

11.05.2022

Nemo for appellant.

Case was called time and again but none appeared on behalf of appellant till rising of the Bench. As such the instant service appeal stands dismissed in default for non-prosecution. No order as to costs. File be consigned to the record room.

Announced
11.05.2022


(Rozina Rehman)
Member (J)



08.12.2021

Appellant in person present. Mr. Muhammad Adeel, Addl: AG for respondents present.


Appellant submitted an application for deletion of his name from the penal of appellants (Muhammad Ajmal) in the instant service appeal which is placed on file. Application is allowed and the name of Muhammad Ajmal is deleted from the penal of appellants in the instant appeal. Office is directed to make necessary correction in the instant appeal. To come up for further proceedings on 01.02.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

01.02.2022

Counsel for the appellant present.

Learned counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 04.04.2022 before S.B.


(Mian Muhammad)
Member(E)

04.04.2022

Appellant present in person and seeks adjournment. Adjourned. To come up for preliminary hearing on 11.05.2022 before S.B.


Chairman

12.10.2021

Appellant in person present.

Appellant seeks adjournment on the ground that his counsel is not available today. Adjourned. To come up for preliminary hearing before the S.B on 08.12.2021.



(MIAN MUHAMMAD)
MEMBER (E)

~~08.12.2021~~

~~Counsel for the appellant present.~~

~~Learned counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 01.02.2022 before S.B.~~




~~(MIAN MUHAMMAD)
MEMBER (E)~~

Form-A

FORM OF ORDER SHEET

Court of _____

Case No. 6606 /2021

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	25/06/2021	<p>The present appellants initially went in Writ Petition before the Hon'ble Peshawar High Court and the Hon'ble High Court vide its order dated 27.05.2021 treated the Writ Petition into an appeal and sent the same to this Tribunal for decision in accordance with law. The same may be entered in the Institution Register and put up to the worthy Chairman for further order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13/08/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	13.08.2021	<p>Nemo for the appellant. Notice be issued to appellant/counsel. To come up for preliminary hearing on 12.10.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>



(V)

**The
PESHAWAR HIGH COURT
Peshawar**

Ph: No. 091-9210149-58



No. 37657 (1)/1644/2021/WP-MN

Dated: 23-June-2021

From

**Deputy Registrar (J),
Peshawar High Court,
Peshawar.**

To

✓
The Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Subject:

**Writ Petitions W.P 3615/2019 Title: Muhammad Ilyas VS Government of KPK
Writ Petitions W.P 2195/2020 Title: Muhammad Ajmal etc VS DG Health Services, KPK
etc**

Memo,

I am directed to send herewith the titled cases in original alongwith all annexures and copy of judgment passed by this Honble Court dated 27.05.2021 for compliance.

Deputy Registrar (J)

Encl: As above.

(D)

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.3615-P/2019

Muhammad Ilyas and others

Vs.

**Government of Khyber Pakhtunkhwa through its Chief
Secretary, Peshawar and others**

Date of hearing **27.05.2021**
Petitioner(s) by: **Abdul Munim Khan,**
Advocate.
Respondents No.1 to 3 by: **Mr. Umar Farooq, AAG.**
Respondents No.4 to 12 by: **Muhammad Ayub Khan**
Shinwari, Advocate.
Respondents No.13 to 21 by: **Mr. Habib Anwar,**
Advocate.
Applicants by: **Mr. Daris Khan, Advocate.**
(in C.M. No. 2367 of 2020)

JUDGMENT

IJAZ ANWAR, J. Through this single judgment, we intend to decide this and the connected Writ Petition bearing **No.2195-P/2020** titled **"Muhammad Ajmal and others Vs. Directorate General Health Services, Khyber Pakhtunkhwa, Peshawar through its Director General and others"**, since, in both these cases, similar questions of law and facts are involved.

2. Petitioners have prayed for the following relief:-

"It is humbly prayed that on acceptance of this writ petition, this Hon'ble Court may graciously be pleased to:-

Declare:

211

- (i) *That the petitioners being qualified and having Bachelor degree in different branches of Pathology are qualified with the relevant requisite qualifications required in the field of Pathology.*
- (ii) *That the acts and actions of the respondents and their refusal to consider the petitioners eligible for the posts of Clinical Technologists (BS-17) by not including them in Cadre of Clinical Technicians due to their degrees in the field of Microbiology, Biochemistry, Hematology and Histopathology/Cytology in line with other persons having Bachelor Degree in Medical Technology is without lawful authority, and of no legal effect and hence ineffective upon the rights of the petitioners.*

Set aside:

the recommendations of the 2nd Committee and the tentative seniority list based on those recommendations as on 21/05/2019 may please be rescinded.

Direct:

The respondents to act in the matter in accordance with law and to consider the petitioners being eligible alongwith other persons working on the same posts and similarly placed employees for the post of Clinical Technologists (BS-17) and restore the seniority list as prepared on 17.01.2019.

Grant:

Any other relief as deemed appropriate in the circumstances of the case not specifically prayed for may also be granted to the petitioners".

3. In essence, petitioners, being employees of MTI/Hospitals/Departments and having Bachelor Degrees in different branches of Pathology, are aggrieved of the decision/recommendations of the respondents/second Committee, whereby, their names were excluded from the Cadre of Clinical Technicians (BPS-17) on the ground that their degrees in the field of Microbiology, Biochemistry, Hematology and Histopathology/Cytology are not relevant to the Pathology Technology. As such, the same is liable to be rescinded and the recommendations of the first Committee, whereby, these Pathology disciplines were considered relevant subjects to the Pathology Technology, may be treated as final for the purpose of promotion.

4. In view of the averments made in the instant petition, comments were called from respondents No.2 and 3, who furnished the same, wherein, they opposed the issuance of desired writ asked for by the petitioners.

5. Arguments heard and record perused.

6. Perusal of the record reveals that petitioners are mainly aggrieved of the decision of the Committee, whereby, the following recommendations were made:-

- i. *To include the names of degree holders of Biochemistry, Microbiology, Hematology and Histopathology in the seniority list of qualified Paramedics of Pathology Cadre being relevant Technology.*
- ii. *Subsequently to reform a separate Cadre for the degree holders of Biochemistry, Microbiology, Hematology and*

Histopathology later as and when the Govt. grants permission.

7. The Committee, infact, was constituted for the inclusion of the names of the Paramedics degree holders of Biochemistry, Microbiology, Hematology and Histopathology in the seniority list of qualified B.Sc Paramedics of Pathology Cadre. Similarly, they are further aggrieved of the provisional seniority list duly circulated, whereby, their names were excluded from the provisional seniority list of qualified degree holders of Pathology Technicians/Senior Technicians (Pathology)/Chief Technicians (Pathology). We, after having examined the case and considered the grievances of the petitioners, called upon learned counsel for the petitioners firstly to justify filing of constitutional petition before this Court and also to address the maintainability of writ petition in view of the bar contained Article 212 of the Constitution of Islamic Republic of Pakistan, 1973. In response to this query, learned counsel argued that it was only recommendations of the Committee and thus without framing any separate Service Rules or amending the law, the names of the petitioners cannot be excluded from the seniority list besides there is no final order in their case.

8. Admittedly, petitioners have submitted their representation/ appeal before the Appellate Authority and in the comments, respondents have rejected their claim. We

are, thus, of the view that the claim/representation of the petitioners having been rejected; as such, the Khyber Pakhtunkhwa Service Tribunal is the only forum where such questions can be raised, taken and decided. Seniority being one of the foremost term and condition of service; as such, in view of the constitutional provisions, the jurisdiction of this Court is barred; besides, petitioners are also having alternate remedy available under the law.

9. In view of the above, since the matter in hand is ripe; as such, we, instead of dismissing this and the connected petition for want of jurisdiction, would send it to the Khyber Pakhtunkhwa Service Tribunal for its decision on merit and in accordance with law. Office is directed to send this and the connected writ petition alongwith its annexures in original to the Khyber Pakhtunkhwa Service Tribunal while its copies be retained for the purpose of record.

Announced
Dt:27.05.2021


JUDGE


JUDGE

(DB) Hon'ble Mr. Justice Lal Jan Khattak and Hon'ble Mr. Justice Ijaz Anwar

Muhammadullah

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT

W.P. No.2195-P/2020

Muhammad Ajmal and others

Vs.

**Directorate General Health Services, Khyber
Pakhtunkhwa, Peshawar through its
Director General and others**

Date of hearing 27.05.2021
Petitioner(s) by: **Muhammad Farooq Malik,**
Advocate.
Respondent(s) by: **Mr. Umar Farooq, AAG.**

JUDGMENT

IJAZ ANWAR, J. For the reasons recorded in Writ
Petition No.3615-P/2019, titled, "Muhammad Ilyas and
others Vs. Government of Khyber Pakhtunkhwa through
its Chief Secretary, Peshawar and others", this writ
petition is disposed of and is sent to the Khyber
Pakhtunkhwa Service Tribunal for its decision on merit.

Announced
Dt:27.05.2021


JUDGE


JUDGE

(DB) Hon'ble Mr. Justice Lal Jan Khattak and Hon'ble Mr. Justice Ijaz Anwar

وکالت نامہ

بعدالت کے لئے درخواست

محمد فاضل قیسر بنام ڈی جی - سیٹی وی

منجانب (مشتضین) دعویٰ اجرم W.P. 2185-P/20

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی و جوابدہی بمقام

غلام محی الدین ملک ایڈووکیٹ سپریم کورٹ آف پاکستان

اینڈ محمد فاروق ملک ایڈووکیٹ ہائی کورٹ کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کرونگا اگر پیشی پر من مظهر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ ساعت ہونے یا بزور تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خورد منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و مگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی و رضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا بطرف درخواست حکم امتناعی یا ترقی یا گرفتاری قبل ازاں اجراء ڈگری بھی موصوف کو بشرا ادا ہونگی علیحدہ مختار نامہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیر مٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند ہے مورخہ 27/11/20 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

FILED TODAY

Deputy Registrar

ATTESTED & ACCEPTED: 39 DEC 2020

Scanned by SB
09 DEC 2020
Signature

Ghulam Mohy-ud-Din Malik

Advocate

Supreme Court of Pakistan.

Muhammad Farooq Malli

Advocate Peshawar.

ENIC: 17301-9123462-7

M. No. 0333-8129616

Handwritten notes and signatures on the left margin, including names like Ghulam Mohy-ud-Din Malik and Muhammad Farooq Malli.

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IN THE PESHAWAR HIGH COURT PESHAWAR

Inst # 33215

1907/ Civil Miscellaneous No. -P/2020

In Impleadment in WP No 2195/20

Muhammad Ajmal V /s Govt of KP

Presented by Noor Mohammad Khattak
on behalf of appellant/petitioner.

Entered in the relevant register.

Put up again along with main case file

Dated 13 OCT 2020


Reader

Dated 13 OCT 2020

Countersigned

Dated 13 OCT 2020


Deputy Registrar

IN THE PESHAWAR HIGH COURT, PESHAWAR.
OBJECTION SLIP

No: 23586

Muhammad Ajmal V/S Govt of KP

8 ~~Copies of annexures~~ Pages 12 to 17 are not legible/attested.



READER

Returned with above mentioned objections for removal to be re-submitted on or before _____

23 July 2020


Deputy Registrar
Peshawar High Court, Peshawa

R/Sir,

- Needfull at Serial # 8 has been done.
- The case is fixed for hearing tomorrow on 14-10-2020 be placed on file. please.


13/X/XY

BEFORE THE PESHAWAR HIGH COURT, PESAWAR

C.M NO. 1907P / 2020

IN

WRIT PETITION NO. 2195-P/2020

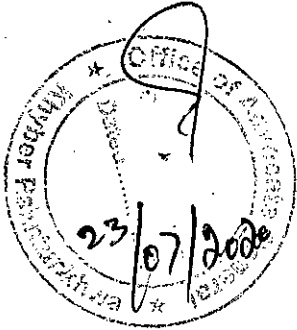
MUHAMMAD AJMAL

VS

GOVT: OF KP & OTHERS

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APPLICANTS

THROUGH:

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

FILED TODAY

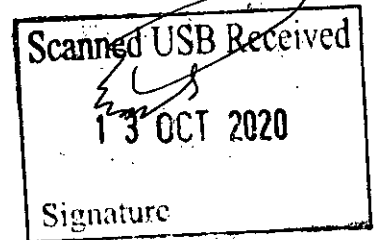
[Signature]
Deputy Registrar

23 JUL 2020

RE-FILED TODAY

[Signature]
Deputy Registrar

13 OCT 2020



BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

C.M NO. 1907P / 2020

IN
Writ Petition No. 2195-P/2020

Muhammad Ajmal & othersPetitioners

VERSUS

Director General Health, Khyber Pakhtunkhwa & Others
.....Respondents

APPLICATION FOR IMPLEADMENT OF
APPLICANTS MENTIONED BELOW IN THE ARRAY
OF RESPONDENTS IN THE ABOVE TITLED WRIT
PETITION.

LIST OF THE APPLICANTS:

- 1) Mr. Syed Fareed Ullah Shah, Senior Technician (BPS-14)
MTI Hayatabad Medical Complex, Peshawar.
- 2) Mr. Kareem Ullah, Chief Blood Bank Technician (BPS-16),
MTI LRH, Peshawar.
- 3) Mr. Muhammad Hanif, Chief Blood Bank Technician (BPS-16),
MTI LRH, Peshawar.
- 4) Mr. Nazir Taj, Chief Technician Pathology (BPS-16),
DHQ Hospital, Nowshera.
- 5) Mr. Siraj, Chief Technician Pathology (BPS-16),
Nawaz Sharif Kidney Hospital, Swat at Mingora.
- 6) Mr. Fazl-e-Azim, Clinical Technician Surgical (BPS-12),
DHQ Hospital, Mardan.
- 7) Mr. Sami Ullah, Clinical Technician Radiology (BPS-12),
THQ Hospital Landikotal, District Khyber.
- 8) Mr. Niamat Ullah, Chief Technician Pathology (BPS-16),
Saidu Teaching Hospital, Swat.
- 9) Mr. Asfandyar Khan, Anesthesia Technician (BPS-12),
Khalifa Gul Nawaz Hospital, Bannu.
- 10) Mr. Avub Said. Clinical Technician Anesthesia (BPS-12).

FILED TODAY
[Signature]
Deputy Registrar
23 JUL 2020

R/SHEWETH:

The applicants submit as under:

- 1- That the captioned writ petition is pending adjudication before this Honorable Court, which is fixed for 14-10-2020.
- 2- That petitioners had filed the above mentioned writ petition for their promotion i.e. 20 % promotion on the basis of seniority-cum-fitness from amongst the Chief Technicians etc. vide notification dated 10-05-2016. **Copy of the rules are attached as annexure A.**
- 3- That petitioners are seeking promotion on the basis of acquiring Bachelor Degree and not on the basis seniority cum fitness. That in case the petitioners succeeded in their stance then the present applicants would be suffered because the present applicants are the senior most employees of the respondents Department and they are entitle for promotion to the next higher scale on the basis of seniority cum fitness. **Copy of the seniority list is attached as annexure B.**
- 4- That the prayer of petitioners regarding their promotion is hit by Article 212(2) of the constitution of Islamic republic of Pakistan, 1973 as well as the applicants has not been incorporated/arrayed as respondents in the above mentioned writ petition, therefore they be impleaded in the array of the respondents as valuable rights of the applicants/ respondents are attached with this writ petition.
- 5- That direct interest of the applicants is involved in the captioned writ petition with regard to their future. That nature of the writ petition will not be changed, if the applicants became party to the writ petition in the array of respondents.
- 6- That if the applicants have not been impleaded as respondents in the above titled writ petition, the applicants would suffer irreparable loss and their valuable rights would be infringed.

FILED TO 5A1
Deputy Registrar
23 JUL 2020

It is, therefore, humbly prayed that on acceptance of this application the applicants may kindly be impleaded as

Dated: 21.7.2020

APPLICANTS

Signature

SYED FARID ULLAH SHAH & OTHERS

THROUGH:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

UMER FAROOQ

&

**SHAHZULLAH YOUSAFZAI
ADVOCATES**

VERIFICATION:

It is verified that no other earlier writ petition was filed between the parties.

FILED TODAY

Deputy Registrar

23 JUL 2020

DEPONENT

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

C.M. NO. 1907 P / 2020

IN

WRIT PETITION NO. 2195-P/2020

MUHAMMAD AJMAL

VS

GOVT: OF KP & OTHERS

AFFIDAVIT

I syed farid ullah shah S/O syed rehman shah R/O Danish abad university town house no H-9 peshawar, (Impleaded respondent) do hereby solemnly affirm that the contents of this **C.M** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

SYED FARID ULLAH SHAH

(Impleaded respondent)

CNIC NO.17301-1610624-5

CELL: 0333-9147727

IDENTIFIED BY:

NOOR MOHAMMAD KHATTAK,
Advocate
High Court, Peshawar

FILED TODAY

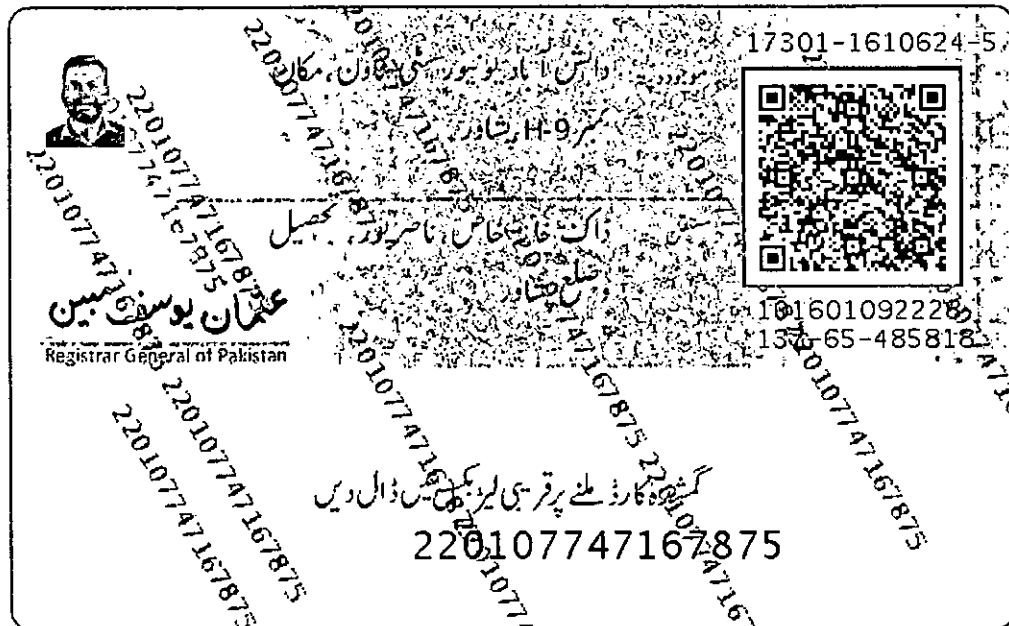
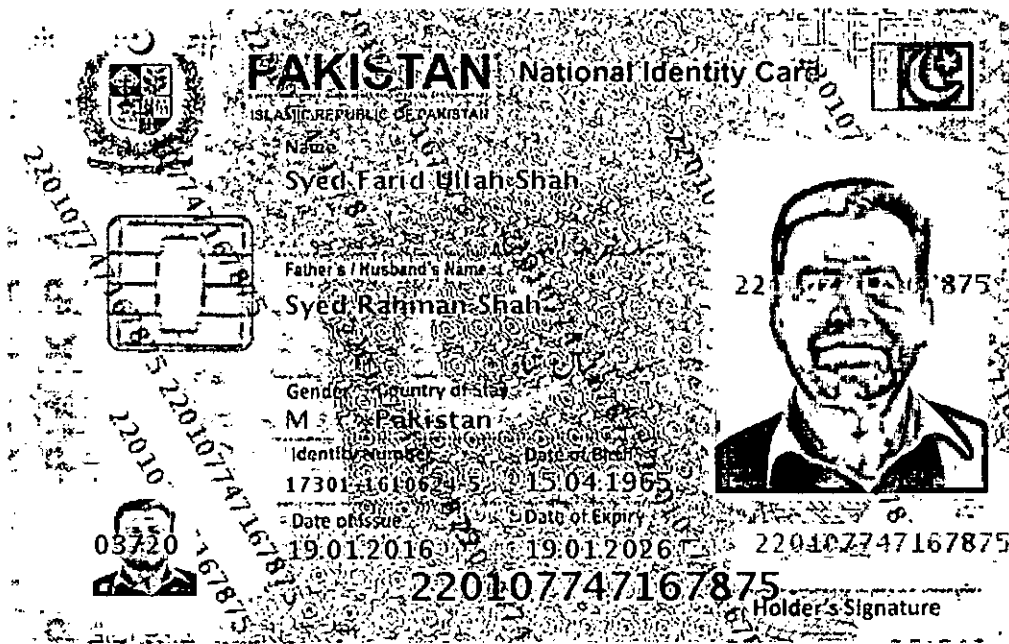
Deputy Registrar
23 JUL 2020

4193

Certified that the above was verified on solemnly affirmation before me by name, this 22 day of July 2020 at Syed Farid Ullah s/o Syed Rehman Shah Peshawar who was Present Neer Muhammad Who is present, Neer Muhammad

Registrar
22/7/2020

Andra verified



Census 1998 Database [x]

There is no record for this individual in the census database. Either no census data was registered, or lacks necessary identity information that could be used for linking the record with this individual.

Other Information that does not appear on card [x]

Place of Birth: پشاور, پشاور

Religion: Islam

BEFORE THE PESHAWAR HIGH COURT, PESAWAR

C.M NO. 1907 P / 2020

IN
Writ Petition No. 2195-P/2020

MUHAMMAD AJMAL VS GOVT: OF KP & OTHERS

ADDRESSES OF PARTIES

LIST OF THE APPLICANTS:

- 1) Mr. Syed Fareed Ullah Shah, Senior Technician (BPS-14)
MTI Hayatabad Medical Complex, Peshawar.
- 2) Mr. Kareem Ullah, Chief Blood Bank Technician (BPS-16),
MTI LRH, Peshawar.
- 3) Mr. Muhammad Hanif, Chief Blood Bank Technician (BPS-16),
MTI LRH, Peshawar.
- 4) Mr. Nazir Taj, Chief Technician Pathology (BPS-16),
DHQ Hospital, Nowshera.
- 5) Mr. Siraj, Chief Technician Pathology (BPS-16),
Nawaz Sharif Kidney Hospital, Swat at Mingora.
- 6) Mr. Fazl-e-Azim, Clinical Technician Surgical (BPS-12),
DHQ Hospital, Mardan.
- 7) Mr. Sami Ullah, Clinical Technician Radiology (BPS-12),
THQ Hospital Landikotal, District Khyber.
- 8) Mr. Niamat Ullah, Chief Technician Pathology (BPS-16),
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- 9) Mr. Asfandyar Khan, Anesthesia Technician (BPS-12),
Khalifa Gul Nawaz Hospital, Bannu.
- 10) Mr. Ayub Said, Clinical Technician Anesthesia (BPS-12),
DHQ Hospital, Mardan.

