


7943/2021

18th Oct., 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Safiullah, Focal Person on behalf of respondents No. 1 to 3 present. Private respondent No. 6 in person present. None present on behalf of respondents No. 4 & 5.

In the preceding order sheet direction was - given to the appellant to submit registered A.D envelopes but he did not submit the same, therefore, notices to respondents No. 4 & 5 could not be issued. Appellant is once again directed to submit the same within 07 days. Thereafter, notices be issued to respondents No. 4 & 5. To come up for written reply/comments of respondents No. 2 to 6 on 22.11.2022 before S.B.


(Fareeha Paul)
Member(E)

22.09.2022

Appellant alongwith his counsel present. Mr. Safiullah, Focal Person on behalf of official 2 & 3 alongwith Mr. Muhammad Riaz Khan Pindakhel, Assistant Advocate General present. Private respondent 6 in person present. None present on behalf of private respondents No. 4 and 5.

Reply on behalf of official respondent No. 1 has already been submitted, while representative of official respondents No. 2 & 3 as well as private respondent No. 6 sought further time for submission of reply/comments. Last opportunity is given to them for submission of written reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck of.

Vide order dated 25.08.2022, it was directed that notices be issued to private respondents No. 4 & 5 for submission of written reply/comments, however the same have not been issued them, therefore, explanation in this respect be called from Moharrar. Notices be issued to private respondents No. 4 & 5 through registered A/D with the direction to submit reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck of. The appellant shall submit registered A.D within 07 days. Adjourned. To come up for submission of written reply/comments on behalf of respondents No. 2 to 6 on 18.10.2022 before the S.B.



(Salah-Ud-Din)
Member (J)

Respected Sir out district
respondents 4 & 5 was once
again not put on notice
due to non-availability
of postal tickets &
notice form A & B. Neither
appellant nor his counsel
contacted as the concerned
Moharrir for the
expense of AD card.
Suf.

07.06.2022

Clerk of counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General present. Ghulam Rasool Superintendent for respondent No.1 present. Nemo for respondent remaining respondents.

Notice issued for 25/08/22

Reply on behalf of respondent No. 1 was submitted. Notice be issued to remaining respondents for submission of comments in office within 15 days of the receipt of notice, positively. To come up for reply/comments on 25.08.2022 before S.B.



(Rozina Rehman)
Member (J)

25.08.2022

Appellant with counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 present. Private respondent No. 6 in person present. None present on behalf of private respondents No. 4 & 5.

Reply/comments on behalf of official respondents No. 1 have already been submitted. Reply/comments on behalf of official respondents No. 2, 3 and private respondents No. 4 to 6 are still awaited. Learned Additional Advocate General for official respondents No. 2, 3 and private respondents No. 6 requested for time to submit reply/comments. Notices be issued to private respondents No. 4 & 5 for submission of reply/comments. Adjourned. To come up for reply/comments on 22.09.2022 before S.B.

Private respondent were not present in office for non-availability of private respondent 4 & 5.


(Mian Muhammad)
Member (E)

01.02.2022

Counsel for the appellant is present. Preliminary arguments have been heard.

Points raised need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 15.03.2022 before S.B.

Appellant Deposited
Security & Process Fee


Chairman

15.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 07.6.2022 for the same as before.

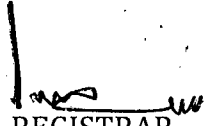


Reader.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 7943 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/12/2021	<p>The appeal of Mr. Khalid Khan resubmitted today by Roeda Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>18/02/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

⑦

The appeal of Khalid Khan S/O Momin Khan, R/O Kandi Dagi Khel Sahabadgan Nowshera Kalan, Tehsil and District Nowshera received today i.e. on 21.12.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Copy of letter dated 21-02-2021 mentioned in para-7 of the appeal is not attached with the appeal.
2. Copy of letter dated 17-01-2021 mentioned in para-8 of the appeal is not attached with the appeal.
3. Annexures of the appeal is not in sequence which may be placed in order as mentioned in the memo of the appeal.


No. 2524 /S.T,

Dt. 21/12 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Roeeda Khan Adv. Pesh.

objection No 1 To 3
has been fresh filed


28/12/2021

(1)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 7943 /2021

Khalid Khan

VERSUS

Medical Superintendent District Headquarter hospital
Noshera & Others

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-7
2.	Affidavit.		8
3.	Addresses of parties		9
4.	Application for Condonation of delay		10 To 11
5.	Copy of appointment order	"A"	12
6.	Copy of notification	"B"	13 To 18
7.	Copies of promotion order dated 30.11.2019 and seniority list	"C" & "D"	19 To 21
8.	Copy of appeal and withdrawn order dated 17.05.2021	"E"	22 To 23
9.	Copy of departmental appeal	"F"	24
10.	Copies of letters	"G" & "H"	25 To 26
11.	Copy of letter	"I"	
12.	Copy of letter	"J"	
13.	Wakalatnama		

وکیل
APPELLANT

Through

(Signature)
Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 21/12/2021

(A)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Khalid Khan S/o Momin Khan R/o Kandi Dagi Khel
Sahabzadgan Noshehra Kalan Tehsil & District
Nowshera.

Appellant

VERSUS

1. Medical Superintendent District Headquarter hospital Noshera.
2. Director General Health Services, KPK Peshawar.
3. Secretary Health through Govt. of KPK Civil Secretariat Peshawar.
4. Ikram Jan S/o Muhammad Salim Junior Clerk BPS-11 District Headquarter Hospital Nowshera.
5. Naeem Khan S/o Rahim Khan Junior Clerk BPS-11 District Headquarter Hospital Nowshera.
6. Zulfiqar Ali Khan S/o Sattar Khan Junior Clerk BPS-11 District Headquarter Hospital Nowshera.

Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE ORDER DATED 30-11-
2019, WHEREBY THE APPELLANT HAS NOT
BEEN PROMOTED TO THE POST OF JUNIOR
CLERK BPS-11 AND MALAFIDELY DEPRIVE
OF HIS DUE RIGHT OF PROMOTION BEING
SENIOR FROM RESPONDENT NO.4 TO 6
AGAINST WHICH THE APPELLANT FILED

(3)

DEPARTMENTAL APPEAL ON DATED
03.09.2021 WHICH HAS NOT BEEN DECIDED
WITHIN THE STATUTORY PERIOD OF 90
DAYS.

PRAYER:-

ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL THE IMPUGNED
PROMOTION ORDER DATED 30.11.2019
AND 17.05.2021 MAY KINDLY BE
DECLARED IS ILLEGAL, VOID AND AB-
INITIO BEING PASSED AGAINST THE
LAW & RULES AND THE APPELLANT
MAY KINDLY BE CONSIDERED FOR
PROMOTION OF JUNIOR CLERK BPS-11
WHEN THE POST OF JUNIOR CLERK
BECAME VACANT AND TO GRANT HIM
EXPEDITIOUSLY ALL ARREARS AND
BENEFITS WITHOUT ANY FURTHER
DELAY TO THE APPELLANT, THE
APPELLANT WAS ILLEGAL DENIED
FROM PROMOTION TO THE POST OF
JUNIOR CLERK BPS-11 AND IF ANY
DELAY THAT ON THE PART OF
RESPONDENTS, THE APPELLANT MAY
ALSO AWARDED ALL THE ARREARS
AND BACK BENEFITS AS FROM THE
DATE OF PROMOTION AS HIS
COLLEAGUES/JUNIORS WERE

3

**PROMOTED TO BPS-11 AS PER HIS
ILLEGIBILITY.**

**ANY OTHER REMEDY WHICH THIS
AUGUST TRIBUNAL DEEMS FIT THAT
MAY ALSO BE ONWARD GRANTED IN
FAVOUR APPELLANT.**

Respectfully Sheweth.

1. That the Appellant has been initially appointed as Ward Orderly (Class-IV) on 07.12.2004 with respondent Department. (Copy of appointment order is attached as annexure "A").
2. That after appointment the appellant performed his duty regularly and with full devotion and no complaint whatsoever has been made against the appellant.
3. That the total section post of DHQ Nowshera of Junior Clerk BPS-11 are 08 and on 33% promotion quota, the respondents were legally bound to promote Class-IV to Junior Clerk. (Copy of notification is attached as annexure "B").
4. That on 30.11.2019 the respondent department issued promotion orders whereby the private respondent No.4 & 5 who are junior to the appellant has been promoted to the post of Junior Clerk BPS-11 while the appellant has not been promoted to the post of Junior Clerk BPS-11 being senior to private respondents No. 4 & 5 which has been clarified from the

5

seniority list of the department concerned. (Copies of promotion order dated 30.11.2019 and seniority list are attached as annexure "C" & D").

5. That the respondent No.6 who is one of the colleague of respondent No.4 & 5 and was junior to the appellant has not been promoted on 30.11.2019 against which the respondent No.6 filed Service Appeal No. 15794/2020 before this Hon'ble Court which has been withdrawn by the respondent No.6 on 02.07.2021 on the ground of providing the promotion order from Class-IV to Junior Clerk to BPS-11 dated 17.05.2021 of the respondent No.6. (Copy of appeal and withdrawn order dated 17.05.2021 is attached as annexure "E").
6. That the appellant submitted a departmental appeal on 03.09.2021 against the impugned promotion order dated 30.11.2019. (Copy of departmental appeal is attached as annexure "F").
7. That on response of departmental appeal the respondent No.2 issued a letter on 21.00.2021 to respondent No.1 for further necessary action on response of which the respondent No.1 issued a letter on 03.11.2021 to respondent No.2 it is pertinent to mentioned here that the reasons mentioned in paragaphe No.3 of the letter dated 03.11.2021. That the regarding documents of the appellant was not found on his personal file as false and fabricated because the appellant provided all the documents at the time of

5

appointment of the year 2004 and letter on once again provided all his documents at the year 2010. (Copies of letters are attached as annexure "G & H).

8. That the respondent No.2 once again issued a letter on 17.01.2021 to respondent No.1 for considered the request of the appellant for promotion of under 33% quota as per seniority list and rules and policy of the government. (Copy of letter is attached as annexure "I").
9. That after that the respondent No.2 issued a letter to respondent No.1 on 03.12.2021 regarding the promotion of the appellant under 33% quota of matriculate class-IV on the basis of seniority law and rules. (Copy of letter is attached as annexure "J").
10. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the impugned order 30/11/2019 & 17.05.2021 are illegal, void and ab-initio order because it has been passed against the law and rules.
- B. That the impugned order is also illegal because private respondent No. 4 to 6 has been promoted to BPS-11 who is junior to the appellant.

