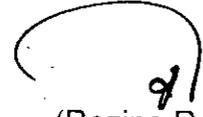


14.06.2022

Appellant present through representative.

Lawyers are on general strike, therefore, case is adjourned to 18.08.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

18.08.2022

Tour to camp court Abbottabad has been cancelled, therefore, the case is adjourned on 20.10.2022 for the same.



READER

20.10.2022

Nemo for the appellant.

Previous date was changed on the strength of Reader's Note, therefore notice be issued to the appellant as well as his counsel to attend the court on the next date. Adjourned. To come up for preliminary hearing before the S.B on 26.12.2022.



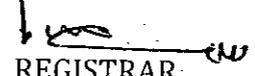
(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 562/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	15/04/2022	<p>The appeal of Dr. Syed Raza Shah presented today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p>	17/5/22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>19-05-2022</u>. Notices be issued to appellatant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>19.05.2022</p> <p>Counsel for the appellatant present and requested for adjournment on the ground that he has not prepared the brief. To come up for preliminary hearing before S.B on 14.06.2022 at camp court Abbottabad.</p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman Camp Court Abbottabad</p>

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: DR Syed Raza vs Gov of Pk etc

S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Arshad Khan Tando</u>		
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

M. Arshad Khan Tando

Signature:

[Handwritten Signature]

Dated:

14/4/22

03469588583

BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 562 /2022

Dr. Syed Raza Hussain Shah, Senior Medical Officer (BPS-18) DHQ,
 Type- C Hospital Battagram.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Chief Secretary, KP Peshawar and
 others.

...RESPONDENTS

SERVICE APPEAL

INDEX

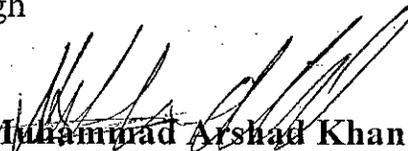
S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 7	
2.	Copy of appointment order	8-16	"A"
3.	Copy of impugned seniority list dated 18/06/2021 received on 15/12/2021	17-21	"B"
4.	Copy of departmental appeal dated 16/01/2022	22	"C"
5.	Wakalatnama	23	



...APPELLANT

Dated: 14/4/2022

Through


 (Muhammad Arshad Khan Tanoli)
 Advocate Supreme Court of Pakistan,
 Abbottabad

BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 562/2022

Dr. Syed Raza Hussain Shah, Senior Medical Officer (BPS-18) DHQ,
Type- C Hospital Battagram.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Chief Secretary, KP Peshawar.
2. Secretary Health KP Peshawar.
3. Director General Health & Health Services KP, Peshawar.
4. District Health Officer District Battagram.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974 FOR
DECLARATION TO THE EFFECT THAT THE
IMPUGNED SENIORITY LIST DATED
18/06/2021 WHEREIN, THE APPELLANT HAS
BEEN SHOWN AT SERIAL NO. 495 WHICH
SHOULD HAVE BEEN AT SERIAL NO. 318.

HENCE, THE IMPUGNED SENIORITY LIST IS TO BE RECONCILED / RECTIFIED AFTER PLACING THE APPELLANT AT SERIAL NO. 318 AND THEREAFTER, ISSUE REVISED SENIORITY LIST.

PRAYER:- ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED SENIORITY LIST DATED 08/06/2021 MAY BE SET-ASIDE AND RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO ISSUE REVISED SENIORITY LIST OF THE APPELLANT AFTER PLACING HIM AT SERIAL NO. 318 INSTEAD OF 495. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE TO THE APPELLANT.

Respectfully Sheweth:-

That the facts forming the backgrounds of the instant service appeal are arrayed as under;-

1. That the appellant got appointment in BPS-17 on 24/01/2004 vide appointment order dated 16/01/2004. Copy of appointment order is attached as Annexure "A".
2. That the appellant received impugned seniority list dated 18/06/2021 on 15/12/2021, wherein, the appellant has illegally been shown at serial No. 495 instead of serial No. 318 in the impugned seniority list. Copy of impugned seniority list dated 18/06/2021 received on 15/12/2021 is annexed as Annexure "B".
3. That the appellant feeling aggrieved, filed departmental appeal on 16/01/2022 but the appellate authority did not bother to reply to the appellant. Copy of departmental appeal dated 16/01/2022 is attached as Annexure "C". Hence, feeling aggrieved from the impugned seniority list, the instant service appeal is filed inter-alia, on the following grounds; -

GRUNDS:-

- a) That the impugned seniority list issued by respondent placing the appellant at serial No. 495 instead of 318 is illegal, malafide, discriminatory, against the law and is not maintainable at law. Hence the impugned seniority list dated 18/06/2021 is liable to be set aside.

- b) That as per impugned seniority list, date of appointment of the appellant has been mentioned as 08/03/2005 instead of 24/01/2004. As a result, the seniority list prepared on the basis of incorrect date of appointment is not maintainable at law.

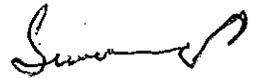
- c) That as a result 178 junior officers in BPS-18 have been made seniors to the appellant. Hence, the impugned seniority list prepared on wrong facts and figure is liable to be set-aside.

