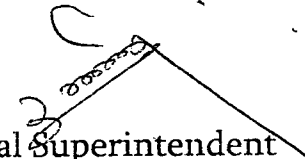
(Chairman)

Medical Superintendent  
DHQ, Hospital  
Nowshera

## Seniority List of Class IV For the post of Junior Clerk DHQ Hospital Nowshera

S.No	Name	Father Name	Date of Birth	Matric Passing Year	Date Of Appointment	Basic SSC		
						1st	2nd	3rd
1	Hazrat Hussain	Sardar hussain	15-04-1966	1984	1994			328
2	Naeem khan	Raheem khan	13-12-1975	1991	03-07-11		414	
3	Ikram Jan	Muhammad saleem	04-10-73	1991	08-01-11		392	
4	Muhammad Tahir	Syed Bad Shah	23-08-1977	1994	10-09-07		477	
5	Muhammad ali	Murad Ali	02-02-76	1994	04-11-09			318
6	Intehab Gul	Mamoor Gul	16-11-1976	1994				352
7	Fayaz Muhammad	Fida Muhammad	17-02-1977	1995	20-07-2017		403	
8	Meer Bashar Khan	Ajmeer khan	25-08-1981	1996				330
9	Zulfiqar Ali	Abdus Sattar	14-09-1978	1998	15-02-2008			375
10	Ijaz Ahmad khan	Haya Muhammad	26-08-1985	2002			393	

  
 Medical Superintendent  
 DhQ, Hospital  
 Nowshera

  
 Medical Superintendent  
 DHQ Hospital Nowshera



**OFFICE OF THE MEDICAL SUPERINTENDENT,**  
**DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**AUTHORITY LETTER**

I hereby authorized Mr. Ghulam Sarwar (Office Assistant BPS-16) of this Hospital to attend the court case on my behalf in Service Tribunal Peshawar on date 15/07/2022.

**MEDICAL SUPRINTENDENT,**  
**DHQ HOSPITAL NOWSHERA.**  
**Medical Superintendent**  
**DHQ, Hospital**  
**Nowshera**

## درخواستیں منظور شد

ذیل جدول کو مدنہ جدول خالی آسامیوں کو مستقل بنیاد پر رکرنے کیلئے ضلع نوشہرہ کے ڈیوٹیاں کے حامل امیدواروں سے درخواستیں منظور کی گئی ہیں۔  
میسرز: سوائے تقریبی انتظار سے کسی درخواست دہندگان کی تہنیتی ذیل درخواستیں منظور کی گئی ہیں۔

نمبر شمار	نام آسامی	BPS	تعداد آسامی	نمبر کی
1	کلینکل ٹیکنیشن (کارڈیالوجی)	12	2	30218 سال
2	کلینکل ٹیکنیشن (ڈیپارٹمنٹ)	12	2	ایضاً
3	کلینکل ٹیکنیشن (فارمیسی)	12	3	ایضاً
4	کلینکل ٹیکنیشن (ڈیپارٹمنٹ)	12	3	ایضاً
5	کلینکل ٹیکنیشن (آپتھالومی)	12	1	ایضاً
6	کلینکل ٹیکنیشن (فریوئرالی)	12	2	ایضاً
7	کلینکل ٹیکنیشن (ریڈیالوجی)	12	2	ایضاً
9	ایئر میڈیکل ٹیکنیشن	11	2	ایضاً
10	سول ایئر میڈیکل ٹیکنیشن	09	4	ایضاً
11	سٹور کیمپر	07	1	3218 سال

