

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR,**

**DIKHAN CAMP.**

**In STA No. 1315/2013**

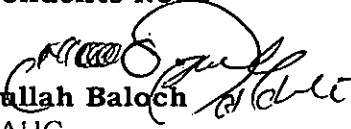
Muhammad Riaz                      VERSUS                      Govt. of KPK etc

**INDEX**

<b>S.No.</b>	<b>Description of document</b>	<b>Annexure</b>	<b>Pages</b>
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2.	Copy of order dated 10/06/2013	--	-- 12

Dated: 10/09/2018

  
**Counsel for respondents No. 5**

  
**Muhammad Abdullah Baloch**  
Advocate Baloch AHC

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR,**

**DIKHAN CAMP.**

**In STA No. 1315/2013**

Muhammad Riaz                      VERSUS                      Govt. of KPK etc

**AMENDED WRITTEN REPLY ON  
BEHALF OF RESPONDENTS NO. 5  
(YASIR HABIB).**

*Respectfully Sir;*

Parawise comments/reply on behalf of respondents 5  
are as under:-

**PRELIMINARY OBJECTIONS**

- a. That appellant has got no cause of action and locus standi in the matter.
- b. That appeal is time barred. Appeal is silent as when appellant made departmental representation and when he filed present appeal. As departmental representation of the appellant had been decided. Appeal is not supported by any application for condonation of delay. Appeal is not competent in form as drafted.
- c. That appellant is estopped by alleged representation as neither promotion nor promotion order has been impugned/challenged in the said representation. The appellant is under bar to raise such controversy in his appeal.

*By  
Chahal*

- d. That appeal is bad for mis-joinder and non-joinder of parties.
- e. That appellant is overage.
- f. That appeal is not supported by any affidavit and appellant has not affixed court fee with the appeal. Appeal is liable to be dismissed.
- g. That appeal is not supported by any affidavit and appellant has not affixed court fee with appeal, hence, the appeal is liable to be dismissed.
- h. That the appellant has not come to the court with clean hands, appellant has neither challenged any seniority list previously nor the present list which were submitted before honourable Peshawar High Court and promotion order of respondent No. 5 is based on the decision of worthy High Court.
- i. That after getting knowledge that the seniority list and promotion matter of class-IV employees of PHSA are pending before worthy Peshawar High Court Peshawar the appellant should have joined the proceedings in HC. He has been slept over since long and now challenged the seniority list. On this score also the instant appeal is liable to be dismissed.
- j. That the appeal is time barred as the appellant has not challenged seniority list of 2007.

**REPLY ON FACTS**

1. The Para is not related to answering respondent.

*All  
Advocate*

2. That Para No. 2 relates to record. However, Burdon lies upon appellant.
3. That Para No.3 relates to record. However, burden lies upon appellant.
4. Correct. The answering respondent was eligible, fit and competent for promotion as he is S.S.C and possesses computer skill. Copy whereof is also Annexed with previous reply :
5. That appellant has concealed true facts. The PHSA is attached department with Health department. PHSA was declared as attached department vide Notification No. SO (O and M)s and GAD/2-68/99 dated 31.08.1999. (Also annexed as Annexure-B). As attached department, a separate directorate was established for PHSA headed by its own director amending the rules of business 1985 dated 31 August, 1999. PHSA as an attached department pertains the affairs and conduct of 05 DHDC, 09 Nursing schools, 03 Paramedical institutes (PIMI), 04 Public health schools, 01 PGPI, 01 PGCN.(Copy of organogram is also annexed as Annexure-C with previous reply). The appellant was transferred to Distt: TB control office D. I.Khan vide DDHS O.O No. &075-81/E-11 dated 21.05.1997. according to rules his service book was also sent to TB control office which is not attached office of PHSA. Appellant was also granted move over From BPS-01 to 02 in TB control office in 1998. Till March 2000, the appellant remained there and could not be considered an employee of PHSA. During this period list of staff of PHSA of D.I.Khan was sent to PHSA. In the year 2011, some servants. of PHSA knocked the door of Honourable Peshawar High court in writ petition No. 1713/2011 and 3751/2010 wherein some of the final seniority lists were presented and to resolve the controversy once for all, the PHSA departmental committee issued various promotions

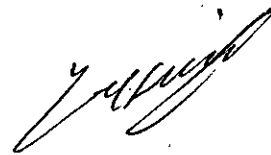
*AR  
Attachments*

order and promotion order No.3010-28 dated 09.05.2013 was one of those. Consequently writ petitions were disposed off accordingly. Copies of writ petitions and final seniority lists are also attached.

6. Incorrect in Toto. Hence denied. Detailed reply has been given in Para No. 4. More so, appeal is not competent in its present form as is badly time barred.
7. No need to reply. That, in furtherance, amended written reply from respondent No. 5 is being submitted. However, all the relevant documents in support of respondents version have already been placed on file through already submitted written reply of respondent No. 5.

#### GROUND-WISE REPLY

1. Incorrect. Appellant is overage and due to his absence from PHSA, his name was not included in list.
2. Incorrect. Not related to answering respondent.
3. Incorrect in Toto, hence not admitted. Higher qualification is not the rule of preference.
4. Incorrect, hence denied. Detailed reply above may please be reiterated. The petitioner has approached the wrong forum as the matter relates to factual controversy.
5. Need no reply.



Your humble  
Respondent No.5

Through Counsel  
Muhammad Abdullah  
Saloch B.A.C.

10/8/18

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR,****DIKHAN CAMP.****In STA No. 1315/2013**

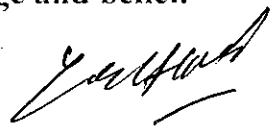
Muhammad Riaz

VERSUS

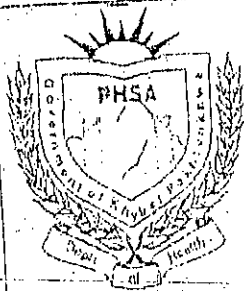
Govt. of KPK etc

**VERIFICATION**

Verified that all the contents of the amended reply  
are true and correct to the best of my knowledge and belief.

Date: 10 /09/2018  
Respondent No.5

20  
A. A. Khan  
M/S  
9



## Provincial Health Services Academy

Department of Health  
Government of Khyber Pakhtunkhwa  
Budhni Road Duranpur Peshawar  
☎ 0912650861 / 2264718; Fax: 0912261249 / 2264717  
E-mail: [info@phsa.edu.pk](mailto:info@phsa.edu.pk)  
Website: [www.phsa.edu.pk](http://www.phsa.edu.pk)

Annex-1  
P2

No. F-28/Admn./SON-DIK/2011-12/3664

Dated: 10/06/2013

To


The Vice Principal  
Public Health School DIKhan

Sub: APPLICATION AS JONIER CLARK.

Memo,

With reference your letter No.152/PHS DIK dated.17-05-2013 on the above noted subject.

You are hereby directed that inform the official concerned that the old seniority list of Class-IV employees were subjudiced in Peshawar High Court Peshawar. The seniority list of Class-IV employees of PHSA and its net work will be issued and circulated to all sub offices/PHSA net work for information.

  
DEPUTY DIRECTOR (M)  
PHSA, PESHAWAR.

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BEFORE PESHAWAR HIGH COURT, PESHAWAR

W.P 1713 /2011



1. Khan Bahadar S/O Abdul Hanan  
R/O Kush Maqam  
Tehsil and District  
Nowshera

2. Naeem Ullah Jan S/O Nazeer Jan  
R/O Village Ghuseya lala  
Tarnab Farm  
Peshawar

3. Fayaz Gul S/O Gul Hayat  
R/O Manzoor Abad  
P.O Hargonee, Wadpaga  
Peshawar

4. Javed Khan S/O Niqab Gul Phase V, Block no 2, Near Public Commission  
PGCN Hayatabad, Peshawar..... PETITIONERS

Versus

1. Secretary Health  
Government of Khyber Pukhtoon Khawa  
Peshawar

2. Director  
Provincial Health Services Academy  
Budhni Road Dufan Pur, Peshawar..... RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF  
ISLAMIC REPUBLIC OF PAKISTAN



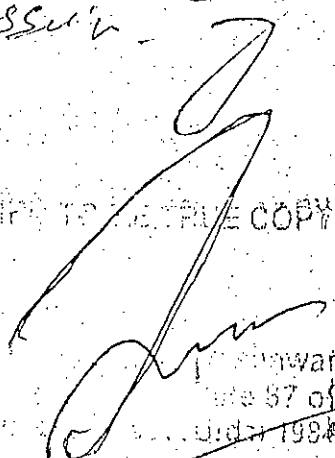
Respectfully Sheweth:

1. That petitioners are the employees of the Provincial Health Services Academy which is an attached department of Health Department. PHSA was declared



PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'  
FORM OF ORDER SHEET.



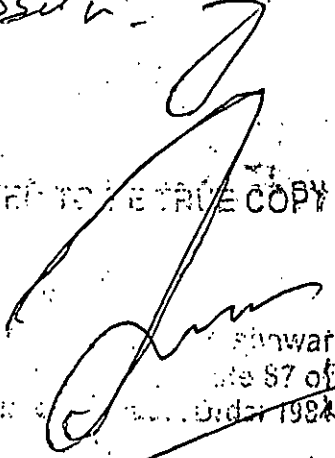
Date of Order	Order or other proceedings with signature of the Judge
1	2
<p>16.5.2013</p>	<p>I.R. (N) with W.P. No.1713/2011.</p> <p><u>Present:</u> Mr.Rehman Ullah Shah, Advocate, for the petitioners.</p> <p>Mr.Obaid Razzak Khan, AAG, alongwith Dr.Fakhr-ud-Din, Deputy Director, Management (BPS-19) Provincial Health Services Academy, Peshawar.</p> <p style="text-align: center;">***</p> <p><u>WAQAR AHMAD SETH, J.</u> - The latter produced the <u>promotion orders</u> of the petitioners which are placed on file and in view of which, this writ petition has become infructuous and disposed of accordingly.</p> <p>Announced 16.5.2013.</p> <p><i>Waqar Ahmad Seth J</i> <i>Malik Mangool Hussain</i></p> <p style="text-align: right;">               JUDGE            JUDGE         </p> <p style="text-align: right;">           CERTIFICATE TO RETRIEVE COPY              Peshawar            Author            The Genl            Peshawar            No 57 of            Order 1984         </p> <p style="text-align: right; font-size: 2em;">20-5-13</p>

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 16/5/13

PESHAWAR HIGH COURT, PESHAWAR.

10

FORM 'A'  
FORM OF ORDER SHEET.

