10<sup>th</sup> Nov, 2022

Due to public holiday on account of Allama Iqbal Day, the case is

adjourned to 07.12.2022 for the same as before.

Reader

06.09.2022

Learned counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all legal and valid objections including the question of limitation. The appellant is directed to deposit security and process fee within 10 days. Out district respondent be summoned through T/2S, the expenses of which be deposited by the appellant within three days. To come up for submission of written reply/comments on 04.10.2022 before the S.B at Camp Court Swat.

04.10.2022

Appellant De

Security & Presses Fee

Appellant present through counsel.

Riaz khan Paindakhel, learned Assistant Advocate General for respondents present.

Reply not submitted. Learned AAG made a request for adjournment in order to submit reply/comments. Opportunity is granted. To come up for reply/comments on 09.11.2022 before SCANNER.B at Camp Court, Swat.

(Rozina R<del>e</del>hman) Member (J) Camp Court Swat

(Salah-Ud-Din) Member (J) Camp Court Swat 07.06.2022

Clerk of learned counsel for the appellant present.

16191

Learned counsel for the appellant is on strike. To come up for preliminary hearing on 04.07.2022 before the S.B at camp court Swat.

04.07.2022

Nemo for appellant.

Notice be issued to appellant/counsel for 02.08.2022 for preliminary hearing before S.B at Camp Court, Swat.

is adjourned to 6-9. 25 for The fame.

(Kalim Arshad Khan) Chairman

Camp Court Sward Ingloga

Courses and the second

(Rozina Rehman) Member (J) Camp Court, Swat Aur to Gammas Vacation The Ever

.8.22

J.

# 10.02.2022Tour is hereby canceled .Therefore, the case is adjournedto 07.04.2022 for the same as before at Camp Court Swat.

Reader

#### 07.04.2022

Junior to counsel for the appellant present.

He made a request for adjournment as senior counsel for the appellant is busy in Peshawar High Court, Mingora Bench (Darul-Qaza) Swat. Adjourned. To come up for preliminary hearing on 06.06.2022 before S.B at Camp Court Swat.

ina-Rehman) ember (J) Camp Court Swat

### 06.06.2022

None for the appellant present.

On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for preliminary hearing on 07.06.2022 before the S.B at camp court Swat.



(Kalim Arshad Khan) Chairman Camp Court Swat

## Form-A

### FORM OF ORDER SHEET

	Court of	
	Case No	7594 12021
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	14/10/2021	The present appellant initially went in Writ Petition before the
		Hon'ble Peshawar High Court Mingora Bench/Dara-ul-Qaza at Swat and the Hon'ble High Court vide its order dated 28.09.2021 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.
2-		This case is entrusted to Touring S. Bench at Swat. Notices be
		issued to appellant/counsel for preliminary hearing to be put up there on $\underline{\sigma_4}$ a $\underline{\gamma_2}$ .
		CHARTYAN
	-	
•		
	Ċ	Nemo for the appellant. Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for
		arguments on 10.02.2022 before the S.B at Camp Court Swat.
• •		Membèr (J) Camp Court Swat

- Starting and a start

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PESHAWAR HIGH COURT
Mingora Bench/Dar-ul-Qaza Swat

All communications should be addressed to the Additional Registrar of this Bench.

Office: 0946-885005 Fax: 0946-885004 E-Mail: darulqazaswat2011@gmail.com

No Writ Petition Branch;

-)021 -10-Dated: \_\_\_\_\_

### The Registrar,

Khyber Pakhtunkhwa Service Tribunal Peshawar, Old Judicial Complex, Khyber Road, <u>Peshawar</u>. 091-9212281

Subject:

Τn

### Writ Petition No. 1023-M of 2019

Dr. Israr Ullah

Petitioner

Date

Versus

Govt. of KPK through its Chief Secretary & others \_\_\_\_ Respondents

Memo:

I am directed by the Hon'ble Division Bench of this Court vide judgment dated **28-09-2021** to forward herewith the original grounds of subject Writ Petition alongwith Annexures etc and certified copy of order sheets and judgment for necessary action in the light of judgment dated **28-09-2021**.

S. No	Case No with Title.	Pages/ Sheets
01	W.P 1023-M of 2019	26 Pages
	Dr. Israr Ullah Vs Govt. of KPK through its Chief Secretary & others	(1-File)

Kindly acknowledge the receipt of this letter along with its enclosures please.

<u>Encl</u>a.a

Additional P

### JUDGMENT SHEET

### PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT (Judicial Department)

#### W.P. No. 1023-M/2019

#### SCANNED KPST Peshawar

#### <u>JUDGMENT</u>

Date of hearing: 28.09.2021

<u>Petitioner:- (Dr. Israr Ullah) by Mr. Rahim</u> <u>Ullah Chitrali, Advocate.</u>

<u>Respondents:- (Govt: of KPK & others) by Mr.</u> <u>Raza-ud-Din Khan, Addl: A.G.</u>

WIQAR AHMAD, J.- Petitioner has filed the instant constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan 1973, with the following prayer;

" It is therefore most humbly prayed that on acceptance of this petition the respondents may kindly be directed to grant proforma promotion in BPS-20 to the petitioner with effect from his eligibility with all back benefits.

Any other relief which is not specifically asked for which this Hon'ble Court deems fit in the facts and circumstances of the case may also be granted in favour of petitioner."