FILED TODAY


Deputy Registrar

23 JUL 2020

APPLICANTS

THROUGH:
NOOR MOHAMMAD KHATTAK
ADVOCATE



EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII
GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 10th May, 2016.

No. SOII-III/ID/3-5/2014 - In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	Principal Technologist (i) Principal Clinical Technologist Dental; (ii) Principal Clinical Technologist Pharmacy; (iii) Principal Clinical Technologist Radiology; (iv) Principal Clinical Technologist Pathology;			By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PIIC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology.

<p>(v) Principal Clinical Technologist Anesthesia; (vi) Principal Clinical Technologist Cardiology; (vii) Principal Clinical Technologist Surgical; (viii) Principal Clinical Technologist Dialysis; (ix) Principal Clinical Technologist Physiotherapy; (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and</p> <p>Principle PHC Technologist</p> <p>(i) Principal PHC Technologist (Multi Purpose); and (ii) Principal PHC Technologist (MCH).</p>				<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p>
<p>2</p> <p>Chief Technologist</p> <p>(i) Chief Clinical Technologist Dental; (ii) Chief Clinical Technologist Pharmacy; (iii) Chief Clinical Technologist Radiology; (iv) Chief Clinical Technologist Pathology; (v) Chief Clinical Technologist Anesthesia; (vi) Chief Clinical Technologist Cardiology; (vii) Chief Clinical Technologist Surgical; (viii) Chief Clinical Technologist Dialysis; (ix) Chief Clinical Technologist Physiotherapy; (x) Chief Clinical Technologist Pulmonology; (xi) Chief Clinical Technologist Gastroenterology; and (xii) Chief Clinical Technologist Ophthalmology/ Otorhinolaryngology; and</p>				<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p>

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<p>Chief PHC Technologist</p> <p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH).</p>			
<p>3 Senior Technologist</p> <p>(i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p> <p>Senior PHC Technologist</p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH).</p>	<p>At least Second Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University/ Institution.</p>	<p>20-35 years</p>	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and (b) fifty percent by initial recruitment.</p>
<p>4 Technologist</p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia;</p>	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution.</p>	<p>18-32 years</p>	<p>(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>

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<p>(vi) Clinical Technologist Cardiology; (vii) Clinical Technologist Surgical; (viii) Clinical Technologist Dialysis; (ix) Clinical Technologist Physiotherapy; (x) Clinical Technologist Pulmonology; (xi) Clinical Technologist Gastroenterology; and (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and</p> <p>PHC Technologist</p> <p>(i) PHC Technologist (Multi-Purpose); and (ii) PHC Technologist (MCH).</p>				<p>(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology.</p> <p>Note: For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p>
<p>5</p> <p>Chief Technician</p> <p>(i) Chief Clinical Technician Dental; (ii) Chief Clinical Technician Pharmacy; (iii) Chief Clinical Technician Radiology; (iv) Chief Clinical Technician Pathology; (v) Chief Clinical Technician Anesthesia; (vi) Chief Clinical Technician Cardiology; (vii) Chief Clinical Technician Surgical; (viii) Chief Clinical Technician Dialysis; (ix) Chief Clinical Technician Physiotherapy; (x) Chief Clinical Technician Pulmonology; (xi) Chief Clinical Technician Gastroenterology; and</p>				<p>(c) forty percent by initial recruitment.</p> <p>By promotion on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>

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	<p>(xii) Chief Clinical Technician Ophthalmology, (Otorhinolaryngology); and</p> <p>Chief PHC Technician</p> <p>(i) Chief PHC Technician (Multi-Purpose); and (ii) Chief PHC Technician (MCH).</p>			
6	<p>Senior Technician</p> <p>(i) Senior Clinical Technician Dental; (ii) Senior Clinical Technician Pharmacy; (iii) Senior Clinical Technician Radiology; (iv) Senior Clinical Technician Pathology; (v) Senior Clinical Technician Anesthesia; (vi) Senior Clinical Technician Cardiology; (vii) Senior Clinical Technician Surgical; (viii) Senior Clinical Technician Dialysis; (ix) Senior Clinical Technician Physiotherapy; (x) Senior Clinical Technician Pulmonology; (xi) Senior Clinical Technician Gastroenterology; and (xii) Senior Clinical Technician Ophthalmology/ Otorhinolaryngology); and</p> <p>Senior PHC Technician</p> <p>(i) Senior PHC Technician (Multi-Purpose); and (ii) Senior PHC Technician (MCH).</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Technicians and PHC Technicians with at least two years service as such in the relevant technology.</p> <p style="text-align: right;"><i>Dr. C</i></p> <p style="text-align: right;"><i>MD</i></p>
7	<p>Technician</p> <p>(i) Clinical Technician Dental; (ii) Clinical Technician Pharmacy; (iii) Clinical Technician Radiology; (iv) Clinical Technician Pathology; (v) Clinical Technician Anesthesia; (vi) Clinical Technician Cardiology; (vii) Clinical Technician Surgical; (viii) Clinical Technician Dialysis; (ix) Clinical Technician Physiotherapy; (x) Clinical Technician Pulmonology; (xi) Clinical Technician Gastroenterology; and</p>	<p>(i) Technician/PHC Technician : At least Second Division Secondary School Certificate with Science from a recognized Board with Diploma in the relevant Paramedical Technology from Khyber Pakhtunkhwa Medical Faculty or Diploma in the relevant Paramedical technology from any recognized institution; provided that the same is registered with the Medical Faculty Khyber Pakhtunkhwa Peshawar; and</p>	18-30 years	By initial recruitment

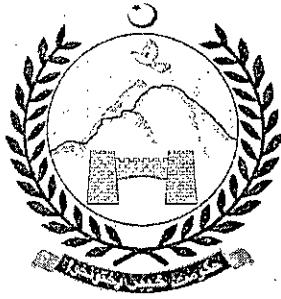
MD

<p>PHC Technician</p> <p>(i) PHC Technician (Multi-Purpose); and (ii) PHC Technician (MCH).</p>	<p>(ii) PHC Technician (MCH): Secondary School Certificate with at least Second Division in Science from a recognized board and Diplomas of LHV and Midwifery from recognized Nursing Examination Board.</p>		<p>PT-1</p>
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SECRETARY TO
GOVERNMENT OF THE KHYBER PAKHTUNKHWA,
HEALTH DEPARTMENT.

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DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.

B-12

To,

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF CHIEF CLINICAL TECHNICIANS**
(PATHOLOGY) BS-16 OF HEALTH SERVICES KHYBER
PAKHTUNKHWA.

Memo:

Enclosed please find Final Seniority List of Chief Clinical Technicians (Pathology) BS-16 of Health Services Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

Note:- Final Seniority List can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR

No. 16658-747 /AE-VII Dated 27/6 /2019

Copy forwarded to the:-

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, Health Department Peshawar

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR

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**FINAL SENIORITY LIST OF CHIEF CLINICAL TECHNICIAN (PATHOLOGY) BS-16 IN THE
HEALTH DEPARTMENT KHYBER PAKHTUNKHWA 2019.**

S. No.	Name	Father Name	Date of Entry in the Cadre	Date of 1st appointment	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Farhad Ali		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	01/10/1989 08.04.2010 02.08.2012	KTH Peshawar	Peshawar	18/05/1960	17/05/2020
2.	Ikramullah	Hijab Gul	Lab Asst: BS 05c) Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	01/02/1988 10/02/1990 08.04.2010 02.08.2012	KTH Peshawar	Charsadda	5/4/1962	04/04/2022
3.	Jehanzeb	Sardar	Lab Asst: BS 05 Lab Tech: S 09 Clinical Tech: B-12 Chief Tech: BS-16	19/10/1976 01/07/1990 08.04.2010 02.08.2012	DHQ Hosp: Charsadda	Charsadda	28/04/1960	27/04/2020
4.	Hakeem Uilah Khan	Amanullah Khan	Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	12/05/1991 08.04.2010 02.08.2012	W & C Hosp: Bannu	Bannu	2/1/1969	01/01/2029
5.	Rafiullah	Shakirullah	Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	13/05/1991 08.04.2010 02.08.2012	SGT Hosp; Swat	Swat	10/08/1959	09/08/2019
6.	Zaffar Islam	M. Sardar Jan	Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	14/05/1991 08.04.2010 02.08.2012	KGN Hosp: Bannu	NWA	25/04/1968	24/04/2028
7.	Bazeed Khan	Shall khan	BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	11/11/1991 08.04.2010 02.08.2012	DHQ Hosp: Wana	SWA	6/11/1966	05/11/2026
8.	Ihsanul Haq	Fazal Rahman	BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	18/03/1992 08.04.2010 02.08.2012	SGT Hosp; Swat	Dir	20.03.1965	19.03.2025
9.	Muhammad Hanif	Muhammad Younis	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	14/06/1981 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Peshawar	2/8/1960	01/08/2020

10.	Karim Ullah	Saad Ullah	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	23/07/1985 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Charsadda	24/05/1965	23/05/2025
11.	Zafar Ullah	Zewar Din	Lab Asst: BS 05 b) BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	25/04/1988 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Charsadda	10/9/1969	09/09/2029
12.	Amir Shahbaz	Shatta Mir	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	30.04.1988 11/08/1992 08.04.2010 02.08.2012 11-08-2015	DHQ Hosp: Karak	Karak	18.02.1962	17.02.2022
13.	Qazi Liaqat Hussain	Qazi Muhammad Akram	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	13/12/1989 02/08/1992 08.04.2010 02.08.2012 11-08-2015	KATH Mansehra	Mansehra	25/04/1966	24/04/2026
14.	Riaz Hussain		Lab Tech: B 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	08/03/1993 08.04.2010 02.08.2012 11-08-2015	AHQ Parachinar	Kurram.	5/2/1969	04/02/2029
15.	Izharullah	Muhammad Sharif	Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	31/12/1994 08.04.2010 02.08.2012 11-08-2015	NKB Memorial Hosp: Peshawar	Peshawar	05/12/1972	04/12/2032
16.	Niamatullah	Nowsherawan	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-15	01/04/1992 26/01/1995 08.04.2010 02.08.2012 11-08-2015	SGT Hosp; Swat	Swat	5/9/1969	04/09/2029
17.	Khurshid Alam		BB Tech BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	22.03.1995 08.04.2010 02.08.2012 11-08-2015	AS NWA Miranshah	ON.W A	10/5/1970	09/05/2030

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18.	Nazir Taj	Faqir Khan	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	29/03/1987 26/10/1995 08.04.2010 02.08.2012	DHQ Hosp: Nowshera	Mardan	1/1/1970	31/12/2030
19.	Abdul Jalil	Sherbat Khan	L/Tech: BPS 09 Sr. Tech: BS-14 Chief Tech: BS-16	29/10/1995 02.08.2012 11-08-2015	DHO Karak	Karak	14/02/1973	13/02/2033
20.	Siraj	Sher Afzal	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	18/07/1989 02/11/1995 08.04.2010 02.08.2012 11-08-2015	NSKH Swat.	Swat	1/1/1967	31/12/2026
21.	Akhtar Ali		Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	18/06/1996 08.04.2010 02.08.2012 11-08-2015	DHQ Hosp: Swabi	Karak	3/6/1967	02/06/2027
22.	Fazli Hakeem	Gul Rahim	Lab Tech: BS.09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	01/10/1996 08.04.2010 02.08.2012 11-08-2015	HMC Peshawar	Peshawar	13.06.1962	12.06.2022
23.	ikramullah	Qavi Jan	L/ Tech: BPS 09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	01/10/1996 17.06.2011 02.08.2012 11-08-2015	DHQ Hosp: Dir Lower	Charsadda	15/04/1966	14/04/2026
24.	Abdul Qadoos	Sheikh Rasool	BBT BS-09 Clinical Tech: B-12 Sr. Tech: BS-14 Chief Tech: BS-16	01/10/1996 17.06.2011 02.08.2012 11-08-2015	DHQ Hosp: Kohat	Karak	1/12/1966	30/11/2026
25.	Muhammad Raziq	Hamzullah	L/ Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	15.11.1986 17.06.2011 02.08.2015 25.10.2017	DHQ Hosp: Mardan	Charsadda	02.02.1967	01.02.2027
26.	Bakht Ali Shah	Niaz Gul	L/ Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	15.11.1986 17.06.2011 02.08.2015 25.10.2017	KTH Peshawar	Charsadda	18.03.1967	17.03.2027

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27.	Muhammad Rafiq	Muhammad Farooq	L/ Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	01.10.1996 17.06.2011 02.08.2015 25.10.2017	KTH Peshawar	Charsadda	01.03.1968	29.02.2028
28.	Mustajab Khan	Gul Muhammad	Lab:Assistant BS-5 B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	17.06.1991 01.10.1996 12.03.2012 11.08.2015 25.10.2017	Maternity Hospital Peshawar	Peshawar	15.04.1972	14.04.2032
29.	Hazrat Usman	Atta Muhammad	L/ Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	16.02.1999 17.06.2011 02.08.2015 25.10.2017	W & C Hospital Kohat	Karak	10.09.1974	09.09.2034
30.	Khan Nawab	Gul Ahmad	L/ Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 17.06.2011 02.08.2015 25.10.2017	SGT Hospital Swat	Swat	01.01.1964	31.12.2024
31.	Nazir Ahmad	Bashir Ahmad	BB Tech: BPS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 17.06.2011 02.08.2015 25.10.2017	DHQ Hospital Charsadda	Charsadda	17.03.1967	16.03.2027
32.	Hamayun	Muhammad Ghaus	Lab:Assistant BS-5 B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	24.01.1990 24.03.1999 17.06.2011 02.08.2015 25.10.2017	LRH Peshawar	Peshawar	11.12.1967	10.12.2027
33.	Amjid Ali	Zait Ullah	Lab:Assistant BS-5 B/Bank Tech: BS 09 JCT(Pathology): B-09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	28.03.1987 04.03.1999 10.05.2006 02.08.2012 11.08.2015 25.10.2017	MASH Peshawar	Charsadda	07.02.1969	06.02.2029
34.	Rizwan Ullah	Abdul Ghafoor	Lab:Assistant BS-5 B/Bank Tech: BS 09 JCT(Pathology): B-09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	29.01.1990 04.03.1999 10.05.2006 02.08.2012 11.08.2015 25.10.2017	Police & Services Hospital Peshawar	Charsadda	25.03.1970	24.03.2030

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35.	Sher Hussan	Haibat Khan	Lab:Assistant BS-5 B/Bank Tech: BS 09 JCT(Pathology): B-09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	19.08.1990 04.03.1999 10.05.2006 02.08.2012 11.08.2015 25.10.2017	Police & Services Hospital Peshawar	Karak	04.01.1971	03.01.2031
36.	Fazli Manan	Abdul Manan	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	SGT Hospital Swat	Swat	01.04.1971	31.03.2031
37.	Muhammad Jalaluddin	Abdul Ghafoor	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	MAS Memorial Hosp: Peshawar	Charsadda	09.103.1973	08.03.2033
38.	Ziarat Khan	Adam Khan	Lab:Assistant BS-5 B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	02.05.1995 04.03.1999 02.08.2012 11.08.2015 25.10.2017	DHQ Hospital Bathkhela	Malakand	28.05.1973	27.05.2033
39.	Muhammad Iqbal	Makhozai	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	DHQ Hospital Daggar Buner	Buner	20.02.1974	19.02.2034
40.	Amjid Khan	Abdul Majid	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	LRH Peshawar	Peshawar	12.03.1976	11.03.2036
41.	Niaz Ali	Gul Said	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	MMC Mardan	Peshawar	05.04.1977	04.04.2037

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42.	Iftikhar Ahmad	Wasif Khan	B/Bank Tech: BS 09 CT(Pathology): B-12 SCT(Pathology): BS-14 Chief Tech: BS-16	04.03.1999 02.08.2012 11.08.2015 25.10.2017	KCD Peshawar	Peshawar	16.04.1977	15.04.2037
Prepared by: Syed Amjid Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood'Ali Shah J/C cum C.O & Checked by Sheeraz Khan Deputy Director Paramedics DGHS.								

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

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Final Seniority list of Degree Holder Paramedics Radiology.2019

S. No.	Name & Father Name	Date of 1st appointment	BPS	Date of Passing Degree	Total / Obtained Marks & Division.	%age	Univer- sity	Present Post- ing	Domicile	Date of Birth	Date of Re- tirement
1.	Naveed Ahmad S/O Anar Badshah	19.01.2013	BS-12	BSc June -21- 2011	900/623	69.22	Ziauddin University	KGNT Hosp; Bannu	Karak	13.03.1986/	12/3/2046
2.	Anwar Shah S/O Ibrahim Shah	13.02.2014	BS-12	BSc 6/4/2012	560/900	62.22	Ziauddin University	DHO Bunner	Bunner	30.03.1991	29.03.2051
3.	Nadar Khan S/O Majeed Gul	18.03.1992	BS-12	BS (H) Feb-2012 09-07-2012	3814 / 5000	76.28	University of Peshawar	DHQH Batkhe- la	Malakand	15.03.1972	14.03.2032
4.	Wajid Khan S/O Musali Khan	22.03.1993	BS-12	Feb-2012 BS (H) 09-07-2012	3405 / 5000	68.10	University of Peshawar	W&C Hosp; Kohat	Kohat	19.04/1971	18.04-2031
5.	Rahmatullah S/O Pir Shah Jehan	3/10/1989	BS-12	BS (H) Feb-2012 09-07-2012	3214 / 5000	64.28	University of Peshawar	KDA Hosp; Karak.	Karak	2/4/1965	1/4/2025
6.	Johar Ali S/O Ghu- lam Rahmani	04.09.1988	BS-14	BS (H) 09-07-2012	3045 / 5000	60.90	University of Peshawar	Services Hosp; Peshawar	Peshawar	01.06.1965	31-05-2025
7.	Tariq Gul S/O Gul Raqib	05.01.2011	BS-12	BS (H) Feb.2012 09-07-2012	3018/5000	60.36	University of Peshawar	KGNTH Bannu	Bannu	12.05.1981	11.05.2041
8.	Nehar Ali S/O Mu- hammad Nasar	11/8/1990	BS-12	BS (H) Feb.2012 09-07-2012	2895/5000	57.90	University of Peshawar	DHQ Hosp; Swabi	Swabi	15/4/1971	14-04-2031
9.	Azam Shah S/O S.Muzaeen Shah	26-11-1988	BS-14	BS (H) 29- 10-2013	3237/5000	64.74	University of Peshawar	LRH Peshawar	Peshawar	14-07-1966	13-07-2026
10.	Barkat Ali S/O Raj Ud Din	14-03-1992	BS-12	BS (H) 12/2/2015	3498/5000	69.96	University of Peshawar	STH Swat	Swat	10/6/1973	9/6/2033

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11.	Amjad Ali Khan S/O Amir Akbar Khan	14.06.2016	BS-12	BS (H) 12/2/2015	3383/ 5000	67.66	University of Peshawar	STH Hosp; Swat	Swat	9/2/1982	8/2/2042
12.	Muhammad Naseem S/O Ahmad Jamil	13.04.2009	BS-12	BS (H) 12/2/2015	3081/5000	61.62	University of Peshawar	DHO Nowshera	Nowshera	12.11.1980 Nowshera	11.11.2040
13.	Abidullah S/O Waheed Gul	14.10.2009	BS-12	BS (H) 12/2/2015	3033 / 5000	60.66	University of Peshawar	MMC Mardan.	Mardan	10.04.1985	9/4/2045
14.	Rizwan Ullah S/O Mehtar Gul Khan	16-04-1995	BS-16	BS (H) 17-03-2017	3.39 CGPA	3.39	KMU Peshawar.	KGNTH Bannu	Bannu	4/3/1971	3/3/2031
15.	Waqas Ahmad S/O Sher Muhammad	3/11/2008	BS-12	BS (H) 17-03-2017	3.38 CGPA	3.38	KMU Peshawar.	DHQ Hosp; KDA Kohat	Kohat	2/9/1985	1/9/2045
16.	Atiq Ur Rahmman S/O Fathur Rahman	30.07.1992	BS-12	BS (H) 30-08-2017	3218/5000	65.56	University of Peshawar	HMC	Upper Dir	15.04.1971	14-04-2031
17.	Syed Faridullah Shah S/O Syed Rehman Shah	01-11-1988	BS-14	BS (H) 30-08-2017	3137 / 5000	62.74	University of Peshawar	HMC Peshawar	Peshawar	15-04-1965	14-04-2025
18.	Muhammad Nasar S/O Sher Zamin	22.04.2008	BS-12	BS (H) 30-08-2017	3077/5000	61.54	University of Peshawar	AHQ Hospital Landi Kotal	Dir Lower	16.11.1984	15-11-2044
19.	Mushtaq Hussain S/O Khan Badshah	01.04.2009	BS-12	BS (H) 30-08-2017	3077/5000	61.54	University of Peshawar	DHO Dir Upper	Dir Upper	28.12.1982	27.12.2042
20.	Faheem Hussain S/O Akhlq Hussain	11.03.1999	BS-12	BS (H) 30-08-2017	3067/5000	61.34	University of Peshawar	DHO Peshawar	Peshawar	06.06.1973	5/6/2033
21.	Maz Ullah S/O Mir Alam Khan	16-11.1989	BS-12	BS (H) 30-08-2017	3057/5000	61.14	University of Peshawar	DHQ Hosp; Charsadda	Charsadda	06.02.1969	5/2/2029
22.	Muhammad Saeed Shah S/O Muham- mad Aslam Shah	07-10.1990	BS-12	BS (H) 30-08-2017	2990/5000	59.80	University of Peshawar	DHO Haripur	Haripur	06.04.1969	5/4/2029
23.	Sultani Raz D/O Noor ul Basar	13.03.2012	BS-12	BS (H) 1/11/2017	3.35	3.35	Bacha Khan UNI	DHQ Hosp: Mardan	Mardan	20.08.1984	19-08-2044
24.	Danial Afzal S/O Mir Afzal Khan	02-05-2013	BS-12	1/11/2017	2.76	2.76	Bacha Khan UNI	KAT Hosp: Man- sehra	Mansehra	06-06-1992	05.06.2052
25.	Bibi Rabia D/O Laiq ali Khan	24.06.2016	BS-12	BS (H) 20-02-2018	3.29	3.29	KMU Peshawar	DHO Charsadda	Charsadda	17.02.1987	16.02.2047

26.	Noor Habib S/O Abdur Rauf	05.03.1999	BS-12	BS (H) 20-02-2018	3.01	3.01	KMU Peshawar.	NBM Hosp: Peshawar	Peshawar	01.08.1972	31-07-2032
27.	Rashid Muhammad S/O Gul Muhammad	04.03.2006	BS-16	BS (H) 22-10-2018	3.7	3.7	KMU	DHO Lakki Marwat	Lakki	15.09.1981	14-09-2041

Prepared by: Syed Amjid Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ali Shah J/C cum C.O Rook Ullah C.O & Checked by Sheeraz Khan Deputy Director Paramedical/DGHS.

