

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No: 1474/2018

Date of Institution ... 12.11.2018

Date of Decision ... 22.03.2021

Syed Abid Iqbal S/o Kachkool Bacha, Resident of Gulabad, Dir Lower (PHC Technologist (MP)(BPS-17). ... (Appellant)

VERSUS

Secretary to Government of Khyber Pakhtunkhwa Health Department, Khyber Pakhtunkhwa at Peshawar and five others. ... (Respondents)

Present:

MR. SAJID ALI, --- For Appellant.
Advocate

MR. M. RIAZ KHAN PAINDAKHEL, --- For respondents.
Assistant Advocate General

MIAN MUHAMMAD --- MEMBER(Executive)
ROZINA REHMAN --- MEMBER(Judicial)

JUDGEMENT.

MIAN MUHAMMAD, MEMBER(E):- The appellant has approached the Service Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 seeking direction to the respondents to consider promotion of the appellant from BPS-09 to BPS-12 from the year 2009 to 2012 and afterward his up-gradation from BPS-12 to BPS-17 from the year 2012 to 2017 alongwith all back benefits.

FACTS.

02. Brief facts of the case, as per memorandum of appeal, are that the appellant was initially appointed as Chief Primary Health Care Technician in Health Department vide appointment order dated 23.02.1982. It was in the year 1999 that

ten (10) vacancies for promotion to the post of Senior Medical Technician were available and accordingly these vacancies were filled vide order dated 12.10.1999 while the appellant then remained on waiting list at serial No.11. However, one of the promotee namely Wali Muhammad did not want to be promoted to the post of Senior Medical Technician and he was allowed to forgo his promotion vide order dated 27.12.1999. Consequently, the appellant got entitled for promotion to the post of Senior Medical Technician against the post vacated by Mr. Wali Muhammad. The appellant though made all out efforts for his due right of promotion as Senior Medical Technician but his case was not properly considered. Appellant filed departmental appeal which was also turned down, hence, the present service appeal.

03. We have heard arguments of the learned counsels for the parties and thoroughly gone through the available case file and related additional documents including case laws produced during course of the respective arguments.

ARGUMENTS.

04. Learned counsel for the appellant vehemently contended that the appellant on forgoing promotion right by Mr. Wali Muhammad became eligible to be promoted against the available resultant vacancy of Senior Medical Technician. It was not fault of the appellant that having being eligible for the said post, was not provided his due right of promotion. He argued that when the vacancy of Senior Medical Technician was available and the appellant duly approached the respondents seeking his due right of promotion, then he was legally entitled to have been promoted to the post from the date when vacancy fell available for him. In support of his arguments, he placed reliance on 1995 PLC (C.S) 489, 2009 SCMR 117, 2012 PLC (C.S) 326 and 1998 PLC (C.S) 980.

05. Quite contrary to the arguments of learned counsel for the appellant, the learned Assistant Advocate General while referring to Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 argued that there is no original or appellate order to have been passed by the respondents and as such the service appeal is not maintainable for adjudication. In support of his arguments, he placed reliance on 2005 SCMR 442, 2006 SCMR 1630 and judgement of this service Tribunal dated 15.12.2017 in service appeal No. 19/2011 titled Abdul Waheed, SET-vs-EDO (E&SE) Abbottabad and others. It was further contended that the appellant has been given his due right of promotion as his case had been duly considered at appropriate time under the rules. He has been upgraded to the post of Chief Primary Health Care Technician (BS-16) and then promoted as Primary Health Care Technologist (Multi Purpose) (BS-17). His case has recently been processed and submitted for promotion to the post of Senior Primary Health Care Technologist (Multi Purpose) (BS-18).

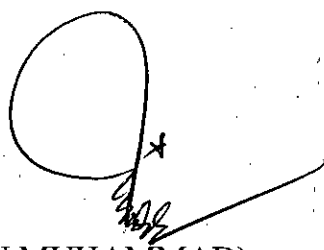
CONCLUSION.

06. Learned counsel for the appellant was confronted with the question where and what is the impugned order to have been passed by the respondents due to which the appellant is aggrieved? He could not produce any order in black and white and pleaded that a clear vacancy was available in 1999 and he was entitled to have been promoted against the same at that time. We are of the considered view that the question of maintainability of a service appeal stands linked to the issuance of an original or appellate order which naturally would have aggrieved a civil servant where-after an appeal would lie to Service Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal 1974. It is crystal clear that there is no

impugned order of the respondents; either original or appellate to have aggrieved the appellant and against which he would have approached to the Service Tribunal for remedy and redressal.

07. As a sequel to the above, since there is no original or appellate order(s) to have been issued by the competent authority or appellate authority which would have affected and aggrieved the appellant, the instant service appeal is therefore hit by Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and dismissed. Parties shall, however, bear their respective costs. File be consigned to the record room.

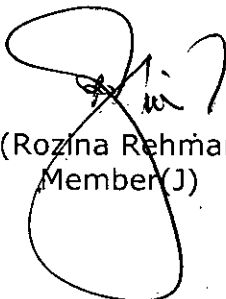
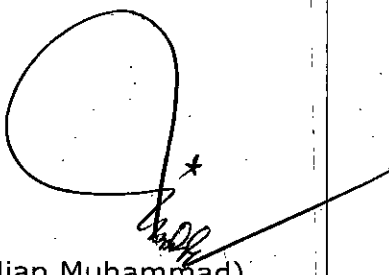
ANNOUNCED
22.03.2021



(MIAN MUHAMMAD)
MEMBER(E)



(ROZINA REHMAN)
MEMBER(J)

S.No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	22.03.2021	<p><u>Present.</u></p> <p>Mr. Sajid Ali, Advocate ... For appellant</p> <p>Mr. M Riaz Khan Paindakhel, Assistant Advocate General ... For respondents</p> <p>Vide our detailed judgment of today consisting of four pages placed on file, since there is no original or appellate order(s) to have been issued by the competent authority or appellate authority which would have affected and aggrieved the appellant, the instant service appeal is therefore hit by Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and dismissed. The parties shall, however, bear their respective costs. File be consigned to the record room.</p> <p><u>Announced</u> 22.03.2021</p> <p> (Rozina Rehman) Member(J)</p> <p> (Mian Muhammad) Member(E)</p>

6.01.2021

Due to COVID 19, the case is adjourned to
3.03.2021 for the same as before.

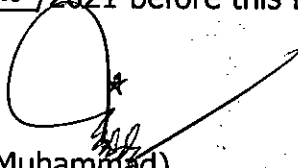

Reader


03.03.2021

Appellant with counsel present.

Riaz Khan Paindakheil learned Assistant Advocate General
for respondents present.

Arguments heard. To come up for order on
22/03/2021 before this D.B at Principal Seat Peshawar.


(Mian Muhammad)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat


04.11.2020

Appellant in person present.

Muhammad Jan learned Deputy District Attorney
alongwith Kazi Muhammad Naeem A.D and Aman Ullah
Litigation Assistant for respondents present.

Lawyers are on general strike, therefore, case is
adjourned to 06.01.2021 for arguments, before D.B at Camp
Court Swat.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat


(Rozina Rehman)
Member (J)
Camp Court, Swat

06.10.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith Mr. Jafar Ali, Assistant and Mr. Amjad Ali, Assistant for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat.

Adjourned to 04.11.2020 for arguments before D.B at camp court Swat.

(Mian Muhammad)
Member(E)

(Muhammad Jamal)
Member
Camp Court Swat

04.11.2020

Appellant in person present.

Mr. Usman Ghani, District Attorney, Mr. Jafar Ali, Assistant, Mr. Amjad Ali, Assistant for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat. Adjourned to 04.11.2020 for arguments before D.B at camp court Swat.

(Mian Muhammad)
Member(E)

(Muhammad Jamal)
Member
Camp Court Swat

07.9.2020

Appellant alongwith counsel present.

Mr. Riaz Painsdakhel learned Assistant Advocate General alongwith Mr. Jaffar Ali, Assistant for the respondents present.

[Redacted] Rejoinder submitted. Learned counsel for the [Redacted] appellant requested for a short adjournment. Granted. To come up for arguments on 06.10.2020 before D.B at Camp Court, Swat.

[Redacted] (Atiq-ur-Rehman) [Redacted] (Rozina Rehman)
Member Member
Camp Court, Swat Camp Court, Swat
[Redacted]
[Redacted]
[Redacted]
[Redacted]

02.03.2020

Appellant in person present. Fayaz Muhammad Qazi Advocate appeared and submitted wakalat nama in favor of the appellant. Mr. Usman Ghani learned District Attorney alongwith Muhammad Shamim S.O for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 06.04.2020 before D.B at Camp Court Swat.



Member



Member
Camp Court, Swat.

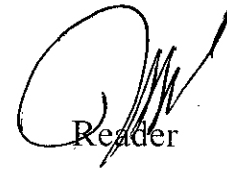
Due to corona virus
fourt to camp Court swat
has been cancelled. To come
up for the same on -07/06/20



Reader

01.06.2020

Due to Covid-19, the case is adjourned. To come up for the same on 06.07.2020, at camp court Swat.



Reader

06.07.2020

Bench is incomplete. Therefore, the case is adjourned. To come up for the same on 07.09.2020, at camp court Swat.




Reader

Service Appeal No. 1474/2018


05.11.2019


Appellant in person present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith M/S Amjid Ali, Assistant on behalf of respondent No. 1, Sohail Ahmad, Assistant on behalf of respondent No. 2 Jaffar Ali, Assistant on behalf of respondents No. 3 & 5 and Jamil Shah, Senior Auditor on behalf of respondents No. 4 & 6. Written replies on behalf of respondents No. 1 & 3, to 6 submitted which are placed on record. Representative of respondents.No. 2 stated at the bar that he relies on the written reply submitted by respondents No. 1, 3 & 5 on behalf of respondent No. 2. Case to come up for rejoinder and arguments on 07.01.2020 before D.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

07.01.2020


Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Muhammad Sajid, Superintendent for respondent No. 2 present. Partial arguments heard. From the partial arguments of the parties, it reveals that the appellant want ante-dated promotion from BPS-09 to BPS-12 but the original order of promotion of BPS-09 to BPS-12 is not available on the record therefore, respondents No. 3 & 5 are directed to direct the representatives to attend the court and also furnish the copy of promotion order of the appellant from BPS-09 to BPS-12 as well as seniority list and DPC of the relevant year. Case to come up for record and arguments on 02.03.2020 before D.B at Camp Court Swat.


(Hussain Shah)
Member
Camp Court Swat


(M. Amin Khan Kundi)
Member
Camp Court Swat


03.09.2019

Appellant in person present. Written reply not submitted. Jameel Shah Senior Auditor (for respondents No.4 & 6) present and seeks time to furnish written reply/comments. No one present on behalf of respondents No.1 to 3 & 5. Respondents No.1 to 3 & 5 be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 09.10.2019 before S.B at Camp Court, Swat.


Member
Camp Court, Swat.

09.10.2019

Appellant in person and M/S Javed Khan, Deputy Secretary and Jaffar Shah, Assistant for the respondents present. Written reply on behalf of respondents not submitted. Representative of the respondents requested for further adjournment. Adjourned to 05.11.2019 for written reply/comments before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

12.06.2019

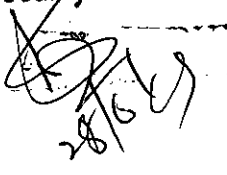
Appellant present. Mr. Mian Amir Qadir learned District Attorney present.

Appellant argued that he was appointed as Chief P.H.C in Health Department District Dir Lower in the year 1982; that in the year 1999, ten (10) vacancies for promotion to the post of Senior Medical Technician were available and were accordingly filled vide order dated 12.10.1999 while the appellant remained on waiting list at serial No.11; that one of the promotee namely Wali Muhammad did not want to be promoted to the post of Senior Medical Technician; that Mr. Wali Muhammad was allowed to forgo his promotion vide order dated 27.12.1999 and consequently the appellant got entitled for promotion to the post of Senior Medical Technician on the post vacated by Mr. Wali Muhammad; that the appellant made all out efforts for his due right of promotion as Senior Medical Technician but his case was not properly considered; that the departmental appeal of the appellant was also turned down; that the appellant should have been promoted in the year 1999 however he was promoted in the year 2017 hence the present appeal.

Learned District Attorney resisted the present service appeal while also raising the issue of limitation.

Points urged by the appellant need consideration. The present service appeal is admitted for regular hearing but subject to all the legal objections including the issue of limitation and maintainability. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 03.09.2019 before S.B at Camp Court, Swat.