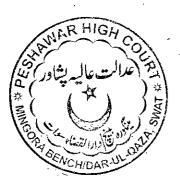
2. Hon'ble Supreme Court of Pakistan while giving its judgment in the case of <u>"Chief</u> <u>Secretary Govt: of the Punjab, etc v/s Ms. Shamim</u> <u>Usman"</u> ("Civil Petition No. 1097-L of 2020") has clarified the situation that the matter of proforma promotion would fall within the exclusive jurisdiction of learned Service Tribunal. Learned counsel for petitioner after realizing the situation

> Nawab (D.B.) Hon'ble Mr. Justice Ishting Ibrahim Hon'ble Mr. Justice Wigar Ahmad



requested that the instant petition be sent to the learned Service Tribunal for disposal according to law. In this respect, he also placed reliance on the judgment of Hon'ble Supreme Court of Pakistan rendered in the case "Muhammad Akram v/s DCO Rahim Yar Khan and others" reported as 2017 SCMR 56. Request of the learned counsel for petitioner seems justified. The instant petition is ordered to be sent to learned Service Tribunal where it shall be treated as an appeal filed before the learned Tribunal. The instant constitutional petition is disposed of accordingly.

and a she and a



ANNO

JUDGE JUDGE

Certified to be True Copy

**1INER** Peshawar High Court, Mingora/Dar-ul-Qaza. Swat Authorized Under Article 07 of Qancon-e-Shahadat Order 1954

EXAÌ

07100 30/09/21

iawab (D.B.) Hon'ble Mr. Justice Ishting Ibrahi a'ble Mr. Justice Wiger

### ) IN THE PESHAWAR HIGH COURT, BENCH MINGORA / DAR-UL-QAZA, SWAT

WRIT PETITION NO. 1023 OF 2018 11-1 ys Gort of Lope etc

This petition had been presented by M.r\_ Rahmullah chitral

On behalf of the petitioner /petitioners.

The petition is in proper form, copies of all the relevant documents have been attached.

Three (  $\mathscr{O}/$  ) spare copies of writ petition have also been attached.

Petition be entered in the revelent register and placed before Hon'able court (D.B) for further orders on 14-10-19the date fixed. READER Dated COUNTERSIGNED

Additional Registrar, peshawar High court, Bench Mingora/Dar-ul-Qaza, swat.

Dated: 09-10-

S & PD IN 2827/56 WP PADS HIGH COURT PH IN H WORK FOLDER 18.69.2018

D. 1000 10	DAR-UL-QAZ		-	
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Checklist has not been filed/duly fille		·		
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Copies of annexure/pages #				
Certificate be furnished that whether r		-		his court.
There should be separate application	•••		1 m y	· • :
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The appeal, revision, application is tim		÷	•	
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Opening sheet has not been filled in p	roperly.		٠.	
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GS&PD.KP.1744/33-PHC Pesh-500 Pads of 100L-21.07.2016/P4(Z)/PHC Jobs/Objection Slip

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### URGENT FORM

Dr Israr Ullah

### .... Petitioner/Petitioners.....

#### VERSUS

### The Govt of KP and others

....Respondent/Respondents......

- 1 will you kindly treat the accompanying C.M as Urgent and in accordance with the provisions of Rules ,9 Chapter 3-A Rules of orders of the High Court , Lahore Volume V
- 2 The grounds of urgency are :

That the Pehhimer was retired after attaing age superannuation vide order datel 14.4.2019, and before retimiel of the Pehhaner The petitions moved an application to the Sespondert no 2, which was plessed before Respondents no 2 but The respondent derived Her in shape of Profimer Promotion to the The petitiner have this argunt applications Va main wp. FILED TODAY 07 QCT/2019

Dated /10/2019 Cell no 03343251883 2 Yours Obediently

#### CHECK LIST

1.	Case Title: Dr israr Ullah VS Govt. of KP & others	Yes .	No
2.	Case is duly signed.		
3.	The law under which the Petition preferred has been mentioned.	~	+
4.	Approved file cover is used.	-	
5.	Affidavit is duly attested and appended.		
6.	Case and Annexure are properly paged & number according to index.		+
7.	Copies of Annexure are legible and attested. (If not, then better copies duly attested have been annexed).		
8.	Certified copies of all the requisite documents have been filed.	1	
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	1	
10.	Case with in time.	7	
11.	The value for the purpose of Court fee and jurisdiction has been mentioned in the relevant column.	1	-
12.	Court fee in shape of Stamp Paper is affixed, (For Writ Rs.500/- For other required).		
13.	Power of Attorney is in proper form.		1/
14.	Memo of addresses filed.	1	+
15.	List of Books mentioned in the Petition.	1	
16.	The requisite number of spare copies attached. (Writ Petition-3, Nos. Civil Appeal (SB-1, SB-2) Civil Revision (SB-1, SD-2).	1	
17.	Case (Revision/Appeal/Petition etc.) is filed on the prescribed form.	1	<u>†</u>
18.	Power of Attorney is attached by Jail Attorney (for Jail Prisoners only).		1/

It is certified that formalities/documentations required in column 2 to 18 above, have been fulfilled.

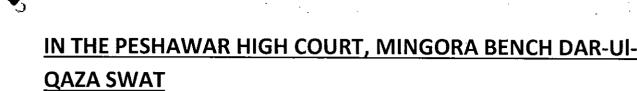
#### Name: Rahim Ullah Chitrali

ADVOCATE HIGH COURT Signature:

Dated: 036/0-2019

FOR OFFICE USE ONLY
Case No
Case Received
Complete in all respect: Yes/No (if No the ground)
· · · · · · · · · · · · · · · · · · ·
Date in Court.
FILED TODAY
07 OCT 2019
$\bigvee$
Additional Registrar

Shund.
Signature (Reader)
Dated OF-10-12
Countersigned:
(Additional Registrar)



#### **OPENING SHEET FOR WRIT PETITION**

Case No	
Date of filling: <u>7/10/19</u>	
District: Chitral / ////	

**Case Type: writ Petition** 

Nature of Original Proceedings:

Original order		<b>Review/Appellate Revision</b>			Order		Bench		
Forum	Date	S.No	Forum	Date		-	ocutory · Order 、		nal bench
1. Petitioner(s) *Dr Israr Ullah1520136534353Mobile No 034492831881520136534353Address: village Danni colony Tehsil and District Chitral2. Petitioner(s) counselRahim Ullah*CNIC**Mobile No.03452928648152023050707-7Address: Rahim & Qazi Law Associate at 2nd floor Continental Plaza Swat								3	
CNIC Mobile No Address: c	pondent(s)* :: is mentione Order/Acti	d in the	memo of ·	the addres			Unknown	· · · · · ·	

On acceptance of this petitions the respondents may kindly be directed to grant proforma promotion in BPS 20 to the petitioners with effect from his eligibility with all back benefit.

