

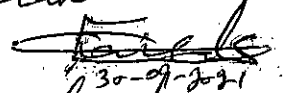
07.07.2021

Appellant present and seeks adjournment as his learned counsel is indisposed today. Adjourned to 30.09.2021 for preliminary hearing before S.B.


Chairman

I Counsel for Appellant withdraw The Instant Appeal as per Instruction of my client to the extent of promotion because the same relief is granted by the Department, however to the extent of seniority etc if it disturbed, Appellant may be Allowed to file a fresh Appeal

Appellant Counsel


30-09-2021

Shah Faizal ilqas Advocate

CNIC # 17201 8581 525-7

cell # 0300 5850207

30.09.2021

Learned counsel for the appellant present.

Learned counsel for the appellant requested for withdrawal of the instant appeal with permission to file a fresh one. In this respect his statement also recorded on the margin of order sheet.

Request is allowed and the appeal in hand is therefore, dismissed, as withdrawn. File be consigned to the record room.

Announced:
30.09.2021



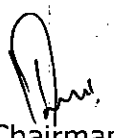


(MIAN MUHAMMAD)
MEMBER(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 15296 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/12/2020	<p>The appeal of Mr. Hazrat Hussain presented today by Mr. Shah Faisal Ilyas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	05.01.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/01/2021</u>.</p> <p> CHAIRMAN</p> <p>Appellant present in person.</p> <p>Requests for adjournment due to indisposition of his learned counsel. Adjourned to 31.03.2021 for hearing before S.B.</p> <p> Chairman</p>
	31.03.2021	<p>Appellant in person present.</p> <p>Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant case is adjourned to 07.07.2021 for hearing before S.B.</p> <p> (Rozina Rehman) Member(J)</p>

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

Service Appeal No. _____/2020

Hazrat Hussain..... **APPELLANT**

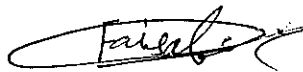
VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal with Affidavit		1-7
2.	Application for Interim Relief with Affidavit		8-10
3.	Addresses of the Parties		11
4.	Copy of the Seniority List	A	12
5.	Copy of the Promotion Order of Respondents No.4 & 5	B	13-14
6.	Copies of Duty Roster and Salary Slips	C	15-17
7.	Copy of Departmental Appeal	D	18
8.	Wakalatnama		19

Appellant
Through



SHAH FAISAL ILYAS

Advocate,
High Court, Peshawar
Cell: 0300-5850207

Dated: 30.11.2020

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

Service Appeal No. 15296 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15786

Dated 01/12/2020

Hazrat Hussain S/o Sardar Hussain

Class-IV, DHQ Hospital, Nowshera. **APPELLANT**

VERSUS

1. Medical Superintendent, District Head Quarter Hospital, Nowshera.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Ikram Jan S/o Muhammad Saleem, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.
5. Naeem Khan S/o Raheem Khan, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.

.....**RESPONDENTS**

Filed to-day

aw
Registrar
01/12/2020

**SERVICE APPEAL U/S 4 OF THE
KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL ACT, 1974.**

Respectfully Sheweth:

Facts giving rise to the instant Service Appeal are as under:-

1. That appellant was appointed as Class-IV in the year 1994 and made arrival well within time and successfully completed two years probation, and till date performing his duty with zeal and devotion, without a single complaint, while respondents No.4 & 5 were appointed in the year 2011 as per seniority list duly signed by respondent No.1. **(COPY OF THE SENIORITY LIST IS ANNEX "A")**.
2. That total sanctioned posts of DHQ, Nowshera of Junior Clerk (BPS-11) are 07 and on 40% promotion quota respondents were legally bound to promote Class-IV to Junior Clerk, keeping in view, seniority-cum-fitness of the employees.
3. That respondent No.1 in disregard of seniority list and in utter violation of Rules, malafidely issued promotion orders of respondent No.4 & 5, despite junior most. **(COPY OF THE PROMOTION ORDER OF RESPONDENTS NO.4 & 5 IS ANNEX "B")**.
4. That the malafide of respondent No.1 is further clarified from the duty roster, wherein till May, 2020, respondents No.4 & 5 drew the salaries of Class-IV and in backdate order of promotion was passed. **(COPIES OF DUTY ROSTER AND SALARY SLIPS ARE ANNEX "C")**.