Appellant Deposited
Security & Process Fee






Member
Camp Court, Swat.

07.03.2019

Appellant in person.

Appellant requests for adjournment due to indisposition of his learned counsel. Adjourned to 04.04.2019 before S.B at camp court, Swat.



Chairman
Camp Court, Swat

04.04.2019

Appellant in person present. Due to general strike of the bar, learned counsel for the appellant is not available. Adjourn. To come up for preliminary hearing on 08.05.2019 before S.B at Camp Court, Swat.



Member
Camp Court, Swat

08.05.2019

Appellant in person present. Heard.

Pre-admission notice be issued to the respondents to furnish reply. Respondent No.3 is also directed to furnish relevant promotion/recruitment criteria and seniority lists alongwith reply. Adjourn. To come up for reply and arguments on 12.06.2019 before S.B at Camp Court Swat.


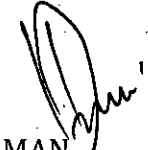



Member
Camp Court, Swat.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1474/2018

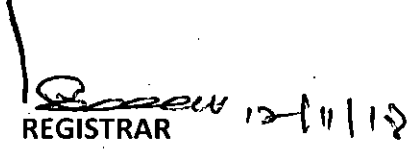
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/12/2018	<p>The appeal of Syed Abid Iqbal resubmitted today by Mr. Sajid Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 11/12/18</p>
2-	13/12/18	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>08-02-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>08.02.2019</p> <p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 07.03.2019 before S.B at Camp Court Swat.</p> <p style="text-align: right;"> Member Camp Court, Swat</p>

The appeal of Syed Abid Iqbal son of Kachkool Bacha resident of Gulabad Dir Lower received today i.e. on 12.11.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copy of up-gradation order mentioned in para-7 of the memo of appeal in respect of appellant is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2213 /S.T.


Dt. 12-11 /2018.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr.Sajid Khan Adv. High Court Swat.

R Sir,

objections have been removed -
Fixed before the court if any objection
still remain.


Sajid Ali (Advocate)
05/12/2018

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
AT PESHAWAR

C.M No. _____/2018

in

Service Appeal No 1474 of 2018

Syed Abid Iqbal VERSUS Govt of KPK and others

APPLICATION FOR CONDONATION OF DELAY IN THE ABOVE
TITLED SERVICE APPEAL.

Respectfully Sheweth:

The Applicant submits as under;

- 1) That the above titled case was filed before this Honorable Tribunal, which was returned due to some objections.
- 2) That on 12/11/2018 the Petitioner was directed to re-submit the instant Service Appeal within next 15 days before this Honorable Tribunal. It is pertinent to mention here, that the case file was received by the applicant's counsel on 29/11/2018 from Lawyers' Library Peshawar High Court, Mingora Bench / Dar ul Qaza Swat.
- 3) That the Applicant failed to resubmit the instant service appeal within stipulated time period due to not receiving the case file on time and because of some un-avoidable circumstances.
- 4) That the delay was not intentional, but inadvertently the applicant failed to re-submit.

It is therefore very humbly requested that the Applicant may kindly be allowed to re-submit the instant Service Appeal.

APPLICANT

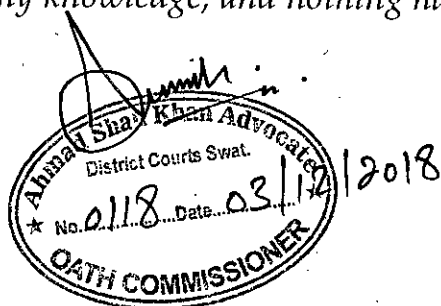
Through Counsel


SAJID ALI

Advocate High Court

Affidavit:-

It is hereby stated on oath the contents of this application are true and correct to the best of my knowledge, and nothing has been kept concealed therein.




Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
AT PESHAWAR

Service Appeal No. 1474 /2018

Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower (PHC Technologist (MP) BPS-17). Appellant

VERSUS

Secretary to Government of KPK Health Department KPK at Peshawar and others Respondents

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5	Copy of letter No. 2027 Dated: 18/05/1999	B	12
6	Copy of order No. 33619-29 Dated: 12/10/1999	C	13-14
7	Copy of up-gradation order Dated: 27/12/1999	D	15
8	Copies of Departmental Appeals	E	16-22
9	Copy of order Dated: 11/05/2012, appeals and reply to appeals of the appellant	F & G	23-28
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Appellant
Through Counsel


Sajid Ali Khan

Advocate High Court

Office: Legal Floor, Sultan Tower

Makanbagh, Saidu Sharif, swat

Cell: 0344-9656595

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
AT PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1474 /2018

Diary No. 1622

Dated 12-11-2018

Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir
Lower (PHC Technologist (MP) BPS-17). Appellant

VERSUS

- ✓ 1) Secretary to Government of KPK Health Department KPK at Peshawar.
- 2) Secretary to Government of KPK, Finance Department KPK at Peshawar.
- ✓ 3) Director General Health Services KPK at Peshawar.
- ✓ 4) Accountant General KPK at Peshawar.
- ✓ 5) District Health Officer Dir Lower at Timergara.
- ✓ 6) District Accounts Officer Dir Lower at Timergara.

..... Respondents

Service Appeal Under Section 4 of Service Tribunal Act read with other relevant provisions, for directing the Respondents to consider promotion of the Petitioner from BPS-09 to BPS-12 from the year 2009 to 2012, and afterward his up-gradation from BPS-12 to BPS-17 from the year 2012 to 2017 along with all back benefit.

Filed to-day
Registrar
12/11/18

Re-submitted to -day and filed.

Registrar
11/12/18

PRAYER:

On acceptance of this Service Appeal, the Respondents may be directed to consider promotion of the Appellant from BPS-09 to BPS-12 from the year 1999 to 2012, and afterward be considered to be up-graded from BPS-12 to BPS-17 from the year 2012 to 2017 along with all back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favor of the appellant against Respondents.

Respectfully Sheweth:

The appellant submits as under;

1. That the appellant was appointed as Chief PHC in Health Department, District Dir Lower on 23/02/1982.
2. That in the year 1999, Respondent No.3 officially sought documents of officials for their promotion to BPS-12 through Respondent No.2 vide letter No. 13984-14050/E.III Dated: 23/04/1999. (Copy of letter No. 13984-14050/E.III Dated: 23/04/1999 is attached herewith as annexure "A").
3. That case of the appellant for promotion was sent to the Respondent No.2 vide letter No. 2027 Dated: 18/05/1999. (Copy of letter No. 2027 Dated: 18/05/1999 is attached herewith as annexure "B").

4. That only 10 posts for promotion were available, on which promotions were given to the deserving persons vide office order bearing No. 33619-29 Dated: 12/10/1999, while the appellant remained on waiting list at Serial No.11. (Copy of order No. 33619-29 Dated: 12/10/1999 is attached herewith as annexure "C").
5. That in the meanwhile one of the promote namely Wali Muhammad, Medical Technician, did not want to be promoted to the post of Senior Medical Technician and in this regard, vide office order No. 40232 Dated: 27/12/1999 his request was allowed and his promotion was reversed. (Copy of office order No. 40232 Dated: 27/12/1999 is attached herewith as annexure "D").
6. That the Appellant then got entitled for promotion to the said vacant post, for which the Appellant submitted his documents before the Respondent No.3, but his case was not properly considered and the Appellant was kept oblivious for a long time. (Copy of application is attached herewith as annexure "E").
7. That later on, the posts of Medical Technicians and Senior Medical Technicians were upgraded to BPS-16 and BPS-17 respectively and the Appellant was upgraded to BPS-16 vide office order Dated:

11/05/2012, against which the Appellant filed plethora applications before the Respondents for considering his case for promotion to the post of Senior Medical Technician in BPS-12 since 1999 and thereafter, the Appellant be upgraded to BPS-17. However, appeals of the Appellant have brought no fruitful result to the Appellant in respect of consideration of his promotion. (Copy of order Dated: 11/05/2012, appeals and reply to appeals of the appellant are attached herewith as annexure "F & G").

8. That the Respondent No.3 turned down the aforesaid appeal of the Appellant vide letter No. 35588 Dated: 18/12/2013. (Copy of the letter No. 35588 Dated: 18/12/2013 is attached herewith as annexure "H").

GROUND:

- i) That the negative attitude of Respondents towards considering the promotion of the Appellant from BPS-09 to BPS-12 from the year 1999 to 2012, and afterward his upgraded from BPS-12 to BPS-17 from the year 2012 to 2017 along with all back benefits, is illegal, unlawful and unconstitutional.
- ii) That the negative attitude of Respondents towards promotion of the Appellant is wrong,

discriminatory, colorful, void-ab-initio, ultra -vires, whimsical and against the facts and in violation of fundamental rights of the Appellant.

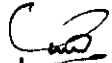
iii) That the Appellant is serving in Health Department as Medical Technician since 1982. In 1999, ten vacancies of Senior Medical Technician in BPS-12 were filled up through promotion, whereas, one of the promotee namely Wali Muhammad, medical Technician had refused his promotion by forgoing his such right, so his promotion was reversed vide order mentioned above, thus one post of Senior Medical Technician became vacant, for which right of promotion of the Appellant was accrued, but despite several efforts were made by the Appellant and time & again approached the Respondents No. 1,3 & 5 for the purpose, however, brought no fruitful result.

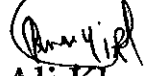
iv) That the Respondents have got no authority to refuse the aforementioned promotion and up-gradation from BPS-09 to BPS-12 from the year 1999 to 2012, and afterward his up-gradation from BPS-12 to BPS-17 from the year 2012 to 2017 along with all back benefits.

- v) That refusal of aforesaid promotion and up-gradation along with all back benefits of the Appellant is discriminatory in nature which directly violates the fundamental rights of the Appellant as guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
- vi) That other grounds not specifically raised will be argued with the permission of this Honorable Court at the time of arguments.

It is therefore very humbly prayed that on acceptance of this Service Appeal; the Respondents may be directed to consider promotion of the Appellant from BPS-09 to BPS-12 from the year 1999 to 2012, and afterward be considered to be up-graded from BPS-12 to BPS-17 from the year 2012 to 2017 along with all back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favor of appellant against respondents.

(Appellant)

Syed Abid Iqbal

Appellant
Through Counsel

Sajid Ali Khan
Advocate High Court &
District Courts Gulkada,
Saidu Sharif, Swat

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
AT PESHAWAR

Service Appeal No. _____/2018


Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower (PHC Technologist (MP) BPS-17). Appellant

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Secretary to Government of KPK Health Department KPK at Peshawar and others Respondents


AFFIDAVIT

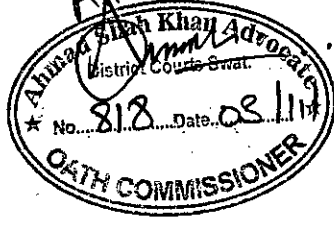
I, Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

Identified by


Sajid Ali Khan
Advocate High Court &
District Courts Gulkada,
Saidu Sharif, Swat

DEPONENT


Syed Abid Iqbal

Affested

No. 818 Date 05/11/2018

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
AT PESHAWAR

Service Appeal No. _____/2018

Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower (PHC Technologist (MP) BPS-17). Appellant

VERSUS

Secretary to Government of KPK Health Department KPK at Peshawar and others Respondents

APPLICATION FOR CONDONATION OF DELAY IN FILING
THE INSTANT SERVICE APPEAL.

Respectfully Sheweth:

The applicant / appellant submits as under:-

1. That the above Service appeal has been filed before this Hon'ble Tribunal, in which no date of hearing has yet been fixed.
2. That the contents of the above mentioned Service Appeal along with the contents of the annexures may be considered as an integral part of this application.
3. That there is a delay in filing the instant service appeal, which is not deliberate, but was due to the reason that the applicant / appellant filed several applications before the respondents, and the respondents made the appellant waiting.
4. That valuable rights of the appellant are involved in the present service appeal.

5. That if the condonation prayed for is not granted, then there will be an irreparable loss to the applicant / Appellant.

It is therefore respectfully prayed that on acceptance of this application an order prayed for may be passed.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of Appellant please.

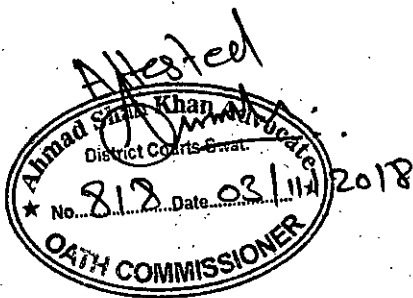
APPELLANT
Through Counsel
(Signature)
Sajid Ali Khan
Advocate High Court

Affidavit:

It is stated on oath that contents of this application are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Hon'ble Court.