Law/rules/governing the original proceedings/Action/in action:-writ petition under article 199 of the constitution of Islamic republic of Pakistan

Signature of Peritioner or Counsel: Dated: 7/10/2019 FILED TODAY Additional Registrar

## BEFORE THE PESHAWAR HIGH COURT MINGORA BENCH DAR-UL-QAZA SWAT

Service Appeal: 7594/2021 W.P.No. 1003-M/2019



Dr. Israr Ullah.....Petitioner

Versus

Govt of KPK & others......Respondents

### **INDEX**

S. No.	Description	Annexures	Pages
1.	Writ petition along with certificate		1-3
2.	Affidavit		4
3.	Memo of addresses		5
4.	Copies of all relevant documents	A	6-8
5.	Copies of applications and recommendation	В	9-12
6.	Notice		13
7.	Wakalat Nama		14
8.	Court fee		15

Re-Filled Today 2019 09 00

Additional Registrar

FILED TODAY 07

Additional Registrar

Petitioner Through counsel

RAHIM ULLAH CHITRAL Advocate High Court Cell No.0345-2928648



BEFORE THE PESHAWAR HIGH COURT AT MINGORA BENCH (DARUL QAZA)
SWAT
Writ Petition No. <u>023</u> M of 2019
Writ Petition NoM of 2019 Service Appeal: 7594/202) Dr Israr Ullah son of Amir Ullah R/o Danni Colony Tehsil and District
ChitralPetitioner

Versus

- 1 Govt of Khyber Pakhtunkhaw through its Chief Secretary, Civil Secretariat ,Peshawar.
- 2 Govt of Khyber Pakhtunkhaw through its Secretary Health, Civil Secretariat, Peshawar.
- 3 Director Health, Khyber Pakhtunkhwa, Peshawar
- 4 District Health Officer Chital.....Respondents.

Writ Petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973,

#### **Respectfully Sheweth:-**

- 1. That the petitioner is law abiding citizen of Pakistan and permanently residing at the address given in the title of this petition and are entitled to all the privilege under the existing law
- 2. That the petitioner joined the service in health department in the year on 10-9-1990 in BPS 17 as medical officer and had served about 29 year his zeal and zest and wa⊈ retired after attaining age superannuation vide order dated 14-4-2019 ( copies of all relevant documents are attached as marked annexure A)
- 3. That petitioner was promoted to BPS 18 in the 2009, and then after completion of necessary training, the petitioner was promoted to BPS 19 on 6-3-2013.

4. That the petitioner after furnishing the requisite documents was very **FILE TODA** much significant to be promoted to BPS 20 in due course of time and clearly mentioned the promotion will not affect others incumbents however astonished to know that others colleagues, with the same criteria were promoted but the petitioner was ignored without any Additional Registrogent reason and justification.

- 5. That the petitioner keeping in view of above circumstance was hopeful to get pro fama promotion after his retirement and as such waited for the same.
- 6. That the petitioner thereafter submitted applications for promotion from BPS 19 to BPS 20 (management cadre to respondents but the no 2 placed before respondents respondents no 1 with recommendation, that the petitioner is eligible for regular promotion to BS -20 as he has done 4 month mandatory training for promotion. to BS -20 at provincial Health Service Academy as per the health management cadre rule 2008 while the length of the service as well as probation of the petitioner concerned is also completed but the respondent denied the benefits in shape of porforma promotion to the petitioner and after denial, the petitioner moved an application to respondents no 1 which is still pending . ( copies of applications and recommendation are attached as marked annexure B)
- That being aggrieved the petitioner prefer this petition on following grounds amongst other inter alia.
   GROUNDS
- 1. That the official respondent have not treated with the petitioner in accordance with law, rule and policy on the subject and acted in violation existing law/policy, and unlawfully acted which is unjust, unfair, hence not sustainable in eye of the law.
- 2. that the petitioner is eligible for regular promotion to BS -20 as he has done 4 month mandatory training for promotion to BS -20 at provincial Health Service Academy as per the health management cadre rule 2008 while the length of the service as well as probation of the petitioner concerned is also completed, the respondents did not observe the rule/regulation and denied the benefits in shape of porforma promotion to the petitioner.
- 3. That the petitioner has served the departments for his whole life and retired from Government service on attaining the age of superannuation, with the hopes of future benefits after retirement but the respondents did not observe the rule/regulation and denied the benefits in shape of porforma promotion to the petitioner.

Additional Registration in article 4, and 25 of the constitution of Islamic Republic of Pakistan, 1973, and unlawfully acted which is unjust, unfair, hence not sustainable in eye of the law.

- 5. That others colleague were promoted to BPS -20 and the name of the petitioner was not considered by the respondent, although they said post were vacant since long before retirement of the petitioner and despite clear recommendation of the respondent no 2 the respondents no 1 intentionally ignored and deprived the petitioner.
- 6. That the petitioner seek leave of this Hon-able Court to raise further legal ground/ point at the time of arguments with the kind permission of the Hon'ble Court.

It is therefore most humbly prayed that on acceptance of this petitions the respondents may kindly be directed to grant proforma promotion in BPS 20 to the petitioner with effect from his eligibility with all back benefit.

Any other relief which is not specially asked for which this Hon'ble Court deems fit in the facts and circumstance of the case may also be granted in favour of petitioner.

titioner duah RAHIM, ULL advøc/ate

#### Certificate:-

It is certified that no such labour Petition is pending or decided by this Hon, able Court

Rahim Ullah Advocate High Court

List of Books. Contribution & Pare 1873 Service les ute 123 FILED TODAY 2019 Additional Registrar

Rahim Ullabs Advocate High car

BEFORE THE PESHAWAR HIGH COURT AT MINGORA BENCH (DARUL QAZA) SWAT

W.P No 1023 M of 2019

Dr Israr Ullah

Govt. of KP & others

### AFFIDAVIT

VS

I, Dr Israr Ullah S/O Amir Ullah Khan R/O village Danin Coloney Tehsile and ,District Chitral do hereby solemnly affirm and declare on oath that the contents of the above titled Writ Petition are true and correct to the best of my knowledge and belief.