5. That in order to get the order of promotions, and the concern documents, application was moved to respondent No.1, but the same was not provided after hectic efforts, however was later on collected from different sources.
6. That being aggrieved from the promotion order passed by respondent No.1 in favour of respondents No.4 & 5, appellant moved a departmental appeal on 24.08.2020, vide Diary No.43320, to respondent No.2 but after lapse of 90 days, the same was not disposed off. **(COPY OF DEPARTMENTAL APPEAL IS ANNEX "D")**.
7. That for the same relief, appellant under wrong advice filed a civil suit before Civil Judge too in the year 2018.
8. That the appellant being aggrieved and having no other remedy except to file instant service appeal, inter alia, on the following grounds;

GROUND S:

- A. That the seniority list is prepared on the basis of acquiring requisite qualification, and the Rules of seniority on the basis of seniority in appointment-cum-fitness is violated, thus the act of the respondent No.1 is based on malafide and in violation of Rules.

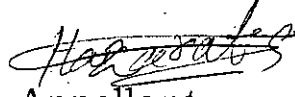
- B. That promotion order of respondents No.4 & 5 being junior to the appellant is illegal, unlawful and without lawful authority, therefore, needs to be set aside.
- C. That Rules of promotion of a civil servant are totally violated, just in order to promote blue-eyed on various considerations.
- D. That act of the respondents by not promoting the appellant is illegal, unlawful, void and ineffective, hence needs interference of this Hon'ble Tribunal.
- E. That the act of the respondents is also against the principles of natural justice, because the appellant is penalized for that wrong, which he has not done.
- F. That the act of the respondents is based on malafide and has been passed in arbitrary manner by bypassing the relevant law and facts on the subject.
- G. That performance of appellant was upto the standard and is entitled to be promoted.
- H. The appellant in his credit has more than 26 years continuous, regular and unblemished service record wherein he was never ever been punished for any disciplinary action.

- I. That no meaningful/ purposeful chance of personal hearing has been afforded to the appellant by the competent authority, so far.
- J. That prior to this, various Departments and Health Department cases had already decided in favour of the employees, thus the appellant is also entitled to be treated equally.
- K. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is, therefore, humbly requested that on acceptance of this Service Appeal;

- i. the promotion order dated 30.11.2019 vide No.7197-7200 and 7192-96 DHQ NSR of respondents No.4 & 5 may graciously be declared as illegal, unlawful, without lawful authority and of no legal effect, and;
- ii. direct respondents to promote appellant to the post of Junior Clerk with all back benefits;

- iii. any other relief, not specifically asked for, which this Hon'ble Tribunal deems fit and appropriate may also be granted in favour of appellant.


Appellant

Through



SHAH FAISAL ILYAS
Advocate,
High Court, Peshawar

Dated: 30.11.2020

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

Service Appeal No. _____/2020

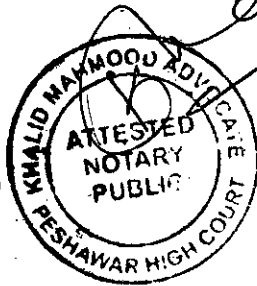
Hazrat Hussain. **APPELLANT**

VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

A F F I D A V I T

I, Hazrat Hussain S/o Sardar Hussain, Class-IV, DHQ Hospital, Nowshera, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Hazrat Hussain
DEPONENT

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

Service Appeal No. _____/2020

Hazrat Hussain. **APPLICANT/APPELLANT**

VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

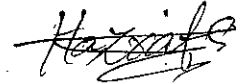
**APPLICATION FOR GRANT OF
INTERIM RELIEF BY RESTRAINING
THE RESPONDENTS FROM MAKING
FURTHER APPOINTMENTS TILL
FILLING THE POSTS AMONGST
PROMOTES UNDER PROMOTION
QUOTA, TILL THE FINAL DISPOSAL
OF THE CASE.**

Respectfully Sheweth:

1. That the above mentioned service appeal is being filed by the applicant/ appellant, in which no date of hearing has yet been fixed.
2. That on the face of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.