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar

ATTESTED

VAKALATNAMA

Before The Peshawar High Court Peshawar

OF 2020

Muhammad Ajmal

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP

(RESPONDENT)
(DEFENDANT)

I/We Syed Fasih ulah Shah & others (Respondents)

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___/___/2020

Syed Fasih ulah Shah

CLIENT(S)

FILED TODAY
[Signature]
Deputy Registrar
23 JUL 2020

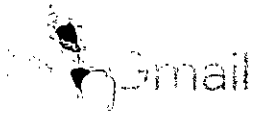
ACCEPTED
NOOR MOHAMMAD KHATTAK
15401-0705985-5
BC-08-0853

& [Signature]
SHAHZULLAH YOUSAFZAI,
ADVOCATES

OFFICE:
Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No. **0345-9383141**

- 1) S. Faridullah Shah John
- 2) Kareemullah a ~~MS~~
- 3) M. Hamid ~~MS~~
- 4) Nazir Taj - Mustafa
- 5) Siraj ~~MS~~ Burtas
- 6) Fazale Azim ~~MS~~
- 7) Samiullah Syamir Ullah
- 8) Nomanullah ~~MS~~
- 9) Ayub Said ~~MS~~ Aziz
- 10) M. Nazir ~~MS~~ Burtas
- 11) Asfandyar Khan ~~MS~~

11/11/11
 11/11/11
 11/11/11



Writ Br <phc.writbranch@gmail.com>

WP No. 2195/2020 For submission of comments.

1 message

Writ Br <phc.writbranch@gmail.com>

Wed, Apr 29, 2020 at 11:59 AM

To: AG <hamza.ayaz1974@gmail.com>, DAG <dagphc161@gmail.com>, Imran Ahmad <dghskplit@gmail.com>, litigation.health.kp@gmail.com, solit1 finance <solit1fd@gmail.com>, Establishment Department <estdkpk@gmail.com>

Dear Sir/Madam,

السَّلَامُ عَلَيْكُمْ

URGENT COURT MATTER

Case file alongwith Order of this Honourable Court, is transmitted for information & necessary compliance at the earliest.

please acknowledge receipt of this Email.

WRIT BRANCH (NOTICE SECTION)

PESHAWAR HIGH COURT, PESHAWAR

2 attachments


wp-2195 of 2020 (28.04.2020).pdf
15K

WP2195P2020 Muhammad Ajmal VS DG HEALTH CF PG63.pdf
4965K

Muhammad Ajmal Vs Director General Health

R/Sir,

1. The above titled **Writ Petition** has been filed by learned counsel for the petitioner which was returned to him with office objection at No. 20 that case does not relate to the PRINCIPAL SEAT. He re-filed the case with a note of request i.e (Flag-A).
2. If approved, we may return the petition to the counsel or fix before the Hon'ble Court.
3. Submitted for orders, please.


H.V.C
27.03.2020

Add: Registrar Judl:

4. Submitted for orders whether to:
 - A. Entertain the case at the Principal Seat for hearing or
 - B. Return for filling it before the appropriate Bench.

Additional Registrar (J)

Hon'able Chief Justice.

Para 4(A) approved.
[Signature]
27.3.20.

IN THE PESHAWAR HIGH COURT, PESHAWAR.
OBJECTION SLIP

No: 12722

Muhammad Ajmal etc V/S DG Health Services, KPK etc

8 Copies of annexures *pages no 21 23 24 26 to 36, 38* are not legible/attested.

20 Case does not relate to *the honorable seat*

[Signature]
READER

Returned with above mentioned objections for removal to be re-submitted on or before _____

24 March 2020

[Signature]
Deputy Registrar
Peshawar High Court, Peshawa

Resubmitted:

The petitioners are working in different cities as paramedics i.e. Peshawar, Nowshera, DIR and Bannu whereas the respondents are residing at Peshawar. The writ petition is very much competent before Principle Bench as the petition has been jointly filed by petitioners.

Firstly, it will save precious time of this Honourable as filing different petitions on same cause of action by every single petitioner would waste time and other petitions can be heard by this Honourable Court.

Secondly, the petitioners have jointly filed the petition so one authoritative judgment would come in field on the point without wasting time on clubbing all the petitions.

Please put up before the bench for its hearing on merits.

[Signature]
Saifullah Muhib Kakakhel
Advocate High Court (LL.M)

27/3/2020

URGENT FORM

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. _____/2020

Muhammad Ajmal and Others Petitioners

VERSUS

Director General Health Services, KP & Others Respondents

1. Will you kindly treat the accompanying Writ Petition as urgent and in accordance with the provisions of Rules 9, Chapter 3-A, Rules Orders of the High Court, Lahore Volume-V.


2. The Grounds of urgency are:

“That respondents are eligible to be promoted to BPS-17 in accordance with Rules/ Notification dated:10.05.2016 in the 20% criteria from date of qualification, however, despite vacancy of posts, they are not being placed on the same. The respondents have designs to appoint their blue eyed chaps by doing away with the Rules/ notification by standing on the Rights of the petitioners, hence, urgent indulgence is required of this Hon’ble Court.


Petitioners

Through

³
Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan


Saifullah Muhib Kakakhel
Advocate High Court (LL.M)
Cell: 0334-4440744

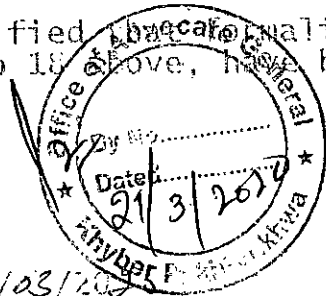
Dated: 21 /03/2020

Before the Peshawar High Court Peshawar

CHECK LIST.

Case Title: <i>Muhammad Aimal & others Versus DB Health Socy</i>		YES	NO
1.	Case is duly signed.	YES	NO
2.	The law under which the case is preferred has been mentioned.	YES	NO
3.	Approved file cover is used.	YES	NO
4.	Affidavit is duly attested and appended.	YES	NO
5.	Case and annexure are properly paged/ numbered according to index.	YES	NO
6.	Copies of annexure are legible and attested. If not, then better copies duly attested have been annexed.	YES	NO
7.	Certified copies of all the requisite documents have been filed.	YES	NO
8.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	YES	NO
9.	Case is within time.	YES	NO
10.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	YES	NO
11.	Court fee in-shape of stamp paper is affixed. (for writ Rs.500, for other was required).	YES	NO
12.	Power of attorney is in proper form.	YES	NO
13.	Memo of addresses filed.	YES	NO
14.	List of books mentioned in the petition.	YES	NO
15.	The requisite number of spare copied attached. (writ Petition-3 Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DR-2).	YES	NO
16.	Case (Revision/appeal/petition etc.) is filed on the prescribed form.	YES	NO
17.	Power of attorney is attested by jail authority (for jail prisoner only).	YES	NO

It is certified that all formalities/documents as requires in column 2 to 18 above, have been fulfilled.



Signature: _____

Date: 21/03/2020

Advocate Peshawar.

For office use only.

Case No. _____

Case received. _____

Complete in all respect; Yes/No (if No the grounds) _____

Date in court. _____

Signature. _____

(Reader)

Countersigned _____

Date. _____

(Deputy Registrar)

In the PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT BRANCH

Case No. _____
Date of Filing: 21/03/2020
District: Peshawar

Case Type: Writ Petition Nature of Original Proceeding: _____

Category Code:

0	5	4	6		
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(Categories & Sub Categories are given at the back of the opening sheet)

Review/Contempt of Court in respect of: _____

Writ of:

Heabus Corpus	Prohibition	Mandamus	Quo Warranto	Certiorari
---------------	-------------	----------	--------------	------------

If Certiorari:

Forum	Date	(I)nterlocutory/(F)inal Order

Case Pertain to

SB

DB

Petitioner Name	Muhammad Ajmal	RE-FILED TODAY
Mobile No.	0333-1718105	<i>[Signature]</i>
Address	Hayatabad Medical Complex, Peshawar	Deputy Registrar
CNIC No.	17101-0260076-3	27, MAR 2020
Email Address	N/A	

Counsel for petitioner(s)	Mian Muhibullah Kakakhel, Sr. ASC, Saifullah Muhib Kakakhel, Mehwish Muhib Kakakhel & Zeenat Muhib Kakakhel Advocates High Court.
Mobile No.	0334-4440744
Address	36-C, 2 nd Floor Cantonment Plaza, Saddar Road, Peshawar
CNIC No.	17101-6035355-3
Email Address	mm_kakakhel@hotmail.com

FILED TODAY
[Signature]
Deputy Registrar
21 MAR 2020

Respondents	Director General Health Services and others
Address	Peshawar

Original Order/Action/Inaction Complained of:

Prayer: In view of the above, it is humbly prayed that this Hon'ble Court may graciously be pleased to:

- i. **Declare** that the petitioners are entitled, eligible and fit to be promoted to BPS-17 in accordance with in vogue Rules/ Notification dated: 10.05.2016 and the joint seniority list made by respondent No. 01.
- ii. **Declare** any amendment in the criteria which adversely affect the promotion of the petitioners as illegal, without jurisdiction, against constitutional rights and legitimate expectancy of the petitioners besides being against the principle of natural justice.
- ii. **Direct** that in case of any amendment in the rules shall not be given retrospective effect on petitioners and the Respondents shall apply the Rules/ Notification dated: 10.05.2016 and implement Judgement/ Order dated: 19.11.2019 of this Hon'ble Court in letter and spirit.
- v. **Direct** the Respondents to convene a meeting of Departmental Promotion Committee and case of the petitioners be put before it to be dealt with in accordance with in vogue law, rules and judgements of this Hon'ble court on the subject

Law/Rules/Governing the Original proceedings/action/inaction

Note: Any suggestion to improve the proforma will be appreciated

Signature *[Signature]*

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. 2195P2020

Muhammad Ajmal and Others

..... Petitioners

VERSUS

Director General Health Services, KP & Others

..... Respondents

INDEX:

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1.	Opening Sheet		
2.	Urgent Form		
3.	Writ Petition		1-7
4.	Affidavit		8
5.	Addresses of parties		9-10
6.	Copy of Notification dated: 10 th May, 2016	A	11-13
7.	Copy of application dated: 16.02.2019	B	14-15
8.	Copy of application to respondent No. 02	C	16-17
9.	Copy of application to Chief Minister	1-C	18-19
10.	Copy of seniority list dated: 27.06.2019	D	20-39
11.	Copy of letter dated: 09.12.2019	E	40
12.	Copy of advertisement of Public Service Commission	F	41-46
13.	Copies of writ petition No. 3109-P/2019	G	47-50
14.	Copy of order dated: 19.11.2019	H	51/A
15.	Copy of Notification dated: 01.02.2018	I	52-53
16.	Notice to respondents		54
17.	Court Fees		55-56
18.	Vakalat Nama		57

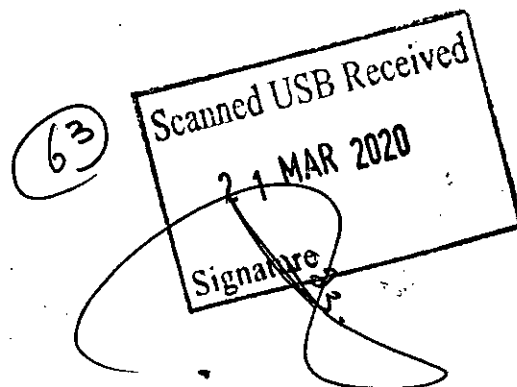
Petitioners

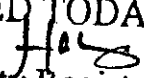
Through

3
Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan


Saifullah Muhib Kakakhel
Advocate High Court (LL.M)
Cell: 0334-4440744

Dated: 21/03/2020



FILED TODAY

Deputy Registrar
21 MAR 2020

(13)

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. 2195P2020

*Deleted
vide order
08/11/21*

1. Muhammad Ajmal S/o Muhammad Afzal
Employed in Hayatabad Medical Complex, Peshawar.
2. Ibrar Ahmad S/o Saiful Islam
R/o Village Bara Banda, Risalpur, District Nowshera.
3. Asadullah Khan S/o Sakhi Jan
R/o Village Totkay P.O Tehsil & District Matta, Swat
4. Ihsan Ul Haq S/o Din Muhammad
R/o Malakand Payan, Tehsil Blambat, Timergarah, District Lower Dir.
5. Hidayat Ullah Khan S/o Mir Faraz Khan
R/o House No. 233/b, Mohallah Rabnawaz Wakeel, Bannu.
6. Zahiruddin S/o Sirajuddin
R/o Kaladag, P.O Haya Seri, Tehsil Blambat, District Lower Dir.
7. Sirajuddin S/o Syed Hakeem
R/o Ziyarat, Talash, Tehsil Timergarah, District Lower Dir.
8. Dilawar Khan S/o Ajdar Khan
R/o Lalo Payan, P.O Khal, Timergarah, District Lower Dir.
9. Israr Ullah S/o Muhammad Qasim
R/o P.O Mir Ali, Hasso Khel, Tehsil Mir Ali, District North Waziristan.
10. Hafizullah Khan S/o Mir Sada Khan
R/o Kotka Asad Khan, Sabo Khel Khattak, P.O Sabo Khel Mundan,
Tehsil & District Bannu.

.....Petitioners

VERSUS

1. Directorate General Health Services, Khyber Pakhtunkhwa Peshawar
through its Director General.
2. Govt. of Khyber Pakhtunkhwa through Secretary Health, Civil
Secretariat, Peshawar.
3. Secretary Finance, Govt. of Khyber Pakhtunkhwa, Civil Secretariat,
Peshawar.

FILED TODAY

H. S.
Deputy Registrar

21 MAR 2020

2

4. Secretary Services & General Administration Department, Khyber Pakhtunkhwa.
5. Medical Health Foundation Department through M.D, Khushal Khan Khattak Road, University Town Peshawar.
6. Secretary Establishment Department of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

..... Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973.**

Respectfully Sheweth:

1. That the petitioners are Paramedics / Graduate Medical Technologists {Hereinafter referred to as GMTs} and are highly qualified being employed in BPS-12, 14 and 16 respectively, working in different MTIs/Hospitals of Khyber Pakhtunkhwa under respondent No. 01.
2. That vacancies occurring in categories of allied health services are allotted in a certain ratio to the GMTs. The allocation is published in the official gazette vide Notification dated: 10th May 2016. *(Copy of Notification dated: 10th May 2016 is attached as Annexure A).*
3. That the recruitment criteria therein in the notification is reproduced herein below:

(a) Forty percent by promotion, on the basis of seniority cum fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years' service as such in the relevant technology;

(b) Twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior's

FILED TODAY
Deputy Registrar
21 MAR 2020

Technicians and Technicians having qualification prescribed for initial recruitment with three years' service as such in the relevant technology.

Note: For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:

Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and

(c) Forty percent by initial recruitment.

4. That the petitioners fit into the 2nd criteria of the aforementioned/ attached notification i.e. **20% by promotion from the date of their acquiring qualification**. As per the said Notification, the Technologists are given a 20% quota from the date of acquiring qualification prescribed for initial recruitment as mentioned in Column 03.
5. That vide a memo dated: 15.05.2018 the ratio of paramedics' staff in the health department in higher grades was enhanced which was to be filled through the aforementioned criteria.
6. That respondents appointed candidates through both the 40% through initial recruitment and 40% through seniority cum fitness, however, played delaying tactics when the vacancy left to be filled by 20% quota were to be fulfilled.
7. That the respondents moved an application dated: 16.02.2019 to the Chief Minister Khyber Pakhtunkhwa for their kind consideration to issue final seniority list and upgrade/promote the petitioners in service in the 20% quota criteria. **(Copy of application dated: 16.02.2019 is attached as Annexure B)**

FILED TODAY
H-2
Deputy Registrar

21 MAR 2020

(4)

8. That another application was filed before respondent No. 02 & Chief Minister for up-gradation of services of GMT to BPS-17 in accordance with 20% quota in Service Rules but is still pending before him. *(Copies of applications to respondent No. 02 & chief minister are attached as Annexure C & C-1)*
9. That after the applications, respondent No. 01 issued final seniority lists of degree holders vide list dated: 27.06.2019 for purpose of promotion on the 20% quota. *(Copy of seniority list dated: 27.06.2019 is attached as Annexure D)*
10. That a working paper regarding promotion of qualified paramedics on the basis of qualification to the post of Clinical Technologists was issued calling the aforesaid promotion lists final and undisputed. *(Copy of letter dated: 09.12.2019 is attached as Annexure E)*
11. That Departmental Promotion Committee is not convened to comply with the Rules dated: 10.05.2016 in case of the petitioners and is being delayed without assigning any reason.
12. That as per information received to the petitioners, respondents are intending to change the criteria for 20% promotion through graduation from the date of acquiring qualification.
13. That the criteria of 40% by initial recruitment have been fulfilled in accordance with the said Rules. *(Copy of advertisement of Public Service Commission Dated: 18.02.2019 is attached as Annexure F)*
14. That the criteria of 40% by promotion on seniority cum fitness was disputed like the present case, which was challenged before this Hon'ble Court through Writ Petition No. 3190-P/2019 whereby, it was disposed of through order dated: 19.11.2019 which is reproduced herein under;

FILED TODAY
HCS
Deputy Registrar

21 MAR 2020

"We dispose of this petition by directing the respondents No. 01 and 02 to implement the quota reserved for GMTs in letter

5

and spirit and strictly in accordance with law and rules on the subject so that the petitioner's grievance could be redressed."

(Copies of writ petition No. 3109-P/2019 and order dated: 19.11.2019 are attached as Annexure G & H)

15. That similarly placed petitioners have been promoted on 1st February 2018 on the 20% criteria of the Rules dated: 10.05.2016 while the same is denied to the present petitioners. *(Copy of Notification dated: 01.02.2018 is attached as Annexure I)*
16. That respondents not promoting the petitioners in accordance with law and rules on the subject is discriminatory, arbitrary and are based on malafide intentions.
17. That respondents are bent upon changing the rules to accommodate their blue-eyed chaps.
18. That the GMTs are not been treated in accordance with law and in utter violation of Articles 4, 25, 27 & 38 of the Constitution of Islamic Republic of Pakistan.
19. That the non-observance of the promotion quota of 20% from the date of acquiring qualification reserved for GMTs in the rules on the subject is illegal being based on non-exercise of jurisdiction and lawful authority.
20. That respondents bent upon amending the present rules OR making rules afresh on the subject criteria is illegal, without jurisdiction and without lawful authority besides being for ulterior motives.
21. That the respondents have violated the golden principle of jurisprudence: *"To refrain from doing anything not permitted by law to do, or to do anything required by law to do"*.

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Deputy Registrar
21 MAR 2020

22. That the conduct demonstrated by the respondents also goes contrary to the principle of *"what is reburied by law to be done in a particular manner has to be done in that manner only otherwise, it would be illegal"*.
23. That there is no reason, rational and justification for leaving out the clause in the rules pertaining to the appointment of the GMTs.
24. That ignoring the GMTs and accommodating the other Inservice employees against the seats reserved for GMTs bespeaks of the malafide, favoritism, nepotism and even underhand dealing on the part of the respondents.
25. That not conveying the departmental promotion committee in accordance with/to implement the rules of dated: 10.05.2016 is to fulfill the nefarious designs of the respondents, which is illegal, without jurisdiction and without lawful authority.
26. That even if the rules are amended by the respondents, they will not be retrospectively imposed on the present petitioners who became eligible while the present rules were in force and since delegated legislation is always prospective and power of retrospective application lies only with the legislature which too has limitations.
27. That the petitioners may add additional grounds, after the stance of the respondents becomes known to him.
28. That the petitioners are left with no other remedy then to approach this Hon'ble Court by way of present writ petition.

PRAYER

In view of the above, it is humbly prayed that this Hon'ble Court may graciously be pleased to:

- i. **Declare** that the petitioners are entitled, eligible and fit to be promoted to BPS-17 in accordance with in vogue Rules/ Notification dated: 10.05.2016 and the joint seniority list made by respondent No. 01.

FILED TODAY
Deputy Registrar
21 MAR 2020

- ii. **Declare** any amendment in the criteria which adversely affect the promotion of the petitioners as illegal, without jurisdiction, against constitutional rights and legitimate expectancy of the petitioners besides being against the principle of natural justice.
- iii. **Direct** that in case of any amendment in the rules shall not be given retrospective effect on petitioners and the Respondents shall apply the Rules/ Notification dated: 10.05.2016 and implement Judgement/ Order dated: 19.11.2019 of this Hon'ble Court in letter and spirit.
- iv. **Direct** the Respondents to convene a meeting of Departmental Promotion Committee and case of the petitioners be put before it to be dealt with in accordance with in vogue law, rules and judgements of this Hon'ble court on the subject.
- v. **Any other relief** deemed appropriate in the circumstances, not asked specifically for, may also be given to the petitioners. The petitioners may also be allowed to put forward any argument/ document at the time of hearing with the permission of this Honourable Court.

INTERIM RELIEF:

It is, therefore, respectfully prayed, that by way of interim relief the respondents may be directed to maintain status quo, till final decision of the case.

[Signature]
Petitioners

Through

³
Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan

[Signature]
Saifullah Muhib Kakakhel
Advocate High Court (LL.M)
Cell: 0334-4440744

Dated: 21 /03/2020

CERTIFICATE:

Certified that as per instructions of my client, no such writ petition on behalf of the petitioners have earlier been filed in this Honourable Court on the subject matter.

LIST OF BOOKS:

- 1. Constitution of Islamic Republic of Pakistan, 1973
- 2. Any other law book or case law according to need.

[Signature]
ADVOCATE

[Signature]
ADVOCATE

FILED TODAY
[Signature]
Deputy Registrar

21 MAR 2020

IN THE PESHAWAR HIGH COURT, PESHAWAR

8

Writ Petition No. 2195 P 2020

Muhammad Ajmal and Others

..... Petitioners

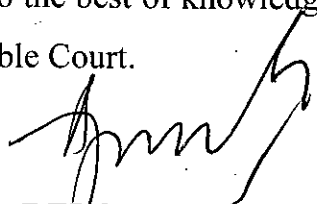
VERSUS

Director General Health Services, KP & Others

..... Respondents

AFFIDAVIT

I, **Muhammad Ajmal** S/o Muhammad Afzal Employed in Hayatabad Medical Complex, Peshawar, do hereby, solemnly affirm and declare on oath that the contents of Writ Petition are true and correct to the best of knowledge and belief and nothing has been concealed from this Honourable Court.



IDENTIFIED BY:

DEPONENT

CNIC# 17101-0260076-3

Cell# 0333-9159395



Saifullah Muhib Kakakhel
Advocate High Court (LL.M)

FILED TODAY
Has
Deputy Registrar
21 MAR 2020

25880

Certified that the above was verified on solemnly affirmation before me in office, this 20 day of March 2020 by M. Ajmal s/o M. Afzal do Peshawar who was identified by Saifullah Muhib Kakakhel Who is personally known to me:

[Signature]
Oath Commissioner
Peshawar High Court, Peshawar.