DEPONENT

Identified by

RAHIMUL CHITRALI

Advocate, High Court

TODAY FILED 07

Additional Registrar

S.NO. Certified that the above was verified on solemn Affirmation before me on this day\_ 2712 Arems of 20 14 By Dr. ullah kham S/O Illa Danin R/0 Calon hist bitin Who was identified by who is personally known to me

> Addi: Registrar Peshawar High Court Circuit Court Chitral

BEFORE THE PESH			ORA BENCH (DARUL
	<u> QAZA</u>	<u>.) SWAT</u>	_
Writ Petition No.	1023	M of 2019	•
Dr Israr Ullah			Petitioner

Versus

Govt of KP ,& others ......Respondents

### **MEMO OF ADDRESS**

### ADDRESSES OF THE PETITIONER.

Dr Israr Ullah son of Amir Ullah R/o Danni Colony Tehsil and District Chitral

CNIC 15201-3653435-3

Cell 03449283188

### **ADDRESSES OF THE RESPONDENTS:**

- 1 Govt of Khyber Pakhtunkhaw through its Chief Secretary, Civil Secretariat ,Peshawar.
- 2 Govt of Khyber Pakhtunkhaw through its Secretary Health, Civil Secretariat, Peshawar.
- 3 Director Health , Khyber Pakhtunkhwa, Peshawar
- 4 District Health Officer Chital.

Petitioner throu ounsel RAHIM-ULL AH'(Chitrafi)

Advocate High Court Office: Rahim & Qazi Law Associates, Continental Plaza 2nd floor Swat Cell No. 0334-325188

)DAY FILE/D

Additional Registrar

019

AnnB

The Chief Secretary Government of Khyber Pakhtunkhwa

### Subject APPLICATION FOR PROMOTION FROM BPS-19 TO BPS-20

No Martin Carton In 1997

Τo

CH CELOF\_RETIREMENT.

it Dyn N. 11-2.

🤹 🤇 🔰 👘 🛶	$(\mathcal{O})$
MANAGEMENT CADRE DOCTORS BPS-20 IN KHYBE	
S. No. Nomenclature of post	HNN A
01. Director General Health Services KPK Peshawar	
02. Additional Director General (Health Services) DGHS KP	PK Peshawar
03. Additional Director General (Admn & Dev :) DGHS KPK Peshawar	
04. Additional Director General (HRM) DGHS KPK Peshawar	
05. Additional Director General (Monitoring & Implementation) DGH	S KPK Peshawar
06. Director General PHSA Peshawar	
07. Director (HRD) PHSA Peshawar	
08. Medical Superintendent DHQ Hospital, Kohat	
09. Medical Superintendent DHQ Hospital, Mardan	
10. Medical Superintendent Saidu Teaching Hospital, Swat	
11. DHO Peshawar	
12. DHO Swat	
13. DHO Mardan	
14. DHO Kohat	
15. DHO Abbottabad	······································
16. DHO Battagram	
17. DHO Nowshera	································
18. DHO Charsadda 1	· · · ·
19. DHO Swabi	· · · · · · · · · · · · · · · · · · ·
20. DHO Karak	
21. DHO Hangu	······································
22. DHO Bannu	·
23. DHO Lakki Marwat	
24. DHO DIKhan	······································
25. DHO Tank	· · · · · · · · · · · · · · · · · · ·
26. DHO Haripur	
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34.       DHO Malakand         35.       DHO Chitral         36.       Medical Superintendent DHQ Hospital, Charsadda	
34.       DHO Malakand         35.       DHO Chitral         36.       Medical Superintendent DHQ Hospital, Charsadda         37.       Medical Superintendent King Abdullah Teaching Hospital, Manseh	ra
<ol> <li>34. DHO Malakand</li> <li>35. DHO Chitral</li> <li>36. Medical Superintendent DHQ Hospital, Charsadda</li> <li>37. Medical Superintendent King Abdullah Teaching Hospital, Manseh</li> <li>38. Medical Superintendent DHQ Hospital, Timergara</li> </ol>	ra
34.       DHO Malakand         35.       DHO Chitral         36.       Medical Superintendent DHQ Hospital, Charsadda         37.       Medical Superintendent King Abdullah Teaching Hospital, Manseh         38.       Medical Superintendent DHQ Hospital, Timergara         39.       MEDICAL SUPERINTENDENT DHQ HOSPITAL, SWABI	
34.       DHO Malakand         35.       DHO Chitral         36.       Medical Superintendent DHQ Hospital, Charsadda         37.       Medical Superintendent King Abdullah Teaching Hospital, Manseh         38.       Medical Superintendent DHQ Hospital, Timergara         39.       MEDICAL SUPERINTENDENT DHQ HOSPITAL, SWABI         40.       PRINCIPAL ZULFIQAR ALI BHUTTO POST GRADUATE PARAMEDICA	
34.       DHO Malakand         35.       DHO Chitral         36.       Medical Superintendent DHQ Hospital, Charsadda         37.       Medical Superintendent King Abdullah Teaching Hospital, Manseh         38.       Medical Superintendent DHQ Hospital, Timergara         39.       MEDICAL SUPERINTENDENT DHQ HOSPITAL, SWABI	

Tel# (0946)9240458/9240225

#### OFFICE OF THE COMMISSIONER MALAKAND DIVISION <u>ŚAIDU SHARIF SWAT</u> <u>Dated: 13-01-2016</u>

Fax# (0946)9240229/9240223

#### Subject: APPRECIATION FOR EXTRA ORDINARY EFFORTS AFTER EARTHQUAKE OF 26TH OCTOBER, 2015.

My dear: Israr indig e shing .

It gives me immense pleasure to convey appreciation for your team work and contribution made for health care of the injured of earthquake of 26<sup>th</sup> October, 2015. It is not clandestine that the disaster was of much greater intensity and the damages were commensurate accordingly. Soon after emergency was declared in whole of Malakand Division let me acknowledged that all Medical Officers, Specialists, Para Medical staff and Nurses etc responsively attended patients. All the injured victims were taken care of, at DHQ Hospitals and at the other allied health facilities under your supervision and control. The best available Medical treatment with provision of Medicines was ensured for the injured victims at the hospitals together with timely transportation of patients to tertiary hospitals/health facilities in other parts of the country.

The efforts made by you and your team for providing Medical care soon after earthquake are hereby acknowledged and appreciated. Quick and spontaneous response from your end has augmented image of the noble profession (Medicine) in the eyes of public. It is anticipated that the same spirit will continue in future. Please convey my appreciation to all the members of your team who endeavoured to successfully accomplish post-earthquake task in your sector and areas of responsibility. Very good job done by all of you .... Keep it up.