- (b)
- C. That the appellant was amongst the senior most Ward Orderly and fit and illegible for promotion firstly to BPS-11 and then with along with other similarly placed colleagues to BPS-11.
- D. That the appellant time and again filed the deferent applications to the department firstly for the purpose of inclusion of appellant name for promotion to Junior Clerk BPS-11. It is pertinent to mentioned here that 4 posts of Junior Clerk BPS-11 as still vacant.
- E. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of the instant Service Appeal the impugned promotion order dated 30.11.2019 and 17.05.2021 may kindly be declared is illegal, void and ab-initio being passed against the law & rules and the appellant may kindly be considered for promotion of Junior Clerk BPS-11 when the post of Junior Clerk became vacant and to grant him expeditiously all arrears and benefits without any further delay to the appellant, the appellant was illegal denied from promotion to the post of junior clerk BPS-11 and if any delay that on the part of respondents, the appellant may also awarded all the arrears and back benefits as from the

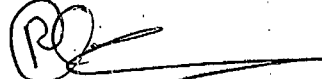
(70)

date of promotion as his colleagues/juniors were promoted to BPS-11 as per his illegibility.

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

ویدو
APPELLANT

Through


Roed Khan
&
Sheeba Khan
Advocates, High Court
Peshawar.

Dated: 21/12/2021

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.


Advocate.

8

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Khalid Khan

VERSUS

Medical Superintendent District Headquarter hospital
Noshera & Others

AFFIDAVIT

I, Khalid Khan S/o Momin Khan R/o Kandi Dagi Khel Sahabzadgan Noshehra Kalan Tehsil & District Nowshera, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.


DEPONENT

IDENTIFIED BY:

Roeeda Khan
Advocate High Court
Peshawar.

(9)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Khalid Khan

VERSUS

Medical Superintendent District Headquarter hospital
Noshera & Others

ADDRESSES OF PARTIES

PETITIONER.

Khalid Khan S/o Momin Khan R/o Kandi Dagi
Khel Sahabzadgan Noshehra Kalan Tehsil &
District Nowshera.

ADDRESSES OF RESPONDENTS

1. Medical Superintendent District Headquarter hospital Noshera.
2. Director General Health Services, KPK Peshawar.
3. Secretary Health through Govt. of KPK Civil Secretariat Peshawar.
4. Ikram Jan S/o Muhammad Salim Junior Clerk BPS-11 District Headquarter Hospital Nowshera.
5. Naeem Khan S/o Rahim Khan Junior Clerk BPS-11 District Headquarter Hospital Nowshera.
6. Zulfiqar Ali Khan S/o Sattar Khan Junior Clerk BPS-11 District Headquarter Hospital Nowshera.

(Signature)
APPELLANT

Through (Signature)

Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 21/12/2021

10

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Khalid Khan

VERSUS

Medical Superintendent District Headquarter hospital
Noshera & Others

APPLICATION FOR CONDONATION OF DELAY (IF ANY)

Respectfully Sheweth,

Petitioner submits as under:

That the above mentioned appeal is filing
before this Hon'ble Court in which no date
is fixed for hearing so far.

GROUND:

A. That the impugned order is void and
illegal and no limitation run against the
void orders because juniors to the
appellant has been promoted to junior
clerk BPS-11 while the appellant has not
been promoted to BPS-11 being senior
most.

✓

B. That there many judgment of the superior court that in case of promotion, pay and financial matter no limitation run against such order.

C. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

U.S. No

APPELLANT

Through



Roeeda Khan

Advocate, Peshawar.

Dated:- 21/12/2021

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) NOWSHERA.

OFFICE ORDER

The competent authority is pleased to appoint Mr. Khalid Khan son of Momin Khan Mahallah-Dagb Khar Village and P.O., Nowshera Kanan, Tehsil and District Nowshera on contract basis against the vacant post of Ward Orderly in BPS-02 under quota reserved for deceased Government Servants children in light of rule 10(4) of Govt. of N.W.F.P. Civil Servants (Appointment, Promotion & Transfer) rules 1989 in relaxation of ban vide Section Officer (R.V) Government of N.W.F.P. Establishment & Administration Department (Regulation Wing) Peshawar Letter No. JOR-V(E&AD)1(18)/2003 dated 13.9.2004 with immediate effect on the following terms and conditions:-

1. Your intitial appointment will be for a period of two(2) years which is extendable, if the job is required to be continued, subject your satisfactory performance.
2. This office can terminate your a pointment on one month notice or one month salary in lieu thereof.

Executive Distt: Officer,
(Health) Nowshera.

NO: 3699-702 / EDO(H)NSR

Dated Nowshera the: 7/12/11

Copy forwarded to:-

1. The Distt:Accounts Officer, Nowshera.
2. The Medical Superintendent DHC Hospital, Nowshera.
3. Accounts Section EDO(Health) Office, Nowshera.
4. Record Section.

Executive Distt: Officer,
(Health) Nowshera.

PTO.

(13)

25

GOVERNMENT OF KHYBER PAKHTUNKHWA,
BOARD OF REVENUE,
REVENUE & ESTATE DEPARTMENT

Peshawar Dated the 23/01/2015

NOTIFICATION

No. 2074/Estt:VII/135/SSRC. In pursuance of provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Revenue & Estate Department, in consultation with Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other condition specified in column 3 to 5 of the Appendix to this Notification and applicable to posts borne on the cadre strength of Deputy Commissioners specified in column 2 of the said Appendix.

APPENDIX

S.No.	Nomenclature of posts with BPS	Minimum qualification for appointment by initial recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1.	Superintendent (BPS-17)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants (BPS-16) of the district concerned with atleast five years service in the offices of respective Deputy Commissioner and Political Agents.