Deponent

(Signature)



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
AT PESHAWAR

Service Appeal No. _____/2018

Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower (PHC Technologist (MP) BPS-17). Appellant

VERSUS

Secretary to Government of KPK Health Department KPK at Peshawar and others Respondents

ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

Syed Abid Iqbal Son of Kachkool Bacha, Resident of Gulabad, Dir Lower.

CNIC: 15307-3737465-3

Cell: 0347-0090535

ADDRESSES OF RESPONDENTS

- 1) Secretary to Government of KPK Health Department KPK at Peshawar.
- 2) Secretary to Government of KPK, Finance Department KPK at Peshawar.
- 3) Director General Health Services KPK at Peshawar.
- 4) Accountant General KPK at Peshawar.
- 5) District Health Officer Dir Lower at Timergara.
- 6) District Accounts Officer Dir Lower at Timergara.

APPELLANT

Through Counsel



Sajid Ali Khan
Advocate High Court &
District Courts, Gulkada
Saidu Sharif, Swat

MOST IMMEDIATE BY express
TOP PRIORITY.

11
DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR
No. 15984-14650/E.II
Dated 23/4/99

Annexure A

To,

All sub-offices of Health
Department in N.W.F.P.

Subject: -
Memo,

PROMOTION OF TECHNICAL OFFICIALS

Enclosed please find herewith a list of LHV's/Medical
Tech. with the remarks to submit the last ten years ACRS from
1989 to 1998 along with No disciplinary action Certificate/Biodata
of the Officials concerned.

The Government of NWFP Health Department is pressing
very hard for submitting their promotion case immediately.

This may be treated on top priority basis and the
same should reach the under-mentioned up to 30/4/99 through
special messenger.

In case of any failure you will be personally
held responsible.

Mr. Waliullah

DEPUTY DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR

No. 14651-52/E.III

Copy forwarded to the:-

1. P.A. to the Secretary to Govt. NWFP Health Deptt.

2. P.A. to DG Health Services N.W.F.P.

for information.

*MS
JL*

DEPUTY DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR

OFFICE OF THE DISTRICT HEALTH OFFICER DIR, AT TIMERGARA.

NO 1264

Dated Timergara the 13/5/1999.
Copy to Mr. Abid Iqbal MT BHU Ouch, you are hereby directed
to submit the last ten years ACRS from 1989-1998 along with No Disciplinary
action certificate/Biodata, onward submission to the higher authority
within three days of the receipt of this letter.

No.

Copy endstt; only is forwarded
to the Director General Health Services NWFP Peshawar
for information w/r to above please.

District Health Officer,
Dir, at Timergara.

ATTESTED

[Signature]
by Advocate

District Health Officer,
Dir, at Timergara.

41 157

Better copy

Most immediate By express
TOP PRIORITY

DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR
No.13984-14050/E.III
Dated: 23/04/99.

To,
All Sub offices of Health
Department in N.W.F.P

Subject: PROMOTION OF LHVS /MEDICAL TECHNICIANS
Memo.

Enclosed please find herewith a list of LHVS/Medical Tech; with the remarks in submit the last then years ACRS from 1989 to 1998 along with no disciplinary action Certificate/Bio data of the Officials.

The Government of NWFP Health Department is pressing very hard for submitting their promotion case immediately.

This may be treated on top priority basis and the same should reach the under-signal up to 30/04/1999 through special messenger.

In case of any future you will be personally held responsible-

**DEPUTY DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR**

No. 1451-52/E.III

Copy forwarded to the:-

1. P.A to the secretary to Govt: of NWFP Health Deptt:
 2. P.A to DG Health Services N.W.F.P
- For information.

*Mk
Per
C/c*

**DEPUTY DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR**

OFFICE OF THE DISTRICT HEALTH OFFICER DIR, AT TIMERGARA.

No 1864 Dated Timergara the 13/05/1999.

Copy to Mr, Abid Iqbal MT BHU Ouch, you are hereby directed to submit the last ten years ACRS from 1989-1998 alongwith No Disciplinary action certificate/Biodata. Onward submission to the higher authority with in three days of the receipt of this letter,

District Heath Officer
Dir Timergara

No copy of endstt; only is forwarded

To the Director General Health Services NWFP Peshawar
For information w/r to above please.

District Heath Officer
Dir Timergara

ATTESTED

Abid Iqbal
by Advocate

12/18

No. 2027 / 1 Dated Timergara the 18/5/99.

From: The District Health Officer,
Dir at Timergara.

To: 13356
25/5/99 The Director General Health,
Services NWFP, Peshawar.

Subject:- PROMOTION OF LHVS/MEDICAL TECHNICIAN.

Memo:-
Reference your Office No. 13984-14050/E.T.H.
Dated, 23/4/1999.

I have the honour to submit herewith
the promotion case in r/o Mr: Abid Iqbal Medical Technician
for favour of further necessary action please.

[Signature]
DISTRICT HEALTH OFFICER,
DIR AT TIMERGARA.

- 1:- Bio data 3 Copies.
- 2:- No Disciplinary Certificate 10 Copies.
- 3:- A.C.R. for the last 10 Years.

[Signature]
DISTRICT HEALTH OFFICER,
DIR AT TIMERGARA.

2

ATTESTED
[Signature]
by Advocate

B

Better copy

12

No 2027/

Dated Timergara the 08/05/1999

From :

The District Health Officer,
Dir at Timergara

To:-

The Director General Health,
Services NWFP, Peshawar.

Subject :-

PROMOTION OF LHVS/ MEDICAL TECHNICIAN.

Memo :-

Reference your office No.13984-14050/E.III
Dated ,23/04/1999.

I have the honor to submit herewith the promotion case in r/o Mr: Abid Iqbal Medical Technician for favour of further necessary action please.

DISTRICT HEALTH OFFICER HEALTH
DIR AT TIMERGARA.

- 1:- Bio data 3 copies
- 2:- No Disciplinary Certificate 10 Copies
- 3:- A.C.R. for the last 10 years.

M.D.
C/C

DISTRICT HEALTH OFFICER HEALTH
DIR AT TIMERGARA.

ATTESTED

by Advocate
by Advocate

Annexure "C"

13

NO. 33619-29 / B.III, Dated Pesh: the 12 / 10 / 1999

Copy forwarded to the :-

- 01. Principal Public Health School, Dayer Abad Peshawar.
- 02. Distt: Health Officer, Tank.
- 03. Distt: Health Officer, D.I. Khan.
- 04. Distt: Health Officer, Swat.
- 05. Distt: Health Officer, Peshawar.
- 06. Distt: Health Officer, Swabi.
- 07. Distt: Health Officer, Bannu.
- 08. Distt: Health Officer, Kohat.
- 09. Distt: Health Officer, Charsadda.
- 10. Distt: Health Officer, Battagram.
- 11. Distt: Health Officer, Dir of Timargarah.

for information and necessary action.

FOR DIRECTOR GENERAL HEALTH SERVICES, PESHAWAR

33630 / B.III

Copy forwarded to the Secretary to Govt. of NWFP, Peshawar.

Distt: Peshawar for information.

FOR DIRECTOR GENERAL HEALTH SERVICES, PESHAWAR

Handwritten notes:
3rd
ind
1st
1st

Office Director
Charsadda
Arrival/Departure reports should be submitted to this Directorate General Peshawar.

XXXXXXXXXXXXX
DIRECTOR GENERAL HEALTH SERVICES, PESHAWAR

ATTESTED
Handwritten signature
by Advocate

Annexure D

AWAL

15

DIRECTORATE GENERAL HEALTH SERVICES NWFP PESHAWAR.

CITIZENSHIP

Mr. Wali Muhammed Medical Technician BHU Gwalerzai
(District Swat) is hereby allowed to forego his promotion
as SMT permanently on his own request.

DIRECTORATE GENERAL HEALTH SERVICES NWFP PESHAWAR.

No. 40232 /B.III Dated 27 /12/99.

Copy forwarded to the District Health Officer Swat
for information with reference to his letter No. 22293/P.5
dated 18/11/99.

2
24/12

CLC

3

ATTESTED
by Advocate
by Advocate



Better copy



DIRECTORATE GENERAL HEALTH
SERVICES NWFP PESHAWAR

OFFICE ORDER.

Mr. Wali Muhammad Medical Technicians BHU
Gwalerai (District Swat) is hereby allowed to forego his promotion as SMT
permanently on his own request.

Sd/XXXXXXXXXXXXXXXXXXXXX
DIRECTOR GENERAL HEALTH
Services NWFP Peshawar,

No. 40232 /B.III

Dated 27/12/99.

Copy forwarded to the District Health Officer Swat for
information with reference to his letter No.22293/P.5
dated 18/11/99.

FCR Director General Health
(NWFP)Peshawar

ATTESTED

by Advocate

RESPECT FULLY

① In 1999, 10 No Medical Technicians were promoted to BPS 12 according to the office order no 36619-29 dated 12/10/1999

I was also submitted all the documents for the

② post BPS 12 according to the office sheet no 13356

ATTESTED

by Advocate

dated 25/5/1999 promotions were given on District wise Seniority - My no is first in District. I was informed by sheet no 1864/131999⁵ dated for submission of documents

③ - Total posts filled in BPS 12 were 10 in 1999
 - 1 Post Forgoes by wali Mohammed (MT)
 - Remains in that time I
 - I was on waiting list and my no was 11 But was not given to me.

In 1999 10 vacancies of S.M.Ts
 in 13 DS 12 were filled up through
 promotion, whereas, one of the
 promotee namely Wali Mohammad
 M.T. has refused his promotion
 by forgoing his such right,
 so his promotion was reversed
 vide office order bearing No 40232

dated 27-12-1999, and again one
 post of Senior Medical Technician
 became vacant. For which right
 of promotion of Syed Abid Ishaq
 (one) was occurred, but despite
 several efforts were made by
 me, but the positive response
 is not received

ATTESTED

by Advocate

I also had submitted an
 appeal on 28/2/017, But no response
 from D.G office till now.

And one copy of previous Application,
 Answer is attached No ~~40~~ 35588/AE-VII

That the said post is now up graded to BPS 17 and is still vacant. So I deserves to be promoted to the said post from 1999 in BPS 12 and afterward his upgradation in virtue of Notification No SOH 11-8-60 2005 paramedics. dated 11/5/2012 alongwith all back benefits.

For the same vacant post I was submitted the documents in D.G Health office but my case was not properly considered and I was kept in dark for a long time.

ATTESTED
by Advocate

I have also submitted an appeal in D.G office on dated _____ No. _____ Through proper channel and also before this But NO positive response Received

بتاریخ 12/10/1999 کو 10 میڈیکل ٹیکنیشنز کو سیکس 12 دیا گیا۔

ایب میڈیکل ٹیکنیشنز ولی محمد کے Forgo کیا۔ پروموشن سیکس 12 کا نہیں لیا۔

9 باقی رہ گئے کل پوسٹس 10 تھے۔

9 کو برکھیا گیا ایب ویلنسی باقی رہ گئی۔ میں 11 وار

پر تھا۔ میرا حق بنتا تھا۔ لیکن نہیں دیا گیا جو کہ مجھے

اندھیر میں آگیا اور اب بھی حق بنتا ہے۔ لیکن ابھی تک

میرا حق مجھے نہیں دیا گیا۔

وہی خالی ہو رہے جا لی ہوا پوسٹس 12 (12)

2012 کو پھر 17 میں سیکس 17 کو پروموت کیا گیا۔

یعنی 1999 میں سیکس 12 سے محروم رکھا گیا اور

2012 میں سیکس 17 سے محروم رکھا گیا۔

دو سیکس دے دیئے ہیں لیکن اب اس حق سے محروم ہوں

اور اب اسل کر چکا ہوں جو اب کے انتظار میں ہوں۔

پھر مجھے 2017 میں سیکس 17 مل گیا ہے۔ لیکن میرا حق بنتا ہے۔

میں 17 مجھے 2012 سے ملے اور اس کے ساتھ فراہم

حکام میں حقدار ہوں۔ اُسے وقت سے ملے۔

ATTESTED
by Advocate

PHC TECHNOLOGIST
RHC QUL ABAD (DIR L)