Date of Order	Order or other proceedings with signature of the Judge
1	2
<p>16.5.2013</p>	<p>I.R. (N) with W.P. No.1713/2011.</p> <p><u>Present:</u> Mr.Rehman Ullah Shah, Advocate, for the petitioners.</p> <p>Mr.Obaid Razzak Khan, AAG, alongwith Dr.Fakhr-ud-Din, Deputy Director, Management (BPS-19) Provincial Health Services Academy, Peshawar.</p> <p>***</p> <p><u>WAQAR AHMAD SETH, J.-</u> The latter produced the <u>promotion orders</u> of the petitioners which are placed on file and in view of which, this writ petition has become infructuous and disposed of accordingly.</p> <p>Announced 16.5.2013.</p> <p><i>Sgt Waqar Ahmad Seth J</i> <i>Sgt Malik Mangool Hussain J</i></p> <p style="text-align: right;">               JUDGE                JUDGE         </p> <p style="text-align: right;">             CERTIFIED TO BE TRUE COPY                Peshawar              Author              The Qanun              Order 1984         </p> <p style="text-align: right; font-size: 2em;">20-5-13</p>

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(11)

GOVERNMENT OF N.W.F.P.  
SERVICES AND GENERAL ADMINISTRATION  
DEPARTMENT  
( SERVICES WING)

NO SOB-IV(S&GAD) 4(4)/89-VOL-II

Dated Peshawar the 13.5.1990

- 4857  
20.5.90
- 1) All Administrative Secretaries to Govt of N.W.F.P.
  - 2) Secretary to Governor N.W.F.P.
  - 3) All Commissioners in N.W.F.P.
  - 4) All Heads of Attached Departments in N.W.F.P.
  - 5) All Heads of Autonomous/Semi-Autonomous Bodies in NWFP
  - 6) All Deputy Commissioners/Political Agents in NWFP.
  - 7) All District and Sessions Judges in NWFP.
  - 8) The Registrar, Peshawar High Court, Peshawar.
  - 9) The Secretary Board of Revenue NWFP Peshawar.
  - 10) The Secretary, NWFP Public Service Commission, Peshawar.
  - 11) The Director Anti-Corruption Establishment Peshawar.
  - 12) The Registrar, NWFP Service Tribunal Peshawar.

MEMBERS OF CLASS-IV EMPLOYEES ASSOCIATION N.W.F.P.  
(20% posts for promotion as Junior Clerks from amongst  
the Matriculate Class-IV Employees)

I am directed to refer to the subject noted above  
that in terms of S.NO. 9, column- 5 of the S&GAD's  
Circular No SOB-I(S&GAD)14-7/80 dated 21.12.1982 read with  
the wide notification of even number dated 26.1.1989, the method  
of recruitment prescribed for filling up the posts of Junior Clerks  
in Civil Secretariat, is as under:-

- a) Not less than eighty percent by initial recruitment;
- b) not more than twenty percent of the vacancies by  
promotion from amongst the holders of the posts of  
Dabari, Gestetner Operator, Qasids, Naib Qasids and  
other equivalent posts in the Secretariat, who have  
passed Secondary School Examination and under forty-  
five years of age and have atleast two years service  
on each.

2- On a demand of Class-IV Employees Association, it has  
been decided that all Provincial Government Departments should follow  
the existing rules regarding reservation of 20% posts for promotion as  
Junior Clerks from amongst the Matriculate Class-IV Employees.

I am therefore, to request that the above instructions  
be kindly be-brought to the notice of all concerned for strict  
compliance.

Your obedient servant

( MUKARRAM DAD KHAN )  
SECTION OFFICER(SERVICES-IV)

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st.No. SOS-IV(S&GAD)4(4)/89-VOL-II Dated Peshwar the 13

Copy forwarded for information to:-

- 1- The Private Secretary to Special Assistant to Chief Minister ( Mr. Abdur Razzig Khan) N.W.F.P. with reference to meeting held on 12.2.1990.
- 2- All Section Officers in S&GAD.
- 3- The Estate Officer in S&GAD.
- 4- The P.S. to Secy(s) S&GAD.
- 5- The Inspector S&GAD.
- 6- Supdt. incharge Ben. Mind Cell S&GAD.

*Mukarram Dast Khan*  
 MUKARRAM DAST KHAN  
 SECTION OFFICER (SERVICES-IV)

@ MANZOOR @

*Attested*  
*S*

GOVERNMENT OF NWFP  
SERVICES AND GENERAL ADMINISTRATION  
DEPARTMENT  
(SERVICES WING)

NO.SOS-VI(S&GAD) 4 (4) /89-Vol-II  
Dated Peshawar the 13.5.1990

1. All Administrative Secretaries to Govt. of N.W.F.P.
2. Secretary to Governor N.W.F.P.
3. All Commissioners in N W F P.
4. All Heads of Attached Departments in N.W.F.P.
5. All Heads of Autonomous /Semi-Autonomous Bodies in NWFP
6. All Deputy Commissioners/Political Agents in NWFP.
7. All District and Session Judges in NWFP.
8. The Registrar Peshawar High Court, Peshawar.
9. The Secretary Board of Revenue NWFP Peshawar.
10. The Secretary, NWFP Public Service Commission, Peshawar.
11. The Director Anti-Corruption Establishment Peshawar
12. The Registrar, NWFP Service Tribunal Peshawar.

DEMANDS OF CLASS-IV EMPLOYEES ASSOCIATION N.W.F.P.  
(20% posts for promotion as Junior Clerks from amongst  
the Matriculate Class-IV Employees)

I am directed to refer to the subject noted above may that in terms of S.No.9, column-5 of the S&GAD's Section No SORI(S&GAD) 4-7/80 dated 21.12.1982 read with next vide Notification of even number dated 26.1.1989, the method recruitment prescribed for filling up the posts of Junior Clerks Civil Secretariat, in as under:-

- a) Not less than eighty percent by initial recruitment;
- b) Not more than twenty percent of the vacancies by promotion from amongst the holders of the posts of Daftari Gestetner Operator, Qasids, Naib Qasids and other equivalent posts in the Secretariat, who have passed Secondary School Examination and under forty-five years of age and have atleast two years Service as such.

2. On a demand of Class-IV Employees Association, it has been decide that all provincial Government Departments should follow the existing rules regarding reservation of 20% posts for promotion as Junior Clerks from amongst the Matriculate Class-IV Employees.

I am therefore, to request that the above instructions kindly be brought to the notice of all concerned for strict compliance,

Yours obedient servant

Sd-  
(MUKARRAM DAD KHAN)  
SECTION OFFICER (SERVICES-IV)

BETTER COPY

(13) ~~13~~

Endst. No.SOS-IV (S&GAD)4 (4) /89-VOL-II Dated Peshawar the 13.5.1990

Copy forwarded for information to:-

1. The Private Secretary to Special Assistant to Chief Minister (Mr Abdul Razziq Khan) NWFP with reference to meeting held on 12.2.1990.
2. All Section Officers in S&GAD.
3. The Estate Officer in S&GAD.
4. The P.S. to Secy(s) S&DAD.
5. The Librarian S&GAD.
6. Supdt: Incharge Ben: Fund Cell S&GA)

Sd/-  
(MUKARRAM DAD KHAN)  
SECTION OFFICER (SERVICES-IV)

@ MANZOOR @  
=====

*Mukarram Dad Khan*  
*[Signature]*

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, CAMP AT D.I.KHAN.**

Service Appeal No. 1315 of 2013

**Muhammad Riaz** son of Allah Bakhsh, Naib Qasid/Chowkidar of Public Health School D.I.Khan.

*Appellant*

**VERSUS**

1. **Govt. of Khyber Pakhtunkhwa**, through Secretary Health Department, Peshawar.
2. **Director General** Health Services, Peshawar.
3. **Director**, Provincial Health Services Academy, Budhni Road, Peshawar
4. **Principal**, Public Health School, D.I.Khan.
- ✓5. **Yasir Habib**, Junior Clerk (under Objection), Public Health School, D.I.Khan.
6. **Sahib Jamal** Junior Clerk, Provincial Health Services Academy, Peshawar.
7. **Qader Khan** Junior Clerk, School of Nursing, Khyber Teaching Hospital, Peshawar.
8. **Naeem Ullah Jan**, Junior Clerk, Post Graduate College of Nursing, Hayatabad, Peshawar.
9. **Khan Bahadar**, Junior Clerk, School of Nursing, Lady Reading Hospital, Peshawar.

No.6 to 9, arrayed on the directions of this Honourable Tribunal, and they are care of respondent No.3

*Respondents*

APPEAL UNDER SECTION 4 OF THE K.P.K. SERVICE TRIBUNALS ACT, 1974, (FURTHER) REPRESENTATION AGAINST THE ORDER DATED 09.05.2013 BEARING No.F28 PHSA/ADMN/ PROMOTION 2012-13-3010-28 OF THE RESPONDENT No.3 VIDE WHICH THE RESPONDENT No.5 HAS BEEN UNDULY FAVOURED WITH PROMOTION FROM THE POST OF NAIB QASID BPS-1 TO THE POST OF JUNIOR CLERK BPS-7, THEREBY GIVING UNDUE BENEFIT TO RESPONDENT No.5 AND COEXTENSIVE REPRESENTATION AGAINST THE ACT OF OMISSION OF THE RESPONDENT No.3 WITHHOLDING THE FIRST

REPRESENTATION AND NON-TRANSMISSION OF THE SAME  
VIDE HIS MEMO No.3664 DATED 10.06.2013.

**PRAYER:**

ON ACCEPTANCE OF THE APPEAL, THE IMPUGNED ORDER DATED 09.05.2013 OF THE RESPONDENT NO.3 MAY BE SET ASIDE AND UNDER THE RULE OF SENIORITY-CUM-FITNESS, THE APPELLANT BEING ELIGIBLE FOR THE PROMOTION MAY KINDLY BE FAVOURED WITH PROMOTION TO THE RANK OF JUNIOR CLERK BPS-7 WITH ATTENDANT BENEFITS.

**The appellant, amongst other grounds, respectfully submits as under:**

1. That appellant was appointed as Naib Qasid BPS-01 since 06.10.1990. Copy of the appointment order is enclosed as **Annexure -I.**
2. The appellant has a clean service record.
3. The appellant is F.A. since 1989. Copy of the certificate is enclosed as **Annexure -II.**
4. The respondent was appointed since 28.06.1994.
5. The respondent No.3 made order of promotion of the Junior Naib Qasid BPS-1/Respondent No.5 on 09.05.2013 and the Seniority List is undisputed. Copy of the Seniority List is **Annexure-III** and the impugned order is enclosed as **Annexure-IV.**
6. The respondent No.5 has been unduly pushed ahead and such act of the Respondents No.3 & 4 has caused grievance to the appellant, hence, the instant appeal, which is competent in its present form. Copy of the Departmental Appeal is **Annexure-V.**
7. That in compliance of the directions of this Honourable Tribunal, the respondents No.6 to 9 have been arrayed as respondents and therefore, this amended appeal is being filed.



**GROUND:**

- i. The rule of Seniority-cum-Fitness has been disregarded.
- ii. There is no complaint of unsatisfactory performance of the appellant.
- iii. The Seniority in service coupled with higher qualification (FA) of the appellant has been overlooked.
- iv. The respondent No.5 is matric and his lower qualification had escaped the notice of the Respondent No.3 & 4 which omission is an act of undue favouritism to the respondent No.5.
- v. The appellant's counsel may be permitted to add further grounds afterwards.

It is, therefore, humbly prayed that the instant appeal may graciously be accepted.