- d) That valuable rights of the seniority as well as promotion to the next higher rank are at stake due to the malafide or the negligent attitude of the concerned officials / officers who prepared the impugned seniority list.
- e) That respondent- department has led the appellant to the place which is utterly / absolutely not known to the principle of jurisprudence, natural justice, good governance and fair play.
- f) That this Honourable Tribunal should not fold up its hand while granting relief to the aggrieved appellant. The mistake of the respondents in the impugned seniority list is apparent which is to be reconciled / rectified and thereafter, revised seniority list after placing the appellant at right and due place is to be issued.
- g) That the matter relates to the terms and condition of service therefore, this

Honourable Tribunal has jurisdiction to entertain the present appeal under Article 212 of the Constitution. Besides, the instant appeal is within the period of limitation.

- h) That other grounds shall be urged at the time of arguments.

It is therefore, humbly prayed that on acceptance of instant service appeal, the impugned seniority list dated 08/06/2021 may be set-aside and respondents may graciously be directed to issue revised seniority list of the appellant after placing him at serial No. 318 instead of 495. Any other relief which this Honourable Tribunal deems appropriate in the circumstances of the case may also be to the appellant.



...APPELLANT

Through



(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan,
Abbottabad

Dated: 14/4 /2022

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

BEFORE THE CHAIRMAN SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2022

Dr. Syed Raza Hussain Shah, Senior Medical Officer (BPS-18) DHQ,
 Type- C Hospital Battagram.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Chief Secretary, KP Peshawar and
 others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Dr. Syed Raza Hussain Shah, Senior Medical Officer (BPS-18) DHQ,
 Type- C Hospital Battagram*, do hereby solemnly affirm and declare that the
 contents of foregoing appeal are true and correct to the best of my
 knowledge and belief and nothing has been concealed therein from this
 Honourable Court.



[Handwritten Signature]

DEPONENT

14/04/2022

Annex-A

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Date: January 16, 2004

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NOTIFICATION

No. SO/Estab/3-18/2004. The Competent Authority is pleased to appoint the following doctors as Medical Officer (BS-17) on contract basis for a period of three years or till the availability of nominees of the NWFP Public Services Commission in the District Agency as mentioned against each subject to provision of Medical Fitness Certificate:-

1	Nafisa Batool FCPS-I (Gynaec) T.M.C. Shp Completed	Ghulam Sarwar Khan	RHC Nishazi District Pesh:
2	Anila Basil FCPS-I (Pulmonology)	Syed Basil Ali Shah	THQH: Tangi District Charsadda
3	Zarveen Qazi	O. Muhammad Yousaf	At the disposal of EDO (H) Mardan
4	Rabia Sarfar T.M.C. Shp Completed	Muhammad Islam	City Hospital Peshawar.
5	Shumailsa Hadi FCPS-I	Abdul Haq Khan	DHQH: Kohat
6	Shahida Sultan FCPS-I	Sultan Khan	AHQ Hospital Bataur
7	Sadis Nawaz FCPS-I	Navaz Ahmad Durrani	AHQ Hospital Mohmand
8	Sumaira Yasmin FCPS-I (Gynaec) MCPS	W/O M. Asif SMO P/S Hospital Peshawar	Govt. Maternity Hospital, Peshawar
9	Shamim Akhtar FCPS-I	Faqir Mohammad	DHQ Hospital Kohat
10	Suameen Liaquat FCPS-I (Gynaec)	Liaquat Ali Shah	AHQ Hospital Baitkheis Mkd Agency
11	Qudsia Qazi	Sadiqueullah	THQH Banda Daud Shah Katak
12	Ayifa Khan	Adam Khan	At the disposal of EDO (H) Manshera
13	Shazia Iqbal	Iqbal Ahmad Khan	At the disposal of EDO (H) Charsadda
14	Sadat Durrani	Ihsan Ali Durrani	At the disposal of EDO (H) Nowshera
15	Farah Nighat Amin	Aminullah Jan	At the disposal of EDO (H) Bunir
16	Atiya Ayaz	Muhammad Ayaz Khan	At the disposal of EDO (H) Manshera
17	Salma Rehman FCPS-I (Surgery)	Maqsoodur Rehman	DHQ Hospital Kohat
18	Sadaf Humayun	Muhammad Humayun	DHQ Hospital Dir Khas
19	Rubina Yousaf FCPS-I	Arsela Khan	C.H. Kalaya Orakzai Agency
20	Suhana	Abdul Sattar	At the disposal of A.S.S.V. Agency
21	Samina Khan	Abdul Karim	At the disposal of A.S. Khyber