بتاریخ 12/10/1999 کو 10 میٹر لنگر ٹیکنیشن کو سکس 12 دیا گیا۔

ایک میٹر لنگر ٹیکنیشن ولی محمد کے Forgo کیا۔ پروموشن سکس 12 قائم کیا گیا۔ 9 باقی رہ گئے۔ کل پوسٹس 10 تھے۔ 9 تو یہ دیا گیا ایک ویلنٹس باقی رہ گئے۔ میں 11 واں نمبر پر تھا۔ میرا حق بنتا تھا۔ لیکن نہیں دیا گیا جو کہ مجھے اندھیرے میں آگیا اور اب بھی حق بنتا ہے۔ لیکن ابھی تک میرا حق مجھے نہیں دیا گیا۔

وہی خالی پوز پر رہ جائی ہوا پوسٹ سکس 12 (2012)

نومبر 2012 میں سکس 17 اور پروموت دیا گیا۔

یعنی 1999 میں سکس 12 سے شروع کیا گیا ہے

2012 میں سکس 17 سے شروع کیا گیا۔

درخواستیں دے دیئے ہیں لیکن ابھی تک اس حق سے محروم ہوں اور ابھی اپیل کر چکا ہوں جو اب کے انتظار میں ہوں۔

نومبر 2017 میں سکس 17 مل گیا ہے۔ لیکن میرا حق بنتا ہے۔ 17 میں 17 تھے 2012 سے ملے اور اسے سارا فراہم کیا۔ جسکا میں حقدار ہوں۔ اُسے وقت سے ملے۔

ATTESTED
by Advocate

PHC TECHNOLOGIST
RHC QUL ABAD (DIR 6)

جنوبی جناب D.G سیکورٹی ایجنسی
لوہا سٹریٹ جناب BRDHO - میرپور

عدوان - سٹروٹس سٹریٹ اور اس کے ارد گرد کے علاقے میں
17 BPS 17/11/2017 سے 21-7-2017 تک
2005 Promotion 2005
SOH III 8.60 کو ملائے

جناب عالی
عدوان گناراش میں - میرپور سٹریٹ 10/12/1999 سے 29-33619-29
9 سیکس سے 12 سیکس کو ترقی دیا گیا تھا
17 میں پروموٹ کر کے دیے

جناب عالی 10 سیکس کو ترقی دیا گیا تھا اور اس وقت بلڈنگ اور ڈی 33619-29
12 میں ترقی مل گئی تھی۔ لیکن اس میں کھل کر اس نام ولی کے لئے پروموٹ کر کے
11 سے انکوار کیا گیا تھا۔ اس کے بعد 11-18-99 سے 18-11-99 اور 9 دنوں تک
ترقی کر کے تھی۔ اب وہ اس حالت میں ہے۔ میں 11 واں ہے۔

اور میرا حق بنتا تھا اور اب بھی بنتا ہے۔ لیکن مجھے اسی حالت میں
پوسٹ سے محروم رکھا گیا ہے۔ جیسا میرا حق بنتا ہے لیکن اب اس
میں ملا ہے۔

میں نے D.G سیکورٹی ایجنسی میں اپنی انکوار کی ہے اور 2665
لیکن جو اب دیا گیا ہے اس کی وینڈس کی ترقی دینے کے لئے 9 سیکس میں آگیا
گیا۔ جو کلر ٹی جی 35588-4E-12 سے 18-2013

تو جناب عالی اس حالت میں وینڈس جو اس کی تھی اسی لئے ترقی دینا
بنتا ہے کہ مجھے دیا جائے جو کہ میں سارا کاغذات جمع کر کے دیا تھا
جو ان سے مانگے گئے تھے۔

تو جناب عالی عرض کرنا چاہتا ہوں کہ 1864-1375/1999 سے 1864-1375/1999
جو ان سے دیا گیا ہے۔ اور سارا کاغذات جو ان کو ملے ہیں۔ مجھے ابھی دیا جائے جو کہ
میرا حق بنتا ہے۔ سارا کاغذات درخواست اس کے ساتھ ہے۔
میں 17 BPS سے ترقی دیا گیا تھا اور اس کے بعد 17 BPS سے ترقی دینا چاہتا ہوں۔
شکر ہے۔ آپ کا دلدار سید عابد رضا
PHC TECHNOLOGIST
M.F. B.S. (HONOUR)
HEALTH
RHC QUIL ABAD
DIR (L)

ATTESTED
by Advocate

ایڈیشن (طہاری) ص ۱

3339337626

پہلے سے 4 سے 1000 روپے

6792

22

عنوان :- درخواست برآمد
Promotion - جناب عالی

17.6.15

Amir

مورد نام گزارش ہے۔ کہ 1999 میں مجھ سے SMT پوسٹ کو
Promotions کے لیے درخواستیں مانگنے کے لیے جو کہ

اس وقت میں DGH آفیس میں جمع کر کے بطور معافی 1864
13358

مجھے پتہ نہیں تھا کہ Promotion پوسٹ کے لیے یا نہیں کیونکہ وہی
معافی نہیں ملی تھی۔ لیکن وہ پتہ ہے کہ 10 MTS کو

سینئر 12 میں پروموشن کے لیے درخواستیں جمع کرائیں 17 مئی 2015

اور ایک (MT) سینیئر ٹیکنیشن نے درخواستیں جمع کرائیں یہ تھا جو کہ

اسی وقت میں وہی پوسٹ خالی آ رہا ہے۔ کہ جس پر
حق بنتا تھا اور اب بھی بنتا ہے۔ لیکن ابھی تک مجھے میرا حق

نہیں دیا گیا۔ میں سینئر 16 میں ہوں اور میرا Qualification

(BSc (H)) ملتا ہے۔ جناب عالی میرا حق بنتا ہے کہ

اسی وقت سے مجھے پروموشن دیا جائے۔ تاکہ مجھے انصاف

ملے۔ جناب عالی درخواست میں جو لکھا ہے۔ اسی کے متعلق

سارے کاغذات درخواست میں تو منسلک ہیں۔

4/15
CIC

Chief PHC Tech
RHC Gul Abad
Secretary
M.O
Gul Abad Dir (L)

ATTESTED
by Advocate

MNO 1347

Annexure F

23



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 11th May, 2012

NOTIFICATION

No. SOH-III/8-60/2005(Paramedics). The Competent Authority is pleased to upgrade the following Chief Primary Health Care Technician (Multi-Purpose) BS-16 and Senior Primary Health Care Technician (M.P) BS-14 to the post of Primary Health Care Technologist (M.P) BS-17 with immediate effect:-

S. No	Name/ Father's Name	Designation with BS	Place of Posting
1.	Niaz Muhammad	Chief Primary Health Care Tech: (MP) BS-16	EDO (H) Peshawar
2.	Khadim Ahmad	-do-	EDO (H) Dir Lower
3.	Khalid Mahmood 26.2.1984	-do-	EDO (H) Manshura
4.	Muhammad Shamim	-do-	EDO (H) Battagram
5.	Akhtar Zaman	-do-	EDO (H) Manshura
6.	Ghuam Habib	-do-	Agency Surg: Bajuar
7.	Tajamul Hussain	-do-	EDO (H) Manshura
8.	Said Rehman	-do-	EDO (H) Mardan
9.	Abdul Karim	-do-	EDO (H) Abbottabad
10.	Barrakatullah S/O Muhammad Jan	-do-	EDO (H) Abbottabad
11.	Mafiz Rehman	-do-	EDO (H) Charsadda
12.	Muhammad Saeedullah	-do-	EDO (H) Shangla
13.	Murad Ali S/O Abdul Said 1984	-do-	EDO (H) Buner
14.	Khalil ur Rehman S/O Said Aman Khan	Senior Primary Health Care Tech: (MP) BS-14	EDO (H) Chitral
15.	M. Akbar Yousaf S/O Mir Ghazan	-do-	EDO (H) Nowshera
16.	Muhammad Noor S/O Muhammad Ayaz	-do-	EDO (H) L/Marwat
17.	Fazli Subhan S/O Haji Zareef Khan	-do-	EDO (H) Peshawar
18.	S. Faiz Ali Shah s/o S. Imdad Ali Shah	-do-	EDO (H) Peshawar
19.	Muslim Shah S/O Haleem Khan	-do-	EDO (H) Mardan
20.	Basher Ahmad	-do-	EDO (H) Haripur
21.	Qayyum Nawaz S/O Sabir	-do-	EDO (H) Haripur
22.	Muhammad Iqbal S/O Abdul Latif	-do-	EDO (H) Abbottabad
23.	Muhammad Ayub S/O Muhammad Feroz	-do-	EDO (H) Battagram
24.	Parvez Khan S/O Wazir Gul	-do-	EDO (H) Mardan
25.	Saeed Ahmad S/O	-do-	EDO (H) Abbottabad
26.	Khurshid Hussain S/O Muhammad Shafi	-do-	EDO (H) Abbottabad
27.	Nadir Khan S/O Gul Azad	-do-	EDO (H) Karak
28.	Iqbal Ahmad Abasi S/O Rajab Ali	-do-	EDO (H) Abbottabad
29.	Shahid Ahmad S/O Allah Ahmad	-do-	EDO (H) Abbottabad
30.	Sajjad Hussain S/O Mubarak Hussain	-do-	EDO (H) Peshawar
31.	Mrs. Nahced Aziz D/O Azizur Rehman	-do-	EDO (H) Haripur
32.	Muhammad Ihsan S/O Ashiq Hussain	-do-	EDO (H) Peshawar
33.	Riaz Ahmad S/O Rahimullah	-do-	EDO (H) Charsadda
34.	Gul Zaman S/O Haji Zarif Khan	-do-	Govt: LRH Peshawar
35.	Muhammad Kalim S/O Sher Gul	-do-	EDO (H) Haripur
36.	Zehin Shah	-do-	EDO (H) Charsadda
37.	Anisur Rehman S/O Rizwanullah	-do-	EDO (H) Charsadda
38.	Liaqat Ali S/O Khewa Gul	-do-	EDO (H) Nowshera
39.	Shamsur Rehman S/O Jan Nisar	-do-	EDO (H) Manshura
40.	Muhammad Nasim S/O Abdul Raziq	-do-	EDO (H) Haripur
41.	Shuaibur Rehman S/O Abdur Rehman	-do-	EDO (H) Abbottabad
42.	Taj Elahi S/O Karan Elahi	-do-	EDO (H) Haripur
43.	Habibur Rehman S/O Muhammad Zaman	-do-	EDO (H) Manshura
44.	Abdur Rashid S/O Abdul Hamid	-do-	EDO (H) Haripur
45.	Akram Sher S/O Mir Abaz	-do-	EDO (H) Peshawar
46.	Fazli Rabbi S/O Hazrat Hussain	-do-	EDO (H) Swat

ATTESTED
by Advocate

2012

203
29

47.	Fazal Nawaz S/O Mula Jan	-do-	EDO (H) Kohat
48.	Rehman ud Din	-do-	EDO (H) Nowshera
49.	Israrul Haq S/O Fazli Haq	-do-	EDO (H) Bannu
50.	Nawaz Khan	-do-	EDO (H) D.I.Khan
51.	Rehmatullahi	-do-	EDO (H) D.I.Khan
52.	Bashir Ahmad S/O Taj Muhammad	-do-	EDO (H) Swabi
53.	Ghulam Gillani S/O Muhammad Zaman	-do-	EDO (H) Bannu
54.	Rifat Sultana D/O Mian Hasan	-do-	EDO (H) Nowshera
55.	Shahid Saleem S/O Raza Khan	-do-	EDO (H) Charsadda
56.	Muhammad Tariq S/O S. Mubarak Hussain	-do-	EDO (H) D.I.Khan
57.	Iaved Khan S/O Pанда Khan	-do-	AS Khyber
58.	Sher Ali Jan S/O Hussain Ali	-do-	EDO (H) Hangu
59.	Abdul Qayyum S/O Raza Khan	-do-	DHS FATA
60.	Abdul Majeed S/O Abdul Halim	-do-	AS Mohmand Agency
61.	Wali Sardar S/O Sakhi Sardar	-do-	SWA Miranshah
62.	Johar Muhammad S/O Faiz Muhammad	-do-	EDO (H) Charsadda
63.	Sajid Ali S/O Habibullah Khan	-do-	EDO (H) Charsadda

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Encl: No. of even No and Date.

Copy forwarded to the:

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar w/r to his letter No. 13681/AE-VII dated 11.05.2012 for necessary action.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Director Health Services FATA, Khyber Pakhtunkhwa.
4. All the Chief Executives, of Teaching Hospitals in Khyber Pakhtunkhwa.
5. All the Principals of Medical Colleges in Khyber Pakhtunkhwa.
6. All the Medical Superintendents, of DHQ Hospitals in Khyber Pakhtunkhwa.
7. All the District Accounts Officers/ Agency Accounts Officers in Khyber Pakhtunkhwa.
8. The Deputy Director (Information Technology) Health Department Peshawar
9. PS to Secretary Establishment, Khyber Pakhtunkhwa.
10. PS to Secretary Finance Department, Khyber Pakhtunkhwa.
11. PS to Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
12. President, Provincial Association of Paramedics, Khyber Pakhtunkhwa Peshawar.