Yours Humble Appellant



(Muhammad Riaz)  
Through Counsel

Dt. 22<sup>nd</sup> January, 2018



**Dil Awaiz Baloch**

**Saree-ul-Ehsan Baloch**  
Advocates High Court, D.I.Khan.



22/1/2018

**VERIFICATION:** It is solemnly affirmed that the contents of the appeal are true and correct to the best of my knowledge and belief and the appeal is within time since the date of non-dispatching of the Departmental appeal on 10.06.2013; and also that this amended appeal is being filed on the directions of this Honourable Tribunal.

**AFFIDAVIT:** I, the Appellant, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.

**Deponent**

**Appellant**




Attested

(9)

Annex - I

P(4)

REGIONAL HEALTH DIRECTORATE, DERA ISMAIL KHAN.

OFFICE ORDER.

As desired by the Minister for Health, SW & PW Department, NWFP, in his D.O. letter Extra No. 21(SE)NO dated 4.10.1990, & ~~Extra No. 21(SE)NO~~ the approval accorded by the Departmental Selection Committee Mr. Muhammad Riaz S/O Allah Bakhsh Moh: Wangrigaran wala, D.I. Khan city is hereby appointed as Chawkidar in M.S No. 1, plus usual allowances as admissible under the rules, sanctioned by the Govt: from time to time, for the post offered to him.

His appointment will be subject to the following terms and conditions:-

The post which is offered to him is sanctioned on temporary basis but is likely to continue on year to year basis.

His appointment is purely on temporary basis and is liable to be terminated at any time without any reason being assigned.

That he is domiciled in D.I. Khan Division, N.W.F.P.

If he wishes to resign at any time, he will resign in writing by giving a prior notice of one month and will continue to serve the Govt: till the resignation is accepted by the competent authority and communicated to him in writing.

He will be governed by such rules and orders relating to Pay, T.A., Leave Rules and Medl: Attendance Rules etc as are issued by the Govt: for the category of Govt: servants he belongs.

His appointment will be subject to the Medl: fitness, Satisfactory Character report and production of Domicile Certificate of N.W.F. Province.

If he accept the offer on the above mentioned terms and conditions, he should report for duty to the:- The Principal, F.H. Tech: School, D.I. Khan against newly created post, within one week, from the date of receipt of this offer, failing which the offer will be considered as cancelled.

Sd/-

Divl: Dy: Director Health Services, D.I. Khan Division, D.I. Khan

No. 14507-10/E-G, Dated

D.I. Khan the

10/11/90

Copy forwarded to that:-

- Mr. Muhammad Riaz S/O Allah Bakhsh, Moh: Wangrigaran wala, D.I. Khan,
- Principal, F.H.T. School, D.I. Khan,
- Private Secretary to Minister for Health, SW & PW Deptt: NWFP, Peshawar,
- Account Section, Divisional Health Directorate, Dera Ismail Khan.

for information and necessary action.

Divl: Dy: Director Health Services, D.I. Khan Division, D.I. Khan

A. B. Qureshi

NOMINATION FORM

Attested

ANNEXURE 'A'

I, Mr. Mohammad Riaz Son of Aliah Bakhsh  
of HEALTH Department the Govt. of N.W.F.P.

hereby nominate the person (s) mentioned below, who is / are member(s) of my Family as defined in the West Pakistan Employees Welfare Fund Ordinance, 1969 to receive the assured sum under the Group Insurance Scheme, in the event of my death.

Name & Address of Nominee	Relation-ship	Whether residing with & wholly dependent upon the applicant of this nomination	Proportion of the amount to be paid	If the Nominee Minor, Name to whom payment to be made on his/hers behalf
MST Amman Bibi	"Mother"	Residing with his son.		

ID No: P/12/243/ESS

To be attested by a Gazetted Class I Officer

Signature of Subscriber & His Seal dated \_\_\_\_\_

Attested by

[Signature]  
(Designation & Seal)

Two Witnesses to Signature & Address

1. Mr. Magbool Allah Jutt
2. Mr. Aman Ullah, Pami

*Altaf* (6) (6)

**APPLICATION FOR ADMISSION TO THE GENERAL PROVIDENT FUND**  
(TO BE SUBMITTED IN DUPLICATE)

1. Account No. to be allotted by the Audit Officer: TR 101/P/K/2432/ESS
2. Name of Subscriber: M.A. - Mehaad Raj
3. Father's Name: M. A. Bakht
4. Whether European Anglo/Pakistan or Pakistan National: Pakistan
5. Official Designation: "Chaukeda"
6. Office to which attached: Femal Health Tech. School
7. Whether post is permanent or Temporary or whether applicant is on Probation to a permanent post: Temp
8. If Temporary whether it will last at least, for 3 years?: yes
9. Rate of Salary P.M. (Per month): Rs 600/- P.M
10. Rate of Subscription per month (Rule 7) G.P.F. Rules: Rs. 25/- P.M
11. Whether compulsory or optional subscriber: Compulsory
12. Date of Birth: 15-1-1966
13. If subscriber fund tachment of such fund: \_\_\_\_\_
14. Date of 1st Appointment: 06/10/1970

Station, D. I. Khan.

Sign: of Applicant M. Raj

Signature of the Head of Office [Signature]

Designation \_\_\_\_\_

Office of the \_\_\_\_\_

No. \_\_\_\_\_

Dated\* \_\_\_\_\_

Returned with Account No. allotted. This No. should be quoted in all correspondence connected. A form of declaration is sent herewith which should be returned duly filled in, as soon as possible.

Signature [Signature]

Designation [Signature]

18/11

18/11

No 226590

Roll No. 97688

Annex-II

P 7

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan  
INTERMEDIATE EXAMINATION

Humanities Group  
SESSION 1989 (ANNUAL)

THIS IS TO CERTIFY THAT Mohammad Riaz  
Son/Daughter of Allah Bakhsh  
and a resident of D.I. Khan District.  
Registered No. \_\_\_\_\_ has passed the *Intermediate Examination* of  
the Board of Intermediate & Secondary Education, Peshawar held in July/Aug 1989  
as a *Private candidate*. He/She obtained 479 Marks out of  
and has been placed in Grade  D  Representing Fair

The Examination was taken as ~~whole~~ in parts.

Asstt. Secretary

Medical Superintendent  
Munir Mahmood Memorial  
Teaching Hospital D.I. Khan

Secretary

Attested

(8)

Board of Intermediate & Secondary Education  
PESHAWAR

48688

DETAILED MARKS CERTIFICATE

Intermediate Examination (Humanities Group)

Session 19 89 (Annual) S. No.

P(8)

Attested

Name Muhammad Riaz

Father's Name Allah Baksh

Roll No. 97688

SUBJECT	Total Number of marks allotted	* F	MARKS OBTAINED	
			In Figures	In words
1 English	200		71	
2 Urdu	200		97	
3 Civ	200		81	
4 IS	200		83	
5 U/A	200		91	
6 Islamic Education	50		= 56	479
7 Pakistan Studies	50		479	
Total	1100		Four Hundred and seventy nine	

Note: Errors/omissions excepted

F: Failed in the papers)

Date \_\_\_\_\_ 19\_\_

Controller of Examination  
Board of Intermediate & Secondary Education  
PESHAWAR

Prepared by \_\_\_\_\_ Checked by \_\_\_\_\_

Medical Superintendent  
Muhi Mehmood Memorial  
Dacine Hospital D

9

Roll No. 0459615  
Roll No. 12069

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**  
Peshawar N.W.F.P. Pakistan  
Secondary School Certificate Examination  
SESSION 1984 (ANNUAL)

THIS IS TO CERTIFY THAT  
Son/Daughter of Muhammed Raza  
and a student of Allah Bakhsh High School, No. 5, D.I. Khan

has passed the Secondary School Certificate Examination  
of the Board of Intermediate and Secondary Education, Peshawar held in April 1984

as a regular candidate. He/She obtained 350 Marks out of 850  
and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:  
1. English 3. Islamiyat 5. Pak Studies. 7. Mathematics.  
2. Urdu 4. Physics. 6. Biology. 8. Nil.

He/She has been awarded Grade C on the basis of internal  
assessment by the Institution concerned.

Date of birth according to admission form is Fifteenth January  
one thousand nine hundred and Sixty Six (15-1-1966)

[Signature]  
Asstt. Secretary  
9th August 1984

[Signature]  
Secretary

This certificate is issued without alteration or forgery.

[Signature]  
Medical Superintendent  
M. J. Mehmood Memorial  
General Hospital D.I. Khan

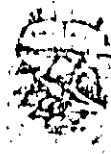
70

10

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Peshawar N.W.F.P. Pakistan  
PROVISIONAL CERTIFICATE

SECONDARY SCHOOL CERTIFICATE EXAMINATION



*Duplicate*

Session 19 *85* Annual/Supplementary

THIS IS TO CERTIFY THAT *Muhammad Bilal*  
 Son/Daughter of *Muhammad Bilal*  
 and a candidate of *Muhammad Bilal*  
 has passed the Secondary School Certificate Examination in the  
 Board of Intermediate & Secondary Education Peshawar held in *1985*  
 as a Regular/Private candidate. He/She obtained *70* Marks out of *100* and has  
 been placed in Grade *1st*

The candidate passed in the following subjects:

1. <i>English</i>	2. <i>Urdu</i>	3. <i>Maths</i>	4. <i>Science</i>
5. <i>History</i>	6. <i>Geography</i>	7. <i>Art</i>	8. <i>Music</i>

Internal Assessment Grade awarded by the Institution *1st*

Date of Birth according to admission form is  
 One thousand nine hundred and *85*

Prepared by *[Signature]*

Checked by *[Signature]*

Date of issue *15/2/85*

*[Signature]*  
 Board of Intermediate and Secondary Education  
 Peshawar

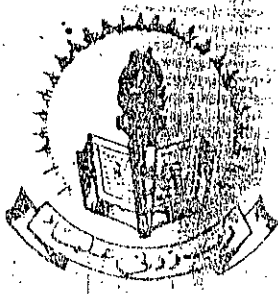
*[Signature]*



(11)  
Attested  
[Signature] (11)

School Adm No. ....

# Government High School No. 5 D. I. Khan



## Character Certificate

I Certify that Mr Muhammad Riabz  
Son of Allaha Babbarh  
Resident of City/Village Chowki Street Dist D. I. Khan  
remained on roll of this School, in Class 10th  
from 1-4-83 to 16-4-84

During his stay in this school he bore a **GOOD MORAL CHARACTER**

He took part in Game Basket Ball ~~Foot Ball~~ Asst  
Activity in which he Participated (1) Scouting Asst  
(2) Nil  
He left the school on 16-4-84

Prepared by A. H. [Signature]  
Headmaster,  
Govt. High School, No. 5,  
D. I. Khan,  
Dated 13-5-84

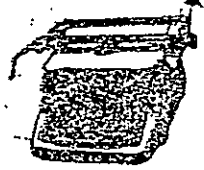
(12)

Roll No ((26)) /BTII/ 90

Date 16.09.1992.