Attested

266	Ibrar Ali Khan		
267	Hayat Muhammad	Bakhtiar	At the disposal of EDO (H) L Dir
268	S. Raza Hussain Shah	Muhammad S. Muhammad Shah	At the disposal of EDO (H) L Dir At the disposal of EDO (H)
269	Amin Khan		Battagram
270	Mian Nizam Ali	Sarwar Khan	At the disposal of EDO (H) Shantal
271	Mian Said Zada	Shebar Man	SGTH Swat
272	Zafar Ali Khan	Faqir said	At the disposal of EDO (H) Shantal
273	Musnad Ahmad	Dawa Khan	At the disposal of EDO (H) U Dir
274	Sarwar Shan	Mashfoof Khan	At the disposal of EDO (H) Kohistan
275	Muhammad Zahir Uddin	Samar Khan	At the disposal of EDO (H) Kohistan
276	Inamul Rehman	Muhammad Iqbal Uddin	At the disposal of EDO (H) U Dir
277	Ashraf Khan	Noor Mehmood	At the disposal of EDO (H) Kohistan
278	Ahmad Hussain	Mahabat Khan	At the disposal of EDO (H) L Dir
279	Javed Wahid	Fazal Ghani	At the disposal of EDO (H) Chitral
280	Nasir Khan	Abdul Wahid Khan	At the disposal of EDO (H) Chitral
281	Alisardul	Qadar Khan	At the disposal of EDO (H) Chitral
282	Imdadul Din	Shah Habib Jan	BHU Ashraf Chitral
283	Yasser Mehmood Khan	Mehboob Ali	At the disposal of EDO (H) Chitral
284	Zafar Shah	Mansoor Rehman	At the disposal of EDO (H) Malakand
285	Uddin	Muhammad Essa	
286	Uddin	Gul Muhammad	At the disposal of EDO (H) Kohistan
288	She Zada	Ahmad	At the disposal of EDO (H) Kohistan
287	Amran Khan	Muhammad Sirej	At the disposal of EDO (H) Kohistan Malakand
288	Mehmood Ali	Liaqat Khan	At the disposal of EDO (H) Chitral
289	Shahid Aman	Amanullah Khan	At the disposal of EDO (H) Malakand
290	Ilkhar Jo Dir	Mahboob Ali	At the disposal of EDO (H) L Dir
291	Ibrar Iqbal	Zaoshah Gul	At the disposal of EDO (H) U Dir
292	Muhammad Zakria	Muhammad Iqbal	At the disposal of EDO (H) Chitral
293	Roshan Ali	Muhammad Ali	At the disposal of EDO (H) Chitral
294	Aziz Rehman	Muhammad Azim	At the disposal of EDO (H) Chitral
295	Samiullah	Rahimullah	At the disposal of EDO (H) Occupied
296	Abdul Munir	Abdur Rehman	At the disposal of EDO (H) Chitral
297	S. M. Shah Ali Khan	Jamshaid Khan	At the disposal of EDO (H) Chitral
298	Akbar Ali Khan	Abdur Akbar Khan	At the disposal of EDO (H) Chitral
299	Muhammad Anwar	Fazal Yaqub	At the disposal of EDO (H) Chitral
300	Muhammad Anwar	Muhammad Shah Khan	At the disposal of EDO (H) Chitral
301	Muhammad Anwar	Muhammad Khan	At the disposal of EDO (H) U Dir
302	Muhammad Anwar	Syed Anwar Shah	At the disposal of EDO (H) Shantal

Attested

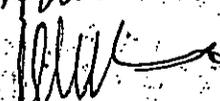
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GOVERNMENT OF NWFP
HEALTH DEPARTMENT
 Dated January 16, 2004

NOTIFICATION

No. SO/Estab/3-18/2004. The Competent Authority is pleased to appoint the following Doctors as Medical Officer (BS-17) on contract basis for a period of three years or till the availability of nominees of the NWFP Public Services Commission in the District Agency as mentioned against each subject to provision of Medical Fitness Certificate:

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2	Anila Basil FCPS-I (Pulmonology)	Syed Basil Ali Shah	THQH: Tangi District Charsadda
3	Zameen Qazi Rabiz Setaf T.M.C. Shiq Completed	O. Muhammad Yousaf Muhammad Islam	At the disposal of EDC (H) Maidan City Hospital Peshawar.
4	Shumaila Hadi FCPS-I	Abdul Haq Khan	DHQH: Kohat
5	Sharada Sultan FCPS-I	Sultan Khan	AHQ Hospital Balakot
6	Sadia Nawaz FCPS-I	Navaz Ahmad Durrani	AHQ Hospital Mohmand
7	Sumeera Yasmin FCPS-I (Gynaec) MCPS	W/O M. Asif SMO P/S Hospital Peshawar	Govt. Maternity Hospital, Peshawar
8	Shamim Akhtar FCPS-I	Faqir Mohammad	DHQ Hospital Kohat
9	Gulmeen Liaqat FCPS-I (Gynaec)	Liaqat Ali Shah	AHQ Hospital Balkhela Mkd Agency
10	Qudsia Qazi Anifa Khan	Sadeqatullah Adam Khan	THQH Banda Daud Shah Karak At the disposal of EDC (H) Manshera
11	Shazia Rizkha Sadaq Durrani	Rizkha Anwar Khan Ihsan Ali Durrani	At the disposal of EDC (H) Charsadda
12	Farah Nighat Amin Aminia Ayaz	Aminullah Jan Muhammad Ayaz Khan	At the disposal of EDC (H) Manshera
13	Salma Rehman FCPS-I (Surgery)	Maqbool Rehman	DHQ Hospital Kohat
14	Sadqa Humayun Rubina Nazreen FCPS-I	Muhammad Humayun Arzela Khan	DHQ Hospital Dir Khas C.H Kalaya Orakzai Agency
15	Sultana Saminia Khatun	Abdul Sattar Abdul Ghaffar	At the disposal of A.S.S.W. Agency At the disposal of A.S. Khyber