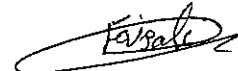
3. That the balance of convenience also in favour of applicant/ appellant.
4. That if the interim relief is not granted, then the applicant/ appellant would sustain an irreparable loss.
5. That grounds of main appeal may be considered as part and parcel of the instant application.

It is, therefore prayed that on acceptance of this application, the interim relief as prayed for in heading of the application may kindly be granted in favour of applicant/ appellant, till the final disposal of the main appeal.



Applicant/Appellant

Through



SHAH FAISAL ILYAS

Advocate,

High Court, Peshawar

Dated: 30.11.2020

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

Service Appeal No. _____/2020

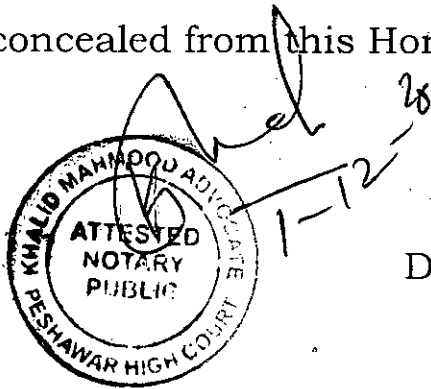
Hazrat Hussain. **APPLICANT / APPELLANT**

VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

A F F I D A V I T

I, Hazrat Hussain S/o Sardar Hussain, Class-IV, DHQ Hospital, Nowshera, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Hazrat Hussain
DEPONENT

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

Service Appeal No. _____/2020

Hazrat Hussain. **APPELLANT**

VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

ADDRESSES OF THE PARTIES

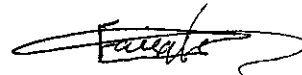
APPELLANT:

Hazrat Hussain S/o Sardar Hussain
Class-IV, DHQ Hospital, Nowshera.

RESPONDENTS:

1. Medical Superintendent, District Head Quarter Hospital, Nowshera.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Ikram Jan S/o Muhammad Saleem, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.
5. Naeem Khan S/o Raheem Khan, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.

Appellant
Through



SHAH FAISAL ILYAS
Advocate,
High Court, Peshawar

Dated: 30.11.2020

12 17

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

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

Medical Superintendent
DHQ Hospital Nowshera



13
**OFFICE OF THE MEDICAL SUPERINTENDENT,
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

OFFICE ORDER

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

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


Sd _____
Medical Superintendent,
DHQ Hospital, Nowshera

Date: 30/11/2019

No. 7187-7200/DHQNSR

Copy forwarded to the:

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


Medical Superintendent,
DHQ Hospital, Nowshera



14

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

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

OFFICE ORDER

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

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

Sd _____
Medical Superintendent,
DHQ Hospital, Nowshera

No. 7192-86 / DHQNSR

Date: 30/11/2019

Copy forwarded to the:

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

C

Medical Superintendent,
DHQ Hospital, Nowshera

	Place of Duty	Morning	Evening	Night
	Supervision	Zulfiqar, Tahir Gul	Haris	Akhtar Gul
01	M/S Office	Fazli Raziq, Hukam Khan, Naeem Khan Umar Zaman	Tariq	
02	Account Section	Waheed, Khaista Ahmad, Awal Khan, Bilal		
03	DMS Office	Niamat Ullah, Gul Zada, Riaz Ahmad, Asiif, Zahid.		
04	Assistant Office	Muhammad, Himad, Mohsin, Awais Ali, Tashfeen		
05	Orthopedic OPD	Zahir Shah, Anis		
06	Skin OPD	Taqueer, Ibrar		
07	Cardiology OPD	Hazrat Hussain, Naveed.		
08	Medical OPD	Junaid . Zakir		
09	Surgical OPD	Sohail, Shahsam Khan.		
10	Eye OPD	Zaib, Irfan.		
11	ENT OPD	Ikram Jan, Safi Ullah, Nouman		
12	Children OPD	Anwar, Diyan.		
13	Psychiatrist OPD	Amir Khatkalay, Shehryar.		
14	Dental OPD	Ishaq. Waqar		
15	Chest OPD	Asad, Ishfaq Ullah		
	Urology OPD	Maaz		
16	Gastroenterologist	Hamad Ali . Shah Fahad		
17	Children Ward	Amir Mumtaz, Waseem Meher . Zahoor	Jamraz Khan Waqar	Rehan, Fayaz Iqbal
18	F Medical Ward			
19	Cardiology Ward			
20	Gynae, FS Ward	Sulman, Zahoor 2, Sajid.	Asad	Hasan, Salman
21	Mali	Nowsherawan, Rajo, Abad Khan, Hamza Khan		
22	Record Section	Waseem Sajjad, imran, Qayum, Safeer		
23	Physiotherapy Unit	Tahir, Misal Khan . Waqas		
24	MS Ward	Sufyan, Bilal, Bacha Muhammad.	Waseem . Meher	Hamza Iqbal, M Farooq
25	HCV Program	Falak Niaz, Khalid Khan.		
26	Ultra Sound	Shahzeb, Khalil-ur-Rehman.		
27	Waste Management	Hamad Amjid, Imran Khan		
28	OT	Rehan, Imran Rauf, Said Ali Shah		
29	Dispensary	Muhammad Ali, Mir Bashar		
30	Laboratory	Shahzad, Fayaz, Hussain, Zulfiqar, Saddam	Imran-3	Bilal, Amir Satar
31	Casualty	Hub Ali , Sabir Islam, Ihtisham 1, Imran Ali Ihtisham 2, Imran Ali, Bakht Munir Tehseen .	Essa Khan, Farzand, Habib Ullah, Shahid, M Amir, Asad, Ismail	Atta Ullah. Haneef . Shad Ali . Aizaz. Awais Qami Muhammad Khalid
32	Main Store	Intikhab Gul, Shah Zaman, Shahab, Jalil		
33	X-Ray Unit	Abdur Rehman, Farzand	Zulqarnain, Saqib Nisar	Daryafat, Iftikhar
34	Labour Room	Miraj, Hamza Khattak, Sherzaib	Aman Ullah	Tayab, Mis:hammad, Saleem
35	Generator & T.Well	Falak Niaz 1, Irfan Wajid, Taimour	Akhtar Nawaz, Asif	Hamad Ali Shah, Asif Iqbal
36	Sunday	Labour Room Kaleem Ullah . , Ihtisham . Bilal Gynae, Hayat Khan Children, Generator & Tubewell Shahid Ali Khan, Majid Iqbal, MSW Awais Khattak, Jamal FSW		
37	Revenue counter	Waqas, Mahmood	Tufail	
39	Ambulance duty	Amir	Asmat	Nauman, Ubaid Khan.
40	Buzerg Shehree	Zaibullah		
41	Laundry	Inam Ur Rehman, Sunny		
42	DHIS	Muhammad Umar		
43	Pharmacist	Zarshaid, Nauman Ali		
44	ECG Room	Akhtar		
45	Try Age	Amjid , Sabir Shah	Aman Ullah	

MEDICAL SUPERINTENDENT,

16

ایکرام

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



Personal Information of Mr IKRAM JAN d/w/s of MUHAMMAD DALEEM

Personnel Number: 00401522 CNIC: 1720162187563

Date of Birth: 04.10.1973 Entry into Govt. Service: 01.03.2008

NTN:

Length of Service: 12 Years 03 Months 001 Days

Employment Category: Active Permanent

Designation: WARD ORDERLI

80814324-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4306-District Headquarter Hospital Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

66,693.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS. 04

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,740.00	1300	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	313.00	2199	Adhoc Relief Allow @10%	221.00
2211	Adhoc Relief All 2016 10%	1,124.00	2224	Adhoc Relief All 2017 10%	1,474.00
2247	Adhoc Relief All 2018 10%	1,474.00	2264	Adhoc Relief All 2019 10%	1,474.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-830.00	3301	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 25,563.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 23,982.00

Payee Name: IKRAM JAN

Account Number: 10550484

Bank Details: UNITED BANK LIMITED, 210120 NOWSHERA CANTT NOWSHERA CANTT.