ATTESTED

by Advocate

(Muhammad Tariq Khan) 11/5
Additional Secretary (Establishment)
Health Department

گورنمنٹ ڈسٹرکٹ ہسپتال، حیدرآباد کے لئے
ڈی ایچ او کے لئے

فصل عالی
موجودہ رتبہ کے لئے 12 Promotions
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Dr. Khalid Khan
Medical Officer
HC, RHC, Gul Abad

Chief
PHC
TECH RHC Gul Abad

ATTESTED
by Advocate

NO. 26451

Dated Timergara the 10/10/2013,

26

FROM: =

The District Health Officer,
Dir Lower at Timergara.

TO: =

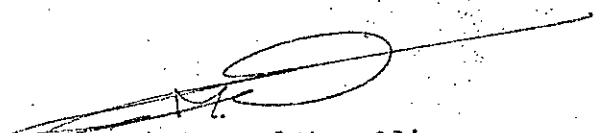
The Director General Health Services,
Khyber Pakhtun Khwa, Peshawar.

SUBJECT: =

APPEAL FOR PROMOTION*

Sir,

I have the honour to forward herewith an application in respect of Mr. Syed Abid Iqbal Chief PHC technician (BPS-15) which is self explanatory, for favour of further necessary action please.


District Health Officer,
Dir Lower at Timergara.

ATTESTED

Amir
by Advocate

OFFICE OF THE DISTRICT HEALTH
OFFICER LOWER DIR.
Phone # 0945-9250098.

27

No. 109471 Dated 22/12/2017.

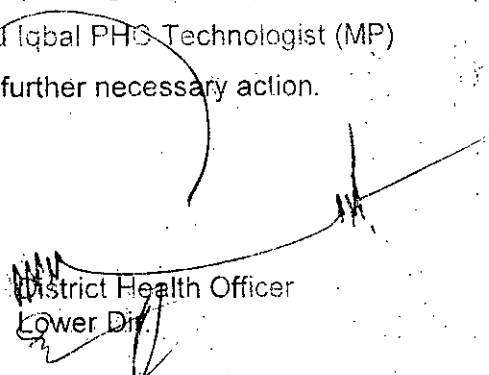
TO,

The Director General Health
Services Khyber Pukhtunkhwa
Peshawar.

SUBJECT :- APPEAL FOR PROMOTION.
Memo :-

Enclosed please find herewith an appeal (in Original) alongwith other documents (which is self explanatory) in respect of Mr. Syed Abid Iqbal PHC Technologist (MP) BPS-17 attached to RHC Gulabad District Dir Lower for favour of further necessary action.

Enclosures Attached.



District Health Officer
Lower Dir.

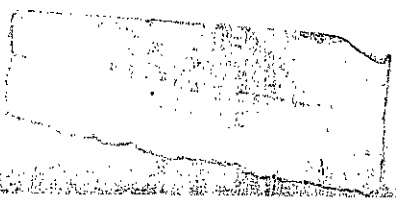
No. 10947

Copy to Mr. Syed Abid Iqbal PHC Technologist (MP) BPS-17 RHC
Gulabad for information.

District Health Officer
Lower Dir.

ATTESTED


by Advocate





Annexure H 29

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

No 35588 / AE-VII

Dated 18/11 /2013.

Handwritten notes and signatures:
A circular stamp with the number 18.
A signature and the number 26.
A signature and the number 9.

To

The District Health Officer,
Lower Dir.

SUBJECT:

APPEAL FOR PROMOTION.

I am directed to refer to your letter No. 2645/ dated 10.10.2013, on the subject noted above and to state that the promotions of Medical Technician (BPS-09) to the of Senior Medical Technician (BPS-12) have been awarded to the senior most Medical Technicians (BPS-09) on the basis of Seniority List according to available vacancies at that time and Syed Abid Iqbal has been kept in the seniority list of (BPS-09) due to non-availability of vacant post on 25.05.1999.

More so, the appeal is time bard and cannot be considered at this stage.

Signature
ASSISTANT DIRECTOR (P-II)
DIRECTORATE GENERAL HEALTH.
SERVICES KPK, PESHAWAR.

18/11/2013

Signature
CIC

ATTESTED

Signature
by Advocate

Medical Technician.

i.No.	Name of Official	Father Name	Domicile	Date of Birth	Date of Joining Service on Regular Basis As:			Place of Present Posting.	Date of Retirement.	Whether appointed/Adjusted against the original post or otherwise.	Remarks.
					A	B	C				
1	Syed Abid Iqbal	Kachkol Pacha	Dir Lower.	8/10/1959	23/2/1982			BHU Mayar	7/10/2019		BSc MT Diploma
2	Zahid Hussain	Umar Muhammad	Dir Lower.	3/2/1958	1/3/1982			BHU Osakai	2/2/2018		
3	Nek Muhammad	Sarfraz Khan	Dir Lower.	18/01/1952	18/03/1982			BHU Nasafa	17/01/2018		Post Graduate Diploma
4	Jan Muhammad	Nowshad Khan	Dir Lower.	17/11/1961	25/06/1983 20/12/1982			BHU Pingal	16/11/2021		
5	Qasim Hussain	Rahmat Hussain	Dir Lower.	9/11/1958	(Comp)	17/1/1983 HT		BHU Toormang	8/11/2018		
6	Ihsan Ullah	Amir Khaliq	Dir Lower.	15/01/1960	12/2/1984			BHU Ramora	14/01/2020		
7	Aziz-ur-Rahman	Bahadar Khan	Dir Lower.	16/05/1959	17/02/1984			BHU Kakas	15/05/2019		Diploma.
8	Khaista Irshad	Amiran Said	Dir Lower.	1/5/1965	18/03/1985			BHU Asegai	30/05/2025		
9	Aziz-ur-Rahman	Momin Khan	Dir Lower.	5/2/1957	10/4/1979 (Comp)	22/09/1985 HT		BHU Ouch	4/2/2017		
10	Muhammad Nazir	Fazli Rashid	Dir Lower.	1/1/1965	12/10/1985			BHU Banda Talash.	31/12/2025		
11	Rafi Ullah	Juma Khan	Dir Lower.	4/1/1952	10/11/1970 (Comp)	13/10/1985 HT		BHU Tawda China	3/1/2012		
12	Jamil Ahmad	Muhammad Saeed	Dir Lower.	15/01/1966	6/2/1986			RHC Gul Abad.	14/01/2026		
13	Sher Bahadar	Abdur Razzaq	Dir Lower.	1/3/1959	6/3/1986			BHU Makhai.	28/02/2019		
14	Sadat Khan	Akbar Said Khan	Dir Lower.	25/06/1964	6/3/1986			BHU Nasafa	24/06/2024		Diploma

Attest

بعدالت جناب سروس ٹریبونل بمقام گلکدہ ضلع سوات

گورنمنٹ / محکمہ ہیلتھ

بنام

سید عابد اقبال

درخواست بمراہ عطا کیگی اجازت برائے اپنے مقدمہ میں از خود وکالت کرنے کا حکم

صادر فرمایا جائے۔

جناب عالی! حسب ذیل گزارش ہے۔

- (۱) یہ کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے جس میں امر و تارتخ پیشی مقرر ہے۔
- (۲) یہ کہ سائل ایک تعلیم یافتہ (B.Sc(Hons)) شخص ہے اور محکمہ ہیلتھ میں بحیثیت میڈیکل ٹیکنالوجسٹ اپنا فرائض منصبی سرانجام دے رہا ہے۔
- (۳) یہ کہ سائل مقدمہ عنوان بالا میں پورا معلوم محفوظ رکھتا ہے اور مقدمہ کے ہر پہلو سے سائل خود آگاہ ہے سائل وکیل نہ رکھنے کے خواہاں ہے
- (۴) یہ کہ سائل خود اپنا وکالت مقدمہ عنوان بالا میں کر سکتا ہے اور سائل کو کوئی بھی مشکل نہیں آئیگا۔

لہذا استدعا ہے کہ بمنظوری درخواست ہذا سائل کو مقدمہ عنوان بالا میں اپنا وکالت از خود کرنے کا حکم صادر فرمایا جائے۔

عریض

سائل / مدعی سید عابد اقبال

تصدیق

تصدیق کیجاتی ہے کہ جملہ مراتب درخواست ہذا
تاحد علم و یقین میرے درست و صحیح ہے اور کوئی امر
عدالت حضور سے مخفی نہیں رکھا گیا ہے۔

العبد

سائل / مدعی سید عابد اقبال

BEFORE THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Appeal No. 1474/2019

Syed Abid Iqbal Appellant

Versus

Secretary to Government of Khyber Pakhtunkhwa Health
Department & other Respondents

(Reply on behalf of Respondent No. 6)


Respectfully Sheweth:

Para No.01 to 08. No Comments

Being an administrative matter, the issue relates to respondent No.1,2,3 and 5. Hence, they are in a better position to redress the grievances of the appellant.

Besides, the appellant has raised no grievances against respondent No.6.

In light of the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1,2,3 and 5 for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.


DISTT ACCOUNTS OFFICER
DIR LOWER AT TIMERGARA

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

Appeal No.1474/2019

Mr. Syed Abid Iqbal.....Appellant.

VERSUS

Secretary to Government of Khyber Pakhtunkhwa Health Department
& othersRespondents.

(Reply on Behalf of respondent No. 4)

Respectfully Sheweth:-

Para No. 01 to 8. No Comments.

Being an administrative matter, the issue relates to respondent No. 1, 2,3 & 5. Hence, they are in a better position to redress the grievances of the appellant. Besides, the appellant has raised no grievances against Respondent No.4.

Keeping in view the above mentioned facts, it is humbly prayed that the appellant may be directed to approach respondent No. 1, 2,3 & 5 for the satisfaction of his grievances and the appeal in hand may be dismissed with cost.


**ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA**

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

SERVICE APPEAL NO. 1474 OF 2019

Syed Abid Iqbal.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
2. That the instant Appeal is bad for mis-joinder and non-joinder of the necessary parties.
3. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
4. That the Appellant has filed the instant appeal just to pressurize the respondents.
5. That the instant Appeal is against the prevailing Law and Rules.
6. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
7. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
8. That the Appellant has not come to the Tribunal with clean hands.
9. That the Appeal is time barred.

ON FACTS:

1. Para No. 1 is incorrect to the extent that the Appellant was appointed as MT on 23/02/1982.
2. In reply to Para No. 2 it is submitted that according to the available posts, the promotion of Paramedics was made according to the seniority list.
3. Para No. 3 as already explained in preceding para.
4. Para No. 4 is correct.
5. Para No. 5 is correct to the extent that the Appellant has already been promoted as PHC Technician (MP) BPS-17 vide Office Order No. SOH-III/8-60/2017 dated 21/07/2017 (Annex-A).
6. Para No. 6 as in preceding para.

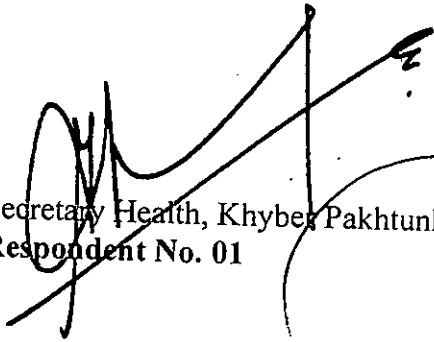
7. Para No. 7 as already explained in Para No. 6 above.
8. Para No. 8 is incorrect to the extent that the petitioner has not been considered according to the rules. He has already been promoted to the post of Technician (BPS-16) and later on promoted to the post of PHC Technician (BPS-17) and recently his case has already submitted to the Govt. for promotion to the post Senior PHC Technologist MP (BPS-18).