[Signature]
ATTESTED

	Stenographer (BPS-16)	university, (ii) a speed of 70 words per minute in shorthand in English and 45 words per minutes in typing; and (iii) Knowledge of computer using MS Word, MS Excel.	26	such in the offices of respective Deputy Commissioners and Political Agents; and (b) forty percent by promotion; on the basis of seniority-cum-fitness, from amongst the Computer Operators with atleast five years service as such in the offices of respective Deputy Commissioners and Political Agents; Provided that if no suitable person is available for promotion then by initial recruitment.
3.	Assistant (BPS-16)	At least Second Class Bachelor's Degree from a recognized University.	20 to 30 years	(a) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with atleast five years service as Junior and Senior Clerk in the Offices of Deputy Commissioners and Political Agents of district concerned; and (b) twenty five percent by initial recruitment from amongst the candidates of the district concerned.
4.	Head Clerk (BPS-14)			By transfer from amongst Senior Clerks (BPS-14) of the district concerned.
5.	Stenographer (BPS-14)	(i) At least Second Class Intermediate or equivalent qualification from a recognized Board;	18 to 30 years	By initial recruitment from amongst the candidates of the district concerned.

[Signature]
ATTESTED

	Senior Clerk (BPS-14)	(ii) a speed of 50 words per minute in shorthand in English and 35 words per minute in typing; and (iii) knowledge of computer in using MS Word, MS Excel.			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks of the district concerned with atleast two years service as such.
	Computer Operator (BPS-12)	(i) At least Second Class Bachelor's Degree in Computer Science/ Information Technology (BCS/BIT four years), from a recognized university; (ii) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	18-to 28 years		By initial recruitment from amongst the candidates of the district concerned.
8.	Pesh Imam (BPS-12)	Sanad in Dars-e- Nizami or a Sanad of Fazaile-Arab; Note: Preference will be given Hafiz-e-Quran.	2 to 22 years		By initial recruitment from amongst the candidates of the district concerned.
9.	Sub Engineer (BPS-11)	Diploma in Associate Engineering in Civil Technology from Board of Technical Education with certificate in Computer Aided Design (CAD) from recognized Institution.	18-30 years		By initial recruitment from amongst the candidates of the district concerned.
10.	Junior Clerk (BPS-11)	(i) At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing.	18 to 30 years		(a) Thirty three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Qasids and Naib Qasids including holders of other equivalent posts in the district concerned with two years service as such, who have passed Secondary School Certificate Examination; and (b) sixty seven percent by initial recruitment from

ATTESTED

3
10

28

the candidates of the district concerned.
Note: For the purpose of promotion there shall be maintained a common seniority list of Qasid and Naib Qasid etc with reference to the date of their appointment.
 Provided that no separate seniority list of Matric and non-matric BS-1 (Class-IV) employees can be maintained being single cadre. Their seniority shall be fixed with reference to the date of their regular appointment.
 Provided further that where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.
 By initial recruitment from amongst the candidates of the district concerned.

11.	Reader/Record Keeper (BPS-7)	At least second division in Secondary School Certificate or equivalent qualification from a recognized Board.	18 to 30 years	By initial recruitment from amongst the candidates of the district concerned.
12.	Alhamad (BPS-5)	At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board.	18-30 years	By initial recruitment from amongst the candidates of the district concerned.
13.	Driver (BPS-4)	Literate having LTV driving license issued by the competent authority. Preference will be given to those who have sufficient experience in driving, repair and maintenance of vehicles.	18-32 years	By initial recruitment from amongst the candidates of the district concerned.
14.	Khadim (BPS-4)	Literate. Note: Preference will be given to Hafiz-e-Quran	18-32 years	By initial recruitment from amongst the candidates of the district concerned.

[Signature]
ATTESTED

207 (17)

1 3-2)		---	By promotion on the basis of Seniority-cum-fitness, from amongst the Naib Qasids with two years as such.
Naib Qasid/ Dowkidar/Sw eeper/Mali (BPS-1)	Literate.	18-32 years	By initial recruitment from amongst the candidates of the district concerned."

Sd/-
 SECRETARY TO GOVERNMENT OF
 KHYBER PAKHTUNKHWA
 REVENUE & ESTATE DEPARTMENT

[Signature]

ATTESTED

Health Se
Officer N
HQ Hosp
Tan S/O

MS/DHQ

al Novwsh
'above ter
nth in adv
You wish t
ime to tim
The appoi
be liable
In case
forged/
You appor

1
2
3
0

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

207: 114 Estt: LTI/135/SSRC

Copy forwarded for information and necessary action to the:

1. Secretary to Government of Khyber Pakhtunkhwa Establishment Department.
2. Secretary to Government of Khyber Pakhtunkhwa Finance Department.
3. Secretary to Government of Khyber Pakhtunkhwa Law Department.
4. Secretary Khyber Pakhtunkhwa Public Service Commission.
5. Registrar Peshawar High Court.
6. Accountant General Khyber Pakhtunkhwa.
7. All Commissioners / Political Agents in Khyber Pakhtunkhwa.
8. All Deputy Commissioners, in Khyber Pakhtunkhwa.
9. Private Secretary to Minister for Revenue Khyber Pakhtunkhwa.
10. Controller, Government Printing Press Peshawar with the request to publish the above notification in the official Gazette and supply 50 printed copies thereof to the undersigned for record.

DEPUTY SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
REVENUE & ESTATE DEPARTMENT

[Signature]
ATTESTED



19 18

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. 7197-7200/DHQ NSR

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.