Leaves: Opening Balance: Aailed: Eamed: Balance:

Permanent Address:

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

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



Personal Information of Mr NAEEM KHAN d/w/s of RAHIM KHAN
Personnel Number: 00588733 CNIC: 1720128135029
Date of Birth: 13.12.1975 Entry into Govt. Service: 08.03.2011

NTN:
Length of Service: 09 Years 02 Months 025 Days

Employment Category: Active Temporary

Designation: WARD ATTENDANT

80814324-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4306-District Headquarter Hospital Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

66,478.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 04

Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	13,420.00	1000	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	277.00	2199	Adhoc Relief Allow @10%	196.00
2211	Adhoc Relief All 2016 10%	1,050.00	2224	Adhoc Relief All 2017 10%	1,342.00
2247	Adhoc Relief All 2018 10%	1,342.00	2264	Adhoc Relief All 2019 10%	1,342.00

Deductions - General

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

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 23,712.00 Deductions (Rs.): -1,581.00 Net Pay (Rs.): 22,131.00

Payee Name: NAEEM KHAN
Account Number:
Bank Details:

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

To:

The Director General,
Health Services,
Khyber Pakhtunkhwa.

Subject: -

APPEAL AGAINST THE ILLEGAL/ MALICIOUS PROMOTION
ORDER ISSUED BY THE MEDICAL SUPERINTENDENT,
DISTRICT HEADQUARTER HOSPITAL NOWSHERA

Respected Sir,

HAZRAT MUSSAZIN

Most respectfully, I -----, Ward Boy, District Headquarter
Hospital, Nowshera hereby submitted the following facts for favourable
consideration and request to set aside the above quoted illegal/malicious
promotion order issued by the Medical Superintendent, District Headquarter
Hospital Nowshera: -

The Medical Superintendent, District Headquarter Hospital
Nowshera has promoted the following two officials from
BPS-4 to BPS-11 in violation of promotion policy 2019,
rules, regulation, procedure and seniority list who stand
junior than this appellatant.

1. Mr. Ikram Jan, Ward Boy.
2. Mr. Naeem Khan, Ward Attendant.

The appellatant was appointed as Ward Orderly BPS-⁰⁵ in
Health Department, Nowshera vide No. ~~263-57~~ dated ~~11/11/11~~ and joined
duty on ~~11/12/11~~ while the other two junior official as listed above were also
appointed in the Health Department, Nowshera vide No. 263-67/Estt:/2007-08
dated ~~02~~ in BPS-1 and vide Office Order No. Nil dated on 8/3/2011 in BPS-1
respectively.

Accordingly both the officials are junior as they have less
service on their credit than the appellatant. However, they were promoted by the
Medical Superintendent, District Headquarter Hospital Nowshera on the basis
of favoritism and nepotism in violation of all established/prescribed rules,
regulation, procedure and seniority as well as merit particularly promotion
policy 2019 as stated above.

Due to this illegal and un-lawful act committed by the
Medical Superintendent, District Headquarter Hospital Nowshera, this
appellatant has been deprived off from his due right which causes irreparable
mental and financial losses. Even this illegal action of the Medical
Superintendent, District Headquarter Hospital Nowshera is against the motive
of the government regarding merit policy.

It is, therefore, requested that the matter may kindly be re-
visited and be given my due right and saved from financial and mental loses.

Thanks.