ON GROUNDS:

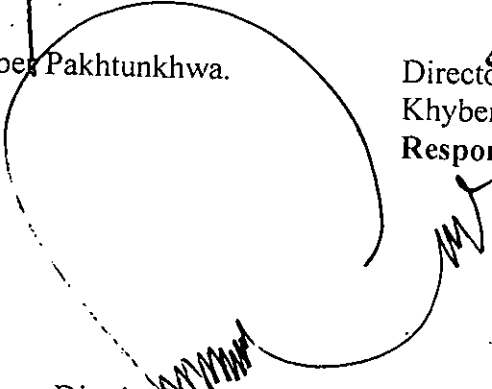
- i. Para-i as already explained in Para No. 2 & 5 of Facts.
- ii. Para-ii is incorrect, as Department has already awarded him his rights according to the rules.
- iii. Para-iii as per Para-i above.
- iv. Para-iv as in Para No. 5 above.
- v. Para-v is incorrect. His fundamental right has been awarded to the Petitioner according to the rules.
- vi. Para-vi no comments.

PRAYER:

It is therefore humbly prayed that on acceptance of the comments, the instant Appeal may very graciously be dismissed with cost.


Secretary Health, Khyber Pakhtunkhwa.
Respondent No. 01


Director General Health Services,
Khyber Pakhtunkhwa.
Respondent No. 03


District Health Officer Dir Lower.
Respondent No. 05



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 03rd August, 2017

NOTIFICATION.

No. SOH-III/8-60/2017. Consequent upon their promotion, vide this department notification of even number dated: 21-07-2017, the Competent Authority is pleased to order the following posting/transfer in different categories/specialties from BS-16 to BS-17 in Health Department with immediate effect in the public interest.



S.No	Name & Designation with BPS	From	To	Remarks
	PHC Technicians (M.P) BS-16 to PHC Technologist (M.P) BS-17			
1.	Jamil ur Rahman	DHO Kohat	DHO Kohat	Against the vacant post
2.	Wali Muhammad	DHO Swat	DHO Swat	...do...
3.	Hidayatullah	DHO Karak	DHO Karak	...do...
4.	Rafiullah	DHO Karak	DHO Bannu	...do...
5.	Shabir Nawaz	DHO Karak	DHO Hangu.	...do...
6.	Muqadar	DHO Swat	PMI Swat	...do...
7.	Abid Iqbal	DHO Dir Lower	DHO Dir Lower	...do...
8.	Ghulam Hazrat	DHO Dir Upper	DHO Dir Upper	...do...
9.	Shaukat Ali	DHO Karak	DHO Karak	...do...
10.	Hameedullah	DHO Bannu	DHO Bannu	...do...
11.	Zari Badshah	DHO Nowshera	DHO Mardan.	...do...
12.	Zahid Hussain Khan	DHO Dir Lower	DHO Dir Lower	...do...
13.	Bashir Ahmad	DHO Shangla	DHO Shangla	...do...
14.	Anwar Saeed	DHO Mansehra	DHO Mansehra	...do...
15.	Fazal Ahmad	DHO L/Marwat	DHO Lakki Marwat	...do...
16.	Muhammad Bashir	DHO Abbottabad.	DHO Abbottabad.	...do...
17.	Nageena Azmat	DHO Peshawar	DHO Peshawar	...do...
18.	Sher Zada	DHQH Charsadda	DHO Charsadda	...do...
19.	Rashida Akhtar	DHO Nowshera	DHO Nowshera	...do...
S.No	Clinical Technician (Pharmacy) BS-16 to Clinical Technologist (Pharmacy) BS-17.			
1.	Bashir Ahmad	SHPD Peshawar	SGM Hospital Peshawar	Against the vacant post
2.	Muhammad Aslam	District Tank	DHQ Hosp. Tank	...do...

3.	Murtaza Khan	IDC Hospital Peshawar	DHO Charsadda.	...do...
4.	Allah Nawaz	DHQH D.I.Khan	DHO DI Khan	...do...
5.	Shafiullah	LRH Peshawar	LRH Peshawar.	...do...
6.	Abdul Malik	KTH Peshawar	KTH Peshawar.	...do...
7.	Abdul Latif	DHO Bannu	DHQ Hosp. Bannu.	...do...
8.	M. Javed	District Nowshera	DHQ, Hospital Charsadda.	...do...
9.	Shafiur Rehman	DHQ Hosp:Karak	DHQ Hosp; Karak	...do...
S.No	Clinical Technician (Anesthesia) BS-16 to the post of Clinical Technologist (Anesthesia) BS-17.			
1.	Sher Dil	KTH Peshawar	LRH Peshawar	Against the vacant post
2.	Tahir Gul	KTH Peshawar	LRH Peshawar	...do...
3.	Niamat	HMC Peshawar	AHQ, Landi Kotal	...do...
S.No	Clinical Technician (Cardiology) BS-16 to the post of Clinical Technologist (Cardiology) BS-17.			
1.	Tajammul Hussain	LRH Peshawar	LRH Peshawar	Against the vacant pos*
2.	Wisal Muhammad	LRH Peshawar	LRH Peshawar	...do...
S.No	Clinical Technician (Dental) BS-16 to the post of Clinical Technologist (Dental) BS-17.			
1.	Muhammad Iqbal	DHQ, Hospital Mardan	KCD, Peshawar.	Against the vacant post
2.	Amanat Ullah	LRH Hospital Peshawar	LRH, Peshawar	...do...
S.No	Clinical Technician (Dialysis) BS-16 to the post of Clinical Technologist (Dialysis) BS-17			
1.	Muhammad Ishfaq	KTH Peshawar	KTH Peshawar	Against the vacant post
2.	Muhammad Ishaq	LRH, Peshawar	LRH Peshawar	...do...
S.No	Chief PHC Technician (MCH) BS-16 to the post of Chief PHC Technologist (MCH) BS-17			
1.	Yasmin Raheel	DHO Malakand	DHO Swat	Against the vacant post
2.	Rukhtaj	DHO Mansehra	DHO Abbottabad	...do...
3.	Sakina Bibi	DHO, Bannu	DHO D.I Khan	...do...
4.	Nasim Akhtar	DHO Chitral.	DHO Peshawar.	...do...
5.	Farkhanda Jabeen	DHO Peshawar.	DHO Peshawar	...do..
S.No	Chief Clinical Technician (Ophthalmology/Otorhinolynology) BS-16 to the post of Clinical Technologist (Ophthalmology/Otorhinolynology) BS-17			
1.	Malik TahirAwan	LRH, Peshawar	LRH, Peshawar	Against the vacant post

2.	Iftikhar Anmad	KTH Peshawar	KTH Peshawar	do...
3.	Mohammad Saleem	DHO Hosp. Di Khan	DHO Hosp. D.I Khan	do...
4.	Qudratullah	DHO Nowshera	M.M.C. Mardan.	do...
5.	Tariq Saeed	LRH Peshawar	LRH Peshawar.	do...

S.No Chief Clinical Technician (Surgical) BS-16 to the post of Clinical Technologist (Surgical) BS-17

1.	Habib Akbar S/O Ahmad Shah	M.M.C. Peshawar	KTH Peshawar	Against the vacant post
2.	Nisar Ahmad S/O Muhammad Ashraf	KGN Teaching Hospital Bannu.	KGN Teaching Hospital Bannu.	do...
3.	Ajmal Khan S/O Sarfarez	KTH Peshawar	KTH Peshawar.	do...

S.No Chief Clinical Technician (Pathology) BS-16 to the post of Clinical Technologist (Pathology) BS-17

1.	Habib Khan	DHO Hosp. Konat	KGN Teaching Hospital Bannu.	Against the vacant post
2.	Shah Jehan	LRH Peshawar	LRH Peshawar.	do...
3.	Rahat Ullah	KTH Peshawar	KTH Peshawar.	do...
4.	Irshad Ali	KTH Peshawar	KTH Peshawar.	do...
5.	Masood Ali	DHO Hosp. Mardan	LRH Peshawar.	do...
6.	Khushdil Khan	DHO Hosp. Charsadda	LRH Peshawar.	do...

They will be on probation for a period of one year.

SECRETARY HEALTH
GOVT. OF KHYBER PAKHTUNKHWA

Enclst. Even No and Date.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, Health Services, Khyber Pakhtunkhwa.
3. The Director General, Provincial Health Services Academy, Peshawar.
4. The Director, Health Services, FATA.
5. Hospital Directors, MTIs, Khyber Pakhtunkhwa concerned.
6. Medical Superintendents, DHO Teaching Hospital, Khyber Pakhtunkhwa concerned.
7. Principals, DHOs, K.M.C.H.S.P., Peshawar.
8. District Health Officers, Khyber Pakhtunkhwa concerned.
9. District Accounts Officers, Khyber Pakhtunkhwa concerned.
10. The Deputy Director, Health Department.
11. PSQ to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Senior Minister Health, Khyber Pakhtunkhwa.
13. PS Secretary Health, Khyber Pakhtunkhwa.
14. Officers concerned.

SECTION OFFICER-III

**DIRECTORATE GENERAL HEALTH SERVICES, KHYBER
PAKHTUNKHWA PESHAWAR.**

All communications should be addressed to the Director General
Health Services Peshawar and not to any official by name.
Exchange Ph: 091-9210187 – Fax: 091-9210130 Web: www.healthkp.gov.pk




No. 11263-393 /AE-VII

Dated 23 / 08 /2017

COPY OF ABOVE AS FORWARDED TO THE.

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Director General Health Service Khyber Pakhtunkhwa.
3. The Director General Provincial Health Service Academy Peshawar.
4. The Director Health Service FATA.
5. All Hospitals Director MTIs, Khyber Pakhtunkhwa Concerned.
6. All Medical Superintendents DHQ Teaching Hospital Khyber Pakhtunkhwa Concerned.
7. Principals/Deans ,KMC/KCD/PGPI, Peshawar.
8. All DHO, District Health Officers Khyber Pakhtunkhwa Concerned.
9. All District Accounts Officers, Khyber Pakhtunkhwa Concerned.
10. The Deputy Director IT. Health Department.
11. PSO to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Senior Minister Health Khyber Pakhtunkhwa.
13. PS Secretary Health Khyber Pakhtunkhwa.
14. PA DGHS KP, Peshawar.
15. Officers Concerned.


ASSISTANT DIRECTOR (Paramedics)
DIRECTORATE GENERAL HEALTH
SERVICES KP, PESHAWAR

23/08/17



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DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

Consequent upon approval accorded by the competent authority the following PHC Tech: (MP) BS-12 have been upgraded to the post of Chief Primary Health Care Technologist (MP) BS-16 vide Govt: of Khyber Pakhtunkhwa, Health Department Notification No. SOH-III/8-60/2005 (Paramedics) dated 11.05.2012.

S. No.	Name/ Father's Name	From
1.	Kamal Zada S/O Muhammad Nawab	District Shangla
2.	Mir Afzal S/O Abdu Qayyum	District Kohat
3.	Wali Muhammad S/O Abdul Khalil	District Swat
4.	Muhammad Riaz S/O Saifoor Bacha	District Mardan
5.	Hidayatullah S/O Eid Muhammad	District Karak
6.	Rafiqullah S/O Dakhil Gul	District Karak
7.	Shabir Nawaz S/O Gharib Nawaz	District Karak
8.	Muqadar S/O Sardar	District Swat
9.	Abid Iqbal S/O Kachkol Bacha	District Dir Lower
10.	Ghulam Hazrat	District Dir Upper
11.	Ishrat Parveen D.O Khadim Hussain	District Peshawar
12.	Shaukat Ali S/O Roshani Gul	District Karak
13.	Hameedullah S/O Rab Nawaz Khan	District Bannu
14.	Zahid Hussain S/O Umer Muhammad	District Dir Lower
15.	Bashir Ahmad S/O Faqir Muhammad	District Shangla
16.	Shah Nawaz S/O Fazal Manan	AS NWA Miranshah
17.	Fazal Rehman S/O Mian Syed Usman	District Swat
18.	Anwar Saeed S/O Muhammad Younis	District Mardan
19.	Fazal Ahmad S/O Khair Ahmad	District L/Marwat
20.	Muhammad Bashir S/O Gohar Rehman	District Haripur
21.	Nageena Azmat D.O Sharfuddin	District Peshawar
22.	Sher Zada S/O Mughal Khan	DHQH Charsadda
23.	Rashida Akhtar D.O Sultan Muhammad	District Nowshera
24.	Rukhsana D/O Jan Muhammad	District Peshawar
25.	Azra Bano D.O Muhammad Hussain	District Peshawar
26.	Abdul Waheed S/O Muhammad Ishtaq	District Haripur
27.	Niaz Ali S/O Fazli Rehman	District Peshawar
28.	Abdur Rahim S/O Shah Jehan	District Abbottabad
29.	Fazli Rabi S/O Mukhtar Nabi	District Battagram
30.	Bakht Amin S/O Muhammad Yousaf	District Swat
31.	Rasheed Ahmad S/O Hamidullah Jan	District L/Marwat
32.	Umar Sardar S/O Ghulam Haider	District Karak
33.	Noor Sahib Khan S/O Ali Marjan	District Kohat
34.	Zafar Ali S/O Rafiquddin	District Charsadda
35.	Maqsood Anwar S/O Muhammad Shah	District Haripur
36.	Alsar Khan S/O Yaqub Khan	District Charsadda
37.	Khalid Khan S/O Durrani Khan	District Peshawar
38.	Noorullah S/O Zahir Khan	AS Mohmand
39.	Muhammad Rafiqat S/O Ghulam Mohammad	District Haripur
40.	Muhammad Idrees S/O Haji Gul	District Peshawar
41.	Bashir Ahmad S/O Amir Rahman	District Mardan
42.	Jan Muhammad S/O Nowshad Khan	District Dir Lower
43.	Qamar Zaman S/O Fazal Rehman	District Karak
44.	Muhammad Irfan S/O Gul Sherin	District Karak
45.	Fazal Wahab S/O Ahib Gul	District Mardan
46.	Muhammad Hussain S/O Ghulam Rasool	District D.I.Khan
47.	Fazal Muhammad S/O Faqir Muhammad	District Swat
48.	Fazal Hadi S/O Lajbar	District Swat
49.	Jehanzeb S/O Kala Khan	District Haripur
50.	Manzoor Ahmad S/O Khan Zaman	District Mardan
51.	Qasim Hussain S/O Rahmat Hussain	District Dir Lower
52.	Muhammad Nawaz S/O Shalwaz Khan	EDO (H) Mardan
53.	Arshad Hussain S/O Minhajuddin	District Swat
54.	Mrs. Yasmin Begum D/O Abdur Rehman	District Mardan
55.	Nadir Khan S/O Mir Badshah	District Kohat
56.	Salahuddin S/O Kaudpoosh	District Shangla
57.	Naeem Tariq S/O Fayaz Gul	District Nowshera
58.	Shahid Gul S/O Amir Muhammad	District Charsadda