IN THE PESHAWAR HIGH COURT, PESHAWAR

Writ Petition No. 2195P 2020

(9)

Muhammad Ajmal and Others

..... Petitioners

VERSUS

Director General Health Services, KP & Others

..... Respondents

ADDRESSES OF PARTIES

PETITIONERS

1. Muhammad Ajmal S/o Muhammad Afzal
Employed in Hayatabad Medical Complex, Peshawar.
2. Ibrar Ahmad S/o Saiful Islam
R/o Village Bara Banda, Risalpur, District Nowshera.
3. Muhammad Waseem S/o Ahmad Jamil
Employee CT Radiology, Nowshera Pabbi Hospital.
4. Ihsan Ul Haq S/o Din Muhammad
R/o Malakand Payan, Tehsil Blambat, Timergarah, District Lower Dir.
5. Hidayat Ullah Khan S/o Mir Faraz Khan
R/o House No. 233/b, Mohallah Rabnawaz Wakeel, Bannu.
6. Zahiruddin S/o Sirajuddin
R/o Kaladag, P.O Haya Seri, Tehsil Blambat, District Lower Dir.
7. Sirajuddin S/o Syed Hakeem
R/o Ziyarat, Talash, Tehsil Timergarah, District Lower Dir.
8. Dilawar Khan S/o Ajar Khan
R/o Lalo Payan, P.O Khal, Timergarah, District Lower Dir.
9. Israr Ullah S/o Muhammad Qasim
R/o P.O Mir Ali, Hasso Khel, Tehsil Mir Ali, District North Waziristan.
10. Hafizullah Khan S/o Mir Sada Khan
R/o Kotka Asad Khan, Sabo Khel Khattak, P.O Sabo Khel Mundan,
Tehsil & District Bannu.

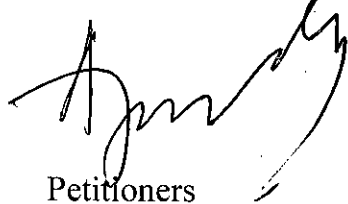
FILED TODAY
Deputy Registrar

21 MAR 2020

RESPONDENTS

10


1. Directorate General Health Services, Khyber Pakhtunkhwa Peshawar through its Director General.
2. Govt. of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
3. Secretary Finance, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Secretary Services & General Administration Department, Khyber Pakhtunkhwa.
5. Medical Health Foundation Department through M.D, Khushal Khan Khattak Road, University Town Peshawar.
6. Secretary Establishment Department of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.



Petitioners

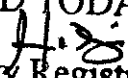
Through

³
Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan



Saifullah Muhib Kakakhel
Advocate High Court (LL.M)
Cell: 0334-4440744

Dated: 21 /03/2020

FILED TODAY

Deputy Registrar
21 MAR 2020

Annex 'A'

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P.III
G A Z E T T E

(11)

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

{Peshawar dated the 10th May 2016.}

No.SOH-III/HD/3-5/2014 -In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
1	2	3	4	5
1	<u>Principal Technologist</u> (i) Principal Clinical Technologist Dental; (ii) Principal Clinical Technologist Pharmacy; (iii) Principal Clinical Technologist Radiology; (iv) Principal Clinical Technologist Pathology;			By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology.

ATTESTED
to be true copy.
Advocate

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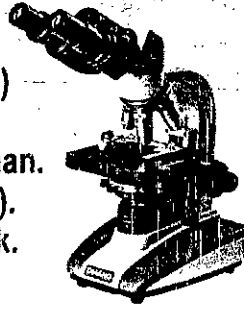
	<p><u>Chief PHC Technologist</u></p> <p>(i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH).</p>			
3	<p><u>Senior Technologist</u></p> <p>(i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and</p> <p><u>Senior PHC Technologist</u></p> <p>(i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH).</p>	<p>At least Second Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University / Institution.</p>	<p>20-35 years</p>	<p>(a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and (b) fifty percent by initial recruitment.</p>
4	<p><u>Technologist</u></p> <p>(i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia;</p>	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution.</p>	<p>18-32years</p>	<p>(a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;</p>

	<p>(vi) Clinical Technologist Cardiology; (vii) Clinical Technologist Surgical; (viii) Clinical Technologist Dialysis; (ix) Clinical Technologist Physiotherapy; (x) Clinical Technologist Pulmonology; (xi) Clinical Technologist Gastroenterology; and (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and</p> <p><u>PHC Technologist</u></p> <p>(i) PHC Technologist (Multi-Purpose); and (ii) PHC Technologist (MCH).</p>			<p>(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology.</p> <p><u>Note:</u> For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3;</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p> <p>(c) forty percent by initial recruitment.</p>
5	<p><u>Chief Technician</u></p> <p>(i) Chief Clinical Technician Dental; (ii) Chief Clinical Technician Pharmacy; (iii) Chief Clinical Technician Radiology; (iv) Chief Clinical Technician Pathology; (v) Chief Clinical Technician Anesthesia; (vi) Chief Clinical Technician Cardiology; (vii) Chief Clinical Technician Surgical; (viii) Chief Clinical Technician Dialysis; (ix) Chief Clinical Technician Physiotherapy; (x) Chief Clinical Technician Pulmonology; (xi) Chief Clinical Technician Gastroenterology; and</p>			<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>

Annex 'B' (14)

SOCIETY OF GRADUATES MEDICAL TECHNOLOGISTS K.P.K

President Asadullah Khan.Cat.C(H)
Matta Swat.
S.V.P Nimatullah Khan GMC D.I Khan.
V.P I Bashir Ahmad.DHQ.(H) Dir (U).
V.P II Saedd ur Rahman DHQ Karak.



General Secretary Zahir Ud Din Dir(L).
AD.G.Sec.Sangeen Ullah LRH Peshawar
Finance Sec.Ihsan UI Haq DHQ Timergara.
Joint SEc.Nazir Taj.DHQ Nowshera.
Info.Sec.Shakat Ali KTH Peshawar.
Office Sec.Noor Muhammad LRH Peshawar.

Ref.No: SGMT 012

Date: 16-2-18

To,

The Chief Minister,
Khyber Pukhtunkhwa

Seal Asadullah Khan
PK Matta Swat
CHIEF MINISTER
Khyber Pakhtunkhwa

Subject: Issuances of Final Seniority list and Up gradation/ Promotion of In service Degree Holders Paramedics Pathology

R/Sir,

The following few lines are stated for your kind consideration; that according to the notification No. SO. (FR/07-03-2015, The Administrative Departments were directed to amend the service rule immediately through mechanism of SSRC accordingly as all BPS- 09 Paramedics KPK were up graded to BPS -12 and Initial Recruitment was declared as having Metric Science & 02 Years Diploma in all respective technologies .

- H/Sir in this notification the administrative departments were also directed to stream line the service structure of BPS-16 and above through mechanism of SSRC.

Then according to another Notification 10 May, 2016 in the suspension of all other Notification by the P& D Department in Consultation with Establishment & Finance Department, The service rules and method of Recruitment was amended only for BPS-17 and rules for BPS-16, BPS-18 and above were not amended.

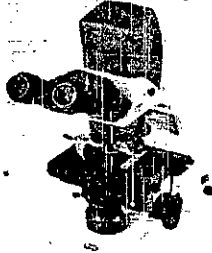
- H/Sir, It is against the natural justice and law/ Rules that according to this notification 10th May, 2016 there is equal 50 % quota for fresh i.e initial recruitment and 50 % Quota for BPS -17 in BPS-18 on seniority basis and no Quota for in service BSc/B.S (Hons)/MSc Degree Holders. Due to 50 % quota in the service rules for BPS-17 were promoted to BPS-18 on seniority basis. (Order Dated 21 July 2017-SOH III/8-60/2017)

P.T.O

ATTESTED
to be true copy
Advocate

SOCIETY OF GRADUATES MEDICAL TECHNOLOGISTS K.P.

President Asadullah Khan.Cat.C(H)
Matta Swat.
S.V.P Nematullah Khan.BMC Bannu.
V.P I Bashir Ahmad.DHQ.(H) Dir (U).
V.P II Saeed ur Rahman DHQ Karak



General Secretary Zahir Ud Din Dir (L)
AD.G.Sec.Sangeen Ullah LRH Peshawar
Finance Sec.Ihsan UI Haq DHQ TMG.
Joint Sec.Nazir Taj. DHQ Nowshera
Info.Sec.Shokat Ali KTH
Office.Sec.Noor Muhammad KTH.

15

No: _____

Dated: _____

- H/Sir, according to 40% quota for in service seniority and 20% quota for in service Degree Holder paramedics the seniority list of different cadres like multi purpose, Anesthesia and Radiologies, etc has been finalized and they have been promoted to BPS-17 while having the highest strength of Degree Holders of Pathology is ignored till the Notification 10th May 2016 and the final list of Degree Holders of Pathology has not been finalized by D.G Health office. So there will be a gap of seniority more than 02 years as there is a common seniority list at BPS-17 level and according to new enhanced formula and notification by Finance Department in 2018, they will be promoted to BPS-18.
- H /Sir recently the Peshawar high court at peshawar, decided in the W. P No.747/2016 announced at 09-01-2019, about the upgradation / Promotion of graduate paramedics BPS 17, with the direction to respondent No 2 I.E Sectary Health to consider the upgradation of degree holders paramedics to BPS-17. In accordance with the law and rules.

In Case , if the matter is decided against the petitioners ,the responded No-2 is directed to assign the reasons. Therefore in black and white to them.

The needful are to be done within 30 days after the receipt of this order.

Therefore we all in service Degree Holders of Pathology serving in KPK Health Department request to your kind authority that may kindly direct the D.G Health Department KPK to issue the **Final seniority list** of Degree Holders Pathology immediately and provide quota in **BPS-18** also like quota in BPS-17 .because it has been notified in the services rules,in notification dated 11-08-2015,that the service rules for BPS-16 and above will be stream lined by mechanism of SSRC and may kindly **include the names of president and G/S society of in service Graduate Medical Technologists K.P.K in the next meeting of SSRC to raise their points of veiw and legal rights to resolve the issues and unpleasent situation among inservice professional graduates of health deptt: K.P.K**

Thanks

Dated

Yours Obediently,
All Degree Holders of Pathology
KPK Health deptt,
Through Asadullah khan president and Zahir Uddin
G.S Society of Degree Holders (Pathology)
Mobile No: 0333-9460626 & 0302-5216469

(16) Annex 'C'

SOCIETY OF GRADUATE MEDICAL TECHNOLOGISTS KPK

PRESIDENT ASADULLAH KHAN CATEGORY C
HOSPITAL MATTA SWAT,
S.V.P KHURSHAD D.H.Q (H) SWABI
V.P I NIAMT ULLAH KHAN GMC D.I KHAN
V.P II MASAL KHAN LRH PEHSAWAR



G. SECRETARY ZAHIR UD DIN DIR LOWER
A.D, G. SEC IMTIAZ AHMAD D.H.Q SHANGLA
F. SECRETARY IHSAN UL HAQ D.H.Q TIMERGARA
INF. SECRETARY DILAWAR KHAN D.H.Q TIMERGARA
JOINT SECRETARY NAZIR AHMAD D.H.Q MARDAN
OFF: SECRETARY ANWAR SHAH T.H.Q BUNER

Ref No _____

Dated _____

To
Honorable Seceratory Health
Khyber Pukhtoon Khwa,

SUBJECT: Up gradation Of Inservice Graduate Medical Technologists
to BPS-17 according to 20%Quota in service rules.

R/SIR

- We all health employees are very pleased of the setting governmnet KPK that our chief Minister is keen interested to upgrade all the employoes of the provincial government under uniform policy for in service employees.
- Honorable Sir,
according to the notification NO SO (FR/07-03-2015. The administrative Departments Were directed to amend the service rules immediatly through mechanism of SSRC accordingly as all BPS-09 paramedics KPK were upgraded to BPS-12 and initial recruitment was declared BPS-12 (having)Matric science and 02 years Diploma in all respective technologies.
- Honorable sir,
In this notification the administrative departments were also directed to stream line the service structure of BPS-16 and above through mechanism of SSRC.
Then according to another notification 10 May,2016 in the suspension of all other notifications by the P & D Department in consultation with establishment and Finance Department, the services rules and methods of recruitment was amended only for BPS-17 and rules for BPS-16 ,BPS-18 and above were not amended.
H/Sir, it is the against the natural justice and law/rules that according to this notification 10th
- May,2016 there is equal 50% quota for fresh i.e. Initial recruitment and 50% quota in for all in service medical technologist BPS-17 in BPS-18 on seniority bases and no Quota for in service BS.c /BS (Hon)/MS,c degree holders.
- H/Sir, according to the notification May 10,2016 40% Quota for in service on seniority basis and 20% Quota for in service degree holder paramedics the seniority lists of different cadres were finalized and they have been promoted to BPS-17and according to this service rules and 50% Quota for BPS-17 in BPS-18 have been Promoted to BPS-18 on in service basis quota On dated 22 May,2018.while having the highest strength of degree holders of pathology is ignored till up date.

ATTESTED
to be true copy
Advocate

(17)

SOCIETY OF GRADUATE MEDICAL TECHNOLOGISTS KPK

PRESIDENT ASADULLAH KHAN CATEGORY C
HOSPITAL MATTA SWAT,
S.V.P KHURSHAD D.H.Q (H) SWABI
V.P I NIAMT ULLAH KHAN GMC D.I KHAN
V.P II MASAL KHAN LRH PEHSAWAR



G.SECRETARY ZAHIR UD DIN DIR LOWER
A.D, G.SEC IMTIAZ AHMAD D.H.Q SHANGLA
F. SECRETARY IHSAN UL HAQ D.H.Q TIMERGARA
INF. SECRETARY DILAWAR KHAN D.H.Q TIMERGARA
JOINT SECRETARY NAZIR AHMAD D.H.Q MARDAN
OFF: SECRETARY ANWAR SHAH T.H.Q BUNER

Ref No _____

Dated _____

H/Sir , recently the health department called upon DPC meeting held on jan 08,2020 for promotion of degree holders paramedics according to 20% Quota seats in medical technologists BPS-17, but due to unknown reasons the DPC meeting for promotion according to final seniority lists issued for different cadres was cancelled and no minutes of this DPC meeting have been issued till up to date.

H/Sir, it is against the natural justice, law and service rule that according to the notification May 10,2016 some different cadres like Dental, anesthesia, PHC technicians (MCH), Ophthalmology and P HC Technician (MP) 23 degree holders paramedics were promoted to BPS-17 on dated Februaty 01,2018 and 11 senior clinical technologists BPS-17 were promoted to BPS-18 and having the greatest strength of degree holders of pathology and other technologies are ignored till up to date and we are depriving from our legal rights of promotion by the way of SSRC rule amendments once again.

Therefore we all remaining degree holders paramedics request to your kind authority to please to call upon DPC meeting for promotion of degree holders paramedics according to 20% Quota in service rules which is undisputed till up to date and we may kindly be promoted to BPS-17 immediately because if we were not considered for promotion will have irreparably loss and there will be a gap of more than 02 years of our fellow that have Been promoted in 2018.

Thanks

Dated:

Your,s obediently,
All Degree Holders Paramedics (In service)
KPK Health Department
Through President Asad Ullah Khan
And G.S Zahir Ud Din
Association of Degree Holders Paramedics
Mobile No.0333-9460626 and 0302-5216469

(18) Annex "C/I"

SOCIETY OF GRADUATE MEDICAL TECHNOLOGISTS K.P.K

PRESIDENT ASADULLAH KHAN CATEGORY C
HOSPITAL MATTA SWAT,
S.V.P KHURSHAD D.H.Q (H) SWABI
V.P I NIAMT ULLAH KHAN GMC D.I KHAN
V.P II MASAL KHAN LRH PEHSAWAR



G.SECRETARY ZAHIR UD DIN DIR LOWER
A.D, G.SEC IMTIAZ AHMAD D.H.Q SHANGLA
F. SECRETARY IHSAN UL HAQ D.H.Q TIMERGARA
INF. SECRETARY DILAWAR KHAN D.H.Q TIMERGARA
JOINT SECRETARY NAZIR AHMAD D.H.Q MARDAN
OFF: SECRETARY ANWAR SHAH T.H.Q BUNER

Ref No _____

Dated _____

To **Honorable Chief Minister,**
Khyber Pukhtoon Khwa,

SUBJECT: Up gradation Of Inservice Graduate Medical Technologists
to BPS-17 according to 20%Quota in service rules.

R/SIR

- We all health employees are very pleased of the setting government KPK that our chief Minister is keen interested to upgrade all the employees of the provincial government under uniform policy for in service employees.
- Honorable Sir,
according to the notification NO SO (FR/07-03-2015. The administrative Departments Were directed to amend the service rules immediately through mechanism of SSRC accordingly as all BPS-09 paramedics KPK were upgraded to BPS-12 and initial recruitment was declared BPS-12 (having) Matric science and 02 years Diploma in all respective technologies.
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PTO

(19)

SOCIETY OF GRADUATE MEDICAL TECHNOLOGISTS KPK

PRESIDENT ASADULLAH KHAN CATEGORY C
HOSPITAL MATTA SWAT,
S.V.P KHURSHAD D.H.Q (H) SWABI
V.P I NIAMT ULLAH KHAN GMC D.I KHAN
V.P II MASAL KHAN LRH PEHSAWAR



G.SECRETARY ZAHIR UD DIN DIR LOWER
A.D, G.SEC IMTIAZ AHMAD D.H.Q SHANGLA
F. SECRETARY IHSAN UL HAQ D.H.Q TIMERGARA
INF. SECRETARY DILAWAR KHAN D.H.Q TIMERGARA
JOINT SECRETARY NAZIR AHMAD D.H.Q MARDAN
OFF: SECRETARY ANWAR SHAH T.H.Q BUNER

Ref No _____

Dated _____

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○ H/Sir, it is against the natural justice, law and service rule that according to the notification May 10,2016 some different cadres like Dental, anesthesia, PHC technicians (MCH), Ophthalmology and P HC Technician (MP) 23 degree holders paramedics were promoted to BPS-17 on dated Februaty 01,2018 and 11 senior clinical technologists BPS-17 were promoted to BPS-18 and having the greatest strength of degree holders of pathology and other technologies are ignored till up to date and we are depriving from our legal rights of promotion by the way of SSRC rule amendments once again.

Therefore we all remaining degree holders paramedics request to your kind authority to please direct secretary health department to call upon DPC meeting for promotion of degree Holders paramedics according to 20% quota in service rules which is undisputed up to Date and we may kindly be promoted to BPS-17 immediately because if were not considered For promotion will have irreprably loss and there will be a gap of more than 02 years Of our fellow that have been promoted in 2018.

Thanks

Dated:

Your,s obediently,

All Degree Holders Paramedics (In service)
KPK Health Department
Through President Asad Ullah Khan
And G.S Zahir Ud Din
Association of Degree Holders Paramedics
Mobile No.0333-9460626 and 0302-5216469

Annex D

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

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.
Exchange Ph. 091-9210187 - 196 Fax: 091-9210130 Web: www.dghskp.gov.pk



20

To,

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS DENTAL/ SR. C.TECHNICIANS DENTAL / CHIEF CLINICAL TECHNICIANS DENTAL (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Dental (BS-12) / Sr. Clinical Technicians Dental (BS-14) / Chief Clinical Technicians Dental (BS-16)(as per approved service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

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

No. 103/3-403 IAE-VII Dated 27/6/2019

Copy forwarded to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.

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

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to be true copy
Advocate

ATTESTED
to be true copy
Advocate

ATTESTED

(21)

Final Seniority list of Degree Holder Paramedics Dental 2019.

S. No.	Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Ajab Khan S/O Bakhar Khan	BS-14	07.05.1968	Feb 2012 BS (D)	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01.03.1938	28.02.2028
2.	Akbar Khan S/O Kheja Qmar	BS-12	15.10.1969	Feb 2012 BS (D)	3151/5000	63.02	University of Peshawar	DHOH Chitral	Chitral	09.03.1954	8/3/2024
3.	Shakool Raziq S/O Fazal Raziq	BS-14	00.08.1967	Feb 2012 BS (D)	3115/5000	62.3	University of Peshawar	LRH Peshawar	Peshawar	14.11.1968	13.11.2028
4.	Shir Muhammad Khan S/O Noor Muhammad	BS-12	22.09.1964	Feb 12 BS (D)	2744/5000	54.88	University of Peshawar	DGI Hosp Swat	Swat	30.03.1954	25.03.2004
5.	Sohab Bibi D/O Saida Jehan Khan	BS-12	19.11.2013	Feb 12 BS (D)	2722/5000	54.44	University of Peshawar	DHO Swat	Swat	20.09.1968	19.09.2048
6.	Munaf Khan S/O Ghazdal Khan	BS-12	12.10.1963	12/2015 BS (D)	3184/5000	71.68	University of Peshawar	LRH Peshawar	Charnabla	27.03.1974	29.03.2034
7.	Hayat Muhammad Khan S/O Muhammad Shahid Khan	BS-12	21.12.2003	12/2015 BS (D)	3314/5000	66.28	University of Peshawar	DHO Batagram	Batagram	17.04.1979	16.04.2039
8.	Tariq Saleem S/O Gul Payao	BS-12	18.02.1962	12/2015 BS (D)	3111/5000	62.22	University of Peshawar	DHOH Karak	Karak	03.09.1972	02.09.2032
9.	Ismail Khan S/O Zar Gul	BS-12	15.07.2015	12/18/2017 BS (D)	305	6.1	KMD UOI	Services Hosp. Peshawar	Peshawar	01.03.1951	23.02.2051
10.	Saf Ullah S/O Shakirullah	BS-12	06.01.2013	12/2017 BS (D)	352	7.04	KMD UOI	BKMC Mardan	Nowshera	02.10.1985	01.10.2045

Final Seniority List of Degree Holder Paramedics Dental 2019

S.No.	Name & Father Name	BPS	Date of 1 st Appointment	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Ajab Khan S/o Bashar Khan	BS-14	07.05.1988	Feb 2012 BS-09	3213/5000	64.26	University of Peshawar	DHO swat	Swat	1.03.1968	28.02.2028
2.	Akbar Khan S/o khoja Omar	BS-12	15-10-1990	Feb 2012 BS-09	3151/5000	63.02	University of Peshawar	DHOH Chitral	Chitral	09.03.1964	08.03.2024
3.	Shakeel Raziq S/o Fazal Raziq	BS-14	03.08.1987	Feb 2012 BS-09	3115/5000	62.3	University of Peshawar	LRH Peshawar	Peshawar	14.11.1968	13.11.2028
4.	Sher Muhammad Khan S/o Noor Muhammad	BS-12	22.09.1994	Feb 2012 BS-(11)	2744/5000	54.88	University of Peshawar	SGT Hosp Swat	Swat	30.03.1984	29.03.208
5.	Sohni Bibi D/o Sadar jehan Mian	BS-12	19.11.2013	Feb 2012 BS-09	2777/5000	54.44	University of Peshawar	DHO Swat	Swat	20.09.1988	19.09.2048
6.	Murad Khan S/o ghandal Khan	BS-12	12.10.1993	12/2/2015 BS-(11)	1684/5000	71.68	University of Peshawar	LRH Peshawar	Charsad da	27.03.1979	26.03.2034

7.	Hayat Muhammad S/o Muhammad Sharif Khan	BS-12	21.12.2003	12/2/2015 BS-09	3314/5000	66.28	University of Peshawar	DHO Batagram	Batagram	17.04.1 979	16.04.2039
8.	Tariq Saleem s/o Gul Payao	BS-12	08.02.1992	12/2/2015 BS-(11)	3131/5000	62.62	University of Peshawar	DHOH Karak	Karak	03.09.1 972	02.09.2032
9.	Ismail Khan S/o Zar Gul	BS-12	15.07.2017	17.03.201 7 BS-(11)	1.63	76.3	KMU UNI	Services Hosp Peshaw ar	Peshaw ar	01.03.1 991 Peshaw ar	28.02.2051
10.	Saifullah S/o Shakirullah	BS-12	09.01.2013	17.03.201 7 BS-(11)	3.52	75.2	KMU UNI	BKMC Mardan	Nowshe ra	02.10.1 985	01.10.2045

-sd-

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

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

All communications should be addressed to the Director General
Health Services Peshawar and not to any official by name
Exchange Ph: 091-9210187 - 196 Fax: 091-9210120 Web: www.healthkp.gov.pk



To:

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS PULMONOLOGY / SR. C. TECHNICIANS
PULMONOLOGY / CHIEF CLINICAL TECHNICIANS PULMONOLOGY
(AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT
KHYBER PAKHTUNKHWA.