Attested


265	Ibrar Ali Khan		
267	Hayati Muhammad	Bakhtiar	At the disposal of EDO (H) L.Dir
268	S. Raza Hussain Sheh	M. Hammad S. Muhammad Shah	At the disposal of EDO (H) L.Dir At the disposal of EDO (H)
269	Amin Khan		At the disposal of EDO (H) Battagram
270	M. Niaz Ali	Sarzarin Khan	At the disposal of EDO (H) Shangha
271	Mian Said Zada	Shabar Mian	SGTH Swat
272	Zafar Ali Khan	Faqir said	At the disposal of EDO (H) Shangha
273	Mushtaq Ahmad	Dawa Khan	At the disposal of EDO (H) U.Dir
274	Sarwar Shah	Mashroof Khan	At the disposal of EDO (H) Kohistan
275	Munammad Zahoor U.Dir	Samar Khan	At the disposal of EDO (H) Kohistan
276	Anamul Renman	Muhammad Moin Uddin	At the disposal of EDO (H) U.Dir
277	Asghar Khan	Noor Mehmood	At the disposal of EDO (H) Kohistan
278	Ahmad Hussain	Marabat Khan	At the disposal of EDO (H) L.Dir
279	Jayyad Wahid	Fazal Ghani	At the disposal of EDO (H) Chitral
280	Nader Khan	Abdul Waheed Khan	At the disposal of EDO (H) Chitral
281	Nisarullah	Qadar Khan	At the disposal of EDO (H) Chitral
282	Ima zud Din	Sher Habbijan	BHU Ashraf Chitral
283	Yesser Mahmood Khan	Mehsoob Ali	At the disposal of EDO (H) Chitral
284	Zakirullah	Mehsoobur Renman	At the disposal of EDO (H)
285	Zakirullah	Munammad Essa	Malakand
286	Nasirullah	Gul Munammad	At the disposal of EDO (H) Kohistan
287	Sir Zada	Ahmad	At the disposal of EDO (H) Kohistan
288	Ahmed Khan	Munammad Siraj	At the disposal of EDO (H) Kohistan
289	Mehmood Ali	Liqat Khan	At the disposal of EDO (H) Malakand
290	Shahid Aman	Amanullah Khan	At the disposal of EDO (H) Chitral
291	Milkar Us Dir	Mahsoob Ali	At the disposal of EDO (H) Malakand
292	Farid Iqbal	Zaoshah Gul	At the disposal of EDO (H) L.Dir
293	Munammad Zakir	Muhammad Iqbal	At the disposal of EDO (H) U.Dir
294	Roshan Ali	Munammad Ali	At the disposal of EDO (H) Chitral
295	Aziz Rehman	Munammad Azim	At the disposal of EDO (H) Chitral
296	Sarfaraz	Rahimullah	At the disposal of EDO (H) Chitral
297	Abul Muneem	Abdur Rehman	At the disposal of EDO (H) Chitral
298	S. Muneer Ali Shah	Jamshed Khan	At the disposal of EDO (H) Chitral
299	Ahmed Ali Khan	Abul Akbar Khan	At the disposal of EDO (H) Chitral
300	Munammad Ahmad	Fakir Yaqub	At the disposal of EDO (H) Chitral
301	Munammad Ahmad	Munammad Shah Khan	At the disposal of EDO (H) Chitral
302	Munammad Ahmad	Munammad Khan	At the disposal of EDO (H) U.Dir
303	Munammad Ahmad	Syed Amin Shah	At the disposal of EDO (H) Shangha

Attested
Wakil

P-12

GOVERNMENT OF NWFP
HEALTH DEPARTMENT
Dated January 16, 2004

NOTIFICATION

No. SO (Estab) 3-18/2004. The Competent Authority is pleased to appoint the following doctors as Medical Officer (BS-17) on contract basis for a period of three years or till the availability of nominees of the NWFP Public Services Commission in the District Agency as mentioned against each subject to provision of Medical Fitness Certificate:-

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2	Anila Basit FCPS-I (Pulmonology)	Syed Basit Ali Shah	THQH: Tangi District Charsadda
3	Zameen Qazi T.M.O-Ship Completed	O Muhammad Yousaf Muhammad Islam	At the disposal of EDO (H) Mardan City Hospital Peshawar.
4	Rabia Sadaq FCPS-I	Abdul Haq Khan	DHQH: Kohat
5	Shumaila Hadi FCPS-I	Sultan Khan	AHQ Hospital Bala
6	Sadia Nawaz FCPS-I	Nawaz Ahmad Durrani	AHQ Hospital Mohmand
7	Sumaira Yasmin FCPS-I (Gynae) MCPS	W/O M. Asif SMO P/S Hospital Peshawar	Govt. Maternity Hospital, Peshawar
8	Shamim Akhtar FCPS-I	Faqir Mohammad	DHQ Hospital Kohat
9	Suameen Liaqat FCPS-I (Gynae)	Liaqat Ali Shah	AHQ Hospital Bafkhera Mko Agency
10	Qudsia Qazi	Sadaqatullah	THQH Banda Daud Shah Karak
11	Arifa Khan	Adam Khan	At the disposal of EDO (H) Mansehra
12	Shazia Bilal	Bilal Anwar Khan	At the disposal of EDO (H) Charsadda
13	Sadat Durrani	Ihsan Ali Durrani	At the disposal of EDO (H) Nowshera
14	Fareh Nighat Amin	Aminullah Jan	At the disposal of EDO (H) Bunir
15	Atiya Ayaz	Muhammad Ayaz Khan	At the disposal of EDO (H) Mansehra
16	Salma Rehman FCPS-I (Surgery)	Maqsood Rehman	DHQ Hospital Kohat
17	Sadique Hunezun	Muhammad Hunezun	DHQ Hospital Dir Khas
18	Rubina Maqsood FCPS-I	Arshad Khan	C.H. Kalaya Orakzai Agency
19	Suhana	Abdul Sattar	At the disposal of A.S.W. Agency
20	Samina Khan	Abdul Khalid	At the disposal of A.S. Khyber