(Sign)

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- 59.	Abdullah Khan S/O Mehr Dil	District D.I.Khan
- 60.	Muhammad Rafiq S/O Ghulam Muhammad	District D.I.Khan
- 61.	Atiqur Rehman S/O Gaida Khel	District Karak
- 62.	Mrs. Mumtaz Shaheen D.O Muhammad Ismail	District Peshawar
63.	Momin Khan S/O Rokhan	District Peshawar
64.	Fida Muhammad S/O Q. Sahibullah	District Peshawar
65.	Muhammad Iqbal S/O Karim Gul	District Peshawar
66.	Tasleem Khan S/O Fazal Rahman	District Charsadda
67.	Khalid Usman S/O Muhammad Saeed	District Karak
68.	Nigar Sultana D/O Pir Bakhs	District Peshawar

On their upgradation to the post of Chief Primary Health Care Tech: (MP) BS-16, the following posting/ transfer adjustment are hereby ordered to be operative from 11.05.2012, the date of upgradation: -

S. No.	Name/ Father's Name	From	To	Remarks
1.	Kamal Zada S/O Muhammad Nawab	District Shangla	District Shangla	-do-
2.	Mir Alzal S/O Abdul Qayyum	District Kohat	District Kohat	-do-
3.	Wali Muhammad S/O Abdul Khalil	District Swat	District Swat	-do-
4.	Muhammad Riaz S/O Saifoor Bacha	District Mardan	District Mardan	-do-
5.	Hidayatullah S/O Eid Muhammad	District Karak	District Bannu	-do-
6.	Rafiqullah S/O Dakhil Gul	District Karak	District Tawk	-do-
7.	Shabir Nawaz S/O Gharib Nawaz	District Karak	District Karak	-do-
8.	Muqadar S/O Sardar	District Swat	District Swat	-do-
9.	Abid Iqbal S/O Kachkol Bacha	District Dir Lower	District Dir Lower	-do-
10.	Ghulam Hazrat	District Dir Upper	District Dir Upper	-do-
11.	Islrat Purveen D.O Khadim Hussain	District Peshawar	District Mardan	-do-
12.	Shaikat Ali S/O Roslami Gul	District Karak	District Karak	-do-
13.	Hameedullah S/O Rab Nawaz Khan	District Bannu	District Bannu	-do-
14.	Zahid Hussain S/O Umer Muhammad	District Dir Lower	District Dir Lower	-do-
15.	Bashir Ahmad S/O Faqir Muhammad	District Shangla	District Shangla	-do-
16.	Shah Nawaz S/O Fazal Mannan	AS NWA Miranshah	District Bannu	-do-
17.	Fazal Rehman S/O Mian Syed Usman	District Swat	District Buner	-do-
18.	Anwar Saeed S/O Muhammad Youns	District Manshera	District Manshera	-do-
19.	Fazal Ahmad S/O Khair Ahmad	District L/Marwat	District L/Marwat	-do-
20.	Muhammad Bashir S/O Gohar Rehman	District Haripur	District Abbottabad	-do-
21.	Nageena Azmat D.O Sharfuddin	District Peshawar	District Peshawar	-do-
22.	Sher Zada S/O Mughal Khan	DHQH Charsadda	District Charsadda	-do-
23.	Rashida Akhtar D.O Sultan Muhammad	District Nowshera	District Nowshera	-do-
24.	Rukhsana D/O Jan Muhammad	District Peshawar	District Swabi	-do-
25.	Azra Bano D.O Muhammad Hussain	District Peshawar	District Nowshera	-do-
26.	Abdul Waheed S/O Muhammad Ishaq	District Haripur	District Kohistan	-do-
27.	Niaz Ali S/O Fazli Rehman	District Peshawar	District Peshawar	-do-
28.	Abdur Rahim S/O Shah Jehan	District Abbottabad	District Abbottabad	-do-
29.	Fazli Rabi S/O Mukhtiar Nabi	District Battagram	District Battagram	-do-
30.	Bakht Amin S/O Muhammad Yousaf	District Swat	District Buner	-do-
31.	Rashid Ahmad S/O Hamidullah Jan	District L/Marwat	District L/Marwat	-do-
32.	Umar Sardar S/O Ghulam Haider	District Karak	District Dir Upper	-do-
33.	Noor Sahib Khan S/O Ali Marjan	District Kohat	District Kohat	-do-
34.	Zafar Ali S/O Rafiuddin	District Charsadda	District Mardan	-do-
35.	Maqsood Anwar S/O Muhammad Shah	District Haripur	District Abbottabad	-do-
36.	Asar Khan S/O Yardil Khan	District Charsadda	District Charsadda	-do-
37.	Khalid Khan S/O Durrani Khan	District Peshawar	District Peshawar	-do-
38.	Noorullah S/O Zain Khan	AS Mohmand	District Swabi	-do-
39.	Muhammad Rifaqat S/O Ghulam Mohammad	District Haripur	District Haripur	-do-
40.	Muhammad Idrees S/O Haji Gul	District Peshawar	District Swabi	-do-
41.	Bashir Ahmad S/O Amir Rahman	District Mardan	District Mardan	-do-
42.	Im Muhammad S/O Nowshad Khan	District Dir Lower	District Dir Lower	-do-
43.	Qamar Zaman S/O Fazal Rehman	District Karak	District Hangu	-do-
44.	Muhammad Irfan S/O Gul Sherin	District Karak	District Hangu	-do-
45.	Fazal Wahab S/O Ahil Gul	District Mardan	District Malakand	-do-
46.	Muhammad Hussain S/O Ghulam Rasool	District D.I.Khan	District D.I.Khan	-do-
47.	Fazal Muhammad S/O Faqir Muhammad	District Swat	District Swat	-do-
48.	Fazal Hadi S/O Lajbar	District Swat	District Chitral	-do-
49.	Jehanzeb S/O Kala Khan	District Haripur	District Haripur	-do-
50.	Manzoor Ahmad S/O Khan Zaman	District Manshera	District Abbottabad	-do-
51.	Qasim Hussain S/O Rahmat Hussain	District Dir Lower	District Dir Upper	-do-
52.	Muhammad Nawaz S/O Shahwaz Khan	EDO (H) Manshera	District Manshera	-do-
53.	Arshad Hussain S/O Minhajuddin	District Swat	District Malakand	-do-
54.	Mrs. Yasmin Begum D/O Abdur Rehman	District Manshera	District Manshera	-do-
55.	Nadir Khan S/O Mir Badshah	District Kohat	District Kohat	-do-
56.	Salahuddin S/O Kandpoosh	District Shangla	District Malakand	-do-

58.	Shahzad Gul S/O Amir Muhammad	District Charsadda	District Charsadda	-do-
59.	Abdullah Khan S/O Mehr Dil	District D.I.Khan	District D.I.Khan	-do-
60.	Muhammad Rafiq S/O Ghulam Muhammad.	District D.I.Khan	District D.I.Khan	-do-
61.	Attique Rehman S/O Gaida Khel	District Karak	District Karak	-do-
62.	Mrs. Muntaz Shaheen D.O Muhammad Ismail	District Peshawar	District Nowshera	-do-
63.	Momin Khan S/O Rokhan	District Peshawar	District Peshawar	-do-
64.	Fida Muhammad S/O Q. Sahibullah	District Peshawar	District Swabi	-do-
65.	Muhammad Iqbal S/O Karim Gul	District Peshawar	District Peshawar	-do-
66.	Tasleem Khan S/O Fazal Rahman	District Charsadda	District Mardan	-do-
67.	Khalid Usman S/O Muhammad Saeed	District Karak	District Tank	-do-
68.	Nigar Sultana D/O Pir Bakhsh	District Peshawar	District Charsadda	-do-

Sd/xxxxxxxx
 Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar

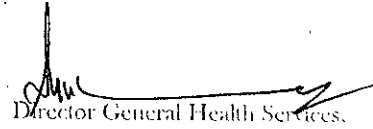
No. 21682-741 /AE-VII

Dated Peshawar the 27 /07/2012

Copy forwarded to the: -

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
2. The DHS FATA, Khyber Pakhtunkhwa, Peshawar.
3. The Director Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.
4. The All Executive District Officers (Health) in Khyber Pakhtunkhwa, Province.
5. The All District Accounts Officers in Khyber Pakhtunkhwa, Province.
6. The Agency Surgeons Mohmand.
7. The Agency Accounts Officer, Mohmand.
8. Muhammad Jamil, Assistant Director (P-II) DGHS Office Peshawar.
9. Incharge, Paramedics Promotion Cell DGHS Office Peshawar.
10. Officials concerned.
11. Personal Files.
12. P.A to DGHS, Khyber Pakhtunkhwa, Peshawar.
13. P.A to Director (Administration) DGHS Office Peshawar.
14. P.A to Deputy Director (Personnel) DGHS Office Peshawar.

For information and necessary action.


 Director General Health Services,
 Khyber Pakhtunkhwa, Peshawar.