Memo: Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Pulmonology (BS-12) / Sr. Clinical Technicians Pulmonology
(BS-14) / Chief Clinical Technicians Pulmonology (BS-16) (as per approved service
Rules) of Health Department Khyber Pakhtunkhwa for information and circulation
amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dchskp.gov.pk

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

No. 10584-873 /AE-VII . Dated 27/6/2019
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**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.**

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Final Seniority list of Degree Holders Paramedics Pulmonology.2019

S. No.	Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Akhtar Ali S/O Habib-Ud-Din	Chief Tech Punit. B-16	31/12/1994	Feb-2012 BS (10)	4068/5000	81.36	University of Peshawar	L.R.H Peshawar	Charsadda	5/11/1995	31/03/2029
2.	Muhammad Iqbal S/O Umar Bukhash	Chief Tech Punit. B-16	25/03/1999	Feb-2012 BS (11)	3623/5000	72.46	University of Peshawar	L.R.H Peshawar	Peshawar	3/3/1998	23/03/2028

Prepared by: Syed Amjad Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ali Shah J.C cum C.D Room Officer C.D Muhammad Asghar MC & Clerk, Syed Sheraz Khan Deputy Director of Health Services DGHS

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Final Seniority List of Degree Holder Paramedics Pulmonology, 2019

S.No.	Name & Father Name	BPS	Date of 1 st Appointment	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Akhtar Ali S/o Habib Ud Din	Chief Tech Pulm B-16	31.12.1994	Fe-2012 BS (11)	4068/5000	81.36	University of Peshawar	LRH Peshawar	Charsada	09.01.1969	03.05.2029
2.	Muhammad Iqbal S/o Umar Bukhash	Chief Tec Pulm B-16	25.03.1999	Feb-2012 BS (11)	3823/5000	72.46	University of Peshawar	LRH Peshawar	Peshawar	03.03.1968	02.03.2028
Prepared by Syed Amjid Ali Shah, Office Assistant, Syed Farman Ali Shah Sr. Clerk/Syed Mehmood Ali Shah J/Clr cum C.O Muhammad Anwar I/C & Checked by Sheeraz Khan, Deputy Director Paramedics, DGHS											

-sd-

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

7
DIRECTORATE GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA, PESHAWAR

All communications should be addressed to the Director General
Health Services Peshawar and not to any official by name.
Telephone No. 991210111 Fax No. 991210116 E-Mail: dghs@peshawar.gov.pk



29

To:

1. The DG-CHSA Peshawar.
2. The Director Health Services Merged Districts, Peshawar.
3. All Sub-Officers of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MFI) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS - PHYSIOTHERAPY / SR. CLINICAL TECHNICIANS
PHYSIOTHERAPY / CHIEF CLINICAL TECHNICIANS
PHYSIOTHERAPY (AS PER APPROVED SERVICE RULES) OF
HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Physiotherapy (BS-12) / Sr. Clinical Technicians
Physiotherapy (BS-14) / Chief Clinical Technicians Physiotherapy (BS-16) as per
approved service Rules) of Health Department Khyber Pakhtunkhwa for information and
circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dghs.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

No. 100/19-302 /AE-VII Dated 27/6/2019

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DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

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DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA PESHAWAR.

(All communications should be addressed to the Director General Health Services Peshawar and not to any official by name)

Exchange Ph. 091-9210187-196 Fax: 091-9210130 Web: www.healthkp.gov.pk

To

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub Offices of Health Services in Khyber Pakhtunkhwa/Merged Districts.
4. All Deans/Principals of Medical College in Khyber Pakhtunkhwa.
5. All Hospitals Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS PHYSIOTHERAPY/SR. C. TECHNICIANS PHYSIOTHERAPY / CHIEF CLINICAL TECHNICIANS PHYSIOTHERAPY (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Physiotherapy (BS-12) / Sr. Clinical Technicians Physiotherapy (BS-14) / Chief Clinical Technicians Physiotherapy (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note: Final Seniority List has also can be downloaded from the official website of Directorate General Health Services, KP, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

No. 10212-302/AE-VII

Dated: 27.06.2019

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1. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

25

Final Seniority List of Degree Holders Paramedics Physiotherapy. 2019

S. No.	Name & Father Name	Date of 1st appointment	BPS	Date of Passing Degree	Total/Obtained Marks & Division.	age%	University	Present Posting	Date of Birth	Date of Retirement
1.	Abdullah S/O Said Beshar	01.02.2009	BS-12	14-12-2005 BS (H)	2231/3500	63.74	University of Karachi	DHQ Hosp: Shangla	31.03.1978	30.03.2036
2.	Rashid Ali S/O Lajbar Khan	13-10-2016	BS-12	09.06.2010 BS (H)	2356/400	58.9	Baqai UNI Karachi	SGT Hosp: Swat	02-01-1988 Swat	01-01-2048
3.	Imam Hussain S/O Fazal Khaliq	17.08.2015	BS-12	26.06.2012 DPT	5200/3155	63.1	Baqai UNI Karachi	SGT Hosp: Swat	10.02.1987 Swat	09.02.2047
4.	Muhammad Tahir S/O Faqir Muhammad	29/09/1987	BS-12	Feb.2012 09.07.2012 BS (H)	2988/5000	59.76	University of Peshawar	LRH Peshawar	20/10/1987	19/10/2027
5.	Javed Hussain S/O Hamid Rasool	1/7/1987	BS-12	Feb.2012 09.07.2012. BS (H)	2943/5000	58.86	University of Peshawar	KTH Peshawar	28/03/1988	27/03/2028
6.	Nadar Khan S/O Khashaki	13-10-2016	BS-12	14.02.2013	2406/3500	68.74	University of Karachi	SGT Hosp: Swat	5-03-1989 Swat	04-03-2049
7.	Taj Wali Khan S/O Gul Wali	16/10/1986	BS-12	12-02-2015	3637/5000	72.7	University of Peshawar	NBMH Peshawar	1/12/1984	31/11/2024
8.	Tanveer Ahmad S/O Ghulam Muhammad	13.01.2007	BS-12	12-02-2015	3518/5000	70.36	University of Peshawar	DHQ: Hospital Suner	01.01.1979	31.12.2039
9.	Tazia Begum S/O wazir Hussain	03.03.2014	BS-12	12-02-2015	3306/5000	66.12	University of Peshawar	Police Hosp: Peshawar	16.10.1982	15-10-2042

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

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26

- To:
1. The DG PHS Peshawar.
 2. The Director Health Services Merged Districts Peshawar.
 3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
 4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
 5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS PHARMACY/ SR. C.TECHNICIANS (PHARMACY)/
CHIEF CLINICAL TECHNICIANS PHARMACY (AS PER APPROVED
SERVICE RULES) OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo: Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Pharmacy (BS-12) / Sr. Clinical Technicians Pharmacy (BS-
14) / Chief Clinical Technicians Pharmacy (BS-16)(as per approved service rules) of
Health Department Khyber Pakhtunkhwa for information and circulation amongst all the
concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

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

No. 10764-853 /AE-VII Dated 27/6/2019

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

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DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA PESHAWAR.

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To

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub Offices of Health Services in Khyber Pakhtunkhwa/Merged Districts.
4. All Deans/Principals of Medical College in Khyber Pakhtunkhwa.
5. All Hospitals Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS PHARMACY / SR. C. TECHNICIANS PHARMACY / CHIEF CLINICAL TECHNICIANS PHARMACY (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Pharmacy (BS-12) / Sr. Clinical Technicians Pharmacy (BS-14) / Chief Clinical Technicians Pharmacy (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note: Final Seniority List has also can be downloaded from the official website of Directorate General Health Services, KP, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

No. 10764-853/AE-VII

Dated: 27.06.2019

Copy Forwarded to the:-

1. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

(27)

Final Seniority list of Degree Holders Paramedics Pharmacy 2019.

S. No.	Name	Date of 1st appointment	Date of Passing Degree	Total/Obataned Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1	Shahbaz S/O Zarab Gul	22.08.1990.	08.02.1992 BS (H)	3500/2790	79.71	Gomal UNI.	DHO Hosp: Hangu	Hangu	10.10.1966	09.10.2026
2	Mushtaq Ahmad S/O Khurshid	27.01.2014	2/1/2007 BS (H)	2396/3600	66.55	Uni of Malakand	DHO Buner	Buner	5/6/1981	4/6/2041

Prepared by, Syed Amjid Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ali Shah J/C cum C.O Rooh Ullah C.O Muhammad Anwar J/C & Checked by Sheeraz Khan Deputy Director Paramedics DGHS.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR.

Final Seniority List of Degree Holder Paramedics Pharmacy, 2019

S.No.	Name & Father Name	Date of 1 st Appointment	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Shahbaz S/o Zarab Gul	22.08.1990	08.02.1992 BS (H)	3500/2790	79.71	Gomal Uni	DHQ. Hosp: Hangu	Hangu	10.10.1966	09.10.2026
2.	Mushtaq Ahmad S/o Khurshid	27.01.2014	2/01/2007 BS (H)	2396/3600	66.55	Uni of Malakand	DHO Buner	Buner	05.06.1981	04.06.2041
Prepared by Syed Amjid Ali Shah, Office Assistant, Syed Farman Ali Shah Sr. Clerk/Syed Mehmood Ali Shah J/Clr cum C.O Muhammad Anwar I/C & Checked by Sheeraz Khan, Deputy Director Paramedics, DGHS										

-sd-

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

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KHYBER PAKHTUNKHWA PESHAWAR.**

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1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) PHC TECHNICIANS (MP) / SR. PHC TECHNICIANS (MP) / CHIEF CLINICAL TECHNICIANS (MP) (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) PHC Technicians (MP) (BS-12) / Sr. (PHC) Technicians (MP) (BS-14) / Chief PHC Technicians (MP) (BS-16)(as per approved service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

**DIRECTOR GENERAL HEALTH SERVICES
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No. 10/33-211 IAE-VII Dated 27/6/2019

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Final Seniority list of Degree Holder Paramedics PHC (MP) 2019.

S. No.	Name & Father Name	Date of 1st appointment	Current BPS	Date of Passing Degree	Total/Obtained Marks & Division.	%age	Board/ University/ Institution	Present Post- ing	District	Date of Birth	Date of Retirement
1.	Murad Ali S/O Sher Bahadar	26-12-2016	BS-12	12-02-2015 BS (H)	3528/5000	70.56	University of Peshawar	DHO Malakand	Malakand	04-04-1985	03-04-2015
2.	Khalid Farooq S/O Muhammad Rafique	07.11.1990	BS-12	12/2/2015 BS (H)	3308 / 5000	66.16	University of Peshawar	AS FR Kohat	Kohat	12-04-1965	11-04-2025
3.	Hidayat Ullah S/O Sahib-ul-Haq	23.05.2006	BS-12	12/2/2015 BS (H)	3266/5000	65.32	University of Peshawar	DHO Batagram	Battagram	14-05-1981	13-05-2014
4.	Ghulam Rabbani S/O Hajar Mand	7/1/2013	BS-12	12/2/2015 BS (H)	3251 / 5000	65.02	University of Peshawar	DHO Shangla	Shangla	15-01-1982	14-03-2012
5.	Misbahuddin S/O Dast Muhammad.	13-04-2001	BS-12	12/2/2015 BS (H)	3227 / 5000	64.54	University of Peshawar	DHO Dir	Upper Dir	5/1/1974	4/1/2034
6.	Saif Ullah Khan S/O Muhammad Parvesh	19-08-2017	BS-12	12/2/2015 BS (H)	3222/5000	64.44	University of Peshawar	DHO Swat	Swat	4/5/1984	3/5/2014
7.	Zahid Ali S/O Muhammad Shauqib	21.02.1985	BS-16	12/2/2015 BS (H)	3174 / 5000	63.48	University of Peshawar	DHO Mardan	Mardan	12.01.1964	11.01.2024
8.	Zia-ul-Hasan S/O Sahib Dad Kha	05/03/1986	BS-14	12/2/2015 BS (H)	3172 / 5000	63.44	University of Peshawar	DHO Dikhan	Dikhan	17.05.1963	16.05.2023
9.	Muraj uddin S/O Umar Din	12.05.1987	BS-14	12/2/2015 BS (H)	3121 / 5000	62.42	University of Peshawar	DHO Mardan	Mardan	07.08.1967	02.08.2023
10.	Muhammad Tahir S/O Sam Muhammad	04.07.2008	BS-12	02-04/2015 BS (H)	3208/5000	64.00	University of Peshawar	DHO Mansehra	Mansehra	08.01.1982	05.01.2012
11.	Naseeb Zada S/O Khair Zada	06.04.1988	BS-14	28-10-2016 BS (H)	3109/5000	62.18	University of Peshawar	DHO Mardan	Mardan	01.12.1960	30.11.2020
12.	Sarfraz Ali S/O Sardar Ali	21-11-2006	BS-12	12/2/2015 BS (H)	3076 / 5000	61.52	University of Peshawar	AS Kurram	Kurram	13.09.1972	14.09.2017

Final Seniority List of Degree Holder PHC (MP) 2019

S.No.	Name & Father Name	Date of 1 st Appointment	Current BPS	Date of Passing Degree	Total/Obtaining Marks & division	% age	Board/University/Institutions	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Murad Ali S/o Sher Bahadar	26.12.2016	BS-12	12.02.2015 BS (H)	3528/5000	70.56	University of Peshawar	DHO Malakand	Malakand	04.04.1985	03.04.2045
2.	Khalid Farooq S/o Muhammad Rafique	07.11.1990	BS-12	12.02.2015 BS (H)	3308/5000	66.16	University of Peshawar	AS FR Kohat	Kohat	12.04.1965	11.04.2025
3.	Hidayat Ullah S/o Sahib Ul Haq	23.05.2006	BS-12	12.02.2015 BS (H)	3266/5000	65.32	University of Peshawar	DHO Batagram	Battagram	14.05.1984	13.05.2044
4.	Ghulam Rabbani S/o Hajat Mand	07.01.2013	BS-12	12.02.2015 BS (H)	3251/5000	65.02	University of Peshawar	DHO Shangla	Shangla	15.03.1982	14.03.2042
5.	Misbahuddin S/o Dost Muhammad	13.04.2001	BS-12	12.02.2015 BS (H)	3227/5000	64.54	University of Peshawar	DHO Dir	Upper Dir	05.01.1974	04.01.2034

6.	Saif Ullah Khan S/o Muhammad Pervez	19.08.201 7	BS-12	12.02.201 5 BS (H)	3222/5000	64.44	University of Peshawar	DHO Swat	Swat	04.05.1 984	03.05.2044
7.	Zahid Ali S/o Muhammad Shoaib	21.02.198 5	BS-12	12.02.201 5 BS (H)	3174/5000	63.48	University of Peshawar	DHO Mardan	Mardan	12.01.1 964	13.01.2024
8.	Zia Ul Hasan S/o Sahib Dad Khan	05.03.198 6	BS-12	12.02.201 5 BS (H)	3172/5000	63.44	University of Peshawar	DHO D.I.Khan	D.I.Khan	17.05.1 963	16.05.2023
9.	Miraj Uddin S/o Umar Din	12.05.198 7	BS-12	12.02.201 5 BS (H)	3121/5000	62.42	University of Peshawar	DHO Mardan	Mardan	03.08.1 967	02.08.2027
10.	Muhammad Tahir S/o Sain Muhammad	14.07.200 8	BS-12	12.02.201 5 BS (H)	3200/5000	64.00	University of Peshawar	DHO Manshe ra	Manseh ra	06.01.1 982	05.01.2042
11.	Naseeb Zada S/o Khair Zada	06.04.198 8	BS-12	12.02.201 6 BS (H)	3109/5000	62.18	University of Peshawar	DHO Mardan	Mardan	01.12.1 960	30.11.2020

12.	Sarfaraz Ali S/o Sardar Ali	21.11.200 6.	BS-12	12.02.201 5 BS (H)	3076/5000	61.52	University of Peshawar	AS Kurram	Kurram	15.09.1 972	14.03.2032
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**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.**

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

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 4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
 5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS DIALYSIS/ SR. C.TECHNICIANS DIALYSIS / CHIEF
CLINICAL TECHNICIANS DIALYSIS (AS PER APPROVED SERVICE
RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo: Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Dialysis (BS-12) / Sr. Clinical Technicians Dialysis (BS-14) /
Chief Clinical Technicians Dialysis (BS-16)(as per approved service Rules) of Health
Department Khyber Pakhtunkhwa for information and circulation amongst all the
concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

No. 10494-583 IAE-VII Dated 27/6/2019

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Final Seniority List of Degree Holders Paramedics Dialysis.2019

Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Ob- tained Marks A Divi- sion.	Per- c	Univer- sity.	Present Post- ing	Domicile	Date of Birth	Date of Retirement	Degree verification
Shahid Khan S/O Zilsh Noor Khan	BS-15	03.3.1999	12-Feb BS (H)	4137/5000	82.74	University of Peshawar	RTH Peshawar	Khyber Agency	14.03.1969	13-03-2029	Not verified
Abdul Rahman S/O Mazhar Khan	BS-12	19.10.2014	12-Feb BS(M) 09.07.2012	4039/5000	80.78	University of Peshawar	GNON Timorjora Dir Lower	Regist Ag.	01.12.1996	17/12/2045	HCC Veri- fied 14/2/2017
Noor Muhammad Khan S/O Mir Asbert Khan	BS-16	01.08.1992	12-Feb BS (H) 09.07.2012	3511/5000	70.22	University of Peshawar	LRI Peshawar	Karak	14.03.1969	13-03-2029	Not verified
Sheraf Ahmad Khan S/O Mirshad Khan	BS-12	14.06.2016	20-02-2015	2.99	2.99	KMU	NSK Hosp. Swat	Swat	14.06.1997	14.06.2042	Not verified

Prepared by: Syed Anwar Ali Shah Officer In-charge, Syed Farhan Ali Khan M. Qazi, Syed Muhammad Ali Khan MC cum C.O. Noor Ullah C.O. Muhammad Anwar MC & Checked by: Syed Anwar Ali Shah Director Paramedics Dialysis

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Final Seniority List of Degree Holder Paramedics Dialysis 2019

S.No	Name & Father Name	BPS	Date of 1 st Appointment	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement	Degree Verification
1.	Shoabi Khan S/o Zilla Noor Khan	BS-16	03.03.1999	12-Feb BS (H)	4137/5000	82.24	University of Peshawar	RTH Peshawar	Khyber Agency	14.03.1959	13.03.2029	
2.	Ata Ur Rehman S/o Niaz Man Khan	BS-12	19.10.2014	12-Feb BS (H) 09.07.2012	4003/5000	80.16	University of Peshawar	DHQH Timargarah Dir Lower	Bajur Ag	04.11.1988	01.01.2045	HEC Verified 1429709
3.	Noor Muhammad Khan S/o Mir Abbas Khan	BS-16	01.08.1982	12-Feb BS (H) 09.07.2012	3511/5000	70.22	University of Peshawar	LRH Peshawar	Karak	14.03.1969	13.03.2029	
4.	Sheraz Ahmad Khan S/o Nisar Ud Din	BS-12	14.06.2016	20.02.2018	2.99	2.99	KMU	NSK Hosp Swat	Swat	1992	19.09.2052	

-sd-

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

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

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3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS CARDIOLOGY / SR. C. TECHNICIANS CARDIOLOGY /
CHIEF CLINICAL TECHNICIANS CARDIOLOGY (AS PER APPROVED
SERVICE RULES) OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Cardiology (BS-12) / Sr. Clinical Technicians Cardiology (BS-
14) / Chief Clinical Technicians Cardiology (BS-16)(as per approved service Rules)
of Health Department Khyber Pakhtunkhwa for information and circulation amongst all
the concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dgshkp.gov.pk

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

No. 10674-763 IAE-VII Dated 27/6/2019

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KHYBER PAKHTUNKHWA, PESHAWAR.**

Final Seniority list of Degree Holder Paramedics Cardiology 2019.

S. No.	Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University.	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Niaz Bar Khan S/O Abdul Ghafar Khan	BS-12	30.06.2009	15-05-2004 BS (H)	391/600	65.17	Ziauddin Medical University Karachi	DHQ Taimergara	District Lower	06.04.1980	5/4/2040
2.	Raham Bacha S/O Khaista	BS-12	29.09.1990	Feb-2012 09-07-2012 BS (H)	3657 / 5000	73.14	University of Peshawar	SGTH Saidu Sharif Swat	Swat	01.01.1970	31.12.2029
3.	Asmat Ara Begum S/O Zar Bat Khan	BS-12	04.10.2013	Feb-2012 09-07-2012 BS (H)	3372 / 5000	67.44	University of Peshawar	DHQ Hosp; Karak	Karak	16.04.1987	15.04.2047
4.	Muammad Asim S/O Muhammad Gul	BS-16	18/10.1988	Feb.2012 09-07-2012 BS (H)	3313 / 5000	66.26	University of Peshawar	LRH Peshawar	Charsadda	24.02.1966	23.02.2026
5.	Muhammad Younas S/O Zain Khan	BS-14	8/7/1990	12/2/2015 BS (H)	3303/5000	66.06	University of Peshawar	LRH Peshawar	Peshawar	15.04.1966	14-04-2026
6.	Nabi Rahmat S/O Abdul Wali Khan	BS-12	01.08.1994	12/2/2015 BS (H)	3291 / 5000	65.82	University of Peshawar	DHO Chitral	Chitral	14.11.1974	13-11-2034
7.	Sajjad Ahmad S/O Ghulam Musa	BS-12	27.07.1992	12/2/2015 BS (H)	3287/5000	65.74	University of Peshawar	DHQ Hosp; Chitral	Chitral	15.02.1971	14-02-2031
8.	Khaista Gul S/O Azad Gul	BS-14	1/7.1990	12/2/2015 BS (H)	3043/5000	60.86	University of Peshawar	LRH Peshawar	Charsadda	10.10.1970	09.10.2030
9.	Syed Gulzar Shah S/O Syed Ashiq Shah	BS-12	24-08-2011	17-03-2017 BS (H)	3.73	85	KMU	KTH Peshawar	Charsadda	11/3/1.991	10/3/2051

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5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS ANESTHESIA/ SR. C.TECHNICIANS (ANESTHESIA)/
CHIEF CLINICAL TECHNICIANS ANESTHESIA (AS PER APPROVED
SERVICE RULES) OF HEALTH DEPARTMENT KHYBER
PAKHTUNKHWA.