**Bhatti Typewriter**

**Institute**



★ **Dera Ismail Khan** ★  
**CERTIFICATE**

(For Practical Training in Typewriting)



Certified that

Mr. Mohammad Riaz .....

Son of

Mr. Allah Bakhsh.....

and a resident of Mohallah Wingrigran Wala Tehsil and District Dera Ismail Khan.

Has successfully completed the Practical Training in Typewriting From this Institute

on of 01-03-1990.

to 31-05-1990

He acquired the speed of ((THIRTY/30)) EIGHT SEPT,

words per minute

Signature of Trainee [Signature]

Note:- The stability of speed is subject to continuous practice in Typewriting

M A Bhatti

[Signature]  
Principal



1914

Daughter  
born of parents who are permanently domiciled in  
North West Frontier Province having been born / settled in this Province  
Village / Mohallah  
Tehsil D.A. Khan District Dera Ismail Khan

Signature of the applicant  
Muhammad Rizq  
Dated 2/9/14

Pursuance to the declaration filed by  
Mr/Miss Muhammad Rizq son/Daughter Allah Bakhsh

domiciled in North West Frontier Province is hereby certified that the  
said Muhammad Rizq is born of parents who are permanent  
residents of the North West Frontier Province having been born / settled within it.

I have satisfied myself from personal knowledge / verification that the  
above declaration is true and certify accordingly.  
This 2nd day of Sep 1914

*[Signature]*

MAGISTRATE 1st CLASS

COUNTERSIGNED

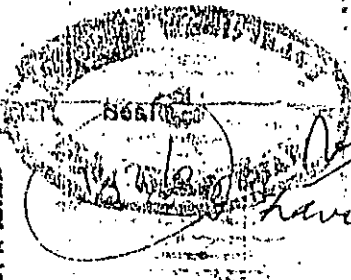
*[Signature]*

DISTRICT MAGISTRATE  
Dera Ismail Khan  
I have verified the contents and attested  
myself on 2/9/14  
Municipal Committee  
D. DEWAN

NO: 10995/HC

dt. 15/9/14 \*Strike out which ever is not applicable

I know Muhammad Rizq son of Allah Bakhsh personally  
He is permanently resident of D.A. Khan  
Azamuddin  
Adviser  
15/9/14



PRINTED AND BOUND BY...

*Attached*  
*[Handwritten Signature]*

FINAL SENIORITY LIST OF CLASS-IV STAFF WORKING IN PHSA & ITS NETWORK

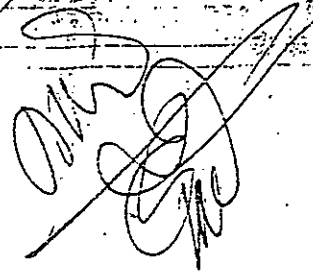
Annex-II

*PGS*

S.N.	FATHER NAME	IPSN	DESIGN	DATE OF BIRTH	EDUC. DE.	DATE OF APPOINT.	DATE OF ARRIVAL IN PHSA	EX. GRADE	PRESNT POSING
1	Mr. Faqir Akbar	02	Chowk	06/07/1960	Swat	01/07/1980	22/07/2000	Matric	SON Swat
2	Muhammad Riaz	02	N/Oasid	01/01/1963	Karak	01/01/1981	25/08/2000	Matric	PHS Karak
3	Muhammad Riaz	02	Cook	13/11/1966	DIRKhan	01/11/1990	07/10/1990	F.A.	PHS DIRKhan
4	Mr. Javed Khan	02	N/Oasid	17/03/1971	Swat	26/01/1991	10/03/2000	Matric	DHDC Swat
5	Mr. Sahib Jamal	02	N/Oasid	06/09/1971	Peshawar	01/05/1992	03/05/1992	Matric	PGCN H/Abad
6	Mr. Yasir Habib	02	N/Oasid	21/10/1971	Peshawar	01/06/1994	01/06/1994	Matric	PGCN H/Abad
7	Shahid Waseem	01	Sweeper	05/04/1976	D.I.Khan	28/06/1994	28/06/1994	Matric	PHS DIRKhan
8	Haji Mohammad	02	Cook	05/03/1971	Abbotbad	25/09/1994	25/09/1994	Matric	PHS ATD
9	Mohammad Sultan	03	Ward Boy	25/10/1975	Peshawar	30/08/1997	27/09/2003	Matric	PGPI FRI
10	Nasim Gulzar Jan	02	N/Oasid	01/05/1974	Manselara	26/09/1998	24/09/2011	Matric	PIMT ATD
11	Mr. Qadir Khan	02	N/Oasid	01/02/1978	Peshawar	26/03/1999	26/03/1999	Matric	SON, HMR
12	Khan Bahader	02	N/Oasid	02/01/1963	Peshawar	21/06/1999	21/06/1999	Matric	PHSA
13	Mulazim Hussain	02	N/Oasid	01/07/1971	Nowshera	23/11/1999	23/11/1999	Matric	PHSA
14	Kishan Chand	01	Sweeper	15/12/1980	DIRKhan	01/01/2000	01/01/2000	Matric	PIMT DIRKhan
15	Shahid Mehmood	02	Bearer	24/01/1984	Swat	12/05/2004	27/12/2005	Matric	SON Swat
16	Mr. Favaz Gul	01	M/Sweeper	14/08/1977	Chitral	01/07/2004	01/07/2004	F.A.	PHS Chitral
17	Mohammad Tariq	02	N/Oasid	23/08/1981	Peshawar	09/03/2005	09/03/2005	Matric	PHSA
18	Munsif Ali	01	N/Oasid	10/04/1985	Mardan	09/04/2007	09/04/2007	Matric	DHDC Mardan
19	Hasham Ali	01	Bearer	15/02/1988	Mardan	25/06/2007	26/06/2007	Matric	SON Mardan
20	Shaukat Ali	01	Chowkidar	01/12/1983	Swat	21/08/2007	21/08/2007	Matric	SON Swat
21	Hafeez-ur-Rehman	01	Chowkidar	02/03/1978	Chitral	23/06/2008	23/06/2008	Matric	DHDC Chitral
22	Shah Faisal	01	Sweeper	12/04/1988	Mardan	21/06/2008	25/06/2008	Matric	DHDC Mardan
23	Hameed Hussain	01	Chowkidar	14/01/1987	Mardan	21/06/2008	27/06/2008	Matric	SON Mardan
24	Riaz Khan	01	Mali	04/04/1989	Peshawar	21/06/2008	21/06/2008	F.A.	PHS N/Abad
25	Masaud-ur-Rehman	01	Chowkidar	12/10/1988	DIRKhan	01/07/2008	01/07/2008	Matric	SON DIRKhan
26	Mohammad Ali	01	Chowkidar	08/03/1982	Swat	05/11/2008	03/11/2008	Matric	SON Swat
27	Mohd Farooq	01	Chowkidar	20/04/1968	Peshawar	06/05/2009	06/06/2009	M.A Arabi	PHS N/Abad
28	Shahid Ali	01	Chowkidar	05/01/1975	Peshawar	13/10/2009	14/10/2009	Matric	PGCN
29	Isamul Khan	01	Mali	02/01/1975	Peshawar	13/10/2009	14/10/2009	Matric	PGCN
30	Rouf Amin	01	Bearer	16/05/1983	Peshawar	13/10/2009	14/10/2009	Matric	PGCN
31	Yasir Ali	01	Cook	03/06/1984	Peshawar	13/10/2009	14/10/2009	Matric	PGCN
32	Waseem Bhatti	01	Chowkidar	27/09/1983	DIRKhan	23/10/2009	23/10/2009	Matric	PIMT DIRKhan
33	Mohammad Usman	01	Chowkidar	29/03/1973	Mardan	24/03/2010	24/03/2010	Matric	DHDC Swat
34	Muhammad Ahmed	01	Sweeper	06/01/1979	Chitral	01/04/2010	01/04/2010	Matric	DHDC Chitral
35	Muhammad Ali	01	Chowkidar	01/11/1984	Kohat	24/04/2010	06/05/2010	B.A.	SON Kohat
36	Hameem Khan	01	N/Oasid	02/01/1967	Peshawar	15/03/2011	15/03/2011	Matric	PHS N/Abad
37	Muhammad Jehan	01	Sweeper	07/03/1985	Mardan	21/03/2011	24/03/2011	F.A.	SON Kohat
38	Yasir Khan	01	Chowkidar	02/03/1978	Peshawar	21/03/2011	21/03/2011	Matric	PHSA
39	Muhammad Ali	01	N/Oasid	03/03/1983	Nowshera	11/07/2011	11/07/2011	Matric	PHSA

*15*

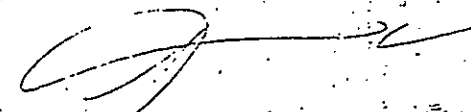
*Attached*



P 16

SENIORITY LIST OF CLASS-IV STAFF WORKING IN PHSA AND ITS ALLIED NETWORK

S. NO	NAME	FATHER'S NAME	B. P. S.	DESIGNATION	DATE OF BIRTH	OF DOMICILE	DATE OF APPOINTMENT	DATE OF ARRIVAL IN PHSA	QUALIFICATION	PRESENT POSTING	STRENGTH
1.	Mr. ✓ Muhamma Riaz	Allah Bakhsh	2	Cook	15/1/1966	Dikhan	6/10/1990	7/10/1990	Maic F.A.	PHS Dikhan	
2.	Mr. Yasir Habib	Habibullah	2	Naib Qasid	5/4/1976 6	Dikhan	28/6/1990 94	30/6/1994	Maic	PHS Dikhan	



PRINCIPAL  
PUBLIC HEALTH SCHOOL  
DERA ISMAIL KHAN

16

17  
After  
D.D.

OFFICE OF THE PRINCIPAL  
PUBLIC HEALTH SCHOOL  
SHEIKH YOUSAF ROAD D.I.KHAN

No. 155

Dated DTK the 07/15/2004

17

To: The Director  
Provincial Health Services Academy  
N.W.F.P. Peshawar.

Subject: PROMOTION.

Memo: Ref: your letter No. 221P-32/M-30/Estt./PHSA  
dated 17-4-2004.

It is for your kind information that there are  
only two grade IV Servants in Public Health School D.I. Khan  
who have qualified differnt Examination. They are :-

1. Mr. Muhammad Rizq (Chowkidar )
2. Mr. Yasir Habib (Naib Qasid)

1. Muhammad Rizq is working as Chowkidar since 10.10.1990

He has passed  
*Science*

1. Matric. (2) P.A. (3) P.T.C. (Primary Teacher Certificate)

1. Typewriting Certificate.

2. Mr. Yasir Habib is working as Naib Qasid from 28.6.1994

He has passed.

1. Matric (2) Technical Training Certificate (3) Typewriting Certificate.

Photo copies of the above Certificats of both Class IV  
Servants are attached for your kind consideration.