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 18/07/12

بعدالت ہیر کچن کو اس سے تریس ٹریس لپٹا ہوا

کورت فیس

قیمت ایک روپیہ

۲۰ منجانب ایسٹ لارڈ

سید عابد انصاری بنام ایسٹ وٹری

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام سے لیکر عیالیں تحریر فاحشی اور اس کے لئے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا ایسے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کر پتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے

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Adetoo & accept

العبد گ واہ شاہ العبد

کے لئے منظور

ہتھام

03008546767

جوابی جواب منجانب اسپل کنڈہ

ضابطہ نمبر 1 - اسپل کنڈہ حسب ذیل عرضوں پر ہے۔

Para (1) - مختصرتاً یہ کہ میں سٹریٹ نمبر 10 کے علاقے میں 23-02-1982 کو کھری ہوئی تھی۔

Para (2) - نقل شدہ سٹیٹ 12 کے 10 پوسٹ ٹیگ - ڈسٹرکٹ ڈائریکٹریٹ میں سٹیٹ 10 کے علاقے میں 10 میں سے ایک نام والی محمد نے Pargo کیا پوسٹ نہیں کیا۔ تو باقی رہ گئے اور ایک پوسٹ خالی ہو گیا کہ میرا نمبر 11 والا تھا۔ لیکن اس خالی پوسٹ پر میرا پروپوسٹ حق بنتا ہے اس وقت ہی حق بنتا تھا لیکن نہیں ہوا۔

Para (3) - فورڈ لیز کے مضامین اس خالی پوسٹ پر میرا پروپوسٹ 11 سے 12 تک ہونا چاہئے تھا۔ اس تک نہیں ہوا۔ اس وقت وہی پوسٹ خالی رہے۔

Para (4) - محمد کے جواب میں لکھا ہے کہ Para 9 پر ہے۔ تو اس پر میں صاف لکھا گیا ہے - 10 پوسٹ ٹیگ 9 پر ایک ایک پوسٹ Pargo کیا۔ چونکہ میرا نمبر 11 والا تھا تو میرا حق بنتا تھا اور اب بھی بنتا ہے۔ لیکن نہیں ملا ہے۔

Para (5) - مختصرتاً یہ کہ میرا پروپوسٹ BPS 17 میں ہوا ہے جو 7/2017 کو ہوا ہے۔ اور جن آرڈر 1999 میں سٹیٹ 12 دیا تھا جو 9 کے 5/2012 کو آٹو سٹیٹ BPS 17 میں لکھا ہے اور اس کے مضامین بھی صحیح سٹیٹ BPS 17 5/2012 میں ملنے چاہئے تھا۔ 5 سال بعد دیا گیا ہے۔ جو میرا حق تلفی ہے۔ اس وقت سے یعنی 1999 سے سٹیٹ 12 پر 2012 کو سٹیٹ 17 BPS لینے کا مقدار ہوں سٹیٹ 18 BPS لینے میں کاغذات کی کمی ہے۔ جو کہ Para 8 سے واضح ہے۔ ان پر عمل کیا جائے۔ اور سٹیٹ 10 کے پوسٹ ٹیگ کے ساتھ صحیح کیا جائے۔ اور سٹیٹ کے معاملات جو کہ میرا حق بنتا ہے دیا جائے۔

اس کا پوسٹ ٹیگ نہیں ہے۔ جو اس میں واضح ہے۔ اس کا پوسٹ ٹیگ ہونا چاہئے۔ اس کا پوسٹ ٹیگ نہیں ہے۔

Para - 6 :- اسی خالی پوسٹ پر اس وقت سے یہی اس وقت کے حساب سے میرا درخواست کیا جائے تاکہ انصاف کے تقاضے پورے ہو اور میرا حق تلفی کا ازالہ ہو۔

Para 7 :- جب میرا پھر ووشن اس خالی پوسٹ پر ہوا تو سب سے پہلے 10 پوسٹ پر ٹیوٹک جیک میرا خراب احوال تھا۔ پوسٹ پر 10 اور ابھی 9 پر ہیں۔ مجھے اندھیرے میں آگیا تھا۔ بے ضمیر آگیا تھا۔ پرو ووشن سیکشن والے میرے حق تلفی کا ازالہ کرے۔

Para 8 :- میرا ساتھ تو نا انصافی یہ ہوئی ہے کہ 1999 میں سیکس 12 سے محروم آگیا۔ فور سیکس 17 BP 5/2012 کی بجائے 2/2017 کو ملا ہے۔ 5 سال لیڈ ملا ہے۔

اور 5/2018 کو فور فائنڈ اور فٹن اس سے بیمار لے لے سیکس 18 BP کی لیڈ منظور دی گئی ہے۔ میرا تھلی قابلیت BSc (Hons) میں ہے۔

اور سیکس 18 BP کے جس سارے کاغذات جمع کیے ہیں ابھی میں ریٹائر ہوئے والا ہوں لیکن وہ 18 BP کے بھی نہیں ملا ہے جو کہ میرا حق بنتا ہے۔

اولے سے عطا ہونے اور سروس (Service Structure) کے مطابق میرا حق بنتا ہے کہ Sr-PHC Technologist

کو ترقی دیا جائے جو کہ سالوں سے خالی پڑے ہیں۔ جیک لے سارے کاغذات جمع ہیں۔

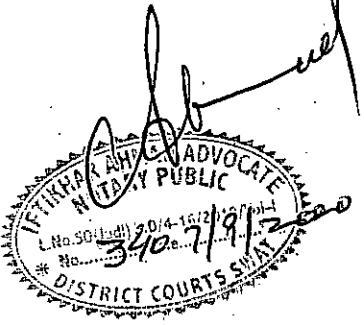
(جواب اطوار 2 صفحات پر مشتمل ہے)

(3)

یہ

سید عابد اقبال ایڈووکیٹ

بیان حلفی
حلفاً بیان کیا کہ مجھ
مراٹب جو اطوار دوست ۱۹۱
ص ۶ پ ۶



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(2)

ANNEX A-1

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(4)

DIRECTORATE GENERAL HEALTH SERVICES NWFP PESHAWAR.

G.I.F. No. _____

Mr. Wali Muhammad Medical Technician BHU Gwalerzai (District Swat) is hereby allowed to forgoe his promotion as BMT permanently on his own request.

27/12/99
DIRECTOR GENERAL HEALTH SERVICES NWFP PESHAWAR.

No 40232 /B.III

Dated 27 /12/99.

Copy forwarded to the District Health Officer Swat for information with reference to his letter No. 22293/P.5 dated 19/11/99.

27/12/99

Mr. H
CIC

(3)

ولی محمد علی صاحب کی پوسٹ میں 12 خود کین لیا گیا۔
اس کی Documentary ثبوت ہے جو
درخواست لیا گیا ہے۔ یہی عالی پوسٹ
پر مبرا حق بنایا ہے۔ کیونکہ مبرا نے 11 واں کلاس
میں پوسٹ دس لیا ہے۔

Medical Technician.

No.	Name of Official	Father Name	Domicile	Date of Birth	Date of Joining Service on Regular Basis As:			Place of Present Posting.	Date of Retirement.	Whether appointed/Adjusted against the original post or otherwise.	Remarks.
					A	B	C				
1	Syed Abid Iqbal	Kachkol Pacha	Dir Lower.	8/10/1959	23/2/1982			BHU Mayar	7/10/2019		BSc MT. HEALTH
2	Zahid Hussain	Umar Muhammad	Dir Lower.	3/2/1958	1/3/1982			BHU Osakai	2/2/2018		Diploma
3	Nek Muhammad	Sarfaraz Khan	Dir Lower.	18/01/1952	18/03/1982			BHU Nasafa	17/01/2017		Post Graduate Diploma
4	Jan Muhammad	Nowshad Khan	Dir Lower.	17/11/1961	25/06/1983			BHU Pingal	16/11/2021		
5	Qasim Hussain	Rahmat Hussain	Dir Lower.	9/11/1958	20/12/1982 (Comp)	17/1/1983 HT		BHU Toormang	8/11/2018		
6	Ihsan Ullah	Amir Khaliq	Dir Lower.	15/01/1960	12/2/1984			BHU Ramora	14/01/2020		
7	Aziz-ur-Rahman	Bahadar Khan	Dir Lower.	16/05/1959	17/02/1984			BHU Kakas	15/05/2019		Diploma.
8	Khaista Irshad	Amiran Said	Dir Lower.	1/5/1965	18/03/1985			BHU Asegai	30/05/2025		
9	Aziz-ur-Rahman	Momin Khan.	Dir Lower.	5/2/1957	10/4/1979 (Comp)	22/09/1985 HT		BHU Ouch	4/2/2017		
10	Muhammad Nazir	Fazli Rashid	Dir Lower.	1/1/1965	12/10/1985			BHU Banda Talash.	31/12/2025		
11	Rafi Ullah	Juma Khan	Dir Lower.	4/1/1952	10/11/1970 (Comp)	13/10/1985 HT		BHU Tavda China	3/1/2012		
12	Jamil Ahmad	Muhammad Saeed	Dir Lower.	15/01/1966	6/2/1986			RHC Gul Abad.	14/01/2026		
13	Sher Bahadar	Abdur Razaq	Dir Lower.	1/3/1959	6/3/1986			BHU Makhai.	28/02/2019		
14	Sadat Khan	Akbar Said Khan	Dir Lower.	25/06/1964	6/3/1986			BHU Nasaf	24/06/2024		Diploma

Allexis

6

BIO DATA.

S. NO.	FATHERS NAME	PRESENT DESIGNATION,	PRESENT BPS.	QUALIFICATION.	DATE OF JOINING SERVICE	PRESENT STATION.	DATE OF BIRTH HOME DISTRICT.	DATE OF RETIREMENT.
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Mr. Abid Iqbal. Mr. Kadir Hussain. Medical Tech: 925-12 3-A 29.2.82 BHU 5.10.1959. 2019. Quah.

DISTRICT HEALTH OFFICER,
DHS AT TIMERGARA.

Handwritten signature and initials

OFFICE OF THE DISTRICT HEALTH OFFICER DIR AT TIMERGARA.

NO DISCIPLINARY ACTION CERTIFICATE.

1. This is certified that neither any disciplinary/Departementa-
-al proceeding/Anti Corroption cases judicaill enquiry
was pending against the official on the date, the promotion
was due nor any penalty was imposed on him under the relev-
-ent rules during the procceding five years.

[Signature]
District Health Officer,
Dir at Timergara

2. This is certified that the official was actually serving
in this parent department on the date the promotion was
due. Further that he was neither on long leave nor under
suspension, nor on deputation abroad nor posted to an
excadre post abroad on the date on which promotion was due.

[Signature]
District Health Officer,
Dir at Timergara

3. This is certified that the official who is otherwise
considered fit for promotion to the higher grade is recomm-
-ended for promotion from BPS-11 to BPS-12 as he cannot
be promoted for want of vaccancy.

[Signature]
District Health Officer,
Dir at Timergara

4. This is certified that the official concerned is a regular
member of the cadre/Service and is eligible for the ps
promotion.

[Signature]
District Health Officer,
Dir at Timergara

بعدالت خیر متوکوا ۵ سرسوار پولیما لورٹ سدوش سوات

قیمت ایک روپیہ	کورٹ فیس
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۵۲ لوجہ ۲۰۱۸ منجانب اپیلٹ

سید عابد امیال بنام گورٹ

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی وجواب دہی وکل کاروائی متعلقہ آن مقام مندرجہ سوات سید صاحب علی ایدوٹیٹ ہائی کورٹ مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی براءد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا ملزار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

۲۰۱۸

۵۲ لوجہ ماہ

المرقوم

العبد گواہ شد العبد
بمقام مندرجہ سوات

ATTESTED
Sajid Ali
by Advocate

"B"

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

TB

No.

Appeal No. 1474 of 20¹⁸.

Syed Abid Iqbal Appellant/Petitioner

Versus

Secy. Health K.P.K Respondent

Respondent No.

Notice to: -

Director General Health Services Govt. of
K.P.K Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier 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 12-6-2019 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 10/6

Given under my hand and the seal of this Court, at Peshawar this
Day of May 20¹⁹.

at Camp Court Swat

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

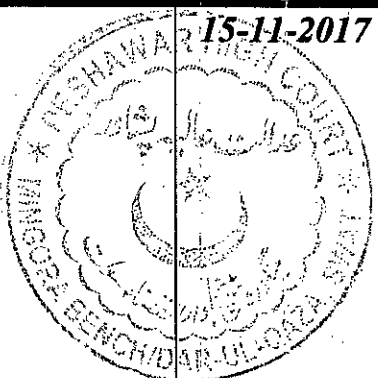


Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

Court of مجلس دارالافتاء

Case No. of

Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.
 <p>15-11-2017</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Certified to be true copy</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">EXAMINER</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Peshawar High Court, Mingora Bench, Dar-ul-Qaza, Swat</p>	<p><u>W.P No. 393-M/2016</u> <u>With Interim Relief</u></p> <p>Present: <i>Petitioner in person.</i></p> <p><i>Mr. Rahim Shah, Asstt:A.G for the respondents.</i></p> <p>*****</p> <p>QALANDAR ALI KHAN, J:- Being a matter relating to terms and condition of service of the petitioner, who is admittedly a civil servant and his grievance relating to promotion falls within the domain of Khyber Pakhtunkhwa Service Tribunal, the petitioner would not press the instant writ petition; and would seek his remedy available to him in the proper forum.</p> <p>The writ petition is disposed of as not pressed.</p> <p><u>Announced</u> <u>Dt: 15.11.2017</u></p> <p style="text-align: right;">  JUDGE </p> <p style="text-align: right;">  JUDGE </p> <p>S.No. <u>6414</u></p> <p>Name of Applicant <u>میر علی احمد</u></p> <p>Date of Filing <u>15.11.17</u></p> <p>Date of Hearing <u>28.11.17</u></p> <p>No of Pages <u>2P</u></p> <p>Legal Fee <u>4/-</u></p> <p>Fee Charged <u>4/-</u></p> <p>Date of Delivery of Copies <u>28.11.17</u></p>

Peshawar High Court, Mingora Bench, Dar-ul-Qaza, Swat

28/11/17

7/16/11/17