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Anesthesia (BS-12) / Sr. Clinical Technicians Anesthesia
(BS-14) / Chief Clinical Technicians Anesthesia (BS-16) (as per approved service
Rules) of Health Department Khyber Pakhtunkhwa for information and circulation
amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website
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No. 9937-10030 /AE-VII Dated 26/6/2019

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KHYBER PAKHTUNKHWA PESHAWAR.

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3. All Sub Offices of Health Services in Khyber Pakhtunkhwa/Merged Districts.
4. All Deans/Principals of Medical College in Khyber Pakhtunkhwa.
5. All Hospitals Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS ANESTHESIA / SR. C. TECHNICIANS ANESTHESIA / CHIEF CLINICAL TECHNICIANS ANESTHESIA (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Anesthesia (BS-12) / Sr. Clinical Technicians Anesthesia (BS-14) / Chief Clinical Technicians Anesthesia (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note: Final Seniority List has also can be downloaded from the official website of Directorate General Health Services, KP, Peshawar.

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Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

No. 9937-10030/AE-VII

Dated: 26.06.2019

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Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

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Final Seniority list of Degree Holders Paramedics Anesthesia 2019

S. No.	Name & Father Name	Date of 1st appointment	BPS	Date of Passing Degree	Total / Obtained Marks & Division.	Age	University.	Present Post-Ing	Domicile	Date of Birth	Date of Retirement
1.	Klaarizad S/O Noor Khan	04.01.1990	BS-12	Feb-2012 09.07.2012 BS (H)	1117 / 5000	67.14	University of Peshawar	DHO Swabi	Swabi	10.01.1970	09.01.2030
2.	Shafiqur-Rahman S/O Gul Rahman	18.08.1992	BS-12	Feb-2012 09.07.2012 BS (H)	3331 / 5000	67.02	University of Peshawar	DHOH KDA Kohat	Karak	20.03.1971	19.05.2031
3.	Muhammad Ajeel S/O Muhammad Afzal	3/10/1996	BS-12	Feb.2012 09.07.2012 BS (H)	3304 / 5000	66.16	University of Peshawar	HMC Peshawar	Charsadda	16/01/1973	15/01/2033
4.	Abdul Ahmad S/O Saif ul Islam Saif	07.04.2009	BS-12	12/2/2015 BS (H)	3308 / 5000	66.16	University of Peshawar	DHO Nowshera	Nowshera	02.04.1982	01.04.2042
5.	Iqbal Khan S/O Nisar Muhammad	8/4/1987	BS-14	12/2/2015 BS (H)	3259 / 5000	65.18	University of Peshawar	SGTH Swat	Charsadda	15/11/1969	14/11/2039
6.	Gohar Ali S/O Sardar Ali	15.09.1992	BS-12	12/2/2015 BS (H)	3255/5000	65.1	University of Peshawar	SGTH Swat	Swat	13.10.1972	12.10.2032
7.	Zafar Ahmad Shah S/O Bahar Zahid	01.03.2009	BS-12	12/2/2015 BS (H)	3158 / 5000	63.16	University of Peshawar	STH Swat	Swat	01.02.1984	11.01.2044
8.	Mustafa S/O Saad Faris	21.02.2008	BS-12	12/2/2015 BS (H)	3058/5000*	61	University of Peshawar	DHO Dir Lower	Dir Lower	03.02.1981	02.02.2041
9.	Syed Rochal Aman S/O syed Wilayat Shah	16/10/1999	BS-12	12/2/2015 BS (H)	3032 / 5000	60.64	University of Peshawar	Services Hosp: Peshawar	Charsadda	10/01/1975	29/01/2035
10.	Bashir Ishaq D/O Muhammad Ibrahim	28.11.2013	BS-12	12/2/2015 BS (H)	3014/5000	60.28	University of Peshawar	DHO Malakand	Malakand	07.01.1985	06.01.2043

Final Seniority List of Degree Holder Paramedics Anesthesia 2019

S.No.	Name & Father Name	Date of 1 st Appointment	BPS	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Khurshid S/o Noor Khan	04.01.1990	BS-12	Feb 2012 09.07.2012 BS (H)	3357/5000	67.14	University of Peshawar	DHO Swabi	Swabi	10.01.1970	09.01.2030
2.	Shafiq ur Rehman S/o Gul Rehman	18.08.1992	BS-12	Feb 2012 09.07.2012 BS (H)	3351/5000	67.02	University of Peshawar	DHQH KDA Kohat	Karak	20.05.1973	19.05.2031
3.	Muhammad Ajmal S/o Muhammad Afzal	03.10.1996	BS-12	Feb 2012 09.07.2012 BS (H)	3308/5000	66.16	University of Peshawar	HMC Peshawar	Charsada	16.01.1973	15.01.2033
4.	Abrar Ahmad S/o Saif Ul Islam Saif	07.04.2009	BS-12	12.02.2015 BS (H)	3308/5000	66.16	University of Peshawar	DHQ Nowsheera	Nowsheera	02.04.1982	01.04.2042
5.	Idrees Khan S/o Nisar Muhammad	08.04.1987	BS-12	12.02.2015 BS (H)	3259/5000	65.18	University of Peshawar	SGTH Swat	Charsada	15.11.1969	14.11.2029
6.	Gohar Ali S/o Sardar Ali	15.09.1992	BS-12	12.02.2015 BS (H)	3255/5000	65.1	University of Peshawar	SGTH Swat	Swat	13.10.1972	12.10.2032

7.	Zahoor Ahmad Shah S/o Bakht Zada	01.03.200 9	BS-12	12.02.201 5 BS (H)	3158/5000	63.16	University of Peshawar	SGTH Swat	Swat	01.02.1 984	31.01.2044
8.	Mustafa S/o Said Furqan	21.02.200 8	BS-12	12.02.201 5 BS (H)	3058/5000	61	University of Peshawar	DHO Dir Lower	Dir Lower	03.02.1 981	02.02.2041
9.	Syed Raoohul Amin S/o Syed Wilayat Shah	16.02.199 9	BS-12	12.02.201 5 BS (H)	3032/5000	60.64	University of Peshawar	Services Hosp. Peshaw ar	Charsad a	30.01.1 975	29.01.2035
10.	Bushra Jabeen D/o Muhammad Ibrahim	28.11.201 3	BS-12	12.02.201 5 BS (H)	3014/5000	60.28	University of Peshawar	DHO Malaka nd	Malakan d	07.01.1 985	06.01.2045

-sd-

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

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

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 5. All Hospital Directors (HTIs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS RADIOLOGY / SR. C.TECHNICIANS RADIOLOGY / CHIEF CLINICAL TECHNICIANS RADIOLOGY (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo: Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Radiology (BS-12) / Sr. Clinical Technicians Radiology (BS-14) / Chief Clinical Technicians Radiology (BS-16)(as per approved service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.com.pk

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KHYBER PAKHTUNKHWA, PESHAWAR.**

No. 10231 / ¹²¹ IAE-VII Dated 27/6/2019

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1. The DG PHSA Peshawar.
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3. All Sub Offices of Health Services in Khyber Pakhtunkhwa/Merged Districts.
4. All Deans/Principals of Medical College in Khyber Pakhtunkhwa.
5. All Hospitals Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS RADIOLOGY / SR. C. TECHNICIANS RADIOLOGY / CHIEF CLINICAL TECHNICIANS RADIOLOGY (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Radiology (BS-12) / Sr. Clinical Technicians Radiology (BS-14) / Chief Clinical Technicians Radiology (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note: Final Seniority List has also can be downloaded from the official website of Directorate General Health Services, KP, Peshawar.

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Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

No. 10031-121/AE-VII

Dated: 27.06.2019

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Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

(37)

Final Seniority list of Degree Holders Paramedics Radiology 2019

S. No.	Name & Father Name	Date of 1 st appointment	BPS	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Naveed Ahmad S/O Anar Badshah	19.01.2013	BS-12	BSc June -21-2011	900/623	69.22	Ziauddin University	KGNT Hosp; Bannu	Karak	13.03.1986/	12/3/2048
2.	Anwar Shah S/O Ibrahim Shah	13.02.2014	BS-12	BSc 6/4/2012	560/900	62.22	Ziauddin University	DHO Bunner	Bunner	30.03.1991	29.03.2051
3.	Nadar Khan S/O Majeed Gul	18.03.1992	BS-12	BS (H) Feb-2012 09-07-2012	3814 / 5000	76.28	University of Peshawar	DHQH Batkhela	Malakand	15.03.1972	14.03.2032
4.	Wajid Khan S/O Musali Khan	22.03.1993	BS-12	Feb-2012 BS (H) 09-07-2012	3405 / 5000	68.10	University of Peshawar	W&C Hosp; Kohat	Kohat	19.04/1971	18.04-2031
5.	Rahmatullah S/O Pir Shah Jehan	3/10/1989	BS-12	BS (H) Feb-2012 09-07-2012	3214 / 5000	64.28	University of Peshawar	KDA Hosp; Karak.	Karak	2/4/1965	1/4/2025
6.	Johar Ali S/O Ghulam Rahmani	04.09.1988	BS-14	BS (H) 09-07-2012	3045 / 5000	60.90	University of Peshawar	Services Hosp; Peshawar	Peshawar	01.06.1965	31-05-2025
7.	Tariq Gul S/O Gul Raqib	05.01.2011	BS-12	BS (H) Feb.2012 09-07-2012	3018/5000	60.36	University of Peshawar	KGNTH Bannu	Bannu	12.05.1981	11.05.2041
8.	Nehar Ali S/O Muhammad Nasar	11/8/1990	BS-12	BS (H) Feb.2012 09-07-2012	2895/5000	57.90	University of Peshawar	DHQ Hosp; Swabi	Swabi	15/4/1971	14-04-2031
9.	Azam Shah S/O S.Muzaeen Shah	26-11-1988	BS-14	BS (H) 29-10-2013	3237/5000	64.74	University of Peshawar	LRH Peshawar	Peshawar	14-07-1966	13-07-2026
10.	Barkat Ali S/O Raj Ud Din	14-03-1992	BS-12	BS (H) 12/2/2015	3498/5000	69.96	University of Peshawar	STH Swat	Swat	10/6/1973	9/6/2033

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

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1. The DG PH Peshawar.
2. The Director Health Services Medical Districts Peshawar.
3. All Sub-Directors of Health Services in Khyber Pakhtunkhwa / Merged Districts.
4. All Deans/Supervisors of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (HFs) in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL
TECHNICIANS SURGICAL / SR. C. TECHNICIANS SURGICAL / CHIEF
CLINICAL TECHNICIANS SURGICAL (AS PER APPROVED SERVICE
RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo: Enclosed please find final Seniority List of Qualified (Degree Holders)
Clinical Technicians Surgical (BS-12) / Sr. Clinical Technicians Surgical (BS-14) /
Chief Clinical Technicians Surgical (BS-16) (as per approved service Rules) of Health
Department Khyber Pakhtunkhwa for information and circulation amongst all the
concerned.

Note:- Final Seniority List has also can be downloaded from the official website
of Directorate General Health Services KP, Peshawar. www.dgnskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 10404-93 /AE-VII Dated 27/6 /2019

Copy forwarded to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

Better Copy (Page 38)

DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA PESHAWAR.

(All communications should be addressed to the Director General Health Services Peshawar and not to any official by name)

Exchange Ph. 091-9210187-196 Fax: 091-9210130 Web: www.healthkp.gov.pk

To

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub Offices of Health Services in Khyber Pakhtunkhwa/Merged Districts.
4. All Deans/Principals of Medical College in Khyber Pakhtunkhwa.
5. All Hospitals Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS SURGICAL / SR. C. TECHNICIANS RADIOLOGY / CHIEF CLINICAL TECHNICIANS RADIOLOGY (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Surgical (BS-12) / Sr. Clinical Technicians Surgical (BS-14) / Chief Clinical Technicians Surgical (BS-16) (as per approved Service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note: Final Seniority List has also can be downloaded from the official website of Directorate General Health Services, KP, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

No. 10404-93/AE-VII

Dated: 27.06.2019

Copy Forwarded to the:-

1. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar.

-sd-

Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

(39)

Annual Security List of Degree Holder Paramedical Staff - 2019.

No	Name & Fat. Name	Date of appointment	Grade	Date of Passing Degree	Obtained Marks & Division	Percentage	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Shah J. Mahroob S/O Muhammad Tajar Khan	02-02-2009	BS-12	26-04-2007 BS (H)	583/600	73.83	Zaidin University	DHO Shangla	Shangla	01-02-1984	31-01-2041
2.	Imtiaz Ahmed S/O Farhad Khan	09-01-2013	BS-12	03-07-2008 BSc	2200/2301	54.5	University of Karachi	DHO Hosp. Shangla	Shangla	14.04.1985	13-4-2045
3.	Masal Khan S/O Haji Hestam Gul	4-8-1992	BS-12	Feb 2012 09-07-2012 BS (H)	4220/5000	84.40	University of Peshawar	LRH Peshawar	Charsadda	17-02-1968	13-03-1928
4.	Munammad Zaman S/O Sharif Khan	13.01.1995	BS-12	Feb-2012 09-07-2012 BS (H)	3637/5000	72.74	University of Peshawar	KTH Peshawar	Peshawar	28.12.1964	27-12-2028
5.	Sajid Hussain S/O Ghulam Nabi	05.11.1995	BS-12	Feb 2012 BS (H) 09-07-2012	3582/5000	71.64	University of Peshawar	NBMH Peshawar	peshawar	15-12-1971	14-12-2031
6.	Sajad Khan S/O Muhammad Yousaf	04.07.1995	BS-12	Feb. 2012 09.07.2012 BS (H)	3456/5000	69.12	University of Peshawar	Molvi Ameer Shah Me: Hosp; Peshawar	peshawar	03.11.1971	03-11-2034
7.	Irshad Ali S/O Sarwar Khan	27/08/1987	BS-14	12-02-2015 BS (H)	3451/5000	69.02	University of Peshawar	KTH Peshawar.	Charsadda	12/3/1967	11/03/2017
8.	Muhammad Abdul- lah Khan S/O Umer Ali Khan	07.03.2008	BS-12	12-02-2015 BS (H)	3409/5000	68.18	University of Peshawar	KGNTB Bannu	Bannu	11.04.1985	10.04.2045

Final Seniority List of Degree Holder Paramedics Surgical 2019

S.No.	Name & Father Name	Date of 1 st Appointment	BPS	Date of Passing Degree	Total/Obtaining Marks & division	% age	University	Present Posting	Domicile	Date Of Birth	Date of Retirement
1.	Shahid Mehboob S/o Muhammad Tajar Khan	02.02.2009	BS-12	26.04.2007 BS (H)	584/800	73.00	Ziauddin University	DHO Shangla	Shangla	01.02.1984	01.01.2044
2.	Imtiaz Ahmad S/o Farhad Khan	08.01.2013	BS-12	03.07.2008 BSC	2200/1201	54.5	University of Karachi	DHQ Hosp: Shangla	Shangla	14.04.1985	13.04.2045
3.	Masal Khan S/o Haji Hastam Gul	04.08.1992	BS-12	Feb 2012 09.07.2012 BS (H)	4220/5000	84.40	University of Peshawar	LRH Peshawar	Charsada	17.03.1968	16.03.2028
4.	Muhammad Zaman S/o Sharif Khan	13.01.1993	BS-12	Feb 2012 09.07.2012 BS (H)	3637/5000	72.74	University of Peshawar	KTH Peshawar	Peshawar	28.12.1968	27.12.2028
5.	Sajid Hassan S/o Ghulam Nabi	08.11.1995	BS-12	Feb 2012 09.07.2012 BS (H)	3582/5000	71.64	University of Peshawar	NBMH Peshawar	Peshawar	15.12.1971	14.12.2031
6.	Sajjad Khan S/o Muhammad Yousaf	04.07.1996	BS-12	Feb 2012 09.07.2012 BS (H)	3456/5000	69.12	University of Peshawar	Molvi Ameer Shah Me; Hosp; Peshawar	Peshawar	03.11.1974	02.11.2034

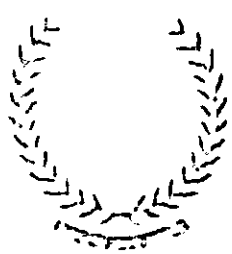
7.	Irshad Ali S/o Sarwar Khan	27.08.1987	BS-14	12.02.2015 BS (H)	3451/5000	69.02	University of Peshawar	KTH Peshawar	Charsada	12.03.1967	11.03.2027
8.	Muhammad Abdullah Khan S/o Umer Ali Khan	07.03.2008	BS-12	12.02.2015 BS (H)	3409/5000	68.18	University of Peshawar	KGNTH Bannu	Bannu	11.04.1985	10.04.2045

-sd-

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

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Annex E



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH-III/10/34278/Paramedics
Dated: 16/12/19

Director General Health Service
Government of Khyber Pakhtunkhwa

16/12/19

**SUBJECT: WORKING PAPER REGARDING PROMOTION OF QUALIFIED
PARAMEDICS ON THE BASIS OF QUALIFICATION TO THE POST OF
CLINICAL TECHNOLOGISTS BS-17.**

In response to your letter No. 21545/AE-VII dated 26/11/2019, the
Director General Health Service has to state that may be furnished a certificate to effect of
the promotion of paramedics to the post of clinical technologists on the basis of a certificate
of qualification of a technologist BS-17 are unobjectionable and final for each specialty to
be considered further in the matter.

[Signature]
Section Officer-III

Encl: even no & date

Director General Health Service, Government of Khyber Pakhtunkhwa

[Signature]
Section Officer-III

[Signature]
ATTESTED
to be true copy
Advocate

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH-III/10-4/2019(Paramedics)
Dated the Peshawar 9th December, 2019

To

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

Subject: **WORKING PAPER REGARDING PROMOTION OF QUALIFIED
PARAMEDICS ON THE BASIS OF QUALIFICATION TO THE POST OF
CLINICAL, TECHNOLOGISTS BS-17.**

I am directed to refer to your letter No. 21549/AE-VII dated: 26.11.2019 on the subject noted above and to state that may be furnished a certificate to effect all submitted lists regarding promotion of qualified Paramedics on the basis of qualification to the post of Clinical Technologist BS-17 are undisputed and final for each specially to this office to proceed further in the matter.

-sd-

Section Officer-III

Endst: even no & date:

Copy forwarded to the PS to Secretary Health, Khyber Pakhtunkhwa.

-sd-

Section Officer-III

KHYBER PAKHTUNKHWA PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.kppsc.gov.pk

Tele: Nos. 091-9214131, 9213563, 9213750, 9212897

Annea F⁵

(41) Dated: 18.02.2019

ADVERTISEMENT No. 02/2019

Online applications are invited for the following posts from Pakistani citizens having domicile of Khyber Pakhtunkhwa by **08.03.2019**

Apply Online Only. Applications other than online will not be accepted. To apply, visit any Jazz Cash / Easy Paise Agent / UBL Omni, deposit application fee of RS.285/- excluding service charges and get transaction I.D through SMS. Visit PSC website www.kppsc.gov.pk and apply online. Documents are not required at the time of submission of application; candidates who qualify the test will have to submit their documents within one week time after announcement of the result.

Note: The candidates are advised to fill in all the columns carefully. Change(s) will not be allowed later on. Unclaimed qualification, experience etc will not be accepted.

Only one application will be sufficient for one serial, however the candidates applying for various quotas should mention serial number of (1)a, (1)b or (1)c in the application form specifically.