J. Ghani  
PRINCIPAL  
PUBLIC HEALTH SCHOOL  
D.I.KHAN.

S.S.  
Mr.  
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(18)

*Attended*

**Provincial Health Services Academy**  
 Department of Health  
 Government of Khyber Pakhtunkhwa  
 Budhni Road Duranpur Peshawar  
 ☎ 0912650861 / 2264718; Fax: 0912261249 / 2264717  
 E-mail: [info@phsa.edu.pk](mailto:info@phsa.edu.pk)  
 Website: [www.phsa.edu.pk](http://www.phsa.edu.pk)

*Annex - IV*

**OFFICE ORDER**

Consequent upon the recommendation of Departmental Promotion Committee held on 03/05/2013 under the Chairmanship of Director PHSA Health Deptt: Khyber Pakhtunkhwa Peshawar, the following Class-IV staff (Naib Qasid) (BPS-01) are hereby promoted to Junior Clerk (BPS-07) with immediate effect in the best interest of public services and posted as mentioned against each.

S.#.	NAME OF OFFICIALS.	FROM.	TO.	REMARKS.
1.	Mr. Salib Jamal ✓	PGCN Hayatabad.	PHSA Peshawar.	Adjusted against vacant post.
2.	Mr. Yasir Habib. <i>P/S</i>	PHS D.I.Khan.	PHS D.I.Khan	Adjusted against vacant post.
3.	Mr. Qader Khan.	PHSA	School of Nursing KTH Peshawar.	Adjusted against vacant post.
4.	Mr. Nadeem Ullah Jan.	PHSA.	PGCN Hayatabad.	Adjusted against vacant post
5.	Mr. Khan Bahader.	PHSA.	School of Nursing, LRH Peshawar.	Adjusted against vacant post subject to the withdrawal of the case or decision of court.

Note: Mr. Kashif Khan Junior Clerk (BPS-07) School of Nursing KTH Peshawar is hereby repatriated to Director General Health Services Khyber Pakhtunkhwa.

*sd -*  
DIRECTOR,

PHSA, PESHAWAR.

Dated 09/05/2013.

*Director*  
*Director*  
*Director*

No.F-28/PHSA/Admn/Promotion/2012/13/30/0-28

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa.
3. Deputy Director, (M) PHSA Peshawar.
4. Deputy Director, (HRD) PHSA Peshawar.
5. Course Director, PHSA Peshawar.
6. Principal, Public Health School DIKhan.
7. Principal, Post Graduate College of Nursing, Hayatabad Peshawar.
8. Vice Principal, School of Nursing, LRH, KTH, Peshawar.
9. Accounts Officer, PHSA Peshawar.
10. District Comptroller of Accounts DIKhan.
11. P.S to Secretary Health Khyber Pakhtunkhwa Peshawar.
12. Administrative Officer, PHSA Peshawar.
13. All concerned officials.

*sd -*  
DIRECTOR

13/05/2013



(19)

Attestation

MW

دانشگاه پشاور اور دیگر تعلیمی اداروں کے طلباء اور اساتذہ کی نمائندگی کے لئے ایک ایسی کمیٹی تشکیل دی جائے جو ان کے مسائل کو حل کر سکے۔

Representation / دیکھ کر عمل لایا / Annex-V P (19)

مقامی سطح پر  
تلاش ہے کہ وہ ساری باتیں جو اسکول میں پیش آتی ہیں  
دسمبر 1990ء کے تقریباً پورا اندازہ لگانے کے لئے  
ایجاد کی جائے۔

یہ کہ ساری سہولتیں اور سہولتیں اسکول میں مل سکیں  
اس کے لئے ضروری ہے کہ صوبہ کو پورا اندازہ لگایا جائے  
دیکھ کر اسکول کی سہولتوں میں کمیوں کو دیکھ کر اسکول  
میں اس کے لئے ایک کمیٹی تشکیل دی جائے۔  
یہ کہ پشاور میں اسکول کی سہولتوں کو دیکھ کر اسکول میں  
ایسی کمیٹی تشکیل دی جائے۔

کسی اور وجہ سے کہ اسکول میں اس کے لئے ضروری ہے  
اس کے لئے ترقیاتی کاموں کو دیکھ کر اسکول میں

OFFICE OF THE PRINCIPAL PUBLIC HEALTH SCHOOL, DERA ISMAIL KHAN.

No. 159 / 1

Dated 23-5-13

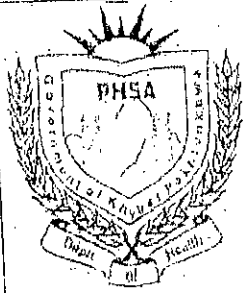
Forwarded in original and recommended the application of the applicant to your goodness for favour of necessary action please.

Copy of the above is forwarded

to Secretary Health Services & P.H.C. Peshawar for necessary action please.

PRINCIPAL,  
PUBLIC HEALTH SCHOOL,  
D. I. KHAN.  
Principal  
Public Health School,  
Dera Ismail Khan

(20) *Affected*  
*M/S*  
*[Signature]*



## Provincial Health Services Academy

Department of Health  
Government of Khyber Pakhtunkhwa  
Budhni Road Duranpur Peshawar  
☎ 0912650861 / 2264718; Fax: 0912261249 / 2264717  
E-mail: [info@phsa.edu.pk](mailto:info@phsa.edu.pk)  
Website: [www.phsa.edu.pk](http://www.phsa.edu.pk)

Annex-VI  
P(20)

No.F-129/Admn./SON-DIK/2011-12/3664

Dated: 06/06/2013.

To:

The Vice Principal  
Public Health School DIKhan.

Sub: APPLICATION AS JONIER CLARK.

Memo,

With reference your letter No.152/PHS DIK dated.17-05-2013 on the above noted subject.

You are hereby directed that inform the official concerned that the old seniority list of Class-IV employees were subjudiced in Peshawar High Court Peshawar. The seniority list of Class-IV employees of PHSA and its net work will be issued and circulated to all sub offices/PHSA net work for information.

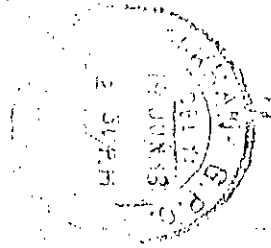
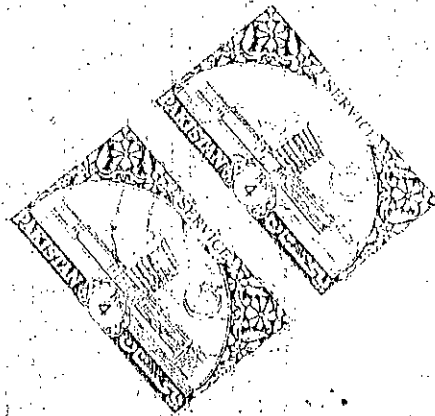
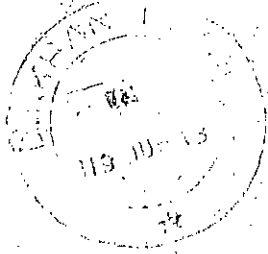
*[Signature]*  
DEPUTY DIRECTOR (M)  
PHSA, PESHAWAR.

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O.P.O.

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Via Principal,  
School of Nursing,  
Deletown Ship D-1-Khan

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# WAKALAT NAMA

(Power of Attorney)



KHYBER PAKHTUNKHWA  
BAR COUNCIL

ADVOCATE HIGH COURT

SAREE UL EHSAN  
Advocate High Court  
bc-12-3357  
Date of Issue: 08-04-2018  
Valid upto: 07-04-2018



KP Bar Council

Before Honorable K.p. Service Tribunal Camp. at D.I. Khan

Muhammad Riaz

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

**Versus**

Govt of K.P.K and others

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

I, Muhammad Riaz  
in the above noted Appeal u/sec 4 K.P.K. Service Tribunal Act  
do hereby appoint and constitute **Saree ul Ehsan, Advocate, High Court,**  
District Bar, DIKhan to appear, plead, act in any Court, in compromise,  
withdraw or refer to arbitration for me as my 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 matter.

Attested & Accepted

Muham. Riaz son of Gulsh Baksh

**CLIENT**

Saree ul Ehsan,

Advocate High Court, New Hall,

District Bar, Dera Ismail Khan

Cell: 0300-579-2794

Mail ID: dilawaizbaloch56@gmail.com

(Appellant)

# WAKALAT NAMA

(Power of Attorney)



KHYBER PAKHTUNKHWA  
BAR COUNCIL

DIL AWAIZ BALOCH  
Advocate High Court  
bc-12-3386  
Date of Issue: 09-04-2018  
Valid upto: 07-04-2019



ADVOCATE HIGH COURT

Before Honorable K.P. Service Tribunal Camp, at D. I. Khan

Muhammad Riya

- (Petitioner)
- (Plaintiff)
- (Applicant)
- (Appellant) ✓
- (Complainant)
- (Decree Holder)

**Versus**

Gort. of K.P.K. and others

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

I, ..... Muhammad Riya ..... Act  
in the above noted ..... Appeal v/Sec. 4 K.P.K. Service Tribunal  
do hereby appoint and constitute Dil Awaiz Baloch, Advocate, High Court,  
District Bar, DIKhan to appear, plead, act in any Court, in compromise,  
withdraw or refer to arbitration for me as my 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 matter.

Attested & Accepted

22/01/2018

**Dil Awaiz Baloch,**

Advocate High Court, New Hall,  
District Bar, Dera Ismail Khan  
Cell: 0300-909-0810  
Mail ID: dilawaizbaloch56@gmail.com

Muhammad Riya 40 Allah Bakh

**CLIENT**

(Appellant)

✓ Riya

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR CAMP AT D.I.KHAN.**

**In Service Appeal No.1315 of 2013**

**Muhammad Riaz VS. Govt. of Khyber Pakhtunkhwa etc**

**REJOINDER TO THE COMMENTS OF  
RESPONDENT NO.5**

**RESPECTFULLY SHEWETH,**

Appellant humbly submits the following reply to the comments of respondent No.5.

**Preliminary Objections:**

- A.** That the para No.a is incorrect. The appellant has got the cause of action and locus standi as he, being senior-most & eligible for promotion, has been deprived of his vested rights.
- B.** Incorrect. The appeal of appellant is well within time.
- C.** Incorrect and misconceived thus denied. Service appeal is fully competent in its present form.
- D.** Incorrect. All the necessary parties have been arrayed.
- E.** Incorrect, misconceived and thus denied. Age factor cannot be involved in the matters relating to promotion of an employee.
- F.** Incorrect. Appeal is duly supported by Affidavit and duly verified and required court fee has been annexed further court fee, if required, will be affixed per direction of this Honourable Tribunal. However, reply/comments of respondent No.5 are not supported by Affidavit.
- G.** Incorrect. Reply as above Para-F.

- H.** Incorrect, misconceived and thus denied. Departmental record and previous Seniority List, which is already Annexure-III with the Service Appeal, the appellant is senior than respondent No.5.
- I.** Misconceived and thus vehemently denied. Neither the Appellant nor respondent No.5 were parties to the Writ Petition before the Honourable Peshawar high Court, Peshawar. Moreover, the Writ Petition No.1713/2011 was disposed off being infructuous and was not decided on merits; thus, the same cannot create any binding effect upon rights of appellant or respondent No.5.
- J.** Incorrect and misconceived. Respondent No.5 has not challenged the latest seniority list (Annexure-III) accordingly to which the appellant is senior.