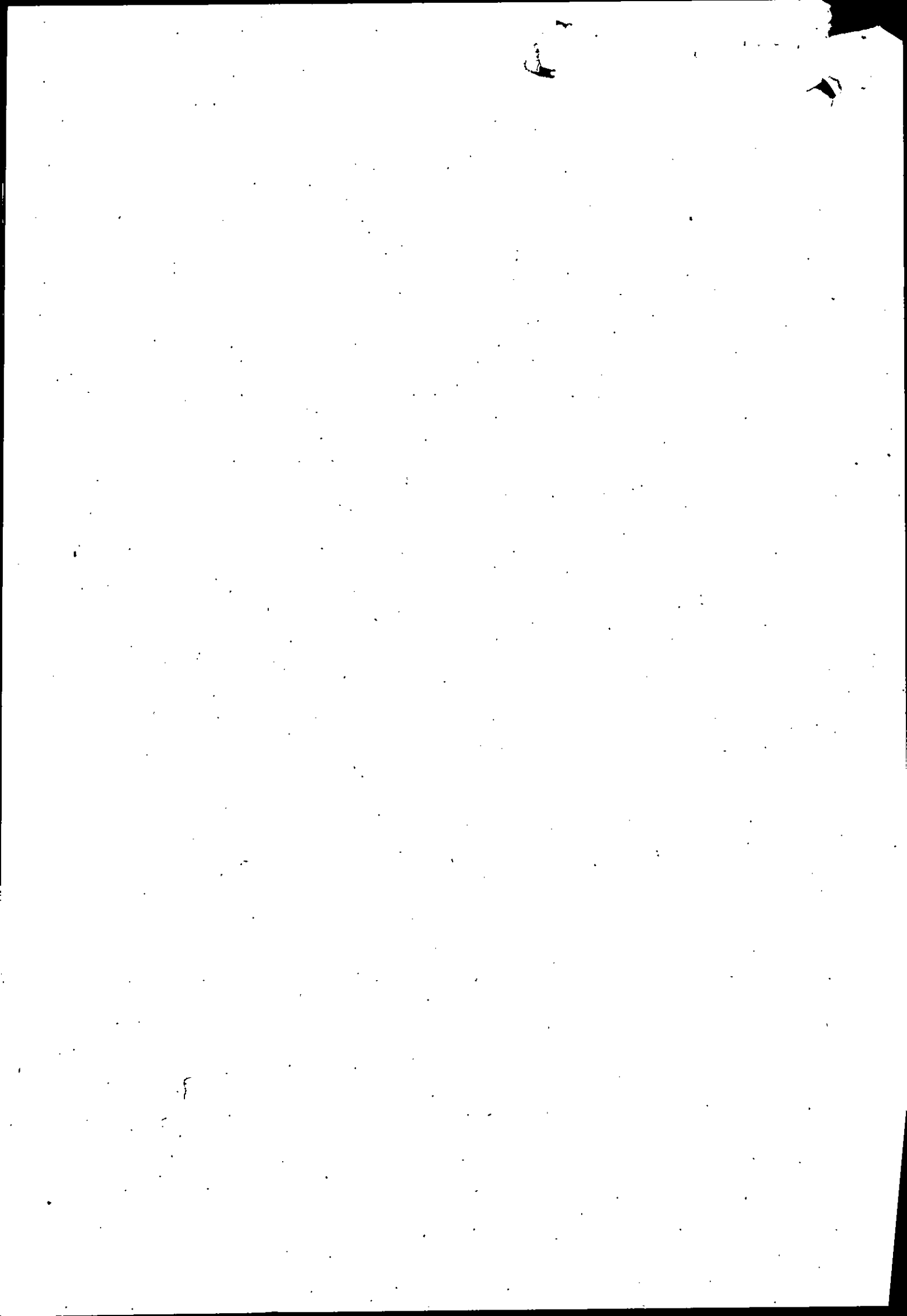
Sincerely Yours

Ward Boy,
DHQ Hospital Nowshera

*Attached all
Photo Copie S. with APPELLANT*

43320

24/8/2020



W A K A L A T N A M A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2020

Hazrat Hussain. **APPELLANT**

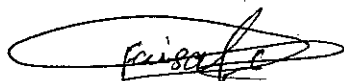
VERSUS

Medical Superintendent,
DHQ Hospital, Nowshera & others. **RESPONDENTS**

I, Hazrat Hussain S/o Sardar Hussain, Class-IV, DHQ Hospital, Nowshera, the appellant in the above noted **Service Appeal** do hereby appoint and constitute **Shah Faisal Ilyas**, Advocate High Court and Federal Shariat Court of Pakistan, to appear, plead, act, compromise, withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, I/we also authorized the said Counsel to file appeal, revision, review, application, and make any miscellaneous application in Criminal/Civil matters or arising out of the matter and to withdraw and receive in my/our behalf all sums and amounts deposited on my/our account in the above noted matter.

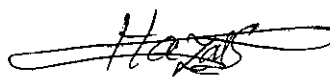
ATTESTED & ACCEPTED

CLIENT(S)



SHAH FAISAL ILYAS
(BC-09-1400)

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Hazrat Hussain

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