AGRICULTURE, LIVESTOCK & COOPERATIVE DEPARTMENT

1.	NINE (09) POSTS OF STATISTICAL OFFICER IN LIVESTOCK & COOPERATIVE DEPARTMENT (CROP REPORTING SERVICES WING). QUALIFICATION: At least 2 nd Class Master Degree or at least 2 nd Class Bachelor's of Sciences (04 years) with Statistics, Economics or Mathematics as one of the subject from a recognized University. AGE LIMIT: 21 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes						
	ALLOCATION:	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
		02	01	02	02	01	01
2.	SIX (06) POSTS OF ASSISTANT SOIL SURVEY RESEARCH OFFICER IN SOIL CONSERVATION, AGRICULTURE DEPARTMENT. QUALIFICATION: At least 2 nd Class Master's Degree in Agriculture (Soil Sciences) or Second Class Bachelor's (Hons) Degree in Agriculture with (Soil Sciences) as major subject from a recognized University. AGE LIMIT: 21 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes						
	ALLOCATION:	Merit	Zone-1	Zone-2	Zone-3	Zone-4	
		02	01	01	01	01	
3.	ONE (01) LEFTOVER POST OF RESEARCH OFFICER / FARM MANAGER (MINORITY QUOTA) IN LIVESTOCK & DAIRY DEVELOPMENT (RESEARCH WING). QUALIFICATION: Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences recognized by PVMC. AGE LIMIT: 22 to 32 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes						
	ALLOCATION:	Merit					

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

4.	TWELVE (12) LEFTOVER POSTS OF MALE SUBJECT SPECIALIST IN VARIOUS SUBJECTS (MINORITY QUOTA) QUALIFICATION: At least 2 nd class Master's Degree or Four years BS Degree in the relevant subject with Bachelor of Education or M.Ed or Master of Education (Industrial Arts or Business Education) or M.A Education or Equivalent Qualification from recognized University. NOTE: For History-Cum-Civics the candidates must possess Master's degree either in History or Political Science provided the other required subject has been studied at B.A level. The other requirement of Teaching degree will, however, remain intact.																											
		<table border="1"> <thead> <tr> <th>S. No.</th> <th>Subject</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>i.</td> <td>Pak Study</td> <td>02</td> </tr> <tr> <td>ii.</td> <td>Chemistry</td> <td>03</td> </tr> <tr> <td>iii.</td> <td>English</td> <td>02</td> </tr> <tr> <td>iv.</td> <td>Statistics</td> <td>01</td> </tr> <tr> <td>v.</td> <td>Economics</td> <td>02</td> </tr> <tr> <td>vi.</td> <td>History-Cum-Civics</td> <td>02</td> </tr> </tbody> </table>		S. No.	Subject	Total	i.	Pak Study	02	ii.	Chemistry	03	iii.	English	02	iv.	Statistics	01	v.	Economics	02	vi.	History-Cum-Civics	02				
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iv.	Statistics	01																										
v.	Economics	02																										
vi.	History-Cum-Civics	02																										
		AGE LIMIT: 23 to 35 years		PAY SCALE: BPS-17		ELIGIBILITY: Male																						
	ALLOCATION:	Merit																										
	NOTE: The Candidates are advised to write Serial No. and Sub Serial No. of the post.																											
5. (a)	SIX (06) LEFTOVER POSTS OF FEMALE LIBRARIAN. QUALIFICATION: Master's degree in Library & Information Science from a recognized University. AGE LIMIT: 21 to 35 years PAY SCALE: BPS-17 ELIGIBILITY: Female																											
	ALLOCATION:	Zone-1																										

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Advocate

(b)	<p>ONE (01) LEFTOVER POST OF FEMALE LIBRARIAN (MINORITY QUOTA) QUALIFICATION: Master's degree in Library & Information Science from a recognized University. AGE LIMIT: 21 to 35 years PAY SCALE: BPS-17 ELIGIBILITY: Female ALLOCATION: Merit</p>	(42)								
	<p>TWO (02) LEFTOVER POSTS OF MALE LIBRARIAN (MINORITY QUOTA) QUALIFICATION: Master's degree in Library & Information Science from a recognized University. AGE LIMIT: 21 to 35 years PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: Merit</p>									
7.	<p>THREE (03) LEFTOVER POSTS OF DIRECTOR PHYSICAL EDUCATION (MALE) (MINORITY QUOTA) QUALIFICATION: At least 2nd class Master's degree in Physical Education from recognized University. AGE LIMIT: 22 to 35 years PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: Merit</p>									
ENERGY & POWER DEPARTMENT										
8.	<p>ONE (01) POST OF ELECTRIC INSPECTOR. QUALIFICATION: (a) Master's Degree in Electrical Engineering from a recognized University with seven year's experience in the relevant field and registered as professional engineer with Pakistan Engineering Council. OR (b) Bachelor's Degree in Electrical Engineering from a recognized University with ten years experience in the relevant field and registered as professional engineer with Pakistan Engineering Council. AGE LIMIT: 32 to 45 years PAY SCALE: BPS-19 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>									
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT										
9.	<p>THREE (03) POSTS OF VETERINARY OFFICER / SURGEON IN THE OFFICE OF CHIEF CONSERVATOR OF WILDLIFE. QUALIFICATION: (i) At least Second Division Doctor of Veterinary Medicine (DVM) or equivalent qualification in Veterinary Sciences, from a recognized University or Institute; and (ii) Registration with Pakistan Veterinary Medicine Council. AGE LIMIT: 18 to 28 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">ALLOCATION:</td> <td style="width: 20%; text-align: center;">Zone-1</td> <td style="width: 20%; text-align: center;">Zone-4</td> <td style="width: 20%; text-align: center;">Zone-5</td> </tr> <tr> <td></td> <td style="text-align: center;">01</td> <td style="text-align: center;">01</td> <td style="text-align: center;">01</td> </tr> </table>	ALLOCATION:	Zone-1	Zone-4	Zone-5		01	01	01	
ALLOCATION:	Zone-1	Zone-4	Zone-5							
	01	01	01							
10.	<p>ONE (01) POST OF ASSISTANT DIRECTOR IN DIRECTORATE OF NON-TIMBER FOREST PRODUCTS. QUALIFICATION: (i) M.Sc (Hons) Agriculture with specialization in Entomology or Horticulture or Plant Pathology from a recognized University; OR (ii) M.Sc Forestry in Second Division from a recognized University. AGE LIMIT: 21 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Male ALLOCATION: Merit</p>									
11.	<p>TWO (02) POSTS OF NTFP DEVELOPMENT OFFICER IN THE DIRECTORATE OF NON-TIMBER FOREST PRODUCTS. QUALIFICATION: (i) B.Sc (Hons) Agriculture with specialization in Entomology or Horticulture or Plant Pathology from a recognized University; OR (ii) B.Sc Forestry in Second Division from a recognized University. AGE LIMIT: 21 to 32 years PAY SCALE: BPS-16 ELIGIBILITY: Male</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">ALLOCATION:</td> <td style="width: 20%; text-align: center;">Zone-2</td> <td style="width: 20%; text-align: center;">Zone-3</td> </tr> <tr> <td></td> <td style="text-align: center;">01</td> <td style="text-align: center;">01</td> </tr> </table>	ALLOCATION:	Zone-2	Zone-3		01	01			
ALLOCATION:	Zone-2	Zone-3								
	01	01								
HEALTH DEPARTMENT										
12.	<p>ONE (01) LEFTOVER POST OF PROFESSOR ANAESTHESIOLOGY IN SAIDU MEDICAL COLLEGE SWAT. (i) QUALIFICATION: (a) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical & Dental Council; and (b) FCPS/MS/MD (duration of 4 years) or qualification with other nomenclatures, in the respective clinical science subject or equivalent qualification recognized by Pakistan Medical & Dental Council; (ii) EXPERIENCE: (a) Three years teaching experience as an Associate Professor and Five years teaching experience as Assistant Professor in the respective basic science subject or Nine years teaching experience as an Assistant Professor and Associate Professor in the respective subject calculated as per Pakistan Medical & Dental Council Regulations and in case of private sector medical colleges, the experience is duly certified by Pakistan Medical & Dental Council; and (iii) RESEARCH PUBLICATIONS: A total of five Research Publications out of which at least two as Principal author in the relevant specialty are required. Only an original article published in a medical journal approved by the Pakistan Medical & Dental Council shall be acceptable. AGE LIMIT: 40 to 50 years. PAY SCALE: BPS-20. ELIGIBILITY: Both Sexes. ALLOCATION: Merit</p>									
13.	<p>ONE (01) POST OF PROFESSOR ANATOMY IN GAJJU KHAN MEDICAL COLLEGE SWABI. (i) QUALIFICATION: (a) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical and Dental Council and (b).FCPS/Ph.D (duration of 4 years) or qualification with other nomenclatures, in respective basic science subject or equivalent qualification recognized by Pakistan Medical and Dental Council; or (c) M.Phil (duration of 2 years) or qualification with other nomenclature, in respective basic science subject or equivalent qualification in the respective specialty recognized by Pakistan Medical and Dental Council, Or (ii) EXPERIENCE: Three years teaching experience as an Associate Professor in the respective basic science subject or nine years teaching experience as an Assistant Professor and Associate Professor in the respective basic science subject calculated as per PM&DC Regulations and duly certified PM&DC in case of experience gained in private sector medical college, and (iii) RESEARCH PUBLICATIONS: A total of at least five research publications are required in the respective basic subjects / specialty. Only an original article published in a medical journal approved by PM&DC shall be acceptable. AGE LIMIT: 40 to 50 years PAY SCALE: BPS-20 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>									

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14.	<p>ONE (01) POST OF PROFESSOR BIOCHEMISTRY IN GAJJU KHAN MEDICAL COLLEGE SWABI. (i) QUALIFICATION: (a) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical and Dental Council and (b) FCPS/Ph.D (duration of 4 years) or qualification with other nomenclatures, in respective basic science subject or equivalent qualification recognized by Pakistan Medical and Dental Council; or (c) M.Phil (duration of 2 years) or qualification with other nomenclature, in respective basic science subject or equivalent qualification in the respective specialty recognized by Pakistan Medical and Dental Council, Or (ii) EXPERIENCE: Three years teaching experience as an Associate Professor in the respective basic science subject or nine years teaching experience as an Assistant Professor and Associate Professor in the respective basic science subject calculated as per PM&DC Regulations and duly certified PM&DC in case of experience gained in private sector medical college, and (iii) RESEARCH PUBLICATIONS: A total of at least five research publications are required in the respective basic subjects / specialty. Only an original article published in a medical journal approved by PM&DC shall be acceptable. AGE LIMIT: 40 to 50 years PAY SCALE: BPS-20 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
15.	<p>ONE (01) POST OF ASSOCIATE PROFESSOR OPHTHALMOLOGY IN SAIDU MEDICAL COLLEGE SWAT / SAIDU GROUP OF TEACHING HOSPITAL SWAT. (i) QUALIFICATION: (a) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical & Dental Council; and (b) FCPS/MS/MD (duration of 4 years) or qualification with other nomenclatures, in the respective clinical science subject after level I qualification or equivalent qualification recognized by the Pakistan Medical & Dental Council. (ii) EXPERIENCE: Five years teaching experience as an Assistant Professor in the respective clinical science subject calculated as per Pakistan Medical & Dental Council Regulations and in case of private medical colleges, the experience is duly certified by Pakistan Medical & Dental Council; and (iii) RESEARCH PUBLICATIONS: A total of three Research Publications out of which at least one as Principal author in the relevant specialty are required. Only an original article published in a medical journal approved by the Pakistan Medical & Dental Council shall be acceptable. AGE LIMIT: 35 to 45 years PAY SCALE: BPS-19 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
16.	<p>ONE (01) POST OF ASSOCIATE PROFESSOR MEDICINE IN SAIDU MEDICAL COLLEGE SWAT / SAIDU GROUP OF TEACHING HOSPITAL SWAT. (i) QUALIFICATION: (a) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical & Dental Council; and (b) FCPS/MS/MD (duration of 4 years) or qualification with other nomenclatures, in the respective clinical science subject after level I qualification or equivalent qualification recognized by the Pakistan Medical & Dental Council. (ii) EXPERIENCE: Five years teaching experience as an Assistant Professor in the respective clinical science subject calculated as per Pakistan Medical & Dental Council Regulations and incase of private medical colleges, the experience is duly certified by Pakistan Medical & Dental Council; and (iii) RESEARCH PUBLICATIONS: A total of three Research Publications out of which at least one as Principal author in the relevant specialty are required. Only an original article published in a medical journal approved by the Pakistan Medical & Dental Council shall be acceptable. AGE LIMIT: 35 to 45 years PAY SCALE: BPS-19 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
17.	<p>ONE (01) POST OF ASSISTANT PROFESSOR BIOCHEMISTRY IN GAJJU KHAN MEDICAL COLLEGE SWABI. QUALIFICATION: (i) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical and Dental Council, and (ii) FCPS / Ph.D (duration of 4 years) or qualification with other nomenclatures, in respective basic science subject or equivalent qualification recognized by Pakistan Medical and Dental Council; or (iii) M.Phil (duration of 2 years) or qualification with other nomenclature, in respective basic science subject or equivalent qualification in the respective basic science subject recognized by Pakistan Medical and Dental Council and having two years teaching exp: as Lecturer / Demonstrator in respective basic science subject i.e M.Phil or qualification with other nomenclature recognized by PM&DC duly certified by PM&DC in case of experience gained in private sector medical college, and; (iv) FCPS/MS/MD or qual: with other nomenclature (dur: of 4 years) in related clinical subject (dur: of 4 years). AGE LIMIT: 27 to 45 years PAY SCALE: BPS-18 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
18.	<p>ONE (01) POST OF ASSISTANT PROFESSOR PHYSIOLOGY IN GAJJU KHAN MEDICAL COLLEGE SWABI. QUALIFICATION: (i) MBBS (duration of 5 or 6 years) or equivalent medical qualification recognized by the Pakistan Medical and Dental Council, and (ii) FCPS/Ph.D (duration of 4 years) or qualification with other nomenclatures, in respective basic science subject or equivalent qualification recognized by Pakistan Medical and Dental Council; or (iii) M.Phil (duration of 2 years) or qualification with other nomenclature, in respective basic science subject or equivalent qualification in the respective basic science subject recognized by Pakistan Medical and Dental Council and having two years teaching experience as Lecturer / Demonstrator in respective basic science subject i.e M.Phil or qualification with other nomenclature recognized by PM&DC duly certified by PM&DC in case of experience gained in private sector medical college, and; (iv) FCPS/MS/MD or qual: with other nomenclature (dur: of 4 years) in related clinical subject (dur: of 4 years) AGE LIMIT: 27 to 45 years PAY SCALE: BPS-18 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
19. (a)	<p>FIFTEEN (15) POSTS OF PHC TECHNOLOGIST (MP) IN HEALTH DEPARTMENT. QUALIFICATION: At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/Institution. AGE LIMIT: 18 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes ALLOCATION:</p> <table border="1" data-bbox="231 2230 1300 2305"> <tr> <td></td> <td>Merit</td> <td>Zone-1</td> <td>Zone-2</td> <td>Zone-3</td> <td>Zone-4</td> <td>Zone-5</td> </tr> <tr> <td></td> <td>04</td> <td>03</td> <td>02</td> <td>02</td> <td>02</td> <td>02</td> </tr> </table>		Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5		04	03	02	02	02	02
	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5									
	04	03	02	02	02	02									

(b)	<p>ONE (01) POST OF PHC TECHNOLOGIST (MP) (FEMALE QUOTA) IN HEALTH DEPARTMENT. QUALIFICATION: At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/Institution. AGE LIMIT: 18 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Female ALLOCATION: Merit</p>														
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	Merit	Zone-1	Zone-2	Zone-3											
	01	01	01	01											
21.	<p>ONE (01) POST OF CLINICAL TECHNOLOGIST (DENTAL) IN HEALTH DEPARTMENT. QUALIFICATION: At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/Institution. AGE LIMIT: 18 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes ALLOCATION: Merit</p>														
22.	<p>FOUR (04) POSTS OF CLINICAL TECHNOLOGIST (PATHOLOGY) IN HEALTH DEPARTMENT. QUALIFICATION: At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/Institution. AGE LIMIT: 18 to 32 years PAY SCALE: BPS-17 ELIGIBILITY: Both Sexes ALLOCATION:</p> <table border="1"> <tr> <td></td> <td>Merit</td> <td>Zone-1</td> <td>Zone-2</td> <td>Zone-3</td> </tr> <tr> <td></td> <td>01</td> <td>01</td> <td>01</td> <td>01</td> </tr> </table>		Merit	Zone-1	Zone-2	Zone-3		01	01	01	01				
	Merit	Zone-1	Zone-2	Zone-3											
	01	01	01	01											
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	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5									
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HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

24.	<p>NINE (09) POSTS OF MALE ASSISTANT PROFESSOR IN DIRECTORATE GENERAL OF COMMERCE EDUCATION & MANAGEMENT SCIENCES. QUALIFICATION: (i) Ph.D in the relevant subject from a recognized University; OR (ii) M.Phil / MS in the relevant subject from a recognized University with three (03) years teaching experience (after M.Phil) in the relevant field from Government Colleges; OR (iii) At least Second Class Master's Degree / BBA (Hons) / BS four (04) years or equivalent qualification in the relevant subject from a recognized University with five (05) years teaching experience (after Master) from Government Colleges.</p> <table border="1"> <thead> <tr> <th>S.No</th> <th>Subject</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>i.</td> <td>Computer Science</td> <td>02</td> </tr> <tr> <td>ii.</td> <td>Mathematics</td> <td>02</td> </tr> <tr> <td>iii.</td> <td>Economics</td> <td>02</td> </tr> <tr> <td>iv.</td> <td>Statistics</td> <td>02</td> </tr> <tr> <td>v.</td> <td>Commerce</td> <td>01</td> </tr> </tbody> </table> <p>AGE LIMIT: 26 to 40 Years PAY SCALE: BPS-18 ELIGIBILITY: Male ALLOCATION: Merit</p> <p>NOTE: The Candidates are advised to write Serial No. and Sub Serial No. of the post.</p>	S.No	Subject	Total	i.	Computer Science	02	ii.	Mathematics	02	iii.	Economics	02	iv.	Statistics	02	v.	Commerce	01																																																																																																
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26. TWENTY (20) POSTS (GENERAL=18+MINORITY QUOTA=01+DISABLE QUOTA=01) OF FEMALE LECTURER IN VARIOUS SUBJECTS IN DIRECTORATE GENERAL OF COMMERCE EDUCATION & MANAGEMENT SCIENCES. QUALIFICATION: (a) At least Second Class Master Degree / BBA (Hons) / BS (04 years) or equivalent qualification in the relevant subject from a recognized university.

S. No.	Subject	Allocation							Total
		Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5		
i.	English	-	01	-	-	-	-	01	
ii.	Urdu	01	01	-	-	01	01	04	
iii.	Maths	01	-	-	-	-	-	01	
iv.	Islamiyat	01	-	01	01	01	-	04	
v.	Statistics	01	-	-	-	-	-	01	
vi.	Pak Study	01	01	-	-	-	-	02	
vii.	Computer Science	-	01	-	-	01	01	03	
viii.	Economics	-	-	-	-	01	-	01	
ix. (a)	Commerce	-	-	-	01	-	-	01	
(b)	Commerce (Minority)	01	-	-	-	-	-	01	
(c)	Commerce (Disable)	01	-	-	-	-	-	01	

AGE LIMIT: 21 to 35 Years

PAY SCALE: BPS-17

ELIGIBILITY: Female

NOTE: The Candidates are advised to write Serial No. and Sub Serial No. of the post.

27. ONE (01) POST OF MALE DIRECTOR PHYSICAL EDUCATION IN DIRECTORATE GENERAL OF COMMERCE EDUCATION & MANAGEMENT SCIENCES.

QUALIFICATION: At least Second Class Master's Degree or equivalent qualification in the relevant subject from a recognized University.

AGE LIMIT: 21 to 35 years

PAY SCALE: BPS-17

ELIGIBILITY: Male

ALLOCATION: Zone-4

28. ONE (01) POST OF FEMALE DIRECTOR PHYSICAL EDUCATION IN DIRECTORATE GENERAL OF COMMERCE EDUCATION & MANAGEMENT SCIENCES.

QUALIFICATION: At least Second Class Master's Degree or equivalent qualification in the relevant subject from a recognized University.

AGE LIMIT: 21 to 35 years

PAY SCALE: BPS-17

ELIGIBILITY: Female

ALLOCATION: Zone-1

29. ONE (01) POST OF FEMALE LIBRARIAN IN DIRECTORATE GENERAL OF COMMERCE EDUCATION & MANAGEMENT SCIENCES.

QUALIFICATION: At least Second Class Master's Degree or equivalent qualification in the relevant subject from a recognized University.

AGE LIMIT: 21 to 35 years

PAY SCALE: BPS-17

ELIGIBILITY: Female

ALLOCATION: Zone-5

30. ONE (01) LEFTOVER POST OF MALE LECTURER GEOGRAPHY IN DIRECTORATE OF HIGHER EDUCATION.

QUALIFICATION: 2nd Class Master Degree in relevant subject or equivalent qualification from a recognized university.

AGE LIMIT: 21 to 30 years

PAY SCALE: BPS-17

ELIGIBILITY: Male

ALLOCATION: Zone-5

31. ONE (01) LEFTOVER POST OF MALE LECTURER URDU IN DIRECTORATE OF HIGHER EDUCATION.

QUALIFICATION: 2nd Class Master Degree in relevant subject or equivalent qualification from a recognized university.

AGE LIMIT: 21 to 30 years

PAY SCALE: BPS-17

ELIGIBILITY: Male

ALLOCATION: Zone-5

HOME & TRIBAL AFFAIRS DEPARTMENT

32. ONE (01) LEFTOVER POST OF MALE PAROLE / PROBATION OFFICER IN DIRECTORATE OF RECLAMATION & PROBATION.

QUALIFICATION: 2nd Class Master Degree in Social Work / Sociology or equivalent qualification from a recognized university.

AGE LIMIT: 21 to 30 years

PAY SCALE: BPS-16

ELIGIBILITY: Male

ALLOCATION: Zone-5

MINES & MINERALS DEVELOPMENT DEPARTMENT

33. ONE (01) POST OF ACCOUNTS OFFICER IN COMMISSIONERATE OF MINES LABOUR WELFARE.

QUALIFICATION: At least Second Class Master's Degree of Business Administration (Finance), Master Degree in Commerce or equivalent qualification from a recognized University.

AGE LIMIT: 21 to 35 years

PAY SCALE: BPS-17

ELIGIBILITY: Both Sexes

ALLOCATION: Merit

POPULATION WELFARE DEPARTMENT

34. ONE (01) POST OF NSV SURGEON.

QUALIFICATION: MBBS Degree or equivalent qualifications recognized by the Pakistan Medical & Dental Council (PMDC).

AGE LIMIT: 21 to 32 years

PAY SCALE: BPS-17

ELIGIBILITY: Male

ALLOCATION: Merit

CORRIGENDUM

Twenty One (21) posts of Assistant Grade Clerk (BPS-16) of Police Department advertised by the Khyber Pakhtunkhwa Public Service Commission vide Advertisement No. 03/2018 at S. No. 159 stands withdrawn.

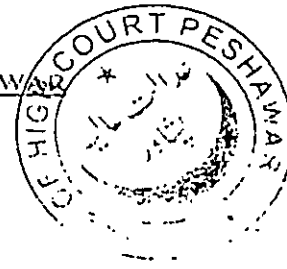
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GENERAL CONDITIONS

- (i) Separate application must be submitted online for each serial applied for subject to fulfillment of eligibility criteria given in the advertisement. By hand / by post applications will not be entertained.
- (ii) Call letters for test will be placed on PSC website. Candidates must keep visiting the PSC website from time to time.
- (iii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates / DMCs are accepted.
- (iv) Candidates are required to make correct entries in the online application which can be documentarily proved as on the basis of their claim / entries they will be called for screening / ability test. Documents for unclaimed entries will not be entertained later on.
- (v) Only the qualification possessed on the closing date of the advertisement shall be taken into consideration.
- (vi) Age shall be reckoned on closing date of the advertisement. Maximum age limit as prescribed in the recruitment rules shall be relaxable up-to 10 years for Disabled persons / Divorce women / Widow / Govt: Servants who have completed Two (2) years continuous service and up-to Three (3) years for candidates belonging to backward areas specified in the appendix attached to the Khyber Pakhtunkhwa Initial Appointment to Civil Posts (Relaxation of Upper Age Limit) Rules, 2008. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt: Servants, general or disabled candidates, whichever is relevant and applicable to them. Employees or ex-employees of development projects of the Government of Khyber Pakhtunkhwa and employees or ex-employees of development projects of the Federal Government under the administrative control of the Government of Khyber Pakhtunkhwa shall also be entitled to age relation equal to the period served in the projects, subject to a maximum limit of ten years provided that this age relaxation shall not be available in conjunction with any other provisions of the age relaxation rules.
- (vii) Candidates applying against disable quota will be required to submit disability certificates issued by the Provincial Council for Rehabilitation of Disabled Persons as well as from the respective Medical Superintendent / Medical Board showing therein the specific disability and both the certificates must be issued before the closing date fixed for online apply.
- (viii) Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates will be required before interview.
- (ix) Applicants married to Foreigners are considered only on production of the Govt: Relaxation Orders.
- (x) A female candidate if married before entry into government service shall acquire the domicile of her husband. If otherwise she will possess her own domicile. However, married female candidates are allowed to opt one of the domicile of her choice. Option once exercised shall be final and changes therein shall not be allowed.
- (xi) Experience wherever prescribed shall be counted after the prescribed qualifications for the post(s) if not otherwise specified in the service rules. The experience certificates should be on prescribed forms available on PSC website.
- (xii) Government reserves the right not to fill any or fill more or less than the advertised post(s).
- (xiii) In case the number of applications of candidates is disproportionately higher than the number of posts, short listing will be made in anyone of the following manner: -
 - (a) Written Test in the Subject.
 - (b) General Knowledge or Psychological General Ability Test.
 - (c) Academic and / or Professional record as the Commission may decide.