Wishing you success in future.

Dr. Israr District Health Officer; Chitral.

GUL

COMMISSIONER MALAKAND DIVISION

No. <u>466-68</u> /2/6/Estt:

Copy for information is forwarded to:-

- 1. The Secretary to Government of Khyber Pakhtunkhwa, Health Department Peshawar. 2. PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
- 3. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.

(USMAN GUL)

COMMISSIONER MALAKAND DIVISION

قائداعظم گولڈميدل ايوارڈ 2018ء زيابتام تريکامپاکتان کولل (رجنرد)پاکتان

تاريخ:2018/ **بق/3** 

جواله نمبر:TIPC/89/18

محرم جناب فرائم اسرار الترحن در لا عمر موال

اعلیٰ کا کردگی پرآپ کو کم مَی 2018 کولا ہور میں منعقد ہونے دالی قومی سطح کی پرُوقارتقریب میں قائداعظم كولثرميثرل ابوارد دياجات كا-

اسلام وعليم إ

· حبثم برامان:

un de la companya de

1) رخسانه کوژ مشیروز براعلی پنجاب (جنگلات/دانگذلائف/فشریز)

چيز پرين تحريک ايخام پاکستان کوسل (رجىردْ) پاکستان

2) خرم شنزراداعوان (الميكريكوانديزروزنامه إسلام آباد/لابور)

3) محمد ذينان خان أركنا ئزرتر يك التحكام باكتان كونس (رجدر ف) باكتان

4) ملك فرحان المجدذ بثي آركنا ئزرتر يك المتحكام پاكستان كونس (رجنر ڈ) پاكستان

5) محمد رضوان خان استنت آرگنا نزرگزیک ایتخام پاکستان کوش (رجنرز) پاکستان

عنوان:

اُمید ہے کہ آپ اللہ کریم کے کرم ہے بخیریت ہوئے تحریک استحکام پاکستان کونسل (رجسرڈ) پاکستان پطن عزیز پاکستان میں داحد ایساساجی اِ دارہ ہے جو گزشتہ کئی سالوں سے وطن عزیز پا کستان کوظیم سے عظیم تربنانے والے گو ہرنایا ب شخصیات کو تلاش کر کے انہیں قو می سطح کی پر وقار تھ ریب میں قو می ہیروز کے نام پر گولڈ میڈل ایوارز دینا ہے۔ بیامریقینا آپ کے لئے باعث سرت ہوگا کہ تحریک استحکام پاکستان کونسل (رجٹر ڈ) پاکستان کی قائم تلظم گولڈ میڈل ایوارڈ کمیٹی نے آپ کی شخصیت یے تمام پہلوؤں کا جائزہ لینے کے بعد آپ کا انتخاب قائد اعظم کولڈ میڈل ایوارڈ کیلیے کیا ہے۔

آپ کویہ قائداعظم گولڈ میڈل ایوارڈ مورخہ کم متی 2018 بروزمنگل بوقت صبح11 بج برخام ڈاکٹر مجید نظامی آ ڈیٹوریم منصل مجائب گھر شاہراہ قائد اعظم (مال راد () لا مورمیں ایک قوی سطح کی پرُدقارتقریب میں دیا جائیگا۔جس میں محترم جناب مسعود احدخان صور حکومت آ زاد جموں دسم مرمحترم جناب مذیب اقبال پوتا حضرت علامہ ا قبال بحتر مدمريم ادرنگزيب دفاتى دزيراطلاعات دنشريات پا كتان بمحتر م جناب خواجه عمران نذ بريسوباتى دز ريصحت پنجاب بحتر م جناب را نامشهودا حمدخان صوبائى دز ريغليم پنجاب بحترم جناب لیفذینٹ جزل(ر)،محمدا کرم خاں چیئر مین پنجاب فیکسٹ بک بورڈلا ہور،محتزم جناب حضرت محی سلطان بابا جانی سرکاراللہ دالے،دور گیرنا محد شخصیات کو اِس پرُد قارتقریب میں بطورمہما نانِ خصوصی مدعوکیا گیاہے۔ اِس سلسلہ میں آپ اپنی دوعد ذلالاً پر مدما بیوڈیٹا ادر کنفرمیشن ہے آگا فرما تیں۔

شير بهادرخاں چنتائی -چيئر مين تحريك التخلام پاكستان كونس (رجىر ڈ) پائستان چيتريين قائداعظم كولدميد () ايوار دسميني چير من آل پاکستان اين . جي -اوزايسوي ايش چف ايد يثرروز نامه اسلام آباد لا جوراسلام آباد 8ايجوكېشن ٹا ۇن وحدت رو ژنز دملتان چونگى لا ہور .. نونى نمبر: 0344-55501736,0301-43 50605,0306-6428039

CS 07/12 Dyning 2324 duted #. 11.2.019

mm B

The Chief Secretary Government of Khyber Pakhtunkhwa

Subject:

Τo

#### APPLICATION FOR PROMOTION FROM BPS-19 TO BPS-20 (MANAGEMENT CADRE) BEING AT THE VERGE OF RETIREMENT.

Dear Sir

Respectfully stated that the undersigned is going to retire on 14-04-2019 on attaining the age of superannuation. Despite availability of post of BPS-20 (Management Cadre) my promotion case been not been processed thereby depriving me of my due promotion. It is travesty of justice that I am being deprived of promotion as hardly two months is left in my retirement.

It is, therefore, humbly prayed that Administrative Department may be **direct**ed to furnish working papers for PSB so that PSB may be conveyed as an **especial** case for my promotion before my retirement as I have to bear the brunt due to lassitude of Health Department and for no fault of mine.

Truly Yours

Dr. Israr Ullah Medical Superintendent Category-D Hospital Drosh district Chitral

Dated: 11-02-2019

Copy to:

1. The Secretary Health Department, Govt. of Khyber Pakhtunkhwa. 2. Director General Health Services, Khyber Pakhtunkhwa.

The Secretary Government of Khyber Pakhtunkhwa, Health Department

Sec

Subject:

#### APPLICATION FOR PROMOTION FROM BPS-19 TO BPS-20 (MANAGEMENT CADRE) ON CIRCULAR BASIS BEING AT THE VERGE OF RETIREMENT.