ATTESTED

Sd _____
 Medical Superintendent,
 DHQ Hospital, Nowshera

43	Pharmacist	Munammad Umar	
44	ECG Room	Zarshaid, Nauman Ali	
45	Try Age	Akhtar	
		Amjid, Sabir Shah	Aman Ullah

ATTESTED

MEDICAL SUPERINTENDENT



CA 20 19

**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.

ATTESTED

Medical Superintendent,
DHQ Hospital, Nowshera

42	DHS	Munammas Umar	
43	Pharmacist	Zarshaid, Nauman Ali	
44	ECG Room	Akhtar	
45	Try Age	Amjid, Sabir Shah	Aman Ullah

ATTESTED


MEDICAL SUPERINTENDENT,

(21)

Seniority List of Class IV DHQ Hospital Nowshera

S.No	Name	Father Name	Date of Birth	Matric Passing Year	Date of Appointment
1	Hazrat Hussain	Sardar Hussain	15-04-1966	1984	1994
2	Naeem khan	Rahim khan	13-12-1975	1991	03-08-11
3	Ikram Jan	Muhammad saleem	04-10-1973	1991	15-5-08
4	Muhammad Ali	Murad Ali	02-02-76	1994	11-04-09
5	Fayaz Muhammad	Fida Muhammad	17-02-1977	1995	20-07-2017
6	Muhammad Nojhan	Laiq Ali	05-08-88	2008	24-10-2013
7	Hamad Ali shah	Zafar Ali shah	29-08-1991	2009	20-07-2017
8	Waseem Sajjad	Fida Muhammad	03-01-95	2013	20-07-2017
9	Mian Muhammad Ali shah	Mian Ijaz Ali shah	11-04-97	2015	08-08-17
10	Falak Niaz khan	Muhammad Fayaz	20-03-1986	2019	03-02-15
11	Muhammad Imran	Abdur Rauf	02-02-89	2006	20-07-2017

ڈی ایچ او ہسپتال نوشہرا
 ڈی ایچ او ہسپتال نوشہرا
 ڈی ایچ او ہسپتال نوشہرا


 Medical Superintendent
 DHQ Hospital Nowshera

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



Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14372
Dated 10/11/2020

Service Appeal No. 15794 2020

Zulfiqar Ali Khan S/o Abdul Sattar

Ward Attendant (BPS-4),

DHQ Hospital, Nowshera. **APPELLANT**

VERSUS

1. Medical Superintendent, District Head Quarter Hospital, Nowshera.
2. Director General, Health Services, District Courts Premises, 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.

Filed to-day

..... **RESPONDENTS**

[Signature]
Registrar

SERVICE APPEAL U/S 4 OF THE

Re-submitted to-day
and filed.

KHYBER PAKHTUNKHWA SERVICES

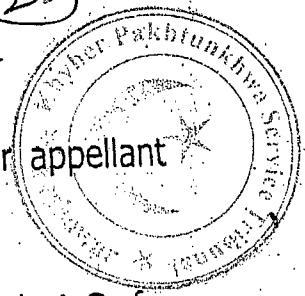
TRIBUNAL ACT, 1974.

[Signature]
Registrar

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Appeal No. 15794/2020
Zulfiqar Ali Khan vs Govt

(23)



02.07.2021

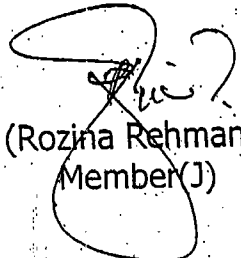
Mr. Shah Faisal Ilyas Advocate counsel for appellant

present:

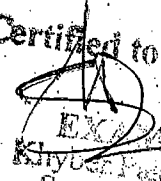
Muhammad Adeel Butt learned Additional A.G for respondents present.

Former has placed before us a copy of office order dated 17.05.2021 regarding appointment of appellant by promotion with the request for withdrawal of the appeal reserving as rights for legal remedies if needed. The appeal is dismissed as withdrawn with permission for the pursuit of legal remedies. File be consigned to the record room.

Announced
02.07.2021


(Rozina Rehman)
Member(J)


Chairman

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 21-12-21
Number of Words 800
Copying Fee 10/-
Urgent 4/-
Total 14/-
Name of Copyist _____
Date of Completion of Copy 21-12-21
Date of Delivery of Copy 21-12-21

حضرت صاحب دینی جسے صلیو صبر سے لیکھتا۔ حضرت شیخ محمد...

درخواست فرادہ لائے جا رہے ہیں

سیناریو بنیاد پیر

جناب عالی اسٹیل کے ذیل درخواست فرادہ ہے۔

(1) یہ اسٹیل لکھنؤ دارڈ اردلی ڈی۔ ایچ۔ ایو۔ ہسپتال نوشہرہ گلان میں

گذشتہ 6 سال سے اپنے فریقین کے راجی کم کر رہا ہے۔

(2) یہ لکھنؤ ہیلے DHA ہسپتال مذکورہ بالا میں گلاس فور ملار میں

کو پیرڈوٹ لگایا ہے جس میں سیناریو لیکٹ کو جو (ظہر میں) لگایا ہے۔

(3) یہ اسٹیل کے فریقین لکھنؤ دارڈ اردلی ڈی۔ ایچ۔ ایو۔ ہسپتال مذکورہ بالا ہوتی ہے۔

سورف 2021، 27، 08 کو۔ (عالمی لکھنؤ درخواست عدد 11) لکھنؤ کوئی شیخوئی نہیں لگی

(4) یہ لکھنؤ ہسپتال ماٹنگلہ نزد سیناریو لیکٹ کو جس کو پیرڈوٹ لگایا ہے۔ اور

نہیں اسٹیل کو لگایا ہے۔

(5) یہ لکھنؤ دارڈ اردلی ڈی۔ ایچ۔ ایو۔ ہسپتال نوشہرہ گلان میں ذرا لکھنؤ

اور عورت حسین۔ ان میں سے عورت عورت جس اسٹیل سے سیناریو ہے جیکہ باقی

سینوں انٹراڈ اسٹیل سے جو نہیں ہیں۔

لکھنؤ اسٹیل ہے۔ کہ اسٹیل کے ساتھ انصاف لکھنؤ ہے۔ اور اسٹیل کو سیناریو

2021، 09، 13 کو اسٹیل سے لکھنؤ ہے۔

اسٹیل ڈیٹا اور شیخوئی لکھنؤ ہے۔

علاقہ گلان دارڈ اردلی ڈی۔ ایچ۔ ایو۔ ہسپتال نوشہرہ گلان

30896
09/09/21



(20)