Attested
[Signature]

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270	Mian Nizari Ali	Sarzarin Khan	At the disposal of EDO (H) Shangri
271	Mian Said Zada	Shabar Mian	SGTH Swat
272	Zafar Ali Khan	Faqir said	At the disposal of EDO (H) Shangri
273	Mushtaq Ahmad	Dawa Khan	At the disposal of EDO (H) U Dir
274	Sarwar Shah	Mashood Khan	At the disposal of EDO (H) Kohistan
275	Muhammad Zahir Uddin	Samar Khan	At the disposal of EDO (H) Kohistan
276	Inamur Rehman	Muhammad Mazi Uddin	At the disposal of EDO (H) U Dir
277	Asghar Khan	Noor Mehmood	At the disposal of EDO (H) Kohistan
278	Ahmed Hussain	Meharab Khan	At the disposal of EDO (H) L Dir
279	Javed Wahid	Fazal Ghani	At the disposal of EDO (H) Chitral
280	Nader Khan	Abdul Waheed Khan	At the disposal of EDO (H) Chitral
281	Nisarullah	Qadar Khan	At the disposal of EDO (H) Chitral
282	Imdad Uddin	Sher Habib Jan	SHU Ashraf Chitral
283	Yasser Mahmood Khan	Mehboob Ali	At the disposal of EDO (H) Chitral
284	Zafarullah	Mehboobur Rehman	At the disposal of EDO (H) Malakand
285	Usman Khan	Muhammad Essa	
286	Shir Zada	Gul Muhammad	At the disposal of EDO (H) Kohistan
287	Amran Khan	Ahmad	At the disposal of EDO (H) Kohistan
288	Mehmood Ali	Muhammad Siraj	At the disposal of EDO (H) Kohistan Malakand
289	Shahid Aman	Liqat Khan	At the disposal of EDO (H) Chitral
290	Intikhar Us Din	Amerullah Khan	At the disposal of EDO (H) Malakand
291	Faraz Iqbal	Mehboob Ali	At the disposal of EDO (H) L Dir
292	Muhammad Zakria	Zadshah Gul	At the disposal of EDO (H) U Dir
293	Roshan Ali	Muhammad Iqbal	At the disposal of EDO (H) Chitral
294	Aziz Rehman	Muhammad Ali	At the disposal of EDO (H) Chitral
295	Samiullah	Muhammad Azim	At the disposal of EDO (H) Chitral
296	Abdul Lateef	Rahimullah	At the disposal of EDO (H) Abolitioned
297	S. Manzoor Shah	Ataur Rehman	At the disposal of EDO (H) Chitral
298	Akbar Ali Khan	Jamshaid Khan	At the disposal of EDO (H) Chitral
299	Muhammad Ameer	Abdul Akbar Khan	At the disposal of EDO (H) Chitral
300	Muhammad Qadir	Fakir Yar	At the disposal of EDO (H) Chitral
301	Imdad Khan	Muhammad Sher Khan	At the disposal of EDO (H) Chitral
302	Muhammad Qadir	Ikhtiar Khan	At the disposal of EDO (H) U Dir
303	Muhammad Qadir	Syed Ammar Shah	At the disposal of EDO (H) Shangri

GOVERNMENT OF NWFP**HEALTH DEPARTMENT**

Dated January 16, 2004

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NOTIFICATION

No. SO(Estab)3-18-2004. The competent Authority is pleased in appoint the following Doctors as medical officer (BS-17) on contract basis for a period of three years or till the availability of nominees of the NWFP Public Service Commission in the District/Agency as mentioned against each subject to provision of Medical Fitness Certificate:-