Dear Sir

Respectfully stated that the undersigned is going to retire on 14-04-2019 on attaining the age of superannuation. Despite availability of post of BPS-20 (Management Cadre) my promotion case been not been processed thereby depriving me of my due promotion. It is travesty of justice that I am being deprived of promotion as hardly two months is left in my retirement.

It is further added that I have been actively involved in healthcare delivery system and especially functionalization of far flung BHUs/RHCs of district Chitral and have been playing important role in polio eradication campaign in the district in making Chitral polio free district. In this regard I have been awarded **Quaid-e-Azam**, **Gold Medal Award**, **2018**, **Appreciation letters from DC**, **Chitral, Commissioner Malakand & Commanding Officer Chitral Scouts Chitral (Copies attached)**.

In view of the above, It is, therefore, humbly requested that the undersigned may be promoted prior to retirement as an special case on circular basis keeping in view my performance as mentioned above and my retirement date (13-04-2019) as my promotion will not affect other incumbents and a post of BS-20 Management Cadre is also vacant in district Chitral. My previous application submitted on dated: 11-02-2019 is also attached.

Truly Yours Dr. Israr Ullah Medical Superintende

Medical Superintendent Category-D Hospital Drosh district Chitral

Dated: 13-03-2019.

Copy to:

Director General Health Services, Khyber Pakhtunkhwa.

The Horrable Chief Secretary Gout of Khyber pakhtum Khina pichawar. Apread For promotion From BPS-19To BPS-20 (Management Cadre) on circulate Basis Being at the Verge of Retirement. Basis Being at the Verge of Retirement. Support: thave The honor To state that gam Respected Sir, geing to retire on 13-04-019 on attaining the age of Superanneiation. Despite availability of posts of BPS-20 (Management Cadre) my promotion case been not processed. His fur Ther added The T I have been actively invertied in health care delivery gratem, aspecially polioeradication and made chitral polis freekince 1995. In This regard thave been awarded contrificate an an poliofree district. Dam Alto amardeil Quaidre-Agam, Gold Medal Award 2018 by Tehnike IsTchkame pakistan Lahore. In view of The above , It is humbly requested That the underkigned may be promoted prior To retirement as an special case on circular basis Reeping in view my préformance as mentioned abore may retirement date (13-04-019) as my promotion with not affect other incumbents a my previous applications kubmitted on 11-02.019 and 13-03-019, for circular promition. If Dated 04-04-019. Dr. Iraily yours of Dr. 15rar ullah M.S. DHOhospital Chitral



### GOVERNMENT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT



### NOTE FOR CHIEF SECRETARY KHYBER PAKHTUNKHWA PROMOTION OF DR ISRARULLAH MANAGEMENT CADRE BS-19 TO BS-20

SUBJECT:

Dr.Israrullah Management Cadre BS-19 presently working against the post of Medical Superintendent DHQ Hospital Chitral has submitted an application to Health Department wherein the doctor concerned has requested for promotion to BS-20 through Circulation basis.

2. Dr. Israrullah Management Cadre BS-19 is regular employee of the Provincial Health Department. The date of birth of the doctor concerned is 14.4.1959 and he shall attain the age of superannuation on 13.04.2019.

3. It is to be mentioned here that Health Department has submitted working paper with regard to the promotion of the Management Cadre BS-19 for regular promotion to BS-20 to the Provincial Selection Board for its consideration. Nine (09) posts of the Management Cadre BS-20 are lying vacant due to the retirement of Member of Service BS-20. As per the Management Cadre Seniority list as stood on 01.01.2018 the doctor concerned is at S.No.13.

4. Dr Israrullah Management Cadre BS-19 is eligible for regular promotion to BS-20 and also recommended for promotion to BS-20 as he has done 04-months mandatory training for promotion to BS-20 at Provincial Health Services Academy as per the Health Management Cadre Rules, 2008 while the length of service as well as probation of the doctor concerned is also competed.

5. In view of the above Health Department proposes that Dr Israrullah. Management Cadre BS-19 Medical Superintendent DHQ Hospital Chitral may kindly be promoted to BS-20 through Circulation basis enabling him to get pensionary benefits of BS-20.

05/04/2019 (Dr.Sved Faroog Jamil) Secretary Health

a C

Secretary Establishment Govt of Khyber Pakhtunkhwa

<u>Chief Secretary</u> Khyber Pakhtunkhwa



BEFORE THE PES	HAWAR HIGH (	COURT AT MINGOR	RA BENCH (DARUL	
5	QAZ	A) SWAT		
Writ Petition No.	(223	M of 2019		
Dr Israr Ullah			Petitioner	
Versus				

Govt of KP ,& others ......Respondents

To.

### Subject: Notice

- 1 Govt of Khyber Pakhtunkhaw through its Chief Secretary, Civil Secretariat Peshawar.
- 2 Govt of Khyber Pakhtunkhaw through its Secretary Health, Civil Secretariat, Peshawar.
- 3 Director Health , Khyber Pakhtunkhwa, Peshawar
- 4 District Health Officer ChitalDear,

I am going to file writ petition on behalf of petitioners above against the action & inaction of your. (Copy of the said writ petition is send along with this notice for your information please).

Thanks

RAHIMULLAH CHITRALI Advocate High Court

### WAKALATNAMA

### (POWER OF ATTORNEY)

BEFORE THE PESHAWAR HIGH COURT AT MINGORA BENCH (DARUL QAZA) SWAT

Writ petition No. 193/M /2019

# Dr Israr Ullah VS Govt. of KP & others

KNOW ALL to whom these presents shall come that I/We, the undersigned the hereby appoint and authorize **RAHIM ULLAH CHITRALI ADVOCATE HIGH COURT**, to be the Advocate for the Petitioner in the above mentioned cause, to do all the following acts, deeds, and things or any of them that is to say:

1. To act, appear, and plead in the above mentioned cause in this Court.

2. To present pleadings, cross-objections and inter-locutory, miscellaneous applications, and to withdraw, compromise and to deposit, or withdraw documents of money in or from the Court as may be deemed necessary or advisable for the prosecution of the said cause.