**PARA-WISE REPLY ON FACTS:**

**Para No. 1.** Needs no reply.

**Para No. 2.** Needs no reply

**Para No. 3.** Needs no reply.

**Para No. 4.** In this Para the respondent No.5 has admitted the date of his appointment, which is much later than that of the appellant and as such seniority of appellant has been admitted. SSC and computer skill cannot override the seniority as, according to law, promotion is awarded only on the basis of seniority; besides, appellant is having higher/FA qualification. Rest of the Para No.4 is therefore strongly denied.

Moreover, reply of respondent No.5 as given in the ground No.3 is contradictory to this para.

**Para No. 5.** This Para is misconceived and therefore, vehemently denied. In the year 2011, final seniority list of Class-IV in PHSA and its network was issued, wherein the appellant has been placed at serial No.3 while the respondent No.5 was placed at serial No.7. Thus, it is very much clear that

appellant is senior to the respondent No.5 in the Seniority List of the year 2011. But later on, official respondents ignored the same and promoted respondent No.5 instead of the appellant and thereby a great injustice has been done to the appellant.

So far as the writ petition No.1713/2011 before Honourable Peshawar High Court is concerned, the respondent No.5 is not a party in the said writ petition and similarly appellant is also not a party to the said writ petition. Moreover, the said writ petition was disposed off being infructuous and was not decided on merits. These facts are clear from the copies so annexed with comments by the respondent No.5. Thus, respondent No.5 cannot derive any rights on the basis of said Writ Petition nor the appellant can be refused his due rights due to the said writ petition. Appellant and respondent No.5 were not parties to the writ petition No.1713/2011 and therefore, writ petition or its final order cannot operate any binding effect upon rights of the appellant.

**Para No. 6.** Incorrect thus, denied.

**Para No. 7.** Misconceived.

**ON GROUNDS:**

**Para No.1.** Incorrect, misconceived and thus denied. in the seniority list of the year 2011 and also as per the list Annexure-III, the appellant is senior than the respondent No.5. Moreover, age factor cannot be involved in the matters relating to promotion of an employee. An employee on the basis of seniority can be awarded promotion just a day before the date of his superannuation.

**Para No.2.** Needs no reply.



**Para No.3.** Misconceived and thus denied. however, this fact is admitted that higher qualification cannot be the rule of preference as only SENIORITY has to be preferred. Para-3 of comments of respondent No.5 is contradictory to the Para No.4 of grounds.

**Para No.4.** Incorrect, misconceived and thus vehemently denied. being a civil servant, appellant has right knocked the jurisdiction of this Honourable Tribunal. Detail reply has already been given in above Paras.

**Para No.5.** No reply.

**It is, therefore, humbly prayed that in the light of above submissions, the Service Appeal may kindly be allowed as prayed for.**

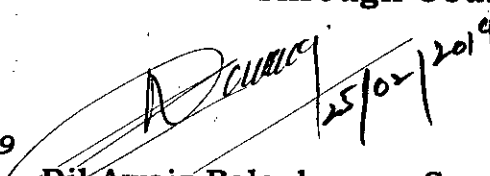
Yours Humble Appellant



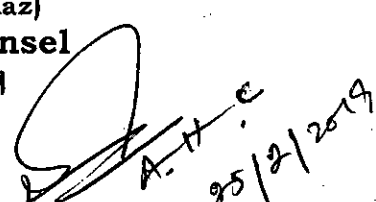
(Muhammad Riaz)

Through Counsel

Dt. 25 February, 2019



Dil Awaiz Baloch



Saree-ul-Ehsan Baloch

Advocates High Court, D.I.Khan.

**VERIFICATION:** It is solemnly affirmed that the contents of the Rejoinder are true and correct to the best of my knowledge and belief and that nothing has been deliberately concealed.



Appellant

**AFFIDAVIT:** I, the Appellant, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Rejoinder** are true & correct to the best of my knowledge, belief & information and nothing has been deliberately concealed from this Honourable Tribunal.



Deponent

**FINAL SENIORITY LIST OF CLASS-IV STAFF WORKING IN PHS & ITS NETWORK 2011**

Sr.	NAME	FATHER NAME	BPS	DISGN	DATE OF BIRTH	DOMICLE	DATE OF APPOINT	DATE OF ARRIVAL IN PHS	QUALIFI	PRESENT POSTING	REMARKS
1	Mr. Fazal Akbar.	Mian Hilal.	02	Chowk.	06/04/1960	Swat.	01/07/1980	29/03/2000	Matric	S.O.N Swat.	
2	Mr. Alam Khan.	Hakim Shah.	02	N/Qasid	06/04/1963	Karak.	30/01/1984	25/08/2000	Matric	DHDC Bannu.	Overage.
3	Muhammad Riaz.	Aliah Isaknsh.	02	Cook.	15/01/1966	DIKhan.	06/10/1990	07/10/1990	F.A.	PHS DIK.	Overage.
4	Ali Rehman	Taza Gul	02	N/Qasid	13/04/1971	Swat	26/01/1991	10/03/2000	Matric	DHDC Swat	
5	Mr. Javed Khan.	Niqab Khan.	02	N/Qasid	06/10/1974	Peshawar.	03/05/1992	03/05/1992	Matric	PGCN II/Abad	Case in court
6	Mr. Sahib Jamal.	Gul Rehman.	02	N/Qasid	21/10/1974	Peshawar.	01/06/1994	01/06/1994	Matric	PGCN II/Abad	
7	Mr. Yasir Habib.	Habib Ullah Malik.	02	N/Qasid	05/04/1976	D.I.Khan.	28/06/1994	28/06/1994	Matric	PHS DIKhan.	
8	Shahid Waseem.	M. Saliman.	01	Sweeper.	05/03/1971	Abbotbad.	25/09/1994	25/09/1994	Matric	PHS ATD.	
9	Haji Mohammad.	Tawab Khan.	02	Cook.	23/12/1969	Peshawar.	30/08/1997	27/09/2003	Matric	PGPI, LRII.	
10	Mohammad Sultan.	Malik Aman.	03	Ward Boy.	23/10/1975	Manshra.	26/09/1998	24/09/2011	Matric	PIMT ATD.	
11	Naeem Ullah Jan.	Nazir Jan.	02	N/Qasid	01/05/1974	Peshawar.	26/03/1999	26/03/1999	Matric	SON, IIMC.	Case in court.
12	Mr. Qadir Khan.	Bader Khan.	02	N/Qasid	04/02/1978	Peshawar.	26/03/1999	26/03/1999	Matric	PHSA.	
13	Khan Bahader.	Abdul Hanan.	02	N/Qasid	02/04/1963	Nowshera	21/06/1999	21/06/1999	Matric	PHSA.	Case in court/overage.
14	Mulazim Hussain.	Shah Nawaz	02	N/Qasid	01/07/1971	DIKhan.	23/11/1999	23/11/1999	Matric	PIMT DIKhan.	
15	Kishan Chand.	Chand.	01	Sweeper	15/12/1980	Swat.	01/01/2000	01/01/2000	Matric	DHDC Swat.	
16	Shahid Mehmood.	Alla Wasaya.	02	Bearer.	24/04/1984	DIKhan.	12/05/2004	27/12/2005	Matric	PIMT DIKhan.	
17	Mr. Fayaz Gul.	Gul Hayat.	01	M.sweeper	14/08/1977	Peshawar.	01/07/2004	01/07/2004	F.A.	PHS.A.	Case in Court.
18	Mohammad Tariq	Misri Khan	02	N/Qasid	28/08/1981	Peshawar	09/03/2005	09/03/2005	Matric	PHSA	
19	Munsif Ali.	Farzand Ali.	01	N/Qasid.	10/04/1985	Mardan.	09/04/2007	09/04/2007	Matric	DHDC Mardan	
20	Hasham Ali.	Sharif Ullah.	01	Bearer.	15/02/1988	Mardan.	25/06/2007	26/06/2007	Matric	SON Mardan.	
21	Shaukat Ali.	Mohd Akbar	01	Chowkidar	01/12/1983	Swat.	21/08/2007	21/08/2007	Matric	SON Swat.	
22	Hafeez-ur-Rehman.	Ubaid Khan.	01	Chowkidar.	02/03/1978	Chitral.	28/06/2008	28/06/2008	Matric	DHDC Chitral.	
23	Shah Faisal.	Wasal Khan.	01	Sweeper.	12/04/1988	Mardan	21/06/2008	25/06/2008	Matric	DHDC Mardan.	
24	Hameed Hussain.	Gul Zamir.	01	Chowkidar.	14/04/1987	Mardan.	21/06/2008	27/06/2008	Matric	SON Mardan.	
25	Riaz Khan.	Janas Khan.	01	Mali.	04/04/1989	Peshawar.	21/06/2008	21/06/2008	F.A.	PHS N/Abad.	
26	Massaud-ur-Rehman.	Shahab-ud-din.	01	Chowkidar.	12/10/1988	DIKhan	01/07/2008	01/07/2008	Matric	SON DIKhan.	
27	Mohammad Ali.	Gulab Shah.	01	Chowkidar.	08/03/1982	Swat.	03/11/2008	03/11/2008	Matric	SON Swat.	
28	Mohd Farooq.	Said Khan.	01	Chowkidar.	20/04/1968	Peshawar.	06/06/2009	06/06/2009	M.A Arabi.	PHS N/Abad.	
29	Shahid Ali	Shoukat A/i	01	Chowkidar.	05-01-1975	Peshawar	13/10/2009	14/10/2009	Matric	PGCN	
30	Ismail Khan	Shahbaz Khan	01	Mali.	02/01/1976	Peshawar.	13/10/2009	14/10/2009	Matric	PGCN.	
31	Rohul Amin.	Mohd Amin.	01	Bearer.	16/03/1983	Peshawar.	13/10/2009	14/10/2009	Matric	PGCN.	
32	Yasir Ali.	Ayaz Khan.	01	Cook.	03/06/1984	Peshawar.	13/10/2009	14/10/2009	Matric	PGCN.	
33	Waseem Bhatti.	Mushtaq Bhatti.	01	Chowkidar.	27/09/1983	DIKhan.	23/10/2009	23/10/2009	Matric	PIMT DIKhan.	
34	Mohammad Usman	Mohd Nawaz	01	Chowkidar.	29/03/1973	Mardan.	24/03/2010	24/03/2010	Matric	DHDC Swat.	
35	Ghafoor Ahmed.	Musharaf Khan.	01	Sweeper.	06/04/1979	Chitral.	01/04/2010	01/04/2010	Matric	DHDC Chitral.	
36	Murtaza Ali	Shafiq Hussain.	01	Chowkidar.	01/10/1984	Kohat.	24/04/2010	06/05/2010	B.A.	SON Kohat.	
37	Hamayun Khan.	Fazal Khaliq	01	N/Qasid	02/01/1967	Peshawar	16/03/2011	16/03/2011	Matric	PHS N/Abad.	
38	Mohammad Jehan.	Sultan Mohd.	01	Sweeper	02/03/1969	Mardan.	21/03/2011	24/03/2011	F.A.	SON Kohat	
39	Noor Khan.	Agha Jan	01	Chowkidar.	02/03/1978	Peshawar	21/03/2011	21/03/2011	Matric	PHSA.	
40	Sirtaj Ali	Umar Khan.	01	N/Qasid.	03/04/1985	Nowshera	11/07/2011	11/07/2011	Matric.	PHSA.	