شرائط و ضوابط: (1) خواہشمند امیدوار اس اشتہار کے شائع ہونے کے بعد 15 دن کے اندر متعلقہ مجاز آفیسر (Medical Superintendent D.H.Q Hospital Nowshera) کے پاس اپنی درخواست سادہ کاند پر بمعہ سی ڈی، کپیڈا انتر قومی شناختی کارڈ کاپی، کاپی اسٹادیٹھ قاعدہ قبول اور 3 عدد تازہ خاندان کے ساتھ جمع کریں۔ (2) 100% کوڈ فوٹ شدہ ملازمین کے بچوں کیلئے 25% کوڈ ریٹائرڈ کلاس فور ملازمین کے بچوں کیلئے 27% کوڈ مظہر افراد کیلئے جبکہ 10% کوڈ خواتین کیلئے اور 3% کوڈ گھرانوں کیلئے منسب کیا جائے گا۔ (3) صرف شارٹ لسٹ امیدواروں کو ڈیپارٹمنٹ اور انٹرویو کیلئے بلایا جائے گا۔ (4) تجربہ کار سرکاری ملازمین سے اور مطلوبہ تعلیمی قابلیت کے بعد قبول ہوگا۔ (5) تقرری سوبائی حکومت کے مجوزہ قواعد ضوابط کے تحت عمل میں لائی جائے گی۔ (6) خواہشمند سرکاری ملازمین اپنے ادارے کے توسط سے درخواستیں ارسال کریں۔ (7) آسامیوں کی تعداد میں کمی بیشی ہو سکتی ہے۔ (8) نامکمل اور دیر سے آنے والی درخواستوں پر نوٹیشن کیا جائے گا۔ (9) شارٹ لسٹنگ کے بعد موزوں امیدواروں کی لسٹ مجاز اتھارٹی کے دفتر میں آویزاں کی جائے گی۔ (10) امیدوار انٹرویو کے موقع پر اپنی اصل دستاویزات ساتھ لائیں گے۔ (11) Age Relaxation یا عمر میں رعایت موزوں امیدواروں کے لئے کی صورت میں قانونی طور پر Age Relaxation سرٹیفکیٹ کے بعد دستیابی پر نوٹیشن کر سکتا ہے۔ (12) منتخب ہونے کی صورت میں کاندات کی تصدیق متعلقہ اداروں سے (Board, University, Faculty) کی جائے گی۔ (13) ٹیسٹ و انٹرویو کیلئے کوئی ایس ڈی ایس نہیں دیا جائے گا۔ (14) مجاز آفیسر بغیر کوئی وجہ بتائے تمام کیڈرز یا کسی ایک کیڈرز کا انٹرویو کو منسوخ کر سکتا ہے۔ (15) کسی بھی قسم کی جعلی دستاویزات کرنے والے امیدوار کے خلاف قانونی کارروائی کی جائے گی۔ (16) مجاز آفیسر کوئی وجہ بتائے بغیر ٹیسٹ انٹرویو کینسل کر سکتا ہے۔

INF(P)2249/19

25-05-2019

مسٹر ایف بی

**WAKALATNAMA**

IN The KP Service Tribunal, Peshawar

Muhammad Ali

(Petitioner)  
(Plaintiff)  
(Applicant)  
(Complainant)  
(Decree Holder)

**VERSUS**

MS, DADR NSR & others

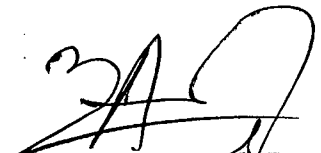
(Respondent)  
(Defendant)  
(Accused)  
(Judgment Debtor)

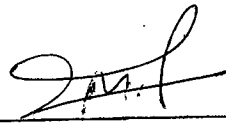
Case \_\_\_\_\_

I/We Muhammad Ali do hereby appoint and constitute **Muhammad Arif Jan Advocate** High Court, Peshawar, to appear. Plead, act, compromise, withdraw or refer to arbitration to me/ us as my/ our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/ Counsel at my/ our matter.

Attested & Accepted

CLIENT/S

  
**Muhammad Arif Jan**  
Advocate, High Court, Peshawar.  
Office No. 6, 1<sup>st</sup> Floor  
Pabbi Medical Centre, G.T. Road  
Peshawar.  
Mobile: 0333-2212213

  
(Muhammad Ali)

(COA Journalist)

~~1/10~~

COA Journalist

COA Journalist

COA Journalist

COA Journalist





**"B"**

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

No.

Appeal No. 7609 of 20 21

Muhammad Ali Appellant/Petitioner

Versus

Mrs. D.H.A. Nowshera Respondent

Respondent No. 3

Notice to: —

Director General Health Services KPK  
Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 2/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 27/12

Day of Dec 20 21

(for Reply)

  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

the case of Williams and the other defendants  
of attendance in the court are the same list of the High Court on the days and specified holidays

Bartholomew

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Bartholomew

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**"B"**

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

No.

Appeal No. 7609 of 20 21

Muhammad Ali Appellant/Petitioner

Versus

M.S. D.H.G. Nowshera Respondent

Respondent No. 2

Notice to: —

Secretary Health Dept. of KPK  
Health Dept. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 2/3/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 27 .....

Day of Dec .. 20 21.

(For Reply)

[Signature]  
Registrar

[Signature]  
6/01/2022

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

Note Case No. While making any correspondence of attendance in the court are the same list of the High Court except on public and gazetted holidays.

Respectfully

Signature

(for Dept)

[Signature]

Date

Page No.

5/3/55

Respectfully  
Signature

Signature

Signature

5-1

52