Note: Candidate who apply for the post(s) are advised to make sure that they are eligible for the post in all respects because eligibility of the candidate will be determined strictly according to the rules after conduct of all tests.

(GHULAM DASTAGIR AHMAD)
DIRECTOR RECRUITMENT
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION



W.P.No. ~~432~~ 3190/2019

Annex-6⁴

(47)

Murtaza Hassan S/o Nawab Ali Khan
R/o House No.268, Street No.7, Sector K-1,
Phase-III, Hayatabad, Peshawar

.....Petitioner

Versus

1. Government of Khyber Pakhtunkhwa through Secretary, Health Department, Peshawar.
2. Secretary, Services & General Administration Department, Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Finance Department, Khyber Pakhtunkhwa, Peshawar.
4. Medical Health Foundation Department through MD Khushal Khan Khattak Road, University Town, Peshawar.

.....Respondents

*WRIT PETITION UNDER ARTICLE 199
OF THE CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN, 1973.*

Sheweth;

- 1) That petitioner is a Graduate Medical Technologist (paramedics with BS Hons), who happens to be the General Secretary of a private association by the name of Khyber Pakhtunkhwa Association of Allied Health Technologists, working / struggling for the welfare of its members and striving for acquiring their

WP3190 2019 MURTAZA HASSAN VS KPK IJH USB 134 PG

m.
ATTESTED

to be true copy
Advocate

ATTESTED
EXAMINER
Peshawar High Court

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due share in jobs in the KPK Health Department. As such, the petitioner is filing the instant petition in the public interest.

- 2) That since the inception, the vacancies occurring in the categories of Allied Health Services are being allocated in certain ratio to the Graduate Medical Technologists (hereinafter referred to as GMTs) and diploma holder technicians. The existing allocation was published in the official Gazette vide notification dated 10th May, 2016 (Annex "A")
- 3) That in these rules, the seat allocation amongst the GMTs & diploma holders find mention as given below:-

"Senior Technologist (BPS-18)

Method of recruitment:

- ⇒ (a) 50% by promotion on the basis of seniority-cum-fitness from amongst the Technologist and PHC Technologists with five years' service as such in the relevant technology; and
- (b) 50% by initial recruitment

⇒ Technologist (BPS-17)

Method of recruitment:

- (a) 40% by promotion on the basis of seniority-cum-fitness from amongst the Technologists and PHC Technologists with five years' service as such in the relevant technology; and
- (b) 40% by initial recruitment"

- 4) That vide a memo dated 11.06.2018 (Annex "B"), the ratio of paramedics staff of the Health Department in the higher grades was enhanced. Due to that later development, the number of posts in the relevant scales for the purpose of the instant petition, i.e .BPS-17 and BPS-18 are 1164 and 284, respectively. It may be taken judicial notice of, that the quota of 40% in BPS-17 and

WP3190 2019 MURTAZA HASSAN VS KPK 1611 USB 134 PG

ATTESTED
EXAMINER
Peshawar High Court

- (49)
- 10) That it would be in the better interest of the real stake holders i.e. patients that the relevant rules in KPK are also brought in line with those prevailing in the province of Punjab since the year 2012.
 - 11) That the facility of internship in the Govt. Hospitals, including MTIs, is not available to GMTs and they are compelled to work at private laboratories and hospitals, where, too, they face unbecoming behavior on the part of the diploma holders.
 - 12) That representation of the GMTs on SSRC committee is essential for facilitating the fresh graduates in medical technologies. This deficiency was also noticed with great concern by the worthy Minister of Health and he was pleased to issue direction to the DG Health under his hand and official stamp on 18.01.2019 in the following words:

"DGHS



*Please include their (KPAAHT) representative in the
SSRC Committee"*

(Copy is attached as Annex "E")

- 13) That the quota reserved for the GMTs both in BPS-17 and BPS-18 was being flagrantly violated at times and against that they had been agitating their grievance duly in writing (Annex "F"), but the respondents always ignored the same.
- 14) That even frequent meetings were held with the respondents and the grievances of GMTs were raised, however, with no tangible result. The last meeting in this respect was held on 15.04.2019 in which the demands of the petitioner's were put on future. (Minutes of the meeting dated 15.04.2019 are attached as Annex "F")

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15) That feeling aggrieved and having no other adequate and efficacious remedy the petitioner seeks indulgence of this hon'ble Court for redress, inter alia, on the following:-

GROUNDS

- A. That the GMTs have not been treated in accordance with law in contravention of Articles 4 & 38 of the Constitution.
- B. That the non-observance of the quota reserved for GMTs in the rules on the subject is illegal, without lawful authority and of no legal effect.
- C. That the respondents have violated the golden principle laid down by the constitution: "*to refrain from doing anything not permitted by law to do, or to do anything required by law to do*" hence, it requires indulgence of this hon'ble Court.
- D. That the conduct demonstrated by the respondents also goes contrary to the principle of "*what is required by law to be done in a particular manner has to be done in that manner only otherwise it would be illegal*"
- E. That there is no reason, rationale and justification for leaving out the clause in the rules pertaining to the appointment of the GMTs.
- F. That ignoring the GMTs and accommodating the other inservice employees against the seats reserved for GMTs bespeaks of the malafide, favouritism, nepotism and even underhand dealing (corruption) on the part of the respondents.
- G. That the petitioner craves to urge additional grounds, after the stance of the respondents becomes known to him.

In this view of the matter, it is therefore, prayed that on acceptance of this writ petition this hon'ble Court may be pleased:

WP1:90:2019 MURTAZA HASSAN VS KPK IJII USB 134 PG

ATTESTED
EXAMINER
Peshawar High Court

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PESHAWAR HIGH COURT, PESHAWAR.
FORM "A"
FORM OF ORDER SHEET.

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Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of Judge or Magistrate and names of parties or counsel where necessary
1	2	3
	19.11.2019.	<p><u>W.P.No.3180-P/2019.</u></p> <p><u>Present:-</u> Petitioner in person. Malik Akhtar Hussain, A.A.G for the respondents.</p> <p><u>LAL JAN KHATTAK, J.:-</u> Through this petition, petitioner seeks direction to the respondents for observing the quota reserved for the GMTs.</p> <p>2. At the very outset, petitioner stated before the court that he would be satisfied if directions are given to the respondents to observe the quota reserved for the GMTs to which the learned A.A.G did not object.</p> <p>4. In view of the above, we dispose of this petition by directing the respondents No.1 and 2 to implement the quota reserved for the GMTs in letter and spirit and strictly in accordance with law and rules on the subject so that the petitioner's grievance could be redressed.</p> <p style="text-align: right;">JUDGE JUDGE</p>

VERIFIED TO BE TRUE COPY
21 NOV 2019

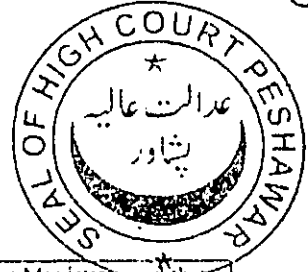
DOVBLE HAJRATIA LAL JAN KHATTAK & HAJRATIA LAL KHATTAK ATTORNEYS

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to be true copy
Advocate

Better copy

S/A

PESHAWAR HIGH COURT, PESHAWAR.
FORM "A"
FORM OF ORDER SHEET.



Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate of parties or counsel where necessary
1	2	3
	19.11.2019.	<p><u>W.P.No.3190-P/2019.</u></p> <p><u>Present:-</u> Petitioner in person.</p> <p>Malik Akhtar Hussain, A.A.G for the respondents.</p> <p><u>LAL JAN KHATTAK, J:-</u> Through this petition, petitioner seeks direction to the respondents for observing the quota reserved for the GMTs.</p> <p>2. At the very outset, petitioner stated before the court that he would be satisfied if directions are given to the respondents to observe the quota reserved for the GMTs to which the learned A.A.G did not object.</p> <p>4. <u>In view of the above, we dispose of this petition by directing the respondents No.1 and 2 to implement the quota reserved for the GMTs in letter and spirit and strictly in accordance with law and rules on the subject so that the petitioner's grievance could be redressed.</u></p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

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Examiner
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Qanun-e-shahadat Order 1988

21 NOV 2019

HON'BLE MR JUSTICE LAL JAN KHATTAK &
HON'BLE MR JUSTICE AHMED ALI



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 1st February, 2018

Annex 'I'

(52)

NOTIFICATION.

No. SOH-III/8-60/2018. Upon recommendations of the Departmental Promotion Committee, the following Paramedics (Relevant Degree Holders) are hereby promoted to the post of Technologists (BS-17) in different categories/specialties in Health Department with immediate effect in the public interest.

1. Chief Technician (Anesthesia) BS-16, Senior Technicians (Anesthesia) BS-14 & Technicians (Anesthesia) BS-12 to Clinical Technologist (Anesthesia) BS-17.

S.NO	Name	Place of Present posting.	Remarks.
1.	Arbab Sikandar S/O Mir Ahmad Khan	MTI, KTH Peshawar	Promoted.

2. Chief Technician (Dental) BS-16, Senior Technicians (Dental) BS-14 & Technicians (Dental) BS-12 to Clinical Technologist (Dental) BS-17.

S.NO	Name	Place of Present posting.	Remarks.
1.	Fazle Anab S/O Fazle Maula	MTI, LRH Peshawar.	Promoted.

3. Chief PHC Technician (MCH) BS-16, Senior PHC Technicians (MCH) BS-14 & PHC Technicians (MCH) BS-12 to PHC Technologist (MCH) BS-17.

S.NO	Name	Place of Present posting.	Remarks.
1.	Ulfat Begum D/O Fazal Ahmad	DHO Charsadda.	Promoted
2.	Arceta Kumari D/O Mir Chand	Services Hospital Peshawar.	Promoted
3.	Bibi Benazir D/O Mubarak Khan	DHO Chitral BHU Shughora Chitral.	Promoted

4. Chief Clinical Technician (Ophthalmology) BS-16, Senior Clinical Technician (Ophthalmology) BS-14, Technicians (Ophthalmology) BS-12 to Clinical Technologist (Ophthalmology) BS-17.

S.NO	Name	Place of Present posting	Remarks.
1.	Waheed Ullah Khan S/O Muhammad Karim	KGN Hospital/MTI Bannu	Promoted
2.	Malik Irfanullah Khan S/O Malik Afzal Khan	DHQ Hosp; KDA Kohat	Promoted
3.	Abdul Wahid S/O Gul Muhammad Khan	NBMH Kohat Road Peshawar.	Promoted

5. Chief PHC Technician (M.P) BS-16, Senior PHC Technicians (M.P) BS-14 & PHC Technicians (M.P) BS-12 to PHC Technologist (M.P) BS-17.

S.NO	Name	Place of Present posting	Remarks.
1.	Khalid Khan S/O Durrani Khan	DHO Peshawar.	Promoted
2.	Khair-ur-Rehman S/O Anwar-ul-Haq	DHO Shangla.	Promoted

ATTESTED
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Advocate

3.	Abdul Razzaq S/O Muhammad Yousaf	DHO Haripur.	Promoted
4.	Fazal Hadl S/O Lajbar	PMIT Swat.	Promoted
5.	Muhammad Iqbal S/O Karim Gul	DHO Peshawar.	Promoted
6.	Syed Maqsood Anwar S/O Syed Muhammad Shah	DHO Abbottabad RHC Kund.	Promoted
7.	Zainul Abidin S/O Izat Khan	DHO Charsadda	Promoted
8.	Jan Muhammad S/O Nowshad Khan	DHO Dir Lower	Promoted
9.	Amir Khan S/O Khan Baz	DHO Peshawar	Promoted
10.	Bashir ul Haq S/O Habibul Haq	DHO Charsadda	Promoted
11.	Muhammad Hashim S/O Gul Zarin	Agency Surgeon Bajaur	Promoted
12.	Muhammad Usman S/O Muhammad Haroon	DHO Mardan	Promoted
13.	Janas Khan S/O Amin Khan	DHO Kohat	Promoted
14.	Qalsar khan S/O Muhammad Hanif	DHO Kohat	Promoted
15.	Aziz ur Rahman S/O Bahadar Khan	DHO Lower Dir.	Promoted

6. They will be on probation for a period of one year.
7. Posting/transfer Notification in favor of above mentioned officers will be issued later on.

**SECRETARY HEALTH
GOVT. OF KHYBER PAKHTUNKHWA**

Endst. Even No and Date.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director General, Health Services, Khyber Pakhtunkhwa.
3. The Director General, Provincial Health Services Academy, Peshawar.
4. The Director, Health Services, FATA.
5. Hospital Directors, MTIs, Khyber Pakhtunkhwa concerned.
6. Medical Superintendents, DHQ Teaching Hospital, Khyber Pakhtunkhwa concerned.
7. Principals/Deans, KMC/KCD/PGPI, Peshawar.
8. District Health Officers, Khyber Pakhtunkhwa concerned.
9. District Accounts Officers, Khyber Pakhtunkhwa concerned.
10. The Deputy Director I.T, Health Department.
11. PS to Senior Minister Health, Khyber Pakhtunkhwa.
12. PS Secretary Health, Khyber Pakhtunkhwa.
13. PA to Additional Secretary (Establishment) Health, Khyber Pakhtunkhwa.
14. PA to Deputy Secretary (Admin) Health, Khyber Pakhtunkhwa.
15. Officers concerned.

Jalil
12.2018
SECTION OFFICER-III

IN THE PESHAWAR HIGH COURT, PESHAWAR

54

Writ Petition No. _____/2020

Muhammad Ajmal and Others

..... Petitioners

VERSUS

Director General Health Services, KP & Others

..... Respondents

NOTICE

To

1. Directorate General Health Services, Khyber Pakhtunkhwa Peshawar through its Director General.
2. Govt. of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
3. Secretary Finance, Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Secretary Services & General Administration Department, Khyber Pakhtunkhwa.
5. Medical Health Foundation Department through M.D, Khushal Khan Khattak Road, University Town Peshawar.
6. Secretary Establishment Department of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

Please take notice that I am filing the above titled writ petition before this Honourable Court.

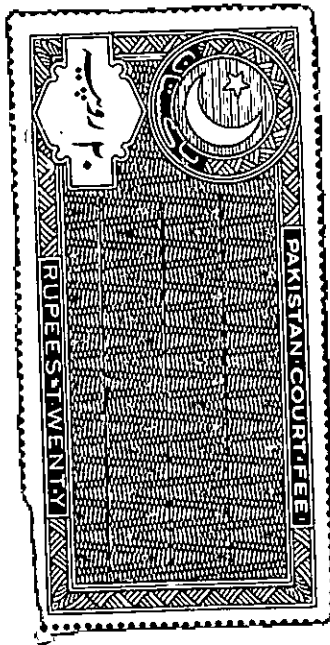
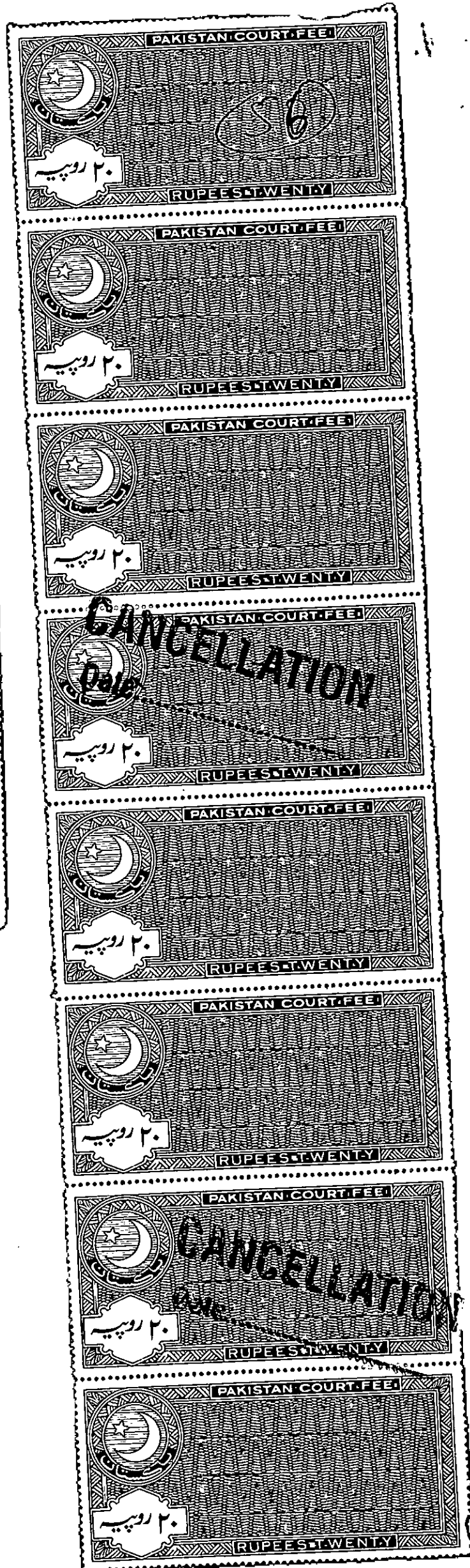
Petitioners

Through

³
Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan

Saifullah Muhib Kakakhel
Advocate High Court (LL.M)
Cell: 0334-4440744

Dated: 21 /03/2020



FILED TODAY
Deputy Registrar
21 MAR 2020

VAKALATNAMA

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2020

Muhammad Ajmal and Others

..... Petitioners

VERSUS

Directorate General Health Services Khyber Pakhtunkhwa through its Director General
and others

..... Respondents

We, do hereby appoint and constitute **Mian Muhibullah Kakakhel** Senior Advocate Supreme Court of Pakistan, **Saifullah Muhib Kakakhel**, **Mehwish Muhib Kakakhel & Zeenat Muhib Kakakhel** Advocates High Court to appear and act for me as my advocates in the above matter.

1. **To** act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.
2. **To** draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.
3. **To** employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND We hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. we further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me on 18th March, 2020.

ACCEPTED BY:

Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan

Petitioners:

Saifullah Muhib Kakakhel
Advocate High Court (LL.M)

Mehwish Muhib Kakakhel
Advocate High Court

Zeenat Muhib Kakakhel
Advocate High Court



KAKAKHEL LAW ASSOCIATES
ADVOCATES AND LEGAL CONSULTANTS

KAKAKHEL LAW ASSOCIATES (ADVOCATES & LEGAL CONSULTANTS) 36-C, 2ND FLOOR, CANTONMENT PLAZA, SADDAR ROAD, PESHAWAR, CANTT, KHYBER PAKHTUNKHWA, PESHAWAR.
PH: 091-5250412, CELL: 0333-9167424 EMAIL: INFO@KAKAKHELLAW.COM

FILED TODAY
Deputy Registrar

21 MAR 2020

PETITIONERS

1. Muhammad Ajmal _____
2. Hidayat Ullah Khan _____
3. Israr Ullah _____
4. Siraj Uddin _____
5. Dilawar Khan _____
6. Ihsan Ul Haq _____
7. Zaheer Uddin _____
8. Hafiz Ullah Khan _____
9. Asad Ullah Khan _____
10. ~~Asrar Ahmad~~ _____

ACCEPTED BY:

Mian Muhibullah Kakakhel
Senior Advocate
Supreme Court of Pakistan

Petitioners:

Saifullah Muhib Kakakhel
Advocate High Court (LL.M)

Mehwish Muhib Kakakhel
Advocate High Court

Zeenat Muhib Kakakhel
Advocate High Court

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ADVOCATES AND LEGAL CONSULTANTS

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PH: 091-5250412, CELL: 0333-9167424 EMAIL: INFO@KAKAKHELAW.COM

FILED TODAY
Deputy Registrar
21 MAR 2020

Muhammad Ajmal & others

Vs. Health Deptt.

Application for deletion of name
of "Muhammad Ajmal" from panel
of appellants.

Respected Sir,

- Applicant humbly submits as under:

1. The instant service appeal is pending for adjudication before this honorable tribunal, wherein today i.e. 8-12-2021, date is fixed.
2. The instant appeal is filed for seeking promotion from Senior Clinical Technician (BPS-14) to Clinical Technologists (BPS-17).
3. The instant appeal filed by number of appellants jointly wherein appellant no.1 namely "Muhammad Ajmal" is promoted to the desired post i.e. Clinical Technologists (BPS-17). (ANNEX-A)

The appellant "Muhammad Ajmal" is provided to desire/subject post, hence, the instant service appeal becomes infructuous to the extent of appellant no.1 "Muhammad Ajmal" and liable to be deleted from panel of appellants.

Dated: 08-12-2021

Applicant,
Ajmal
Muhammad Ajmal



ANNEX-A

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Peshawar, the 24th August, 2021

NOTIFICATION

SOH-III/8-60/2021 (C.T Anesthesia BS-17): The Competent Authority, on the recommendations of Departmental Promotion Committee (DPC), in its meeting held on 14-07-2021, is pleased to promote the following Clinical Technicians (Anesthesia) (BS-12) to the post of Clinical Technologist Anesthesia (BS-17) on regular basis, with immediate effect:

S.No	Name with Father Name of Officers	Place of present posting.
1.	Khurshid S/O Noor Khan	DHO Swabi
2.	Shafiq-ur-Rehman S/O Gul Rahman	DHQB KDA Kohat
3.	Muhammad Ajmal S/O Muhammad Afzal	HMC Peshawar
4.	Abrar Ahmad S/O Saif ul Islam Saif	DHQ Nowshera
5.	Idrees Khan S/O Nisar Muhammad	SGTH Swat
6.	Gohar Ali S/O Sardar Ali	SGTH Swat
7.	Zahoor Ahmad Shah S/O Bakht zada	STH Swat
8.	Mustafa S/O Said Faqir	DHO Dir Lower

2. The officers on promotion will remain on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Posting/Transfer Notifications in respect of above mentioned officers will be issued later on.

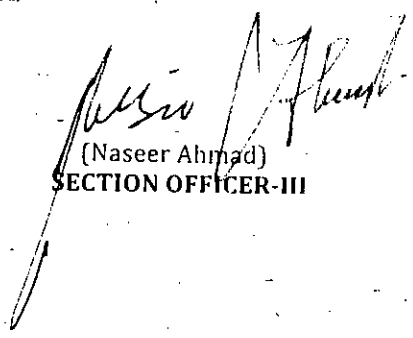
**Secretary to Govt. of Khyber Pakhtunkhwa
Health Department**

Endst of even No and Date.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, concerned.
4. Hospital Director, MTI concerned.
5. Chief Executive, Saidu Group of Teaching Hospital, Swat.
6. Medical Superintendent, DHQ Hospital, concerned.
7. District Accounts Officer, concerned.
8. The Deputy Director (I.T) Health Department.
9. PS to Secretary Health, Khyber Pakhtunkhwa.
10. PS to Special Secretary (E&A) Health, Khyber Pakhtunkhwa.

11. PA to Additional Secretary (Estab) Health, Khyber Pakhtunkhwa.
12. PA to Deputy Secretary (Admn) Health Department.
13. Officers concerned.


(Naseer Ahmad)
SECTION OFFICER-III

M.KASHIF KHAN/***