PHS 12/10/11  
**DIRECTOR**  
 Local Health Services Academy  
 Department of Health  
 Government of Khyber Pakhtunkhwa

PROVINCIAL HEALTH SERVICES ACADEMY

Government Of Khyber Pakhtunkhwa  
Health Department

F-24/PHSA/Admn/S.Lists/2017-18/ 277

Dated: 22/02/2018

To:

- The Principal Public Health School,  
Nishtarabad, Hayatabad Peshawar, D. I. Khan and Abbottabad.
- The Vice Principal School of Nursing,  
LRH, KTH, HMC Peshawar, Kohat, Bannu, D. I. Khan, Swat, ATH Abbottabad &  
Mardan.
- The Principal ZAB PGPI Duranpur Peshawar.
- The Principal, PGCN Hayatabad Peshawar.
- The Principal, PIMTs, Swat, Abbottabad and D. I. Khan.
- The Deputy Directors, DHDCs, Mardan, Swat, Chitral, Abbottabad and Bannu.

Subject: PROVISIONAL SENIORITY LIST OF SSC PASSED CLASS-IV EMPLOYEES OF  
PHSA NETWORK, HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servant Ac, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and Rule 3 of the Khyber Pakhtunkhwa, tentative seniority list of SSC Passed Class-IV Employees as upto 31.12.2017, working under the administrative control of the DG PHSA is hereby being circulated amongst all SSC Passed Class-IV Employees for their information and confirmation about correctness of the entries therein.

In case, any one has any objection with regard to seniority or any other particulars shown in this list, the same may please be communicated to this office for reconsideration and rectification, within one month of the receipt of this communication.

In case of non-receipt of any objection/s within the stipulated time, no representation whatsoever will be accepted and it will be presumed that they have no objection on this seniority list and the same will be considered as FINAL.

Since the establishment of PHSA till date, final seniority lists have never been issued and this Directorate desires to finalize the same once forever.

THE MATTER BE GIVEN TOP PRIORITY PLEASE.

DIRECTOR (HRD)

Cc:

PS to Secretary to the Govt. of Khyber Pakhtunkhwa Health Department for information.

(37)

**TENTATIVE SENIORITY LIST OF SSC Passed CLASS-IV EMPLOYEES OF PHSA NETWORKS,  
KHYBER PAKHTUNKHWA. 06-12-2017**

S #	Name	Father Name	BPS	Designation	Date of Birth / Domicile	Date of Appointt:	Date of Arrival in PHSA Network	Qualific	Present Posting	Remarks
1.	Muhammad Sultan	Malak Aman	4	Naib Qasid	23/10.1975.Abbotabad	26/09/1998	26-09-1998	Matric	PIAT Abbotabad	
2.	Alam khan	Hakim shan	3	Naib Qasid	06.04.1963.Bannu	04.02.1984	31.08.1999	Matric	DHDC Bannu	
3.	Muhammad Riaz	Allah Bakhash	3	Cook	15.01.1965.DIKhan	06.10.1990	31.08.1999	F.A	PHS Di Khan	
4.	Ali Rehman	Taza gul	3	Naib Qasid	13.04.1971.Swat	26.01.1991	31.08.1999	Matric	DHDC Swat	
5.	Muhammad Riaz	Khan Zaman	3	Chowkidar ★	01.10.1974.Abbotabad	01.10.1993	31.08.1999	Matric	SON, HMC	
6.	Shaheed Naseem	M. Saliman	3	Sweeper	05.03.1971.Abbotabad	25.09.1994	31.08.1999	Matric	PHS ATD	
7.	Azam Khan	Gul sher Khan	3	Naib Qasid	18.02.1971.Bannu	17.09.1999	31.08.1999	Matric	DHDC Bannu	
8.	Mulazim Hussain.	Shah Nawaz	3	Naib Qasid	01.07.1971.DIKhan	23.11.1999	23.11.1999	Matric	PIMT D.I.Khan	
9.	Kishan Chand.	Chand.	3	Sweeper	15.12.1980.Swat	01.01.2000	01.01.2000	Matric	DHDC Swat.	
10.	Fazal Akbar	Main Hilal	3	Chowkidar ★	01.07.1960.Swat	01.07.1980	01.03.2000	Matric	SON Swat	
11.	Haji Mohammad.	Tawab Khan.	3	Cook.	23.12.1969.Peshawar	30.08/1997	27.09.2003	Matric.	PGPI, LRH	
12.	Arif Nawaz Khan	Nek Nawaz Khan	3	Cook	01.04.1985.Bannu	07.10.2004	07.10.2004	Matric	SON, Bannu	
13.	Muhammad Tariq	Misre Khan	3	Naib Qasid	23.08.1986.Peshawar	09.03.2005	09.03.2005	Matric	PHS Nishterabad	
14.	Shahid Mehmood.	Alla Wasaya.	3	Bearer.	24.04.1984.DIKhan	12.05.2004	27.12.2005	Matric	PIMT D.I.Khan	
15.	Taslim Arif	Taj Muhammad	3	Cook	20.10.1986.Balagram	01.08.2007	01.08.2007	Matric	DHDC Abbotabad	
16.	Hasham Ali	Sharif Ullah.	3	Bearer	15.02.1988.Mardan	25.06.2007	26.06.2007	Matric	SON Mardan.	
17.	Monsef Ali	Farzand Ali	3	Naib Qasid	10.04.1985.Mardan	09.04.2007	09.04.2007	Matric	DHDC Mardan	
18.	Masood Ur Rehman	Oari Shahab uddin	3	Chowkidar ★	12.10.1988.DIKhan	15.09.2007	15.09.2007	F.A	SON, D.I.Khan	
19.	Muhammad Ali	Gulab Shah	3	Chowkidar ★	08.03.1982.Swat	03.11.2008	03.11.2008	Matric	SON Swat	
20.	Riaz Khan	Janas Khan	3	Malji	04.04.1989.Peshawar	21.06.2008	21.06.2008	F.A	PHSA	
21.	M. Aslam	Islamuddin	3	Bearer	05.04.1964.DIKhan	06.10.1990	22.06.2008	Matric	SON D.I.Khan	
22.	Shah Faisal	Wasal Khan	3	Sweeper	12.04.1988.Mardan	21.06.2008	25.06.2008	Matric	DHDC Mardan	
23.	Hameed Hussain.	Gul Zamir.	3	Chowkidar ★	14.04.1987.Mardan	21.06.2008	27.06.2008	Matric	SON Mardan.	
24.	Hafeez-ur-Rehman	Ubaid Khan.	3	Chowkidar ★	02.03.1978.Chitral	28.06.2008	28.06.2008	Matric	DHDC Chitral.	
25.	Khurram shehzad	M. Alsar Khan	3	Naib Qasid	02.05.1980.Abbotabad	12.11.2008	12.11.2008	Matric	DHDC Abbotabad	

Handwritten signature and date: 9/11

(35)

## TENTATIVE SENIORITY LIST OF SSC Passed CLASS-IV EMPLOYEES OF PHSA NETWORKS,

### KHYBER PAKHTUNKHWA. 06-12-2017

26.	Abdul Waheed	Abdul Aziz	3	Chowkidar *	10.06.1978.Kohat	06.12.2003	12.12.2003	Matric	SON, Kohat
27.	Ismail Khan	Shehbaz Khan	3	Mali	02.01.1976.Peshawar	13.10.2009	14.10.2009	Matric	PHS Hayatabad
28.	Shahid Ali	Shoukat Ali	3	Chowkidar *	05.01.1975.Peshawar	13.10.2009	14.10.2009	Matric	PGCN
29.	Rohul Amin	M: Amin	3	Bearer	16.03.1983.Peshawar	13.10.2009	14.10.2009	Matric	PGCN Hayatabad
30.	Yasir A'	Ayaz Khan	3	Coc	03.06.1984.Peshawar	13.10.2009	14.10.2009	Matric	PGCN
31.	Waseem Bhatti	Mushtaq Bhatti	3	Chowkidar *	27.09.1983.DIKhan	23.10.2009	23.10.2009	Matric	PIMT DIKhan.
32.	Ghafoor Ahmad	Musharaf Khan	3	Chowkidar *	06.04.1979.Peshawar	01.04.2010	01.04.2010	Matric	DHDC Chitral
33.	Murtaza	Shafeeq Hussain	3	Chowkidar *	01.01.1984.Kohat	04.02.2010	04.02.2010	B.A	SON Kohat
34.	Adnan Gori	Yousaf Masih	3	Sweeper	05.08.1982.Peshawar	15.10.2010	18.10.2010	Matric	PHSA
35.	Hamayun Khan	Fazal.Khaliq	3	Naib Qasid	02.01.1967.Peshawar	16.03.2011	16.03.2011	Matric	PHS N/Abad.
36.	Noor Khan	Agha Khan	3	Chowkidar *	02.03.1978.Peshawar	21.03.2011	21.03.2011	Matric	PHSA
37.	Mussafar Khan	Gul Riaz	3	Chowkidar *	02.08.1992.Peshawar	21.03.2011	21.03.2011	Matric	PHSA
38.	M: Jehaz	Sultan M:	3	Sweeper	02.03.1969.Mardan	21.03.2011	24.03.2011	F.A	SON Kohat
39.	Tahir Khan	Rangeen Khan	3	Mali	01.01.1991.DIKhan	06.09.2011	06.09.2011	Matric	SON, DIKhan
40.	Farid Khan	Daulat Khan	3	Chowkidar *	28.03.1967.Peshawar	05.03.1999	18.07.2011	Matric	SON, LRH
41.	Sirtaj Ali	Umar Khan	3	Naib Qasid	03.04.1985.Nowshera	11.07.2011	11.07.2011	Matric	SON LRH
42.	Waqar	Fazal Rabi	3	Naib Qasid	14.08.1992.	01.03.2012	01.03.2012	Matric	PHS Hayatabad
43.	Rashid Ashraf	M: Ashraf	4	Lab Attendant	04.02.1990.Abbottabad	30.04.2012	30.04.2012	FA	PIMT ATD
44.	M: Ayaz Khan	M: Tamas Khan	3	Naib Qasid	03.02.1988.Peshawar	10.03.2012	10.03.2012	FA	PHSA
45.	Haider Hussain	Sher Dullah	3	Bearer	05.05.1976.Chitral	27.12.2012	27.12.2012	Matric	DHDC Chitral
46.	Rasool Shah	Noor Ali Shah	3	Naib Qasid	25.04.1985.Karrak	13.04.2013	13.04.2013	Matric	SON, HMC
47.	Kamran	Fazal Nabi	3	Bearer	01.02.1992.Nowshera	16.04.2013	17.04.2013	Matric	DHDC Mardan
48.	Asif Ullah	Habib Ullah	3	Naib Qasid	06.08.1982.Peshawar	17.05.2013	18.05.2013	B.A	PGCN Hayatabad
49.	Haroon Hussain	Basher Ahmad	3	Naib Qasid	11.01.1988.Peshawar	12.06.2013	14.06.2013	B.Com	PHSA
50.	Syed Manzar Ali Shah	Shahid Shah	3	Chowkidar *	10.04.1987.Mardan	07.08.2013	12.08.2013	F.A	SON, Mardan
51.	Sikandar Saeed Jilani	Ghulam Jilani Asif	3	Chowkidar *	11.05.1985.Peshawar	12.11.2013	12.11.2013	F.A	PHSA
52.	Ghareeb Nawaz	Dost Muhammad	4	Library Attendant	05.09.1979.Abbottabad	30.09.2015	01.10.2015	Matric	SON Abbottabad