3. To withdraw or compromise the cause or submit or arbitration any difference or dispute that shall arise touching or in any manner relating to the said cause.

4. To employ/appoint//nominate any other advocate/pleader or substitute or his/their behalf authorizing him to exercise the same powers and authorities hereby conferred on the Advocates, they may thing fit to do so.

And I/We hereby agree to ratify whatever Advocates or his/their substitute shall do in

And We hereby agree not to hold the Advocates of his/their substituted responsible for the result of the said cause in consequence of his/their absence from the Court where the said cause is called up for hearing.

Additional Registrar

RAHIM & QAZI LAW ASSOCIATES

ADVOCATES HIGH COURT

Office: 2<sup>ND</sup> FLOUR CONTINENTAL PLAZA MAKAN BAGH SWAT Cell. 03343251883- 03452928648

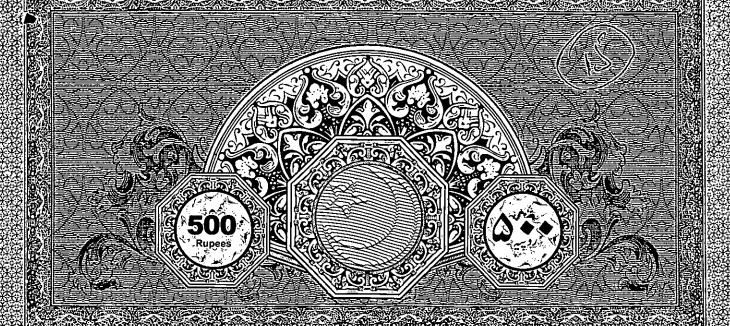
Dr. Israr Ulla)

PETITIONER

RAHIMATLEA HITRA ADVOCATE HIGH COURT



#### 1.11

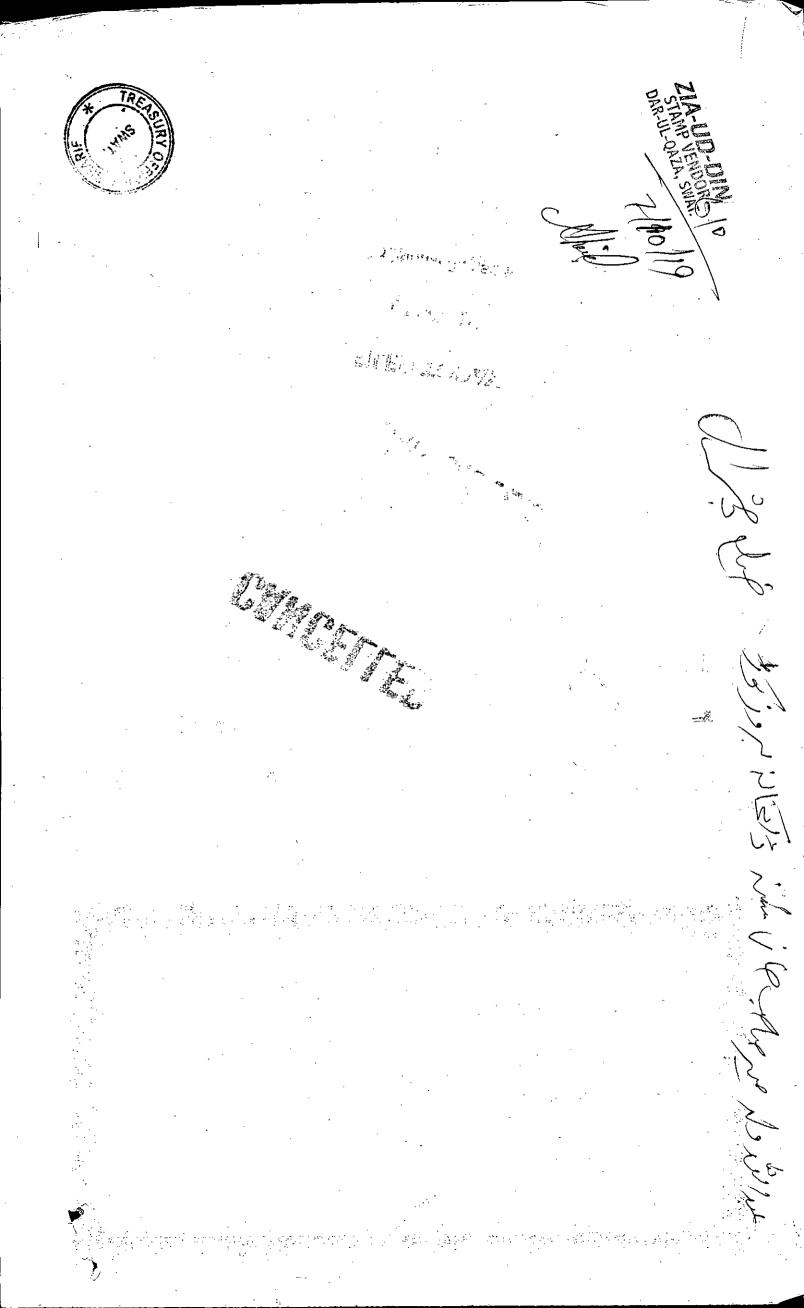


PAKISTAN COURT FEE

AM BELLE



Additional Registrar



PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

Court of .....

Case No...... of......

Date of Order or Order or other Proceedings with Signature of Judge and that of parties or counsel Proceedings where necessary. 14-10-2019 W.P No. 1023-M/2019 Mr. Rahimullah Chitrali, Advocate for the Present: petitioner. Mr. Wilayat Ali Khan, A.A.G for the respondents. \*\*\*\*\* The learned A.A.G present in Court in some other cases accepts notice on behalf of the respondents who shall file their para-wise comments within fortnight. Adjourned to a date in office. JUDGE CH/D J**V/**ØGE

(D.8)

office,

HON'BLE MR. JUSTICE SVED ARSHAD ALI HON'BLE MR. JUSTICE WOAR AHMAD

# ESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT FORM OF ORDER SHEET Court of ... Case No..... Date of Order or Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary. **Proceedings** 18-02-2020 W.P No. 1023-M/2019 Present: Mr. Rahimullah Chitrali, Advocate for the petitioner. Mr. Wilayat Ali Khan, A.A.G for the respondents. Comments of the respondents No. 2 to 4 have not been received. The learned A.A.G seeks further time to file the required comments. May do so within a period of fortnight. In the meanwhile, the focal person of the Health Department be transmitted copy of this petition through his e-mail. The learned A.A.G shall also inform the said person to file the requisite comments before the date fixed. Adjourned to 17.03.2020. HIDGE **MUDGE**