DIRECTORATE GENERAL HEALTH SERVICES "G" KHYBER PAKHTUN KHWA PESHAWAR

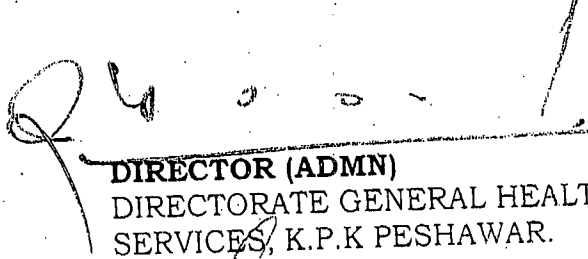
E-Mail Address: nwfdghs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 4495 / Personnel Dated: 21 / 10 / 2021

To,

The Medical Superintendent
DHQ Hospital Nowshera.

Subject: **APPLICATION**
Memo:

Enclosed please find herewith a copy of an application alongwith its enclosures submitted by Mr. Khalid Khan Ward Orderly which is self explanatory for further necessary action with the remarks to furnish your detailed comments so as to proceed further.


DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

20/10/2021

MEDICAL SUPERINTENDENT
D.H.Q HOSPITAL NONSHERA

[Handwritten signature]

Reference your letter No. 425/personnel dated 21/10/2021 on the subject caption above
Mr. Khalid Khan S/O Moin Khan is working as ward orderly since office since 07/11/2004. During the promotion process, all the employees were informed for submission of their requisite documents. The personal file/service book of Mr. Khalid Khan was checked throughly and his documents were not found. In this regard he was informed the submission of his documents, but he failed to submit the documents. After a long absence, he submitted the documents in October 2021. While employees of his cadre was promoted in 30/11/2019. He was not taken the matter seriously and when all the other employees were promoted then he knock the door of higher ups without any approach to his office. In the light of above clarification, the claim of this employee at this stage is not justified. However your kind order/ advice will be considered in this regard.

Application

The Director General Health Services,
Hyber Pakhtunkhwa Peshawar.

Reference No. 3782-DHONS/K

Dated 03/11/2021

OFFICE OF THE MEDICAL SUPERINTENDENT
D.H.Q HOSPITAL NONSHERA

5157
05/11/2021

(26)

H



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: nwfdghs@yahoo.com Office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 8412-17 / Personnel Dated: 03/12/2021

To,

The Medical Superintendent
DHQ Hospital Nowshera.

Subject: **GUIDANCE REQUIRED.**
Memo

Reference to your letter No. 4220 dated 24.11.2021 on the subject noted above.

You are one again requested to consider the request of Mr. Khalid Khan Ward Orderly for promotion under 33% quota of matriculate Class-IV on the basis of seniority as per Rules/ policy of the Government.

DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

C.C

P.A to DGHS Khyber Pakhtunkhwa Peshawar.

03/12/2021



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

(28)

E-Mail Address: hwfdgzs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 801647 / Personnel Dated: 17/11/2021

To,

The Medical Superintendent
DHQ Hospital Nowshera.

Subject:

APPLICATION.

Memo:

Reference to your letter No. 3782/DHQ/NSR dated 03.11.2021 on the subject noted above.

You are requested to consider the request of Mr. Khalid Khan Ward Orderly for promotion of Class-IV under 33% quota as per seniority list as per rules/ policy of the Government.

[Signature]
DIRECTOR (ADMINISTRATION)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.

C.C

P.A to DGHS Khyber Pakhtunkhwa Peshawar.

[Signature]
15/11/2021

Before the Chairman, Mr. Justice Tandon, Justice

Sub-Committee on
Service Tribunal
Diary No. 796
Dated 11-6-2021

Mr. Kishor Kumar Verma, Assistant, and Veterinary Inspector

Interests, Technical, Charitable - Appellant

Put up to the court with the case -
with without appeal.

VS

Government of Uttar Pradesh, High Court, Lucknow

of State Development, Police & other.

Application for early hearing.

Respectfully Shri. ...

1. That the Appellant filed the above appeal on 22-12-2020
but due to COVID-19 and other reasons, the hearing
of the case is fixed for preliminary hearing but is
not due to COVID-19 and other reasons.

2. That the date for preliminary hearing is now fixed
12-8-2021, which is too late.

Therefore, it is prayed that the appeal may be
fixed at the earliest date for the best
interest of justice -

Appellant
Name: ...
Date: 11/6/21
Through ...
Advocate ...

Call: 0332-8541783

13/07
Date for a hearing
of July, 2021.
11/6/2021
11/6/2021
11/6/2021

Servant Appal M 14/10/2020

11

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR.

Appeal No.7943 of 2021

Khalid Khan Petitioner

VS

187_

07-6-22

MS District Headquarters Hospital Nowshera Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS.


Respectfully Sheweth,

Preliminary objection

1. Correct
2. Partially Correct, as respondent has various explanations, inquiries are done against him.
3. Incorrect ,6 seats of Junior Clerks were advertised to which Quota is of 2 seats.
4. Incorrect, the list published does not bear appellant name as he does not applied for said post.
5. Partially correct, the appeal being not maintainable was withdrawn.
6. Incorrect, the responded asked for guidance from the higher authorities for which letter was issues.
7. Incorrect, the responded provided all support and relevant documents asked by the appellant as shown in the annexure. Correct.
8. Incorrect , respondent reply was that as appellant did not avail the chance and didn't provided document there for has no right for the said post.
9. Incorrect.