Jawid / 9/11

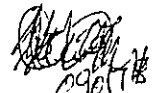
(37)

**TENTATIVE SENIORITY LIST OF SSC Passed CLASS-IV EMPLOYEES OF PHSA NETWORKS,  
KHYBER PAKHTUNKHWA. 06-12-2017**

53.	Muhammad Sadheer	Muhammad Taj	3	Chowkidar	02.04.1989. Abbottabad	30.09.2015	01.10.2015	Matric	PIMT Abbottabad
54.	M. Zahir Shah	M. Ghafoor	3	Naib Qasid	01.04.1984. Swat	25.03.2016	01.04.2015	Matric	PIMT Swat
55.	Ijaz-ul-Haq	Fazal Haq	3	Naib Qasid	11.02.1991. Swat	25.03.2016	01.04.2015	FSc	PIMT Swat
56.	Inamullah	Zahir Rawan	4	Lab Attendant	03.09.1994. Swat	25.03.2016	01.04.2015	FSc	PIMT Swat
57.	Nawaz Hussain	Ayaz Hussain	4	Tube Well Operator	06.10.1995. Swat	25.03.2016	01.04.2015	FSc	PIMT Swat
58.	Akhtar Hussain	Akbar Hussain	3	Sweeper	15.03.1996. Swat	25.03.2016	01.04.2015	Matric	PIMT Swat
59.	Amir Tariq	Tariq Khan	3	Bearer	10.05.1991. Abbottabad	25.03.2016	01.04.2015	B.A	DHDC Abbottabad
60.	Ibad Gul	Shahab Gul	3	Naib Qasid	04.01.1987. Peshawar	08.01.2016	13.01.2015	FA	PHS Hayatabad
61.	Fazal-e-Haq	Fazal-e-Rabb	3	Chowkidar	15.02.1982. Peshawar	08.01.2016	10.01.2015	F.A	SON KTH
62.	/	/		/	/	/	/	/	/
63.	/	/		/	/	/	/	/	/
64.	/	/		/	/	/	/	/	/
65.	/	/		/	/	/	/	/	/

10/12/17  
P.R.  
H.R.

10/12/17  
P.R.  
H.R.

  
DIRECTOR (HRD)  
PHSA, Peshawar.

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 753 /ST Dated 12-4-2019


To,

The Director,  
Provincial Health Services Academy,  
Peshawar.

SUBJECT: - ORDER IN APPEAL NO. 1315/2013, MUHAMMAD RIAZ VS GOVT.

I am directed to forward herewith a certified copy of Order/Judgment dated 26.03.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR

OFFICE OF THE PRINCIPAL  
PUBLIC HEALTH SCHOOL  
SHEIKH YOUSAF ROAD D.I.KHAN.

NO. 155 /PP

Dated D.I.K. the 07/15/2004.

To.

The Director

Provincial Health Services Academy  
N.W.F.P. Peshawar.

Subject:

PROMOTION.

Memo:

Ref: your letter No. 221P-32/M-30/Estt:/PHSA  
dated 17-4-2004.

It, is for your kind information that there are  
only two grade IV Servants in Public Health School D.I.Khan  
who have qualified differnt Examination. They are :-

1. Mr: Muhammad Riaz (Chowkidar )
2. Mr: Yasir Habib (Naib Qasis)

(1) Muhammad Riaz is working as Chowkidar since 10.10.1990

He has passed.

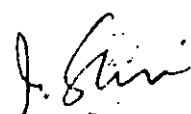
1. Science Metric. (2) P.A. (3) P.T.C. (Primary Teacher Certificate)
- 4) Typewriting Certificate.

(2) Mr: Yasir Habib is working as Naib Qasid from 28.6.1994

He has passed.

1. Metric (2) Technical Training Certificate (3) Typewriting Certificate.

Photo copies of the above Certificats of both Class IV  
Servants are attached for your kind consideration.

  
PRINCIPAL  
PUBLIC HEALTH SCHOOL  
D.I.KHAN.



OFFICE OF THE PRINCIPAL PUBLIC HEALTH SCHOOL DI KHAN.

No. 505/20/PHS/DIK.

Dated: 3/11/2016.

To.

The Director.

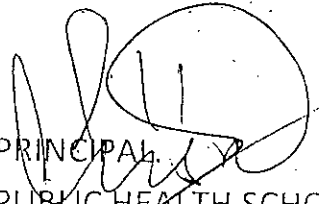
Provincial Health Services Academy  
Peshawar.

SUBJECT. POSTING OF JUNIOR CLERK.

Memo.

I have the honour to state that the two <sup>post</sup> post of Junior Clerk <sup>are</sup> is laying vacant one nursing school, DI Khan. and one post of Public Health school DI Khan. ~~the~~ work of this office is suffering very badly due to vacant Post of junior Clerk. Final Seniority list of Class IV staff has already been issued and at S.NO.3 of seniority list Mr. Mohammad Riaz. Class IV/Cook of this office eligible for the post of Junior Clerk having FA. Qualification as well as domicile holder of DI Khan District. (Copy of Seniority list enclosed for read y reference)

Therefore you are requested to kindly fill the said post of junior clerk by promotion of any class IV on merit basis or advise/guide to this office for filling of the post of junior clerk for smooth functioning/running of official work of Public Health Schjool DI Khan.

  
PRINCIPAL,  
PUBLIC HEALTH SCHOOL  
DERAL ISMAIL KHAN

Provisional Seniority List of Class-IV working in PHSA its Allied Institution

S#	Name	Father Name	BPS	Disgn:	Date of	Domicile	Date of Appointment	Qualifi:	Date of Eligibility of Promotion	Present Posting	Remarks
1	Fazal Akbar	Main Hilal	2	Chowkidar	07/01/1960	Swat	07/01/1980	Metric	07/01/1980	SON Swat	
2	Alam Khan	Hakim Shah	2	N/Qasid	04/06/1963	Bannu	02/04/1984	Metric	02/04/1984	DHDC Bannu	
3	M. Riaz	Allah Bakhsh	2	Cook	15-01-1966	DI Khan	10/06/1990	F.A	10/06/1990	PHS DI Khan	
4	M. Aslam	Islamuddin	2	Bearer	04/05/1964	D.I Khan	10/06/1990	Metric	10/06/1990	SON D.I Khan	
5	Ali Rehman	Taza gul	2	N/Qasid	13-4-1971	Swat	26-1-1991	Metric	26/01/1991	DHDC Swat	
6	M. Riaz	Khan Zaman	2	Chowkidar	10/01/1974	Abbotabad	10/01/1993	Metric	10/01/1993	SON, HMC	
7	Shahid Naseem	M. Saliman	1	Sweeper	03/05/1971	Abbotabad	25-9-1994	Metric	25/09/1994	PHS ATD	
8	M. Sultan	Malak Aman	2	N/ Qasid	23-10-1975	Abbotabad	26-9-1998	Metric	26/09/1998	PIMT Atd	
9	Farid Khan	Daulat Khan	2	Chowkidar	28-03-1967	Peshawar	03/05/1999	Metric	03/05/1999	SON, LRH	
10	Azam Khan	Gul sher Khan	2	N/Qasid	18-2-1971	Bannu	17-9-1999	Metric	17/09/1999	DHDC Bannu	
11	Mulazim Hussain	Shah Nawaz	1	N/Qasid	07/01/1971	D I Khan	23/11/1999	Matric	23/11/1999	PIMT D.I Khan	
12	Kishan Chand	Chand	1	Sweeper	15-12-1980	Swat	01/03/2000	Metric	01/03/2000	DHDC Swat	
13	Haji Muhammad	Tawab Khan	1	Cook	23/12/1969	Peshawar	30/08/1997	Matric	27/09/2003	PGPI, LRH	
14	Arif Nawaz Khan	Nek Nawaz Khan	2	Cook	04/01/1985	Bannu	10/07/2004	Metric	10/07/2004	SON, Bannu	
15	Shahid Mehmood	Alla Wasaya	2	Bearer	24-04-1984	DI Khan	06/05/2005	Metric	06/05/2005	PIMT DI Khan	
16	M. Tariq	Misre Khan	2	N/ Qasid	28-8-1986	Peshawar	03/09/2005	Metric	03/09/2005	PHS Nishtrarabad	
17	Syed Ghalib Hussain	Abid Ali Shah	1	N/Qasid	01/01/1963	Bannu	23-12-2006	Metric	23/12/2006	SON Bannu	
18	Hassan Ali	Sharif Ullah	1	Bearer	15-02-1988	Mardan	25-06-2007	Metric	25/06/2007	SON Mardan	
19	Taslim Arif	Taj Muhammad	1	Cook	20-10-1986	Batagram	01/08/2007	Metric	01/08/2007	DHDC Atd	
20	Shoukat Ali	Mohd Akbar	1	chowkidar	12/01/1983	Swat	21/08/2007	Matric	21/08/2007	SON Swat	
21	Imsef Ali	Farzand Ali	1	N/ Qasid	04/10/1985	Mardan	04/09/2007	Metric	04/09/2007	DHDC Mardan	
22	Masood Ur Rehman	Qari shahab uddin	1	Chowkidar	10/12/1988	DI Khan	15-9-2007	F.A	15/09/2007	SON, DI Khan	
23	Riaz Khan	Janas Khan	2	Mali	04/04/1989	Peshawar	21/06/2008	F.A/ Diploma	21/06/2008	PHSA	
24	Shah Faisal	Wasal Khan	1	Sweeper	04/12/1988	Mardan	21-6-2008	Metric	21/06/2008	DHDC Mardan	
25	Hammed Hussain	Gul Zamir	1	chowkidar	14/04/1987	Mardan	21/06/2008	Matric	21/06/2008	SON Mardan	
26	Abdul Wahid	Abdul Aziz	1	Chowkidar	06-09/1978	Kohat	12/06/2008	Metric	12/06/2008	SON, Kohat	
27	Hafeez Ur Rehman	Ubaid Khan	1	Chowkidar	23/02/1978	Chitral	28/06/2008	Matric	28/06/2008	DHDC Chitral	
28	Muhammad Ali	Gulab Shah	1	chowkidar	03/08/1982	Swat	03/11/2008	Matric	03/11/2008	SON Swat	

*copy*  
*Provisionally*  
*As circulated*  
*18/12*  