S No	Name of Doctors	Father's Name	Place of Posting
1	Nafisa Batool FCPS-I (Gynae) TMO Ship Completed	Syed Basit Ali Shah	RHC Nahaqi District Pesh
2	Anila Dasit FCPS-1 (Pulmonology)	Ghulam Sarwar Khan	THQH Tangi District Charsadda
3	Zameen Qazi	Q Muhammad Yousaf	At the disposal of EDO (H) Mardan
4	Rabia Sadar TMO Ship Completed	Muhammad Islam	City Hospital Peshawar
5	Shumaila Hadi FCPS-I	Abdul Hadi Khan	DHQH Kohat
6	Shahida Sultan FCPS-I	Sultan Khel	AHQ Hospital Bajaur
7	Sadia Sultan FCPS-I	Nawaz Ahmad Durrani	AHQ Hospital Mohmand
8	Sumeera Yasmin FCPS-I(Gynae) MCPS	W/O M. Asif Smo P/S Hospital Peshawar	Govt: Maternity Hospital Peshawar
9	Shamim Akhtar FCPS-I	Faqir Mohammad	DHQ Hospital Kohat
10	Gulmeen Liaqat FCPS-I (Gynae)	Liaqat Ali Shah	AHQ Hospital Batkhaila Mkd Agency
11	Qudsia Qazi	Sadaqatullah	THQH Banda Daud Shah Karak
12	Atifa Khan	Adam Khan	At the Disposal of EDO (H) Mansehra
13	Shazia Ikhtiar	Ikhtiar Ahmad Khan	At the Disposal of EDO (H) Charsadda
14	Sadaf Durrani	Ihsan Ali Durrani	At the Disposal of EDO (H) Nowshera
15	Farah Nighat Amin	Aminullah Jan	At the Disposal of EDO (H) Bunir
16	Attiya Ayaz	Muhammad Ayaz Khan	At the Disposal of EDO (H) Mansehra
17	Salman Rehman FCPS-I (Surgery)	Maqboor Rehman	DHQ Hospital Kohat
18	Sadlas Hamayun	Muhammad Hamayun	DHQ Hospital Dir Khas
19	Rabia Naureen FCPS-I	Arsala Khan	C.H Kalaya Orakzai Agency
20	Sultana	Abdul Sattar	At the disposal of A.S.S.W Agency
21	Samina karim	Abdul Karim	At the disposal of A.S Khyber

Assesed
HKS

266	Ibrar Ali Khan	Bakhtiar	At the disposal of EDO (H) L Dir
267	Hayat Muhammad	Muhammad	At the disposal of EDO (H) L Dir
268	S. Raza Hussain Shah	S. Muhammad Shah	At the disposal of EDO (H) Battagram
269	Amin Khan	Sarzamin Khan	At the disposal of EDO (H) Shangla
270	Mian Nizam Ali	Shebar Mian	At the disposal of EDO (H) Swat
271	Mian Said Zada	Faqir Said	At the disposal of EDO (H) Shangla
272	Zafar Ali Khan	Dawa Khan	At the disposal of EDO (H) U. Dir
273	Mushtaq Ahmad	Ashroof Khan	At the disposal of EDO (H) Kohistan
274	Sarwar Shah	Samir Khan	At the disposal of EDO (H) Kohistan
275	Mohammad Zahoor Ud Diin	Muhammad Moin Uddin	At the disposal of EDO (H) U. Dir
276	Inamur Rehman	Noor Mehmood	At the disposal of EDO (H) Chitral
277	Asghar Khan	Muhabat Khan	At the disposal of EDO (H) L Dir
278	Altaf Hussain	Fazal Ghani	At the disposal of EDO (H) Chitral
279	Junaid Wahid	Abdul Wahid Khan	At the disposal of EDO (H) Chitral
280	Nadir Khan	Qadar Khan	At the disposal of EDO (H) Chitral
281	Nisarullah	Sher Habib Jan	BHU Ashrat Chitral
282	Imtiazud Din	Mehboob Ali	At the disposal of EDO (H) Chitral
283	Yasser Mahmood Khan	Mehboobur Rehman	At the disposal of EDO (H) Malakand
284	Zafarullah	Muhamma Essa	At the disposal of EDO (H) Kohistan
285	Janatullah	Gul Muhammad	At the disposal of EDO (H) Kohistan
286	Sher Zada	Ahmad	At the disposal of EDO (H) Kohistan
287	Imran Khan	Muhammad Siraj	At the disposal of EDO (H) Malakand
288	Mehmood Ali	Liaqat Khan	At the disposal of EDO (H) Chitral
289	Shahid Aman	Amanullah Khan	At the disposal of EDO (H) Malakand
290	Iftikhar Ud Din	Mahboob Ali	At the disposal of EDO (H) L. Dir
291	Ibrar Iqbal	Badshah Gul	At the disposal of EDO (H) U. Dir
292	Muhammad Zakaria	Muhammad Iqbal	At the disposal of EDO (H) Chitral
293	Roshan Ali	Muhammad Ali	At the disposal of EDO (H) Chitral
294	Azizur Rehman	Muhammad Azim	At the disposal of EDO (H) Chitral
295	Samiullah	Rahimullah	At the disposal of EDO (H) Abbottabad
296	Abdul Muheem	Abdul Rehman	At the disposal of EDO (H) Chitral
297	S. Mumtaz Ali Shah	Jamshaid Khan	At the disposal of EDO (H) Chitral
298	Akbar Ali Khan	Abdul Akbar Khan	At the disposal of EDO (H) Chitral
299	Niaz Ahmad	Bakht Yar	At the disposal of EDO (H) Chitral
300	Nisar	Muhammad Khan	At the disposal of EDO (H) Chitral
301	Inayatullah	Khalid Khan	At the disposal of EDO (H) U. Dir
302	Umer Zada	Syed Ahmad Shah	At the disposal of EDO (H) Shangla

Annex- B

Government of Khyber Pakhtunkhwa, Health Department



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Dated Peshawar the June 18, 2021

NOTIFICATION

NO. SOH (E-V)/Gen.Cadre/BS-18/2021 In pursuance of Section-8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Final Seniority List of General Cadre Doctors (BS-18), Health Department, Government of Khyber Pakhtunkhwa as stood on 15.05.2020 duly approved by the Competent Authority is hereby notified/ circulated for information and necessary action by all concerned.

**Secretary Health
Government of Khyber Pakhtunkhwa**

Endst. Of even No. & Date.

Copy to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa.
4. Director General Health Services, Khyber Pakhtunkhwa, Peshawar. Notified Final Seniority List as attached with the request to circulate it amongst all concerned for information and record purpose.
5. Director General PHSA, Khyber Pakhtunkhwa.
6. Director General Drugs, Khyber Pakhtunkhwa.
7. Chief HSRU, Health Department, Khyber Pakhtunkhwa.
8. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
9. All District Health Officer, Khyber Pakhtunkhwa.
10. All Medical Superintendent, Khyber Pakhtunkhwa.
11. All Hospital Director MTIs, Khyber Pakhtunkhwa.
12. Manager, Government Printing Press, Peshawar for Gazette notification.
13. PS to Minister for Health Department, Khyber Pakhtunkhwa.
14. PS to Secretary Health Department, Khyber Pakhtunkhwa.
15. All Doctors concerned.

(Latif-ur-Rehman)
SECTION OFFICER (E-V)

FINAL SENIORITY LIST OF SENIOR MEDICAL OFFICERS (BS-18) OF THE HEALTH DEPARTMENT AS STOOD ON 15.05.2020

Sl. No.	Name of Officer/Official with academic qualification.	Date of Birth and Domicile	Date of 1st entry into Govt. Service	Regular appointment/promotion to the present post.		Present Place of posting.
				Date of promotion	BPS	
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1.	Dr. Naila Ismail d/o Muhammad Ismail Bangsh.	13.06.1962 Kohat	15.8.1987	20.9.1995	BS-18	By Promotion Demonstrator KMC Peshawar
2.	Dr. M. Umar Farooq s/o Muhammad Hasham, MBBS	20.04.1962 DI Khan	6.12.1987	20.8.2001	BS-18	By Promotion On deputation to NIH Islamabad
3.	Dr. Ziaur Rashid s/o Sofi Abdur Rashid, MBBS	23.11.1963/ Abbottabad	12.4.1989	22.05.2018	BS-18	By Promotion SMO DHQ Abbottabad
4.	Dr. Mir Azar Khan S/O Habib Noor, MBBS	1.01.1963/ NW Agy	12.4.1989	22.05.2018	BS-18	By Promotion SMO RHC Spinwami NW Miranshah
5.	Dr. Jamila Sarwar, MBBS	25-3-1963/ Abbottabad.	12-4-1989	12.8.2000	BS-18	By Promotion SWMO AMC Abbottabad
6.	Dr. Nasrat Shah s/o Khan Badshah, MBBS	24.12.1962 Khyber Ag	12.4.1989	16.04.2008	BS-18	By Promotion SMO THQ Dogra Picket
7.	Dr. Aisha Siddiqi D/O Abdul Qayum, MBBS.	6.6.1961/ Manshra	24.9.1989	12.8.2000	BS-18	By Promotion ON DEPUTATION TORUNJAB
8.	Dr. Mubashir Ahmad s/o Arjumand Khan, MBBS	1.5.1964/ Dir	18.6.1990	10.09.2009	BS-18	By Promotion SMO Molvi Jee Hospital Peshawar
9.	Dr. Saecda Asad D/O K.G. Mohiuddin, MBBS	15.03.1962 Peshawar	15.5.1991	06.04.2015	BS-18	By Promotion SWMO Molvi Jee Hospital Peshawar
10.	Dr. Zarmina Qasim D/O Muhd Qasim Imani, MBBS	04.03.1965 Peshawar	15.5.1991	10.09.2009	BS-18	By promotion SWMO KTH Peshawar

[Signature]
Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

[Signature]
Section Officer (EV)
Health Department
Khyber Pakhtunkhwa

[Signature]
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Distt. Bar Abbottabad

735.	Dr. Farhana d/o Hussain Ahmad, MBBS.	L/Dir/ 07.08.1978	24.10.2009	02.01.2018	BS-18	By Promotion	Attached to DHO Lower Dir
736.	Dr. Ishrat Jehan d/o Shamsul Wahab	22.08.1978/ Swat	24.10.2009	15.11.2017	BS-18	By Promotion	SGTH Swat
737.	Dr. Ahmad Saood Dar S/O Nisar Ahmad Dar	08.10.1978 Peshawar	24.10.2009	02.01.2018	BS-18	By Promotion	W&C Hosp: Rajar Charsadda
738.	Dr. Mushtaq Ahmad s/o Badshahul Mulk M.D	Dir (L) 24.10.1978	24.10.2009	15.11.2017	BS-18	By Promotion	DHOH, Nowshera
739.	Dr. Khalid Hafiz S/O Hafizur Rahman, MBBS	Swat 8.11.1978	24.10.2009	15.11.2017	BS-18	By Promotion	SGTH Swat
740.	Dr. Muhammad Ayaz Khan s/o Haji Amir Nawab MBBS	Bunir 16.12.1978	24.10.2009	15.11.2017	BS-18	By Promotion	DHOH Bunir
741.	Dr. Ayub Khan s/o Umar Gul M.D	Swat 13.04.1966	24.10.2009	15.11.2017	BS-18	By Promotion	BHU Nazar Abad Swat
742.	Dr. Adil Khan s/o Fazli Subhan, MBBS	Charsadda 30.12.1978	24.10.2009	22.05.2018	BS-18	By Promotion	City Hospital Kohat Road Peshawar
743.	Dr. Ajab Khan s/o Ismail Khan MBBS	Charsadda 25.02.1979	24.10.2009	15.11.2017	BS-18	By Promotion	Attached to DHO Dir Lower
744.	Dr. Rukhsana d/o Malik Farukh Sair Khan	Swat 05.03.1979	24.10.2009	15.11.2017	BS-18	By Promotion	SGTH Swat
745.	Dr. Zulfiqar Ali S/O Ijaz Hussain Awan	Peshawar 14.07.1979	24.10.2009	15.11.2017	BS-18	By Promotion	SMO KD Peshawar
746.	Dr. Muhammad Fayyaz s/o Muhammad Ayaz, MBBS	Mardan 05.01.1980	24.10.2009	02.01.2018	BS-18	By Promotion	At the disposal of DHS Merge Dist
747.	Dr. Waliullah S/O Shera Jan	NWA 12.01.1980	24.10.2009	22.05.2018	BS-18	By Promotion	HMC Peshawar
748.	Dr. Muhammad Ali Khan S/O Sain Muhammad Malik	Manshehra 28.11.1980	24.10.2009	15.11.2017	BS-18	By Promotion	Attached to DHO Manshehra

Deputy Director (HRM)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

Section Officer (P/W)
Peshawar

Attested
Arshad Khan
Office # 33 Jinnah Plaza Adjacent to
Distt. Bar Abbottabad

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749.	Dr. Mudassar Shahzad s/o Muhammad Zahir Shah MBBS	Peshawar 26.07.1982	24.10.2009	22.05.2018	BS-18	By Promotion	DD-BOP Peshawar
750.	Dr. Fahd Khalid Umerzai S/O Muhammad Khalid Khan Umerzai. MBBS	05.09.1985 Peshawar.	19.01.2012	15.11.2017	BS-18	By Promotion	DD-DGHS Office Peshawar

CERTIFICATE

Certified that the above seniority list is final and un-disputed.

afar
 Deputy Director (HRM)
 Directorate General Health Services
 Khyber Pakhtunkhwa Peshawar

[Signature]
 Section Officer (DV)
 Health Department
 Khyber Pakhtunkhwa Peshawar

DEPUTY DIRECTOR (HRM)
 DIRECTORATE GENERAL HEALTH SERVICES
 KHYBER PAKHTUNKHWA PESHAWAR

[Signature]
 Mr. Shaukat Khan
 Supreme Court of Pakistan
 33 Jinnah Plaza Auditorium
 Dist: Bar Abotabad

Annex - E³

To

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The Chief Secretary
Khyber Pakhtunkhwa

SUB: DEPARTMENTAL APPEAL FOR CORRECTION OF SENIORITY LIST DATED PESHAWAR THE JUNE 18, 2021 VIDE NOTIFICATION NO. SOH (E-V)/Gen.Cadre/BS-18/2021

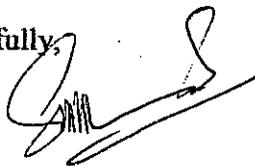
Respected Sir,

The appellant humbly requesting to submit as under:-

1. Reference is made to impugned Notification No. SOH (E-V)/Gen.Cadre/BS-18/2021, dated the Peshawar 18-06-2021.
2. It is submitted that I was appointed as Medical Officer (BPS-17) on 24-01-2004 vide No SO(Estab) 3-18-2004 dated 16-01-2004 (copy of appointment order is attached).
3. That I got the seniority list vide Notification No. SOH (E-V)/Gen.Cadre/BS-18/2021 dated the Peshawar 18-06-2021 on 15-12-2021 and got aggrieved when checked it thoroughly. I found myself on **Serial No. 495** and my service entry has mistakenly been mentioned as 08-03-2005 instead of 24-01-2004.
4. That by virtue of this illegal seniority list of BPS-18, about 178 Junior Officers have been made seniors. Thus seniority as well as promotion of the appellant badly affected.

In view of the above it is prayed that impugned seniority of the appellant may be rectified/reconciled and there after issue revised seniority list of the appellant after placing his name at **Serial No 318** of the list.

Yours Faithfully,



Dr. Syed Raza Hussain Shah
Senior Medical Officer (BPS-18)
DHQ Type-C Hospital Battagram
Dated:-16-12-2021

Attested

Muhammad Arshad
Advocate High Court
Office No. 22 Adjacent
Dated: 16/12/2021

کورٹ فیس

وکالت نامہ

Chairman Service Tribunal KPK Peshawar بعدالت

DR Syed Raza Shah نام Govt of KPK ملک عنوان:

Appellant منجانب:

Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

ATD Mr. Arshad Khan Tanoli Asc Attd

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم:

بمقام:

Syed Raza Shah