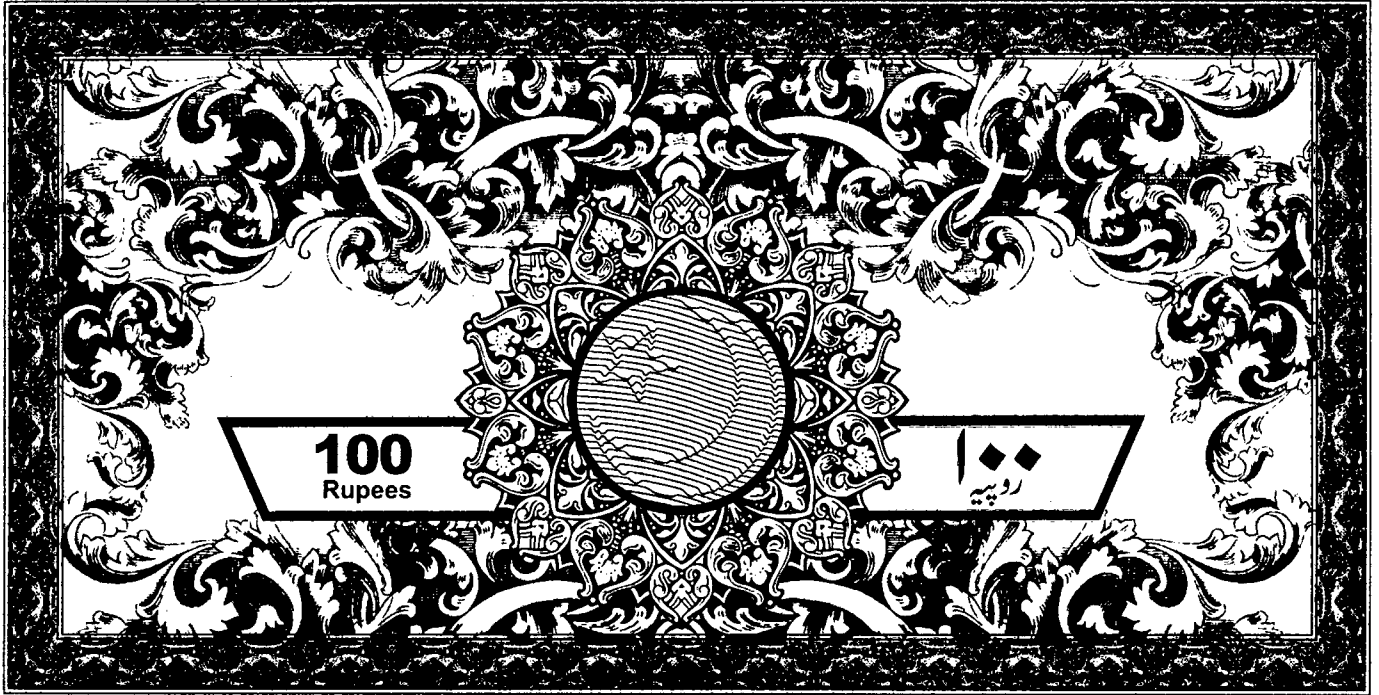
Gorunds:

- A. Incorrect.
- B. Incorrect, as he didn't applied for the said post, and all codal formalities were following during the selection process.
- C. Incorrect, he did not applied and nor was mentioned in seniority list .
- D. Incorrect, appellant did not applied for the seniority list nor he was listed.
- E. It is humbly requested that writ petition me kindly be dismissed as the applicant did not applied at the time when seniority list was in the making nor does he gave application for the subject noted above in time.


Respondent
MS DHQ Hospital
Nowshera

Responsible No 1
0348-0246355

MS DHQ Hospital
Nowshera




AFFIDAVIT


I Ghulam Sarwar S/O Ghulam Siddique R/O Rustam Tehsil & District Mardan KPK do hereby solemnly affirm and declare on oath that Pere wise comments on Behalf of Respondents.

Preliminary objection

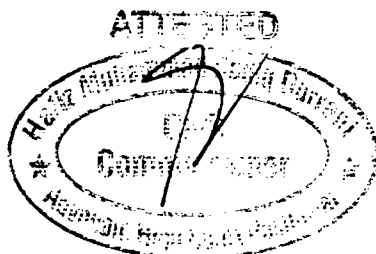
1. Correct
2. Partially Correct, as respondent has various explanations, inquiries are done against him.
3. Incorrect ,6 seats of Junior Clerks were advertised to which Quota is of 2 seats..
4. Incorrect, the list published does not bear appellant name as he does not applied for said post.
5. Partially correct, the appeal being not maintainable was withdrawn.
6. Incorrect, the responded asked for guidance from the higher authorities for which letter was issues.
7. Incorrect, the responded provided all support and relevant documents asked by the appellant as shown in the annexure. Correct.
8. Incorrect , respondent reply was that as appellant did not avail the chance and didn't provided document there for has no right for the said post.
9. Incorrect.

Whatever stated above is true and correct to the best of my knowledge and belief and nothing has been concealed herein.