(D.B)

off

Hon'ble MR. Luttice fyed Arshad Ali Hon'ble MR. Luttice Wigar Ahmad

# PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

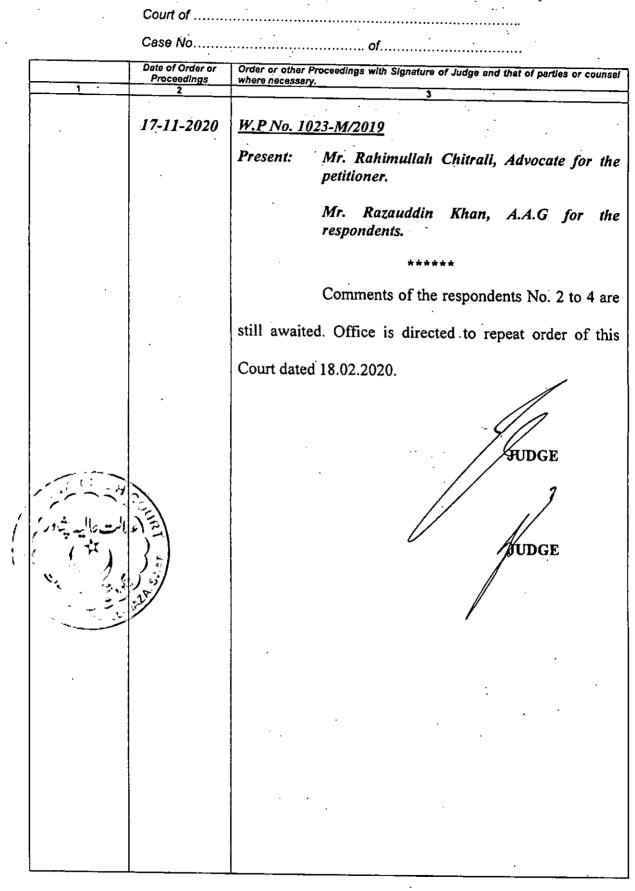
### FORM OF ORDER SHEET

Court of ..... Case No. Date of Order or Order or other Proceedings with Signature of Judge and that of parties or counsel Proceedings where necessary. 17-03-2020 W.P.No. 1023-M/2019 Present: Nemo for the petitioner. Mr. Wilayat Ali Khan, A.A.G for the respondents. As the lawyers' community is observing strike, therefore this case could not be heard. Adjourned to 12.05.2020. Petitioner as well as his counsel be informed accordingly. JUDGE Ľ JUDGE H/n (D.B) HON'RLE MR. JUSTICE SYED ARSHAD ALL HON'RLE MR. JUSTICE WIGAR AHMAD office 18/3

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# <u>PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT</u>

### FORM OF ORDER SHEET



(0.8)

HON'RIA MR. LUTTICE LIMITAO IBRAHIM HON'BLE MR. LUTTICE WIDAR AMMAQ

GS&PD.KP-1621/4-RST-6,000 Forms-05.07.17/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. 13 7594 APPEAL No..... of 20 Dr. 13rav ullich Apellant/Petitioner Versus Through chief Seap: 12 Pl. Posh: **RESPONDENT(S)** Dr ISrav ullah S/O Amis ullah Notice to Appellant/Petitioner/ Danni Colony Tehsel & Distt: chitral

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

on at

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

> Registrar, . Khyber Pakhtunkhwa Service Tribunal, Peshawar.

GS&PD.KP-1621/4-RST-6,000 Forms-05.07.17/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal

# "A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. APPEAL No...... 7.5.9.69..... of 20 2 Dr 15 per ultur **Apellant/Petitioner** Versus Through Chief Serif: Kpk Desh: **RESPONDENT(S)** Counsel Rahmullah chitral Notice to Appellant/Petitioner..... Adracate High Court Smal 0345-2928648 Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal

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

at Camp Court Smat

on

Khyber Pakhtunkhwa Service Tribunal. Peshawar.

GS&PD.KP.SS-1776/1-RST-5,000 Forms-09.05.18/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. R Swat No. Dy ISYAY Illah. **Apellant/Petitioner** Versus Through One & Sery: **RESPONDENT(S)** Notice to Appellant Positioner Gout of KPK Intough Its Secretary Health Peshawar Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 4-10-22 at 9:00 AM You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default. At CAMP. Court Swat Pégistrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar. Khyber

GS&PD\_KP.SS-1776/1-RST-5,000 Forms-09.05.18/P4(Z)/F/PHC\_Jos/Form A&B Ser. Tribunal "**'**'**A**" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. TB Swat Dy ISTAY Ulluh **Apellant/Petitioner** Versus Frough Chief Sent **RESPONDENT(S)** Distric Houlth officer Chitrul Notice to Appe Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal 4-10-22 at 9:00 Am

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

at amp Court. Swat Khyber Pakhtunkhwa Service Tribunal, For Reply Peshawar.

GS&PD.KP.SS-1776/1-RST-5,000 Forms-09.05.18/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. 1B Swat No. APPEAL No. 7594 of 20 21 Do Isray Ullah **Apellant/Petitioner** Versus Mouch Chief Sery: Resp No 3 Notice to Appellant/Petitioner Director Health Selecci KPK Rechawar Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 4-10-22 at 9:00 HM You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default. Wt camp Court Swat. For Reply

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

&PD.KP-2557/3-RST-5000 Forms-09.07.2018/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. (wat No. APPEAL No. 7594 ..... of 20 21 Do Ispar ullak **Apellant/Petitioner** Versus Through chief Sery RESPONDENT(S) Resp NO: (1) Notice to Appellant/Petitioner Grovt: of KPK Through chief Secy Resh

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on  $-\frac{1}{2} - \frac{1}{2} - \frac{1}{2$ 

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

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Registrar, Khyber Pakhtunkhwa Service Tribunal,

Peshawar.