 Medical Superintendent
 DHQ
 Hospital Nowshera
 Respondent No 1

DEPONENT 
 Name: Ghulam Sarwar
 Office Assistant DHQ
 Hospital Nowshera
 CNIC: 16101-7329437-3
 Mobile # 0348 0246355

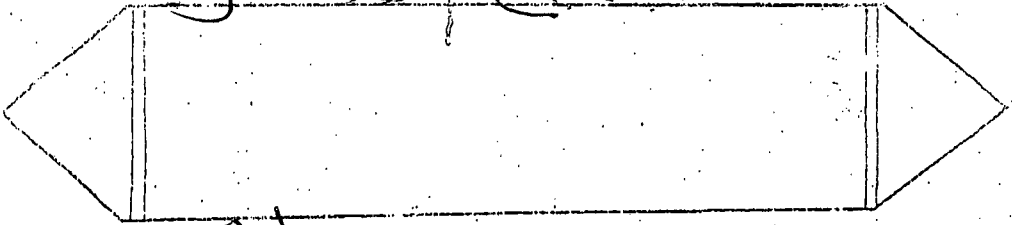
07 JUN 2022



نوس ڈی ڈی آر پیس نمبر 07-6-2022



باعتنا معاً



باعتنا معاً
باعتنا معاً
باعتنا معاً

باعتنا معاً

موضوع
مقدمہ
دعویٰ
جرم

باعتنا معاً

باعتنا معاً

باعتنا معاً

باعتنا معاً

باعتنا معاً

باعتنا معاً

Accept

باعتنا معاً

باعتنا معاً

It is, therefore, most humbly prayed that on acceptance of the instant petition, the captioned case may very graciously be fixed for an early date of hearing as convenient to this Hon'ble Tribunal in the best interest of justice.

Dated: 01-02-2022

Petitioner

Through



Roeda Khan
Advocate High Court,
Peshawar

"B"

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

(S.B)

No.

Appeal No..... of 20 .

7943

21

.....Appellant/Petitioner
Khalid Khan ~~Sp~~ ~~vs~~ ~~vs~~
Versus

(Reg)

.....Respondent
MS, District Headquarter Noshera
Respondent No.....

(06)

Notice to: -

Zulfiqar Ali Khan Sp Sattar Khan (Jr. Clerk)

DHA Noshera

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

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

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

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

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

Day of.....20 .

Feb

22

07

(For Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No..... 7943 of 2021

(Reg)

Khalid Khan ~~Q. Q. Q.~~ Appellant/Petitioner

Versus

Ms., District Headquarter Noshera Respondent

Respondent No..... (05)

Notice to: - Naeem Khan s/o Rahim Khan Jr. Clerk,
 DHQ Noshera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 15/03/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 07

Day of..... Feb 2022

(For Reply)

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
 JUDICIAL COMPLEX (OLD), KHYBER ROAD (S13)
 PESHAWAR.

No.

Appeal No. 7943 of 2021

Khalid Khan ~~Q. B. B. B.~~ Appellant/Petitioner

Versus

MS. District Headquarter Noshera Respondent

Respondent No. (04)

Notice to: - Ikram Jan So Muhammad Salim Jr. Clerk.
 DHQ, Noshera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/03/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 07

Day of Feb 2022

(For Reply)

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

No.

Appeal No. 7943 of 2021

Khalid Khan Appellant/Petitioner

Versus

M.S. District Headquarter Noshera Respondent

Respondent No. 1

(Reg)

Notice to: - Medical Superintendent DHQ Hospital Noshera.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....15/03/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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


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

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

Given under my hand and the seal of this Court, at Peshawar this.....07.....

Day of.....Feb.....20 22

(For Reply)


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

(S-B)

No.

Appeal No. 7943 of 20 21

Khalid Khan Appellant/Petitioner
Versus

MS, District Headquarter, Noshera Respondent

Respondent No. 03

Notice to: - Secretary Health through Govt of KPK
Civil Secretariat, Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/03/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 07

Day of Feb 20 22

(For Reply)

10/2/2022

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

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

"B"

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

No.

Appeal No. 7943 of 2021

Khalid Khan Appellant/Petitioner

Versus

MS, District Headquarters Noshera. Respondent

Respondent No. (2)

Notice to:

Director General Health Services, KPK,
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....15/03/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....07.....

Day of.....Feb.....2022

(For Reply)

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"A"

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

No.

APPEAL No. 7943 of 2022.

Khalid Khan

Appellant/Petitioner

Versus

Ms Superintendent District Headquarter Nowshera

RESPONDENT(S)

Respondent (3) Secy Health through Govt of KPIC
Notice to Appellant/Petitioner Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 25/08/2022 at 9:00am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

Copy of appeal already sent

28/9/2022
copy of appeal not available.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

SP
2

No.

APPEAL No. 7943 of 2022.

Khalid Khan

Appellant/Petitioner

Versus

MS District Headquarter hospital Nowshera

RESPONDENT(S)

Respondent (2)

Notice to Appellant/Petitioner

DG Health Services KPK

Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 25/08/2022 at 9:00am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

[Signature]

Copy of appeal already sent

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. *7943*

SB

APPEAL No. *7943* of 20 *21*

Khalid Khan

Appellant/Petitioner

Versus

Medical Superintendent

RESPONDENT(S)

Respondent (4)

Notice to Appellant/Petitioner

Ikram Jan s/o M. Salim
Junior Clerk (BPS-11) District
Headquarters Hospital Moushera.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *22/11/2022* at *7:00 am*.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No.....

SB
of 20

21

~~600~~
7943

~~Javed~~
Khalid Khan

Appellant/Petitioner

Versus

Medical Superintendent

RESPONDENT(S)

Notice to Appellant/Petitioner

Respondent (S)

Naeem Khan, S/O Rahim Khan

Junior Clerk BPS-11 District Headquarters

Hospital Mardan

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

22/11/2022

7:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar