

1-8-22

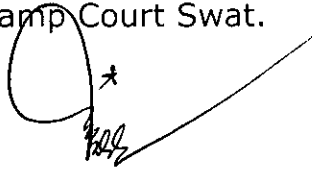
Due to Samoon's vacation the case is adjourned
to 6-9-22 for the same.



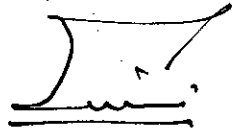
06.09.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 & 2 present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 05.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat



(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

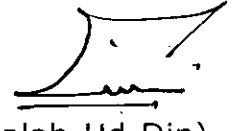
05.10.2022

Junior of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for official respondents No. 1 & 2 present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 07.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)
Member (J)
Camp Court Swat

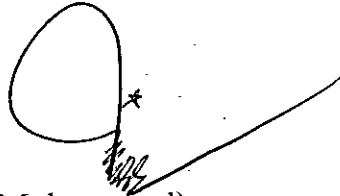


(Salah-Ud-Din)
Member (J)
Camp Court Swat

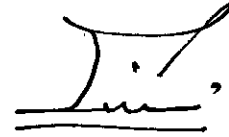
13.05.2022

Junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that senior counsel is busy before the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza) Swat. Adjourned. To come up for arguments on 10.06.2022 before the D.B at camp court Swat. .



(Mian Muhammad)
Member(E)

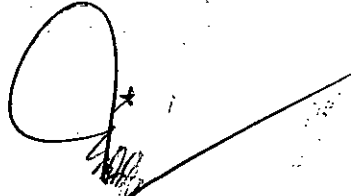


(Salah Ud Din)
Member(J)
Camp Court Swat

10th June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 04.07.2022 before the D.B at camp court Swat.



(Mian Muhammad)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Swat

04.07.2022

Junior to counsel for appellant present.

Noor Zaman Khattak, learned District Attorney for respondents present.

Former made a request for adjournment as senior counsel is busy before Hon'ble Peshawar High Court; granted. To come up for arguments on 01.08.2022 before D.B at Camp Court, Swat.



(Fareeha Paul)
Member (E)
Camp Court, Swat




(Rozina Rehman)
Member (J)
Camp Court, Swat

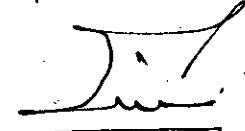
10.02.2022 Tour is hereby canceled .Therefore, the case is adjourned to 07.04.2022 for the same as before at Camp Court Swat.


Reader

07.04.2022 Mr. Fathe Ullah, Advocate (junior of learned counsel for the appellant) present. Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza) Swat. Adjourned. To come up for arguments on 13.05.2022 before the D.B at Camp Court Swat.


(Rozina Rehman)
Member (J)
Camp Court Swat


(Salah-ud-Din)
Member (J)
Camp Court Swat

Due to COVID-19 the case is
adjourned to 06/10/21

On
Readn

06.10.2021

Nemo for parties.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General present.

Preceding date was adjourned on a Reader's note, therefore appellant, his counsel and respondents⁽³⁾ be put on notice for 09.12.2021 for arguments, before D.B at Camp Court, Swat.



(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat



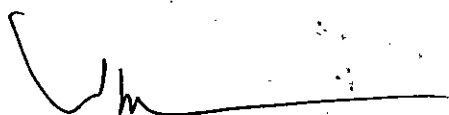
(Rozina Rehman)
Member(J)
Camp Court, Swat

09.12.2021

Junior to counsel for appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for alongwith Dr. Wasim Khan District Pathologist for respondents present.

Former made a request for adjournment as senior counsel is before Hon'ble Peshawar High Court. Opportunity is granted. To come up for arguments on 10.02.2022 before D.B at Camp Court, Swat.



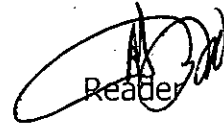
(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

06.01.2021

Due to COVID-19, the case is adjourned to
03.03.2021 for the same as before.


Reader


03.03.2021

Nemo for appellant.

Riaz Khan Paindakhel, Assistant Advocate General for
respondents present.

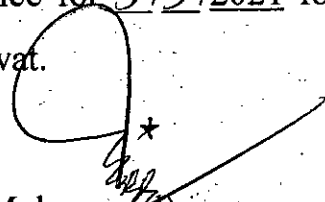
Preceding date was adjourned on a Reader's note,
therefore, notice be issued to the appellant/counsel for
5/5/2021 for arguments before D.B at camp court Swat.

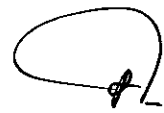
(Mian Muhammad)
Member(E)


(Rozina Rehman)
Member(J)
Camp Court Swat

Continued
03.03.2021

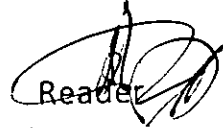
Later on, learned counsel for appellant attended the
Tribunal however respondent No.3 is absent, he and his counsel
be put on notice for 5/5/2021 for arguments, before D.B at
camp court Swat.


(Mian Muhammad)
Member(E)


(Rozina Rehman)
Member(J)
Camp Court Swat

_____ .2020

Due to COVID19, the case is adjourned to
05/10/2020 for the same as before.

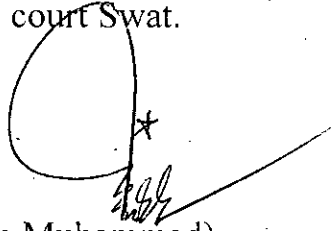

Reader

05.10.2020

Appellant in person alongwith his counsel Mr. Imran Qalander, Advocate is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents present.

According to junior counsel his senior counsel is engaged in the Daar-UI-Qaza, Bench of the Peshawar High Court, Peshawar. Requested for adjournment.

Adjourned to 04.11.2020 for arguments before D.B at camp court Swat.



(Mian Muhammad)
Member(E)



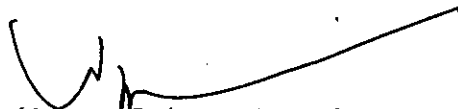
(Muhammad Jamal)
Member
Camp Court Swat

04.11.2020

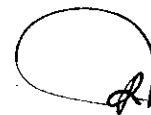
Appellant in person.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 06.01.2021 for arguments, before D.B at Camp Court Swat.



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

02.03.2020

Appellant in person present. Mr. Usman Ghani learned District Attorney present.

Written reply/comments submitted on behalf of respondents. Order dated 04.02.2020 regarding attachment of salary of representative namely Sher Baz Section Officer stands withdrawn. Adjourn. To come up for rejoinder if any and arguments on 06.04.2020 before D.B at Camp Court, Swat.



Member
Camp Court, Swat.

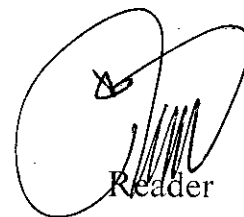
Due to corona virus
tour to camp Court swat
has been cancelled. To come
up for the same on 07/06/20



Reader

01.06.2020


Due to Covid 19, the case is adjourned. To come up for the same on 05.08.20 at camp court Swat.



Reader

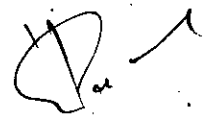
08.01.2020

Appellant in person present. Mr. Riaz Ahmad Paindakheil, Assistant AG for official respondents No. 1 & 2 and private respondent No. 3 in person present. Written reply on behalf of private respondent No. 3 has already been submitted. Neither written reply on behalf of official respondents No. 1 & 2 submitted nor their representatives of the department present, therefore, notices be issued to the respondents No. 1 & 2 with the direction to direct the representatives to attend the court and submit written reply on the next date positively. Last chance is granted. Case to come up for written reply/comments on behalf of official respondents No. 1 & 2 on 04.02.2020 before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

04.02.2020

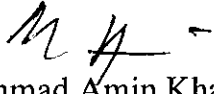
Appellant in person present. Private respondent No.3 present. Written reply on behalf of official respondents is still awaited. Sher Baz Section Officer representative of respondent No.2 absent. The present service appeal is lingering on due to none submission of written reply on behalf of official respondents. Time and again the case has been adjourned for submission of reply. Pay of Sher Baz Section Officer (representative of respondent No.2) is attached till further orders. Warrant of attachment of salary be issued accordingly. Notice be issued to official respondents for submission of reply on 02.03.2020 before S.B at Camp Court, Swat.


Member
Camp Court, Swat.

Service Appeal No. 796/2018


05.11.2019

Junior counsel for the appellant present. Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith M/S Amjid Ali, Assistant on behalf of respondent No. 2 and private respondent No. 3 in person present. Written reply on behalf of private respondent No. 3 already submitted while representative of respondent No. 2 requested for further adjournment for filing of written reply. Last chance is granted. Case to come up for written reply/comments on behalf of respondent No. 2 on 04.12.2019 before S.B at Camp Court Swat.


(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

04.12.2019

Appellant in person present. Written reply of respondent No.2 still awaited. On the previous date, Amjid Ali Assistant appeared on behalf of respondent No.2 and requested for adjournment for filing reply, however, today he is absent. The present service appeal is lingering on at the stage of submission of reply for sufficient time, hence adjourned on the payment of cost of Rs.2000/- to be paid by the respondent No.2 to the appellant. Notice be issued to respondent No.2 as well as absent representative for reply. Adjourned to 08.01.2020 before S.B at Camp Court, Swat.


Member
Camp Court, Swat.

03.09.2019


Appellant in person present. Written reply not submitted. Private respondent No.3 in person present and seeks time to furnish written reply/comments. No one present on behalf of official respondents. Amjid Ali Assistant (for respondent No.2) absent. Respondents No.1 & 2 as well as absent representative be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 09.10.2019 before S.B at Camp Court, Swat.



Member
Camp Court, Swat.

09.10.2019


Clerk of counsel for the appellant present. Mr. Mian Ameer Qadir, Deputy District Attorney for official respondents and private respondent No. 3 in person present. Written reply on behalf of respondent No. 3 submitted today. Neither written reply on behalf of respondent No. 2 submitted nor his representative present therefore, notice be issued to respondent No. 2 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Case to come up for written reply/comments on behalf of respondent No. 2 on 05.11.2019 before S.B at Camp Court Swat.



(Muhammad Amin Khan Kundi)
Member
Camp Court Swat.


10.06.2019

Clerk to counsel for the appellant present. Written reply not submitted. Private respondent No.3 in person present and seeks time to furnish written reply/comments. Amjid Ali Assistant representative of respondent No.2 absent. Respondents as well as the absent representative be put to notice with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 01.07.2019 before S.B at Camp Court, Swat.


Member
Camp Court, Swat.

01.07.2019

Clerk to counsel for the appellant present. Iftikhar Ahmad Advocate present, submitted wakalat nama in favor of private respondent No.3 and requested for time to furnish written reply/comments. Amjid Ali Assistant representative of official respondent No.2 absent. Official respondents as well as absent representative be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 03.09.2019 before S.B at Camp Court, Swat.


Member
Camp Court, Swat.

06.03.2019

Counsel for the appellant present.

Contends, inter-alia, that respondent No. 3 (Dr. Waseem Khan) was posted at Sheikh Zayed Hospital Saidu Sharif, Swat while the appellant being senior in the merit had opted for the said hospital as per his preference No. 1. The appellant was instead posted at Nawaz Sharif Kidney Hospital, Swat which was his third option as noted in his arrival report dated 09.01.2018. In the said manner discrimination was meted out to the appellant, it was added.

In view of the above, instant appeal is admitted for regular hearing subject to all just and legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents. To come up for written reply/comments on 03.04.2019 before S.B at camp court Swat.

Appellant Deposited
Security & Process Fee

Chairman
Camp Court, Swat

03.04.2019

Clerk to counsel for the appellant present. Private respondent No.3 in person present and seeks adjournment. No one present on behalf of respondent No.1 & 2. Notice be issued to respondents No.1 & 2 with direction to furnish written reply/comments. Adjourn. To come up for written reply/comments on 10.06.2019 before S.B at Camp Court Swat.

Member
Camp Court, Swat

796/2018


05.10.2018

Counsel for the appellant Mr. Jamal Shah, Advocate present and requested for adjournment. Granted. To come up for preliminary hearing on 07.12.2018 before S.B at camp court, Swat.


Chairman
Camp Court, Swat

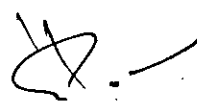
07.12.2018

Appellant absent. Learned counsel for the absent. Notice for appearance be issued to the appellant for 08.02.2019. Adjourn. To come up for preliminary hearing on the date fixed before S.B at Camp Court Swat.


Member
Camp Court, Swat.

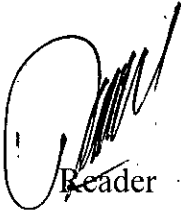
08.02.2019

Minhas Yousafzai Advocate appeared and submitted wakalt nama in favor of the appellant and being freshly engaged, requested for adjournment. Adjourn. To come up for preliminary hearing on 06.03.2019 before S.B at Camp Court Swat.


Member
Camp Court, Swat

10.08.2018

Clerk to counsel for the appellant present. Due to summer vacation the case is adjourned to 05.10.2018 for the same at camp court Swat.


Reader

~~10.08.2018~~



~~Clerk to counsel for the appellant present. Due to summer vacation the case is adjourned to 05.10.2018 for the same at camp court Swat.~~

~~Reader~~

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 796 /2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/06/2018	<p>The appeal of Dr. Salimullah presented today by Mr. Sabir Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 13/6/18</p>
2-	14-6-2018	<p>This case is entrusted to Touring S. Bench at Swat for preliminary hearing to be put up there on <u>10-08-2018</u></p> <p> CHAIRMAN</p>

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICES
TRIBUNAL AT PESHAWAR**

Service Appeal No. 796 / 2018

Dr. Salimullah.

... Appellant

VERSUS

Chief Secretary KPK and others.

... Respondents

INDEX

S #	Description of documents	Annexure	Pages
1.	Memo of appeal along with certificate	1-4
2.	Affidavit	5
3.	Memo of addresses	6
4.	Copies of credentials	A	7
5.	Copy of MCPS certificate / degree	B	8
6.	Copy of appointment order as Senior Lecturer of Pathology of KMU	C	9
7.	Copy of appointment order as Acting Pathologist at Nawaz Sharif Kidney Hospital Swat	D	10, 11
8.	Copy of appointment order, <i>Adhoc D-Pathologist</i>	E	12 - 22
9.	Copy of application, '.....'	F	23, 24
10.	Copy of appointment order, <i>Application</i>	G	25 - 32
11.	Copy of departmental appeal <i>& other relevant documents</i>	H	33 - 43
12.	Wakalat Nama		44

Appellant
Through Counsel


Sabir Shah
Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICES
TRIBUNAL AT PESHAWAR**

Service Appeal No. 796 / 2018

Khyber Pakhtunkhwa
Services Tribunal

Diary No. 1048

Dated 13-6-2018

Dr. Salimullah S/o Hidayatullah R/o Qambar, Tehsil Babuzai, District Swat, presently posted at Nawaz Sharif Kidney Hospital, District Swat.

... Appellant

VERSUS

- (1) Chief Secretary Khyber Pakhtunkhwa at Peshawar.
- (2) Secretary Health, Khyber Pakhtunkhwa at Peshawar.
- (3) Dr. Waseem Khan presently posted at Sheikh Zaid Hospital, Swat.

... Respondents

Appeal under Section 4 of Khyber Pakhtunkhwa Services Tribunal Act, 1974, against the non-posting of the appellant in accordance with his option and merit position.

Prayer:-

On acceptance of the instant appeal, the respondent No. 2 may kindly be directed to post the appellant in accordance with his option and merit position as District Pathologist at Sheikh Zaid Hospital Swat. Any other remedy, for which the appellant is otherwise entitled, may also very kindly be granted in favour of the appellant:

Filed to-day

Registrar
13/6/18

Respectfully Sheweth:

1. That the appellant is graduate of Khyber Medical College, Peshawar (Year 2008) (Copies are attached as annexure A).

2. That the appellant got his MCPS (Clinical Pathology) with distinction in 2016 (Copy is attached as annexure B).
3. That the appellant served as Senior Lecturer of Pathology (BPS-18) for about 3 Years in Khyber Medical University at Peshawar (Copy is attached as annexure C).
4. That appellant joined as Medical Officer (Adhoc) at Nawaz Sharif Kidney Hospital Swat and later on was appointed as Acting Pathologist in the said hospital (Copies are attached as annexure D).
5. That in the meanwhile the Health Department advertised the post of District Specialist Pathology (Adhoc), the appellant qualified and was appointed, but the respondents department not posted him in accordance with his merit position and his option even directed him to take charge at DHQ Batkhela, wherein the post was already filled by another doctor, so, the appellant approached the respondent No. 2 and requested for posting at Sheikh Zaid Hospital Swat, the proposal therefor was approved by respondent No. 2 but the same was not honored and respondent No. 3 was transferred from Nawaz Sharif Kidney Hospital on the vacant post at Sheikh Zaid Hospital Swat, wherefore approval had already been issued by respondent No. 2 for posting of the appellant (Copies are attached as annexure E).
6. That the appellant requested the respondent No. 2 through an application to post the appellant at Sheikh Zaid Hospital Swat, as per approval of respondent No. 2 but in vain (Copy of application is attached as annexure F).
7. That in the meanwhile the Khyber Pakhtunkhwa Public Service Commission on the already advertised post, interviewed the appellant for the post of District Pathologist on regular basis and the appellant was recommended and in this respect an official

notification of health department was issued on January 8th, 2018 and the appellant submitted his arrival report in the office of SO.1 at Health Department on January 9th, 2018 and also submitted his option to be posted him in accordance with his option and merit position (Copies are attached as annexure G).

8. That it was again shocking for the appellant that Mr. Dr. Waseem Khan, who was low in merit of the appellant, was posted at Sheikh Zaid Hospital Swat, while the appellant being meritorious, was not posted at the hospital ibid as it was his first option.
9. That against the aforementioned illegalities and irregularities, the appellant filed a departmental appeal before respondent No. 1 well within time, which was not decided within its statutory period (Copies of departmental appeal is attached as annexure H).
10. That the appellant having aggrieved of the action and inactions of respondents Nos. 1 & 2 submit the instant appeal inter alia on the following grounds.

GROUND:-

- a. That the appellant has not been treated in accordance with the law and was thoroughly discriminated during his posting as District Pathologist (Adhoc) and now regular, as enshrined in Article 4 and 27 of the Constitution of Islamic Republic of Pakistan.
- b. That the appellant was meritorious from respondent No. 3 as the appellant score in accordance with the KP, Public Service Commission record was 63/100, while that of respondent No. 3 was 52/100 and the appellant was in legitimate expectancy to be posted at Sheikh Zaid Hospital Swat as his first option but the official respondents, violated all the Rules, Regulations and norms of justice.

- c. That the official respondents treated the respondent No. 3 as their blue eyed in previous Adhoc posting as well as in the present regular posting against the merit position and criteria on the subject, while treated the appellants discriminatory.
- d. That any other ground not specifically raised shall be argued at the time of arguments with the leave of court.

It is, therefore, humbly prayed that, on acceptance of the instant appeal, the respondent No. 2 may kindly be directed to post the appellant in accordance with his option and merit position as District Pathologist at Sheikh Zaid Hospital Swat. Any other remedy, for which the appellant is otherwise entitled, may also very kindly be granted in favour of appellant.

Appellant through

Serimullah

Sabir Shah

Sabir Shah
Advocate High Court

Certificate:

Certified, as per instruction of my client that it is the first ever service appeal filed in this Hon'ble court.

Sabir Shah

Sabir Shah
Advocate High Court

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICES
TRIBUNAL AT PESHAWAR**

Service Appeal No. _____ / 2018

Dr. Salimullah.

... Appellant

VERSUS

Chief Secretary KPK and others.

... Respondents

Affidavit:

I, Dr. Salimullah S/o Hidayatullah R/o Qambar, Tehsil Babuzai, District Swat, do hereby solemnly affirm and declare on oath that all the contents of the accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent: _____

Dr. Samiullah

ATTESTED
IRFAN ULLAH ADVOCATE
NOTARY PUBLIC

12-6-18

**BEFORE THE KHYBER PAKHTUNKHWA, SERVICES
TRIBUNAL AT PESHAWAR**

Service Appeal No. _____ / 2018

Dr. Salimullah.

... Appellant

VERSUS

Chief Secretary KPK and others.

... Respondents

Memo of Addresses:

Address of Appellant:

Dr. Salimullah S/o Hidayatullah R/o Qambar, Tehsil Babuzai, District Swat, presently posted at Nawaz Sharif Kidney Hospital, District Swat.

Addresses of Respondents:

- (1) Chief Secretary Khyber Pakhtunkhwa at Peshawar.
- (2) Secretary Health, Khyber Pakhtunkhwa at Peshawar.
- (3) Dr. Waseem Khan presently posted at Sheikh Zaid Hospital, Swat.

Appellant through


Sabir Shah
Advocate High Court

Serial No.: 09646/702

Reg. No.: 2001-KMC-8964
Session: Annual 2007

KHYBER MEDICAL UNIVERSITY
PESHAWAR, PAKISTAN.

has conferred upon

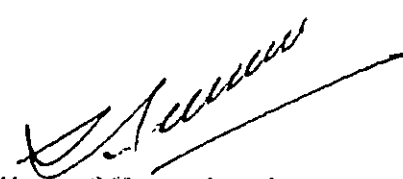
SALIMULLAH s/o HIDAYATULLAH


of Khyber Medical College, Peshawar

the degree of

BACHELOR OF MEDICINE & BACHELOR OF SURGERY

Given this seventeenth day of November two thousand and eight


Controller of Examinations


Registrar


Vice Chancellor.



Ann. A P#7



*Know all men by these Presents, that we, the
President and Council of the College of Physicians
and Surgeons Pakistan admit*

Dr. Salimullah

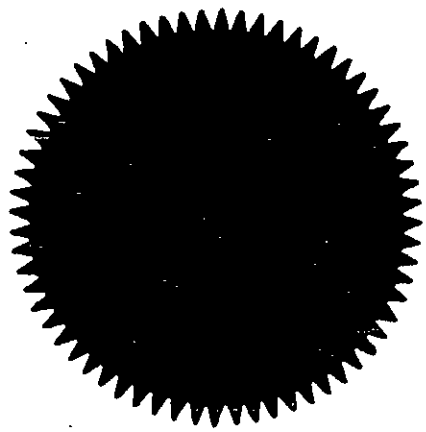


★ ★ **a Member of the College** **Verified From The College Record And Certified To Be True**

in the subject of Clinical Pathology

DR MUHAMMAD SHARIF
Chief Controller of Examinations
College of Physicians & Surgeons Pakistan

*In witness thereof, we have subscribed our names
and caused the seal of the College to be hereunto
affixed this 7th day of January 2017*



J. V. Rauf President

Member

[Signature] Executive Committee

Registrar

[Signature] of the College

ATTESTED

[Signature]



KHYBER MEDICAL UNIVERSITY
INSTITUTE OF MEDICAL SCIENCES



PHQ Teaching Hospital, K.D. 1, Kohat, Khyber Pakhtunkhwa, Pakistan. Ph# +92-922-9260325, Fax # +92-922-9260365

No. 871 /KMU-IMS/P.F./2016

Dated: 24th September, 2016

Experience Certificate

This is to certify that Dr. Salim Ullah s/o Hidayat Ullah is working as Lecturer (BPS-18) in Pathology Department KMU Institute of Medical Sciences Kohat as per the following details.

1. From 7th November, 2013 to 31st August, 2016 on adhoc basis with one day gap after every 06 months.
2. From 1st September, 2016 till date on regular basis.

This is issued in supercession of this office certificate No. 678/KMU-IMS/PF/2016 dated 18th July, 2016.



Dr. Salim Ullah
Principal
KMU Institute of Medical Sciences,
Kohat

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Anwar D. (10)
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SO (E-II)/3-18/2016

Dated Peshawar, the 07th December, 2016


To

The Medical Superintendent,
Nawaz Sharif Kidney Hospital,
Swat.

Subject: APPLICATION OF DR. SALIM ULLAH ADHOC MO

I am directed to refer to your letter No.15386/NKHS dated 14.10.2016 on the subject noted above and to state that competent authority has been pleased to condone the joining period in respect of Dr. Salimullah Adhoc Medical Officer, BS-17, till 15.12.2016.

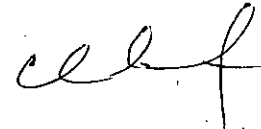
Encl: As above.


(Jibreel Raza)
Section Officer (E-II)

Copy forwarded to:-

1. PS to Secretary Health, Khyber Pakhtunkhwa, Peshawar.
2. PA to Deputy Secretary-I, Health Department.

Section Officer (E-II)



ATTESTED



Nawaz Sharif Kidney Hospital

Manglor Swat, Khyber Pakhtunkhwa, Pakistan

Ph. No.: 0946-730890-91, Fax No. 0946-730889

11

SERVICE & EXPERIENCE CERTIFICATE

It is certified that **Dr. Salimullah S/o Hidayatullah** is employed by Health Department KPK as Medical Officer and is serving in Nawaz Sharif Kidney Hospital Manglor Swat since 15/12/2016 till date. As he has done **MCPS Clinical Pathology** and is a qualified Pathologist so he has been assigned the duty of pathologist in Department of Pathology and Blood bank of this Hospital since his arrival.

During his service till now, he remained hard working, punctual, devoted and professional in his duties.

His duties / job specifications are as follows:-

- (1) Working as pathologist in all sections of laboratory including, Microbiology, Hematology, Chemical Pathology and Blood Bank.
- (2) Assuring the quality and standard of all investigations by daily run and checkup of quality control.
- (3) Dealing with patients and doctors regarding their queries about investigations.
- (4) Dealing with companies supplying laboratory equipments and reagents.
- (5) Teaching and guidance of the paramedical staff working in Laboratory and blood bank.
- (6) Dealing with MBBS students and teachers of Saidu Medical College Swat, visiting the hospital.

Date of Issue 18/04/2017

No. 1101 /PF

Copy forwarded to Dr. Salimullah with reference to his application dated: 15/04/2017

Signature Dr. Ghulam Rahmani

Name of issuing Authority: Dr. Ghulam Rahmani

Designation: DMS

BPS (or Equivalent): 18

Phone No: 0946-730890

Office Stamp/Seal: **Deputy Medical Superintendent**
Nawaz Sharif Kidney Hospital, Swat



Ann. E:
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 4th July 2017

NOTIFICATION

No. SOH-1/(HD)3-5/2015 On the recommendations of Departmental Selection Committee, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to order the appointment of the following doctors as Distt: Specialists Gynaecology, Pathology, Nephrology and Peads Surgery (BS-18) on adhoc basis for a period of one year or till the availability of regular selectees of Public Service Commission whichever is earlier with immediate effect in the public interest:-

District Specialist Gynaecology (BS-18)

S.No.	Name of doctor	Present place of posts	Domicile
1	Dr. Sadia Anwar D/O Ghulam Rabani	Fresh	D.I.Khan
2	Dr. Perveen Shafi D/O Shafi Gul	Fresh	Mardan
3	Dr. Uzma Zaman D/O Badi uz Zaman	WMO D.I.Khan	D.I.Khan
4	Humaira Bibi D/O Sahibzada Muhammad Rasool	Fresh	Haripur
5	Bibi Sara D/O Fazle Raziq	Women and Dental Medical College Abbottabad	Swabi
6	Rukhsana Karim D/O Abdul Karim	HMC Peshawar	Khyber Agency
7	Tanzila Pervez D/O Muhammad Pervez	WMO Services Hospital Peshawar	Nowshera
8	Nazia Khan D/O Saeed Ullah	WMO Bunir	Bunir
9	Mamona Qadir D/O Ali Qadir	KTH Peshawar	Mardan
10	Nazia Wahid D/O Abdul Wahid	AHQH Bajaur	Dir Lower
11	Shabana Kokeb D/O Fazal ur Rahman	DHQH Haripur	Abbottabad
12	Sadia Nasir D/O Nasir Khan	WMO NKBMH Kohat Road Peshawar	Peshawar
13	Chaman Ara D/O Khona Gul	WMO Population Welfare Office Abbottabad	Dir Lower
14	Saba Nasir D/O Muhammad Nasir	Fresh	Abbottabad
15	Shabnum Gul D/O Habib ur Rahman	KGMC Peshawar	Bajaur Agency
16	Maria Zil e Huma D/O Ghulam Sarwar	WMO Tank	Tank
17	Sarwat Laqa D/O Prof. Laqa Ullah	GKMC Swabi	Mansehra
18.	Seema Gul D/O Fateh Khan	TMO PGMI	Peshawar
19	Hina Zuhra D/O Abid Raza	LMH Kohat	Kohat
20	Hemasa Gul D/O Sherin Khan	WMO Mardan	Mohmand Agency
21	Sadia Dilawar D/O Dilawar Khan	WMO Haripur	Haripur
22	Sadia Haider D/O Haider Zaman	Fresh	Mansehra
23	Shazia Tabassum D/O Muhammad Roshan	HMC Peshawar	Karak
24	Naseema Usman D/O Usman Khan	DHQH Abbottabad	Peshawar.
25	Abida Gul D/O Zar Gul	THQH Banna Battagram	Battagram
26	Mehnaz Akhtar D/O Sakhi Badshah	KTH Peshawar	Karak
27	Farzana Sarwar D/O Sarwar Khan	Fresh	Haripur
28	Shakira Noreen D/O Fazle Elahi	DHQH Charsadda	Peshawar
29	Kausar Inayat D/O Inayat Ullah	DHQH Abbottabad	Dir Lower

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30	Nayar Latif D/O Abdul latif	WMO Population Welfare D.I.Khan	D.I.Khan
31	Jeharat Gul D/O Liaqat Ali	RHC Havalian Abbottabad	Nowshera
32	Najma Bibi D/O Saadullah Jan	Fresh	Lakki Marwat
33	Hassina Shabir D/O Shabir Hussain	Fresh	Kurram Agency
34	Asma Zahir D/O Muhammad Zahir	RHC Umarzai Charsadda	Charsadda
35	Najma Ayub D/O Ayub Khan	WMO Sari Koat	Mardan
36	Sadaf Sarwar D/O Muhammad Farooq	WMO Pirpai Nowshera	Nowshera
37	Rubina Pervaiz D/O Muhammad Pervaiz	WMO Molvi Amier Shah Hospital Peshawar	Mansehra
38	Dure Shamar Faisal D/O Abdul Ahad	Peshawar Medical College. Peshawar	Peshawar
39	Saliva Ikram D/O Syed Shahzad Badshah	WMO Matta Swat	Mardan
40	Qurat ul Ain D/O Muhammad Rehman	Fresh	Dir Lower
41	Shabnam Jafri D/O Manzar Hussain	Fresh	Kurram Agency
42	Aisha Ali D/O Raja Barkat	ATH Abbottabad	Mansehra

District Specialist Pathology (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile
1	Taqvim ul Haq S/O Fazle Subhan MD	LRH Peshawar	Nowshera
2	Aysha Safdar D/O Safdar Hussain	Fauji Foundation Hospital Peshawar	Peshawar
3	Salva Shah D/O Mian Ajmal Shah	Fresh	Peshawar
4	Muhammad Ali S/O Wazir Gul CHINA	MO Malakand	Malakand
5	Sher Badshah S/O Behramand Khan	Dental Surgeon Bunir	Bunir
6	Azhar Yaqoob S/O Muhammad Yaqoob	LRH Peshawar	Peshawar
7	Sajjad Ahmad S/O Attaullah	GMC D.I.Khan	D.I.Khan
8	Muhammad Asif S/O Khair Ullah	SMC Swat	Karaka
9	Rafiq Ahmad S/O Haji Gul	Fresh	Kohat
10	Maria Kamran D/O Abdur Rasheed	Fresh	Peshawar
11	Dr. Ammar Bin Saad S/O Qazi Saad	MO THQH Khanpur Haripur	Haripur
12	Mahwish Nowshad D/O Nowshad	Fresh	Nowshera
13	Muhammad Nasir Khan S/O Talemand Khan	SMC Swat	Swat
14	Tabassum Imran D/O Hazrat Imran	SMC Swat	Swat
15	Gul Muhammad S/O Kotai	KGMC Peshawar	Bajaur Agency
16	Waseem Khan S/O Fazal Ghafoor	SMC Swat	Swat
17	Shahid Hussain S/O Muhammad Farooq	NSKH Swat	Swat
18	Shazia Tariq D/O Allaud Din Qureshi	Fresh	Peshawar
19	Salimullah S/O Hidayatullah	NSKH Swat	Swat
20	Aurangzeb S/O Farid Gul	KMC Peshawar	Nowshera
21	Waheed Alam S/O Zahir Ullah	MO Charsadda	Charsadda
22	Humaira Khan D/O Asfandyar Khan	Fresh	Malakand
23	Asim Muhammad S/O Qamar Zaman	MO Adhoc Peshawar	Peshawar
24	Shabir Ahmad Khan S/O Noor Alimad Khan	Fresh	Orakzai Agency
25	Mian Muhammad Naveed S/O Mian Said Karam	MO DHQH Nowshera	Nowshera

ATTESTED

District Specialist Nephrology (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile
1	Rehmat Ali Khan S/O Waris Khan	MO NSKH Swat	Swat

District Specialist Paeds Surgery (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile
1	Muhammad Javed Khan S/O Inayat Shah	MO THQH Timergara	FR Peshawar

1. Their salaries shall not be released till verification of their documents by the concerned institutions.
2. The above mentioned appointees are directed to submit their arrival report within 15 days after issuance of the notification failing which their appointment shall be treated as cancelled.

SECRETARY HEALTH

Endst No and date even

C.C

1. Hospital Director HMC/LRH/KTH, Peshawar/ATH, Abbottabad, MMC, Mardan/DHQTH/MMMTH D.I.Khan/KGNTH, Bannu/NMC, Nowshera.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Chief Executive/Principal SGTH/SMC Swat/GKMC Swabi.
4. Director Health Services FATA, Peshawar.
5. DHOs concerned.
6. Medical Supdt./Incharge DHQTHs/DHQHs/THQHs concerned.
7. Distt: Accounts Officers/Agency Accounts Officers concerned.
8. Director Information, Khyber Pakhtunkhwa.
9. Computer Programmer Health Department.
10. P.S to Minister Health, Khyber Pakhtunkhwa.
11. P.S to Secretary Health Department.
12. Doctors concerned.
13. Personal files of the doctors concerned.

(Signature)
 (Fazleem Khan)
 Section Officer-I

ATTESTED

(Signature)



15

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

Dated Post. the 19th July 2017

Notification

No. SOH-1/HD/13-5/2015 Consequent upon their appointment as District Specialists (BS-18) in various specialties on adhoc for a period of one year or till the availability of regular selectees of Public Service Commission whichever is earlier vide Notification of even No dated 4th July 2017, the Competent Authority is pleased to order the posting of the following District Specialists in the hospital/Health facilities noted against their names with immediate effect:-

District Specialist Physician (BS-18)

S.No.	Name of doctor	Present Place of posting	Domicile	Posted against the vacant post of Distt. specialist Physician (BS-18) at
1	Dr. Zia Ullah S/O Hayat-ul Haq	SGTH Swat	Swat	THQH Khawaza Khe's Swat
2	Dr. Anwar Kamal S/O Haji Azad Khan	KGNT Bannu	Bannu	THQH Sarai Naurang Lakki Marwat
3	Dr. Muzamil Shah S/O Abdul Ghaffar Khan	Category D Hospital Lal Qila Dir Lower	Dir Lower	Category 'D' Hospital Lal Qila Dir Lower
4	Dr. Durr-e-Sameen D/O Mali Tariq Javed Ahmad Khan	WMO Mohm G Hospital Peshawar	Peshawar	Category 'D' Hospital Garhi Taji Peshawar
5	Dr. Sahibzada Imtiaz Ahmad S/O Sahibzada Javed Iqbal	MO DHQH Dir Upper	Dir Upper	DHQH Dir Upper
6	Dr. Alam Zeb S/O Bahadar Said	MO KTH Peshawar	Dir Upper	THQH Chakdara Dir Lower
7	Dr. Murad Ali S/O Amanullah	THQH Takht Bai Mardan	Mardan	THQH Takht Bai Mardan
8	Dr. Usman Gul S/O Faqir Gul	BKMC, Mardan	Malakand	Category 'D' Hospital Thana Malakand
9	Dr. Alaud Din S/O Badshah Khan	DHQ Timergara	Dir Lower	Category 'D' Hospital Monda Dir Lower
10	Dr. Salma Zeb D/O Aurangzeb	AP Physiology GKMC Swabi	Peshawar	DHQH Nowshera
11	Dr. Fazal Malik S/O Shah Wali	MO SPMK Hospital Pura Shangla	Buner	DHQH Buner
12	Dr. Sabir Rehman S/O Muhammad gul	MO AHQH Bajaur Agency	Bajaur Agency	DHQH Dir Lower
13	Dr. Muhammad Akram Khan S/O Khan Afasar	DHQH Haripur	Haripur	DHQH Haripur
14	Dr. Fazal Rehman S/O Jalat Khan	MO adjusted against the post of Distt. specialist in own pay and scale at AHQH Bajaur Agency	Bajaur Agency	AHQH Bajaur
15	Dr. Sher Ali Khan S/O Mir Asad Khan	BBSTH Abbottabad	Abbottabad	Type 'D' Hospital Garhi Habibullah Mansehra

District Specialist Gastroenterology (BS-18)

S No	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Gastroenterology (BS-18) at
1	Dr. Dilaram Khan S/O Suliman Khan	MO HMC Peshawar	Bajaur Agency	DHQH Batkhela Malakand
2	Dr. Arshad Khan S/O Rangeen Shah	MO THQ Top Swabi	Swabi	DHQH Pindi

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3	Dr. Muhammad Umar Khan S/O Resham Khan	MO DHQH Karaka	Karak	DHQH Kohat
4	Dr. Muhammad Imran Ullah S/O Muhammad Roshan	THQH Takhti Nasrati Karak	Karak	DHQH Karak
5	Dr. Fakhar-e-Alam S/O Noor Alam Khan	Fresh	Karak	DHQH Lakki Marwat
6	Dr. Waheedullah S/O Muhammad Umar Khan	MO DHQH Dir Lower	Lower Dir	DHQH Timergara Dir Lower
7	Dr. Jawad Khan S/O Inayatullah	MO RHC Tordhere Mardan	Swabi	DHQH Mardan
8	Dr. Muhammad Daud S/O Nasrullah	Fresh	Charsadda	DHQH Charsadda
9	Dr. Ihsanullah S/O Lal Marjan	Fresh	NW Agency	DHQH Haripur
10	Dr. Fazal Manan S/O Sher Afzal	Fresh	Swabi	DHQH Swabi
11	Dr. Naimat Ullah S/O Gul Faraz	MO AHQH Bajaur	Bajaur	DHQH Dir Upper

District Specialist General Surgery (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Surgery (BS-18) at
1	Dr. Asif Mehmood S/O Abdul Khaliq	DHQH Karak	Karak	THQH Banda Daud Shah, Karak
2.	Dr. Ayesha Khan Afridi D/O Hakim Khan Afridi	WMO Services Hospital Peshawar	Khyber Agency	At the disposal of Director Health Services FATA
3	Dr. Ahmad Ali S/O Karim Khan	Social Security Teaching Hospital Islamabad	Swabi	Category 'C' Chota Lahore Swabi.

District Specialist Radiology (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Radiology (BS-18) at
1	Dr. Samreen Malik D/O Malik Wasil Khan	DHQH Mansehra	Mansehra	King Abdulah Teaching Hospital Mansehra
2	Dr. Ayesha Afridi D/O Raza Khan	Fresh	Khyber Agency	DHQH Charsadda
3	Dr. Andaleeb D/O Qazi Kamal ud Din	Fresh	Kohat	Liaquat Memorial Hospital Kohat
4	Dr. Shamsad Khan S/O Saadullah Khan Afridi	HMC Peshawar	Khyber Agency	Category 'D' Shabqadar Charsadda
5	Dr. Rabia Afridi D/O Sardar Mir Afridi	Fresh	FR Kohat	W&C Hospital Kohat
6	Dr. Muhammad Iqbal S/O Aziz Ullah Khan	AP LRH, Peshawar	Buner	DHQH Daggar Buner
7	Dr. Mir Raza Shah S/O Khalil Badshah	DHQH Hangu	Orakzai Agency	DHQH Hangu

District Specialist Psychiatry (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Psychiatry (BS-18) at
1.	Dr. Muhammad Younas Khan S/O Yaqoob Khan	Fresh	Kurram Agency	DHQH Charsadda
2.	Dr. Muhammad Riaz S/O Muhammad Shoaib	Fresh	Orakzai Agency	DHQH Nowshera

District Specialist Pathology (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Pathology (BS-18) at
1	Taqvim ul Haq S/O Fazle Subhan	LRH Peshawar	Nowshera	DHQH Charsadda

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1	Saba Shah D/O Mian Ajmal Shah	Fresh	Peshawar	THQH Shabqadar Charsadda
2	Muhammad Ali S/O Wazir Gul	MO Malakand	Malakand	DHQH Batkhela
3	Sher Badshah S/O Behramand Khan	Dental Surgeon Buner	Buner	DHQH Shangla
4	Azhar Yaqoob S/O Muhammad Yaqoob	LRH Peshawar	Peshawar	Molvi Amer Shah Memorial Hospital Peshawar
5	Muhammad Asif S/O Khair Ullah	SMC Swat	Karak	DHQH Karak
6	Rafiq Ahmad S/O Haji Gul	Fresh	Kohat	Category 'D' Chota Lahore Swabhi
7	Maria Kamran D/O Abdur Rasheed	Fresh	Peshawar	DHQH Nowshera
8	Dr. Anwar Bin Saad S/O Qazi Saad	MO THQH Khanpur Haripur	Haripur	DHQH Haripur
9	Mahwish Nowshad D/O Nowshad	Fresh	Nowshera	THQH Dargai, Malakand
10	Tabassum Imran D/O Hazrat Imran	SMC Swat	Swat	THQH Matta Swat
11	Waseem Khan S/O Fazal Ghaloor	SMC Swat	Swat	Nawaz Sharif Kidney Hospital Swat
12	Shahid Hussain S/O Muhammad Farooq	NSKH Swat	Swat	Nawaz Sharif Kidney Hospital Swat
13	Salimullah S/O Hidayatullah	NSKH Swat	Swat	DHQH Batkhela
14	Waheed Alam S/O Zahir Ullah	MO Charsadda	Charsadda	DHQH Karak
15	Humaira Khan D/O Asfandyar Khan	Fresh	Malakand	DHQH Charsadda
16	Asim Muhammad S/O Qamar Zaman	MO Adhoc Peshawar	Peshawar	W&C Hospital Karak
17	Shabir Ahmad Khan S/O Noor Ahmad Khan	Fresh	Orakzai Agency	At the disposal of Director FATA

District Specialist Nephrology (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Nephrology (BS-18) at
1	Rehmat Ali Khan S/O Waris Khan	MO NSKH Swat	Swat	Nawaz Sharif Kidney Hospital Swat

District Specialist Paeds Surgery (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Paeds Surgery (BS-18) at
1	Muhammad Javed Khan S/O Inayat Shah	MO THQH Timergara	FR Peshawar	DHQH Timergara Dir Lower

District Specialist Dentistry (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt. Specialist Dentistry (BS-18) at
1	Dr. Nadia Ashraf D/O Muhammad Ashraf	Dental Surgeon HMC Peshawar	Charsadda	DHQH Charsadda
2	Dr. Zubair Badshah S/O Said Badshah	Dental Surgeon Talash Dir Lower	Dir Lower	DHQH Dir Lower
3	Dr. Zafar Ali Khan S/O Asghar Ali Khan	Fresh	Peshawar	DHQS Swabi
4	Dr. Muhammad Masood Khan S/O Mumtaz Ali Khan	LRH Peshawar	Peshawar	DHQH Kohat
5	Dr. Bushra Mehboob Mahboob Elahi			DHQH Mardan

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6	Dr. Rozi Afsar S/O Hamim Gul	Fresh	Shanglo	DHQH Shanglo
7	Dr. Muhammad Halim Khan S/O Abdul Hakim	Cat. D Hospital Lal Qilla Dir Lower	Dir Lower	DHQH Dir Upper
8	Dr. Sohail Shahzad S/O Bakht Rawan	Fresh	Dir Lower	DHQH Batkhela Malakand
9	Dr. Ajmal Khan S/O Bakht Zamin Khan	SGTH Swat	Swat	DHQH Abbottabad
10	Dr. Muhammad Farooq S/O Fateh Gul	BMC, Bannu	Bannu	DHQH Lakki Marwat
11	Dr. Sajid Ali S/O Shehzad Khan	KCD Peshawar	Peshawar	DHQH Karak
12	Dr. Hidayatullah S/O Malanaq Jan	Fresh	Bajaur Agency	DHQH Chitral
13	Dr. Tanveer Hussain Bangash S/O Yousaf Hussain Bangash	Dental Surgeon Type D Hospital Lora Abbottabad	Kurram Agency	DHQH Manserha
14	Tariq Mehmood S/O Shah Jehan	Fresh	SW Agency	DHQH Buner

District Specialist Skin (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt: Specialist Skin (BS-18) at
1	Dr. Usman Rafiq S/O Muhammad Rafiq	Fresh	Mansehra	DHQH Mansehra
2	Dr. Jamal Ahmad Khan S/O Pervez Ahmad Khan	DHQH Nowshera	Nowshera	DHQH Haripur
3	Dr. Niaz Akbar Afridi SO Muhammad Akbar	AMC Abbottabad	FR Kohat	DHQH Battagram

District Specialist Anaesthesia (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt: Specialist Anaesthesia (BS-18) at
1	Dr. Abdur Rahman S/O Muhammad Gul	Fresh	Bajaur	DHQH Tlmergara
2	Dr. Muhammad Ali S/O Muhammad Ibrahim	Fresh	Malakand	DHQBatkhele, Malakand
3	Dr. Salman Malik S/O Shahriyar Khan	KTH Peshawar	Charsadda	DHQH Charsadda
4	Dr. Saira Ehsan D/O Qazi Ehsan Ullah Qureshi	WMO LRH Peshawar	Peshawar	Molvi Amir Shah Memorial Hospital Peshawar
5	Dr. Sibghatullah S/O Malik Mehboob Khan	KTH Peshawar	NW Agency	W&C Hospital Bannu
6	Dr. Abdur Rahman S/O Mir Gul Khan	Fresh	FR Peshawar	RHC Nahaqi Peshawar
7	Dr. Jawad Khan S/O Muhammad Rafiq	Fresh	Peshawar	Category 'D' Shabqadar Charsadda
8	Dr. Abdul Haq S/O Haji Nawaz	HMC Peshawar	Khyber Agency	At the disposal of Director Health Services FATA
9	Dr. Waqar ul Mulk S/O Mukhtar ul Mulk	MO DHQH Batkhela	Malakand	DHQH Batkhela, Malakand
10	Dr. Aaqila Khan D/O Ghulam Muhammad	WMO LRH Peshawar	Peshawar	Naseerullah Khan Babar Hospital Peshawar

District Specialist Anaesthesia (BS-18)

S.No.	Name of doctor	Present place of posting	Domicile	Posted against the vacant post of Distt: Specialist Anaesthesia (BS-18) at
1	Dr. Ismat Ullah Khan S/O Nawaz Khan	Retired as from Health Deptt. KPK	Lakki Marwat	DHQH Lakki Marwat
2	Dr. Khalid Asif D/O Muhammad Bakhtsh	Retired as from Health Deptt. KPK	Haripur	DHQH Abbottabad

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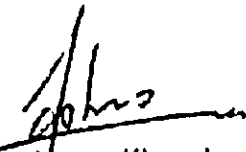
They are directed to assume charge within 30 days after the issuance of this notification failing which their appointment shall be treated as cancelled.

SECRETARY HEALTH

Encls. No and date even

C.C

1. Hospital Director HMC/LRH/KTH, Peshawar/ATH, Abbottabad, MMC, Mardan/DHQTH/MMMTH D.I.Khan/KGNTH, Bannu/NMC, Nowshera.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director General, Health Services, Khyber Pakhtunkhwa.
4. Chief Executive/Principal SGTH/SMC Swat/GKMC Swabi.
5. Dean KMC/KCD, Peshawar, AMC, Abbottabad/GMC, D.I.Khan/BMC, Bannu/NMC, Nowshera.
6. Director Health Services FATA, Peshawar.
7. DHOs concerned.
8. Medical Supdt./Incharge DHQTHs/DHQHs/THQHs concerned.
9. Distt; Accounts Officers/Agency Accounts Officers concerned.
10. Director Information, Khyber Pakhtunkhwa.
11. Computer Programmer Health Department.
12. P.S to Minister Health, Khyber Pakhtunkhwa.
13. P.S to Secretary Health Department.
14. Doctors concerned.
15. Personal files of the doctors concerned.


 (Tasleem Khan)
 Section Officer-I

Copy available on the website www.healthko.gov.pk

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PUC Pages-1-2/C

PUC is an application of Dr. Salimullah wherein he has stated that he is serving as Medical Officer in Nawaz Sharif Kidney Hospital Swat and upon his appointment as District Specialist Pathology (BS-18 adhoc), he has been posted at DHQH Batkhela. He has further stated that he belongs to Swat and post of Distt: Specialist Pathology (BS-18) is vacant at Sheikh Zaid Hospital Swat.

It is pointed out that we have posted 02 District Specialist Pathology (BS-18) against one vacant post at DHQH Batkhela. Dr. Muhammad Ali at S.No.3 of the notification (Page-10/c) has assumed charge over-there and now Dr. Salimmullah (applicant) is surplus and required to be posted elsewhere.

Since, post of Consultant Pathologist (BS-18) at Sheikh Zaid Hospital Swat is lying vacant and the doctor concerned being domicile of Swat also opted for posting at Swat.

It is proposed that we may post Dr. Salimullah, District Specialist Pathology (BS-18 adhoc) at Sheikh Zaid Hospital Swat, please.

105
R.No. 2103
Date 4.8.17
Secretary Health

Deputy Secretary-I

Section Officer-I
3/8/2017

For approval please:

Jay Health

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Approved. 4 Aug 17

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

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Dated Pesh: the 4th Aug: 2017

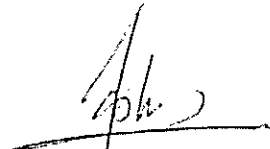
NOTIFICATION

No.SOH-I/(HD)3-5/2015 In partial modification of this department Notification of even No dated 19th July 2017, the Competent Authority is pleased to order the posting of Dr. Salimullah, District Specialist Pathology (BS-18 adhoc)[under transfer to DHQH Batkhela] at Nawaz Sharif Kidney Hospital Swat.

SECRETARY HEALTH

ENDST No and date even

- C.C
1. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
 2. Medical Supdt; Nawaz Sharif Kidney Hospital Swat with the remarks to accept his charge assumption report w.e.f 20th July 2017.
 3. Medical Supdt; DHQH Batkhela Malakand Agency.
 4. Distt: Accounts Officer, Swat.
 5. Doctor concerned.
 6. Personal file of the doctors concerned.


(Tasleem Khan)
Section Officer-I


ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 4th Aug; 2017

NOTIFICATION


No.SOH-I/HD/3-5/2017 The Competent Authority is pleased the order the transfer of Dr. Waseem Khan S/O Fazal Ghafoor, District Specialist Pathology (BS-18 adhoc) Nawaz Sharif Kidney Hospital Swat to Sheikh Zayed Hospital Swat with immediate effect in the public interest.


SECRETARY HEALTH

Endst No and date even

C.C

1. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
2. Medical Supt; Nawaz Sharif Kidney Hospital Swat.
3. Medical Supdt; Sheikh Zayed Hospital Swat.
4. District Accounts Officer, Swat.
5. Doctor concerned.
6. Personal file of the doctor concerned.


 (Tasleem Khan)
 Section Officer-I


ATTESTED

(This application has already been submitted to the honorable Secretary health by hand in his office on 26th October 2017 and this copy is being submitted in Diary section just for record purpose. **Diary No: 19092**)

To,

**The Secretary Health
Government of Khyber Pakhtunkhwa**

Subject:

1. **Irregularities in posting orders for the post of District specialists Pathology in July 2017.**
2. **Request for resolving the issue of posting me against the proposal approved by the honorable Secretary health.**

Respected Sir,

I am really grieved to be writing these lines which point out some irregularities in health department but I have no other soft way for resolving my issue. I have been in contact with you through your official facebook messenger while I was in Saudi Arabia for Hajj. Now I have returned from Hajj so want to bring my problem in your kind consideration again. I have a firm belief that my issue will be resolved without involvement of third party.

I would like to discuss my issue briefly:

1. I am graduate of Khyber Medical College Peshawar (in 2008).
2. I did my MCPS training in Clinical Pathology from Rehman Medical Institute Peshawar.
3. After Training I joined Khyber Medical University as Senior Lecturer Pathology BPS-18 and served there for about three years. (Period: 7th November 2013 to 14th December 2016)
4. I joined Health department as Medical Officer (Adhoc) on 15 December 2016 after resignation from job in was posted in Nawaz Sharif Kidney Hospital Swat.
5. As I was qualified (having degree of MCPS in Clinical Pathology) so I was appointed as acting pathologist in the hospital I was posted.
6. I worked day and night for the development of the hospital and uplifted the laboratory and blood bank services many folds.
7. Meanwhile the posts for district specialist Pathology were advertised by health department in which I was also selected (1st notification on 4th July 2017).
8. I gave my first arrival report in Health secretariat in SO 1 office and was expecting to be posted in Saidu group of teaching hospitals or at least the station I was already working in i.e. Nawaz Sharif Kidney Hospital Swat.
9. The 2nd notification from health department was released on 19th July 2017 and I was shocked to know that I was posted in DHQ Hospital Batkhela while another person Dr. Waseem who was previously working in Saidu Medical College as Lecturer was substituted on my place. Ironically, another pathologist was also posted in DHQ Hospital Batkhela while the post was only one. Anyhow I went to DHQ Hospital Batkhela on 20th July for arrival report and as I was expecting, the Medical Superintendent didn't accept it saying that the post is already filled.
10. I rushed to the health department on 20th July to resolve the issue and I was told that some mistakes have occurred in posting and the problem will be sorted out. I requested to place me either in Saidu Group of Teaching Hospitals or Sheikh Zayed Hospital as both the Pathologist posts were still vacant.

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11. My proposal for the post of Pathologist in Sheikh Zayed Hospital Swat was made as per SOPs of health department and was forwarded to your office for approval on Friday 4th August 2017. The proposal was approved by you at about 1:30 pm on the same day.
12. I was really shocked to see the notification thereafter that I have been posted in Nawaz Sharif Kidney Hospital while Dr. Waseem was transferred to Sheikh Zayed Hospital Swat. It is further mentioned that Dr. Waseem has never given arrival in NSKH Swat.
13. As I was already exhausted from repeated visits to health department and was also extremely busy in preparation for Hajj (Obtaining EOL for Hajj and NOC etc) so it was impossible for me to pursue my case in health department again. Anyhow I conveyed my message to the honorable secretary health through Facebook messenger stating that I will resume this case after returning from Hajj.
14. Now I have returned from Hajj so am putting this case to you with hope to be resolved soon.

As per SOPs of Health department, no posting and transfer particularly of District Specialists, can be done without approval from honorable secretary health so why these rules were violated two times just to benefit one person and victimize the other one both the times? It clearly seems to be involvement of some illegal resources without your kind knowledge. If Dr. Waseem has approached some political figure or have used some other illegal means to do this then I could also have used the same means of higher level than him but never did so and will never do so as snatching someone's right through such means is unethical.

Further I want to say that I have done MCPS in Clinical Pathology which is the standard qualification for the post of Pathologist at district level and my distinction is that I am the only person who could get this degree in this specialty from CPSP in the last two years from the whole Pakistan. On the other hand, Dr. Waseem has done M.Phil in Histopathology (a sub-specialty of pathology) which can never be considered as a proper qualification for this post. The other pathologist in Saidu Group of Teaching Hospitals has also done M.Phil in Microbiology with no practical background. It simply means that the three main hospitals of the district Swat are deprived of proper pathologists and when an attempt was made to post me there in order to improve the diagnostic services there, some illegal forces came seamlessly to sabotage this attempt without even getting you know.

I am an employee of Health department so will interact with all in future including those who have victimized me so don't want to complaint against them. I request that the irregularities in my case may be considered as clerical mistakes and just warning should be issued to those involved.

I hope that my posting order will be made as per approved proposal (copy attached to the original application submitted to honorable Secretary Health on 26th October 2017) and the transfer of Dr. Waseem will be reversed.

Thanking you in anticipation.

Yours Obediently:

Dr. Salimullah

S/o Hidayatullah

District Specialist Pathology (BPS-18)

Nawaz Sharif Kidney Hospital, Manglor Swat

CNIC# 15602-3757009-3

Contact# 0345 9523012

Salimullah
ATTESTED

Date: 26-Oct-2017

(This application was submitted in Diary Section of Health Department on 13th Nov-2017 with Diary No: 19130)

To

**The Secretary Health
Government of Khyber Pakhtunkhwa**

Subject: Appeal for provision of Justice

Respected Sir,

With all regards it is stated that I met your kind self in your office on 26th October 2017 regarding the issue of my posting (as District Specialist Pathology BPS-18) in Nawaz Sharif Kidney Hospital against the proposal approved by you for Sheikh Zayed Hospital Saidu Sharif Swat. I also submitted an application to you by hand stating my issue in detail and you set an inquiry in that.

(A copy has been submitted in diary section today (26-Oct-2017) for record purpose with **Diary no: 19092**)

Now, **I have been recommended by the Public Service Commission** for the same post (District Specialist Pathology BPS-18) and I have submitted my verified documents to SO1. I request to kindly make my posting this time according to the proposal you have already approved or according to the merit score devised by public service commission. As per information I have obtained from PSC, **my merit score is 63/100** while the person for whom I have been victimized two times is having merit score of **52/100**. Further, I have done MCPS in Clinical Pathology which is the standard qualification for the post of pathologist at district level while the pathologist working in SGTH and Sheikh Zayed Hospital Saidu Sharif Swat are having M.Phil (from KMU) which can never be considered as a standard qualification for a clinical post.

Here is a brief comparison of my status vs the status of Pathologist working in Shaikh Zayed Hospital.

	Dr. Salimullah (me, the victim)	The doctor posted in Sheikh Zayed Hospital Swat.	Remarks
1	MCPS (Clinical Pathology)	M.Phil (Histopathology) from KMU. It is to be noted that KMU offers only a piece of paper to the students and no practical skills. I have been there for three years so better know about it. The situation has now improved a bit but the case under discussion is having the old degree.	M.Phil is a theoretical degree having no concern with clinical post so can never be considered as a standard qualification for a clinical post though they can be preferred (and are always preferred) for teaching posts. Further M.Phil is a single specialty degree so what will a person do as a pathologist in other

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			fields.
2	MBBS from Khyber Medical college Peshawar	MBBS from Ayub Medical College Abbottabad	Both are standard colleges yet the merit of KMC is higher.
3	I was already working as acting pathologist before my posting as DS pathology.	He was working as demonstrator in Saidu Medical College Swat.	It is to be noted that he was posted on my place in NSKH Swat while I was kicked out from district Swat to Batkhela. I was again victimized for him when my posting was made against your approved proposal for Sheikh Zayed Hospital Swat.
4	My Merit Score in recent PSC interview is 63/100	His Merit score is 52/100.	Keeping all other facts aside, even if this merit score is being made a base for posting then it would be much easy to decide about whom should be posted where.
5	I am the only candidate having the degree of MCPS in Clinical Pathology in the whole list of candidates in PSC selectees. Further, I am the only candidate from the whole Pakistan who could get this qualification in the last two years.	The doctor concerned and majority of the PSC selectees are having M.Phil from KMU which I have already stated that it has no concern with practical work which is must for a District Pathologist. M.Phil (KMU version) is basically a theoretical degree and meant for teaching purpose only.	If these key posts are handed over to non technical people then how can we bring health reforms?
6	Since my arrival in NSKH, I have assumed the charge of Pathologist and have developed the laboratory and blood bank services there many folds. If I am asked to submit a detailed progress report, I will definitely submit it with actual data.	No development at all. If you kindly ask them for a progress report, they will definitely fail to provide a real one. The agonizing condition of lab. services can be confirmed from any doctor working there.	Shaikh Zayed Hospital and SGTH Swat are the main hospitals in Swat. The development of Laboratory and Blood Bank services over there is the need of time but the condition there is stagnant since long as no sincere Pathologist has been posted there so far and when you issued orders of posting me there, it was changed just to favor someone.
7	By the grace of almighty Allah, I have brought the	M.Phil "Scholars" (KMU version) even don't know	Running a lab with out QC is like measuring

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<p>level of our laboratory and blood bank services to the level of any standard lab across the world in limited resources. I myself run QC material on the machines for most of the tests being done in our laboratory.</p>	<p>what QC (Quality control) is, how it is run and interpreted? I think it is not their fault because they have never been taught this boring subject. If you kindly visit the hospital and make a demand for QC data of just one month, everything will become clear to you.</p>	<p>something without scale. Every day, thousands of investigations are send to the out side labs just because the doctors in these three hospitals don't trust the inside labs. By the Grace of Allah our lab has now become a reference lab for doctors. My claim can be verified from any doctor working in NSKH Swat.</p>
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There are so many other technical points which I want to discuss but am scared of lengthening this letter so am avoiding it.

Respected sir: The Shaikh Zayed hospital (Newly constructed Casualty) and SGTH (Central Hospital and Saidu Hospital) Swat are the three main hospitals of Swat which drain the major portion of patients from the whole Swat including patients from far flung areas of Swat like Kalam and Otror. It even deal with patients from District Shangla and Buner too. It is a fact that a hospital depends upon the laboratory services for better diagnosis and hence better management. At present the diagnostic services in these three hospitals are in the hands of two non technical pathologists which I think is not fair with the people of Swat.

It is therefore requested in your honor to kindly consider my plea in the best interest of the people of Swat and I assure you that I will InshaAllah uplift the diagnostic services there like I did in NSKH Swat.

(I am sorry for any errors, omissions or use of inappropriate, unofficial words and request that these may please be overlooked)

Thanking you in anticipation.

Yours Obediently:

Dr. Salimullah

District Specialist Pathology (BPS-18)

Nawaz Sharif Kidney Hospital, Swat

CNIC# 15602-3757009-3

Contact# 0345 9523012

Date: 10th November 2017

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 8th January 2018

NOTIFICATION

No.SOH-1/(HD)3-5/2017

On the recommendations of Khyber Pakhtunkhwa Public Service Commission, the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to appoint the following doctors as District Specialists (BS-18) on regular basis with immediate effect. They will be on probation for a period of one year.

S.No.	Name of doctor	Service status of the recommendees	Domicile
District Specialist Cardiology (BS-18)			
1.	Dr. Hafiz Muhammad Jamil Gul S/O Ismail	Distt. Specialist Adhoc Police and Services Hosopital Peshawar	Charsadda
2.	Dr. Javaid ur Rehman S/O Mehmood ul Hassan	Distt. Specialist Adhoc DHQH Charsadda	Karak
3.	Dr. Abdul Salar Khan S/O Mamoor Khan	Distt. Specialist Adhoc AHQH Landi Kotal Khyber Agency	Kurrarn Agency
4.	Dr. Ifikhar Ahmad Khan S/O Ahmad Khan	MO SGTH Swat	Swat
5.	Dr. Muhammad Ilyas S/O Muhammad Liaq	MO DHQH Timergara Dir Lower	Dir
District Specialist Pathology			
1.	Dr. Muhammad Iqtesham Khan S/O Muhammad Idrees	Demonstrator KMC	Peshawar
2.	Dr. Ammar Bini Saad S/O Qazi Saad	Distt. Specialist Adhoc DHQH Haripur	Haripur
3.	Dr. Saima Nadeem D/O Shahriyar Nadeem	Demonstrator KMC	Malakand
4.	Dr. Tabbassum Imran D/O Hazrat Imran	Distt. Specialist Adhoc SGTH Swat	Swat
5.	Dr. Maria Kamran D/O Abdul Rashid	Distt Specialist Adhoc DHQH Nowshera	Peshawar
6.	Dr. Muhammad Nasir Khan S/O Talemand Khan	AP SMC Swat	Swat
7.	Dr. Salimullah S/O Hidayat Ullah	Adhoc Distt. Specialist Nawaz Sharif Kidney Hospital Swat	Swat
8.	Dr. Muhammad Asif S/O Khairullah Khan	AP SMC Swat	Karak
9.	Dr. Muhammad Tariq Hamayun Khan S/O Faqir Muhammad Khan	Fresh	Bajaur
10.	Dr. Waseem Khan S/O Fazal Ghafoor	Demonstrator SMC Swat	Swat
11.	Dr. Muhammad Kaleem Khan S/O Abdul Sammad Khan	ATH Abbottabad	NW Agency
12.	Dr. Asim Muhammad S/O Qamar Zaman	AP BMC, Bannu	Peshawar
13.	Dr. Shabir Ahmad Orakzai S/O Noor Ahmad Khan	Distt. Specialist adhoc AHQH Landikotal	Orakzai Agency
14.	Dr. Nadia Tila D/O Tila Muhammad	Fresh	Peshawar
15.	Dr. Muhammad Ali S/O Wazir Gul	Distt. Specialist Adhoc DHQH Batkhela	Malakand

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Diploma Holders			
16.	Dr. Ayesha Safdar D/O Safdar Hussain	Fresh	Karak
17.	Dr. Waheed Alam S/O Zahir Ullah	Distt Specialist Adhoc DHQH Charsadda	Charsadda
18.	Dr. Shahid Hussain S/O Muhammad Farooq	Distt Specialist Adhoc Nawaz Sharif Kidney Hospital Swat	Swat
19.	Dr. Taqvim ul Haq S/O Fazal Subhan	Distt Specialist Adhoc DHQH Nowshera	Nowshera
DISTRICT SPECIALIST RADIOLOGY (BS-18)			
1.	Dr. Ayesha Afridi D/O Raza Khan Afridi	Fresh	Khyber Agency
2.	Dr. Samreen Malik D/o Malik Wasil Khan	Distt Specialist Adhoc King Abdullah Teaching Hospital Manserha	Manserha
DISTRICT SPECIALIST PAEDS SURGERY (BS-18)			
1.	Dr. Muhammad Javed Khan S/O Inayat Shah	Distt Specialist Adhoc DHQH Timergara Dist Lower	FR Peshawar

- The terms and conditions of their services will be governed under Khyber Pakhtunkhwa Civil Servants Act 1973 and rules made there under.
- They are directed to submit arrival report within 15 days in the Health Department failing which their appointment shall be treated as cancelled.
- Their transfer/posting order will be issued later-on.

SECRETARY HEALTH

Endst No and date even
C.C

- Accountant General Khyber Pakhtunkhwa Peshawar.
- Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
- Hospital/Medical Director MTIs concerned.
- DHOs concerned.
- Medical Supdt; DHQHs/THQHs concerned.
- Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- Distt Accounts Officer concerned.
- PS to Minister Health, Khyber Pakhtunkhwa
- PS to Secretary Health Department.
- PA to Addl. Secretary Health Department.
- Doctors concerned.
- Personal file of the doctors concerned.

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(Tasleem Khan)
Section Officer-I



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: the 31st January 2018

NOTIFICATION

No. SOH-I/(HD)3-5/2017

Consequent upon their appointment as District Specialists (BS-18) through Public Service Commission Khyber Pakhtunkhwa on regular basis vide this department Notification of even No dated 8th January 2018, the competent authority is pleased to post the following District Specialist (BS-18) in the hospitals noted against their names with immediate effect.

S.No.	Name of doctor	Present place of post	Posted at
District Specialist Radiology (BS-18)			
1.	Dr. Ayesha Afridi D/O Raza Khan Afridi	Fresh	DHQH Charsadda
2.	Dr. Samreen Malik D/o Malik Wasil Khan	Distt. Specialist Adhoc King Abdullah Teaching Hospital Mansehra	King Abdullah Teaching Hospital Mansehra
District Specialist Cardiology (BS-18)			
1.	Dr. Hafiz Muhammad Jamil Gut S/O Ismail	Distt. Specialist Adhoc Police and Services Hosopital Peshawar	Police and Services Hospital Peshawar.
2.	Dr. Javaid ur Rehman S/O Mehmood ul Hassan	Distt. Specialist Adhoc DHQH Charsadda	DHQH Charsadda
3.	Dr. Abdul Salar Khan S/O Mamoor Khan	Distt. Specialist Adhoc AHQH Landi Kotal Khyber Agency	AHQH Landikotal Khyber Agency
District Specialist Pathology (BS-18)			
1.	Dr. Ammar Bini Saad S/O Qazi Saad	Distt. Specialist Adhoc DHQH Haripur	DHQH Haripur
2.	Dr. Tabbassum Imran D/O Hazrat Imran	Distt. Specialist Adhoc SGTB Swat	Saidu Group of Teaching Hospitals Swat
3.	Dr. Maria Kamran D/O Abdul Rashid	Distt Specialist Adhoc DHQH Nowshera	DHQH Nowshera
4.	Dr. Salimullah S/O Hidayat Ullah	Adhoc Distt. Specialist Nawaz Sharif Kidney Hospital Swat	Nawaz Sharif Kidney Hospital Swat
5.	Dr. Waseem Khan S/O Fazal Ghafoor	Distt. Specialist Adhoc Sheikh Zayed Hospital Swat	Sheikh Zayed Hospital Swat
6.	Dr. Muhammad Ali S/O Wazir Gul	Distt. Specialist Adhoc DHQH Batkhela	DHQH Batkhela
7.	Dr. Waheed Alam S/O Zahir Ullah	Distt Specialist Adhoc DHQH Charsadda	DHQH Charsadda
8.	Dr. Shahid Hussain S/O Muhammad Farooq	Distt Specialist Adhoc Nawaz Sharif Kidney Hospital Swat	Nawaz Sharif Kidney Hospital Swat.
9.	Dr. Taqvim ul Haq S/O Fazal Subhan	Distt. Specialist Adhoc DHQH Nowshera	DHQH Nowshera.
District Specialist Paeds Surgery (BS-18)			
1.	Dr. Muhammad Javed Khan S/O Inayat Shah	Distt. Specialist Adhoc DHQH Timergara Dir Lower	DHQH Timergara Dir Lower

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2. They are directed to join their duties within 30 days failing which their appointments shall be treated as cancelled.

SECRETARY HEALTH

Endst No and date even

- C.C
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
 3. Chief Executive Saidu Group of Teaching Hospitals Swat.
 4. Hospital/Medical Director MTIs concerned.
 5. DHOs concerned.
 6. Medical Supdt; DHQHS/THQHS concerned.
 7. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
 8. Distt: Accounts Officer concerned.
 9. PS to Minister Health, Khyber Pakhtunkhwa
 10. PS to Secretary Health Department.
 11. PA to Addl. Secretary Health Department.
 12. Doctors concerned.
 13. Personal file of the doctors concerned.


(Tasleem Khan)
Section Officer-I

ATTESTED



TO,

CHIEF SECRETARY

GOVERNMENT OF KHYBER PAKHTUNKHWA

Diary NO: 1782 (we)

Date: 19-02-2018

Subject: Appeal under KPK CIVIL SERVANTS ACT 1973 for provision of justice in posting of District Specialist Pathology BPS-18

Respected Sir,

With all regards it is stated that I have been posted as District Specialist Pathology BPS-18 in Nawaz Sharif Kidney Hospital Swat vide Health Department KPK notification No.SOH-I/(HD)3-5/2017, Dated: 31 Jan, 2018 (Notification attached on pages No: 4, 5) on regular basis after recommendation by Khyber Pakhtukhwa Public Service commission.

I have grievance that my posting has not been done according to the merit score formulated by public service commission as my first option for posting was Sheikh Zaid Hospital Swat where another person Dr. Waseem Khan having low merit score (52/100) than mine (63/100) has been posted.

It is further mentioned that Health Department has done injustices with me several times before for favoring the same person i.e Dr. Waseem Khan.

I would like to discuss my issue briefly:

My brief academic and employment background:

1. I am graduate of Khyber Medical College Peshawar (2008).
2. I did my MCPS (Clinical Pathology) with distinction in 2016. I was the only doctor who could clear this exam from CPSP after two years i.e. no one could clear this toughest exam in 2015-16 other than me.
3. After Training, I joined Khyber Medical University as Senior Lecturer Pathology BPS-18 and served there for about three years. (Period: 7th November 2013 to 14th December 2016)
4. I joined Health department as Medical Officer (Adhoc) on 15 December 2016 after resignation from job in was posted in Nawaz Sharif Kidney Hospital Swat.
5. As I was qualified (having degree of MCPS in Clinical Pathology) so I was appointed as acting pathologist in the hospital I was posted.
6. I worked day and night for the development of the hospital and uplifted the laboratory and blood bank services many folds.

Background of appeal:

7. Meanwhile the posts for district specialist Pathology (Adhoc) were advertised by health department in which I was also selected (1st notification on 4th July 2017).

ATTESTED

8. I gave my first arrival report in Health secretariat in SO 1 office and was expecting to be posted in Saidu group of teaching hospitals Swat or at least the station I was already working in i.e. Nawaz Sharif Kidney Hospital Swat.
9. **INJUSTICE NO. 1:** The 2nd notification from health department was released on 19th July 2017 and I was shocked to know that I was posted in another district, DHQ Hospital Batkhela while another person Dr. Waseem Khan who was previously working in Saidu Medical College as Demonstrator was posted on my place i.e. Nawaz Sharif Kidney Hospital Swat.
10. **INJUSTICE NO. 2:** Ironically, another pathologist, Dr. Muhammad Ali was also posted in DHQ Hospital Batkhela while the post was only one. Anyhow I went to DHQ Hospital Batkhela on 20th July for arrival report and as I was expecting, the Medical Superintendent didn't accept it saying that the post is already occupied. **It was perhaps the worst time in my life as I was making preparation for Hajj at that time but got indulged in this matter.**
11. I rushed to the health department on 20th July to resolve the issue and requested the Secretary Health to place me either in Saidu Group of Teaching Hospitals or Sheikh Zaid Hospital as both the Pathologist posts were still vacant.
12. **INJUSTICE NO. 3:** Mean while I came to know that Dr. Tabassum Imran who was posted in Civil Hospital Matta Swat, has been transferred to Saidu Teaching Hospital Swat as she was not willing to go to Matta for duty. At the same time another female doctor, Dr. Mehwish Naushad who is resident of Nowshehra was Transferred to Civil Hospital Matta Swat. I have grievances at this point that why I was not posted in Saidu Teaching Hospital as I had no post at that time? Why an out district doctor was posted in Swat while the doctor of the same district was still waiting for posting? These two transfers we made in very short time while my case was still pending.
13. After repeated visits and requests, my proposal for the vacant post of Pathologist in Sheikh Zaid Hospital Swat was made as per SOPs of health department and was forwarded to Secretary health office for approval. The proposal was approved by Secretary Health on Friday 4th August 2017.
14. **INJUSTICE NO. 4:** On the same day the notification was done and I was shocked to see that I have been posted in Nawaz Sharif Kidney Hospital while Dr. Waseem Khan was transferred to Sheikh Zaid Hospital Swat.
15. As I have already mentioned that those days I was extremely busy in preparation for Hajj (Obtaining EOL for Hajj and NOC etc.) so it was impossible for me to pursue my case in health department again. Anyhow I conveyed my message to the honorable secretary health through email and official facebook messenger stating that I will resume this case after returning from Hajj.
16. I returned from Hajj and met the Secretary Health in his office regarding the injustice done to me. I provided the proofs of changing his approved proposal regarding my posting in Shaikh Zaid

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hospital and requested him to provide me justice (application attached at pages No. 6, 7 dated: 26th Oct-2017) but nothing was done. Meanwhile the Public Service commission interview for the same post on regular basis was conducted and I was recommended.

17. I got information from public service commission that my merit score is 63/100 which was higher than Dr. Waseem Khan so requested the Health Secretary to post me according to my merit score and also reminded him my grievances about unjustified previous postings (Application attached at Page No. 8, 9, 10 dated: 26th Oct-2017).

18. The official notification from health department was done on 8th Jan, 2018 afternoon and I submitted my arrival report along with verified documents in SO1 office Health Department on 9th Jan, 2018. I again requested in my arrival report (copy attached at page No. 11) to post me according to merit score of public service commission. I also referred to my previous applications in my arrival report.

19. **INJUSTICE NO. 5:** After so many injustices and exertion, I was sure that this time I will be posted according to my merit score (63/100) but ironically I was again posted in Nawaz Sharif Kidney Hospital Swat and the same person Dr. Waseem Khan who is low in merit than me (52/100) was posted in Shaikh Zaid Hospital Swat.

Further I want to say that I have done MCPS in Clinical Pathology which is the standard qualification for the post of Pathologist at district level and my distinction is that I am the only person who could clear this toughest exam in this specialty from CPSP during 2015-16. On the other hand, Dr. Waseem Khan has done M.Phil in Histopathology (a sub-specialty of pathology) which can never be considered as a proper qualification for the post of District specialist Pathology. The other pathologist in Saidu Group of Teaching Hospitals has also done M.Phil in Microbiology. It simply means that the three main hospitals of the district Swat are deprived of proper pathologists.

I hope that the honorable Chief Secretary will consider my appeal and will direct the Health Department to post me on my rightful place according to the public service commission merit score.

Thanking you in anticipation.

Sincerely yours:

Dr. Salimullah *Salimullah*

District Specialist Pathology (BPS-18)
Nawaz Sharif Kidney Hospital, Manglor Swat
CNIC# 15602-3757009-3
Contact# 0345 9523012
Email: salimkth@gmail.com

Date: 09-Feb-18

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Pesh: lhc 31st January 2018

NOTIFICATION

No.SOIL-I/(HD)3-5/2017 Consequent upon their appointment as District Specialists (BS-18) through Public Service Commission Khyber Pnkhtunkhwa on regular basis vide this department Notification of even No dated 8th January 2018, the competent authority is pleased to post the following District Specialist (BS-18) in the hospitals noted against their names with immediate effect.

[Handwritten signature]

S.No.	Name of doctor	Present place of post	Posted at
District Specialist Radiology (BS-18)			
1.	Dr. Ayesha Afridi D/O Raza Khan Afridi	Fresh	DHQH Charsadda
2.	Dr. Samreen Malik D/O Malik Wasil Khan	Distt: Specialist Adhoc King Abdullah Teaching Hospital Manserha	King Abdullah Teaching Hospital Manserha
District Specialist Cardiology (BS-18)			
1.	Dr. Hafiz Muhammad Jamil Gul S/O Ismail	Distt: Specialist Adhoc Police and Services Hosopital Peshawar	Police and Services Hospital Peshawar.
2.	Dr. Javaid ur Rehman S/O Mehmood ul Hassan	Distt: Specialist Adhoc DHQH Charsadda	DHQH Charsadda
3.	Dr. Abdul Salar Khan S/O Mamoor Khan	Distt: Specialist Adhoc AHQH Landi Kotal Khyber Agency	AHQH Landikotal Khyber Agency
District Specialist Pathology (BS-18)			
1.	Dr. Ammar Bini Saad S/O Qazi Saad	Distt: Specialist Adhoc DHQH Haripur	DHQH Haripur
2.	Dr. Tabbassum Imran D/O Hazrat Imran	Distt. Specialist Adhoc SGTH Swat	Saidu Group of Teaching Hospitals Swat
3.	Dr. Maria Kamran D/O Abdul Rashid	Distt Specialist Adhoc DHQH Nowshera	DHQH Nowshera
4.	Dr. Saleemullah S/O Hidayat Ullah	Adhoc Distt: Specialist Nawaz Sharif Kidney Hospital Swat	Nawaz Sharif Kidney Hospital Swat
5.	Dr. Waseem Khan S/O Fazal Ghafoor	Distt: Specialist Adhoc Sheikh Zayed Hospital Swat	Sheikh Zayed Hospital Swat
6.	Dr. Muhammad Ali S/O Wazir Gul	Distt: Specialist Adhoc DHQH Battihela	DHQH Battihela
7.	Dr. Waheed Alam S/O Zahir Ullah	Distt Specialist Adhoc DHQH Charsadda	DHQH Charsadda
8.	Dr. Shahid Hussain S/O Muhammad Farooq	Distt Specialist Adhoc Nawaz Sharif Kidney Hospital Swat	Nawaz Sharif Kidney Hospital Swat.
9.	Dr. Taqvim ul Haq S/O Fazal Subhan	Distt: Specialist Adhoc DHQH Nowshera	DHQH Nowshera.
District Specialist Paeds Surgery (BS-18)			
1.	Dr. Muhammad Javed Khan S/O Inayat Shah	Distt: Specialist Adhoc DHQH Timergara Dir Lower	DHQH Timergara Dir Lower

ATTESTED

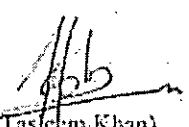
[Handwritten signature]

2. They are directed to join their duties within 30 days failing which their appointments shall be treated as cancelled.


SECRETARY HEALTH

Endst No and date even

- C.C
- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- 2. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3. Chief Executive Saidu Group of Teaching Hospitals Swat.
- 4. Hospital/Medical Director MTIs concerned.
- 5. DHOs concerned.
- 6. Medical Supdt; DHQs/THQs concerned.
- 7. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 8. Distt: Accounts Officer concerned.
- 9. PS to Minister Health, Khyber Pakhtunkhwa
- 10. PS to Secretary Health Department.
- 11. PA to Addl. Secretary Health Department.
- 12. Doctors concerned.
- 13. Personal file of the doctors concerned.


 (Tasleem Khan)
 Section Officer-I

ATTESTED



(This application has already been submitted to the honorable Secretary health by hand in his office on 26th October 2017 and this copy is being submitted in Diary section just for record purpose. **Diary No: 19092**)

To,

**The Secretary Health
Government of Khyber Pakhtunkhwa**

Subject:

- 1. Irregularities in posting orders for the post of District specialists Pathology in July 2017.**
- 2. Request for resolving the issue of posting me against the proposal approved by the honorable Secretary health.**

Respected Sir,

I am really grieved to be writing these lines which point out some irregularities in health department but I have no other soft way for resolving my issue. I have been in contact with you through your official facebook messenger while I was in Saudi Arabia for Hajj. Now I have returned from Hajj so want to bring my problem in your kind consideration again. I have a firm belief that my issue will be resolved without involvement of third party.

I would like to discuss my issue briefly:

1. I am graduate of Khyber Medical College Peshawar (in 2008).
2. I did my MCPS training in Clinical Pathology from Rehman Medical Institute Peshawar.
3. After Training I joined Khyber Medical University as Senior Lecturer Pathology BPS-18 and served there for about three years. (Period: 7th November 2013 to 14th December 2016)
4. I joined Health department as Medical Officer (Adhoc) on 15 December 2016 after resignation from job in was posted in Nawaz Sharif Kidney Hospital Swat.
5. As I was qualified (having degree of MCPS in Clinical Pathology) so I was appointed as acting pathologist in the hospital I was posted.
6. I worked day and night for the development of the hospital and uplifted the laboratory and blood bank services many folds.
7. Meanwhile the posts for district specialist Pathology were advertised by health department in which I was also selected (1st notification on 4th July 2017).
8. I gave my first arrival report in Health secretariat in SO 1 office and was expecting to be posted in Saidu group of teaching hospitals or at least the station I was already working in i.e. Nawaz Sharif Kidney Hospital Swat.
9. The 2nd notification from health department was released on 19th July 2017 and I was shocked to know that I was posted in DHQ Hospital Batkhela while another person Dr. Waseem who was previously working in Saidu Medical College as Lecturer was substituted on my place. Ironically, another pathologist was also posted in DHQ Hospital Batkhela while the post was only one. Anyhow I went to DHQ Hospital Batkhela on 20th July for arrival report and as I was expecting, the Medical Superintendent didn't accept it saying that the post is already filled.
10. I rushed to the health department on 20th July to resolve the issue and I was told that some mistakes have occurred in posting and the problem will be sorted out. I requested to place me either in Saidu Group of Teaching Hospitals or Sheikh Zaid Hospital as both the Pathologist posts were still vacant.

ATTESTED

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- 11. My proposal for the post of Pathologist in Sheikh Zaid Hospital Swat was made as per SOPs of health department and was forwarded to your office for approval on Friday 4th August 2017. The proposal was approved by you at about 1:30 pm on the same day.
- 12. I was really shocked to see the notification thereafter that I have been posted in Nawaz Sharif Kidney Hospital while Dr. Waseem was transferred to Sheikh Zaid Hospital Swat. It is further mentioned that Dr. Waseem has never given arrival in NSKH Swat.
- 13. As I was already exhausted from repeated visits to health department and was also extremely busy in preparation for Hajj (Obtaining EOL for Hajj and NOC etc) so it was impossible for me to pursue my case in health department again. Anyhow I conveyed my message to the honorable secretary health through Facebook messenger stating that I will resume this case after returning from Hajj.
- 14. Now I have returned from Hajj so am putting this case to you with hope to be resolved soon.

As per SOPs of Health department, no posting and transfer particularly of District Specialists, can be done without approval from honorable secretary health so why these rules were violated two times just to benefit one person and victimize the other one both the times? It clearly seems to be involvement of some illegal resources without your kind knowledge. If Dr. Waseem has approached some political figure or have used some other illegal means to do this then I could also have used the same means of higher level than him but never did so and will never do so as snatching someone's right through such means is unethical.

Further I want to say that I have done MCPS in Clinical Pathology which is the standard qualification for the post of Pathologist at district level and my distinction is that I am the only person who could get this degree in this specialty from CPSP in the last two years from the whole Pakistan. On the other hand, Dr. Waseem has done M.Phil in Histopathology (a sub-specialty of pathology) which can never be considered as a proper qualification for this post. The other pathologist in Saidu Group of Teaching Hospitals has also done M.Phil in Microbiology with no practical background. It simply means that the three main hospitals of the district Swat are deprived of proper pathologists and when an attempt was made to post me there in order to improve the diagnostic services there, some illegal forces came seamlessly to sabotage this attempt without even getting you know.

I am an employee of Health department so will interact with all in future including those who have victimized me so don't want to complaint against them. I request that the irregularities in my case may be considered as clerical mistakes and just warning should be issued to those involved.

I hope that my posting order will be made as per approved proposal (copy attached to the original application submitted to honorable Secretary Health on 26th October 2017) and the transfer of Dr. Waseem will be reversed.

Thanking you in anticipation.

Yours Obediently:

Dr. Salimullah *Salimullah*
 S/o Hidayatullah
 District Specialist Pathology (BPS-18)
 Nawaz Sharif Kidney Hospital, Manglor Swat
 CNIC# 15602-3757009-3
 Contact# 0345 9523012

Date: 26-Oct-2017

ATTESTED

cef

(This application was submitted in Diary Section of Health Department on 13th Nov-2017 with Diary No: 19130)

To

**The Secretary Health
Government of Khyber Pakhtunkhwa**

Subject: Appeal for provision of Justice

Respected Sir,

With all regards it is stated that I met your kind self in your office on 26th October 2017 regarding the issue of my posting (as District Specialist Pathology BPS-18) in Nawaz Sharif Kidney Hospital against the proposal approved by you for Sheikh Zaid Hospital Saidu Sharif Swat. I also submitted an application to you by hand stating my issue in detail and you set an inquiry in that.

(A copy has been submitted in diary section today (26-Oct-2017) for record purpose with **Diary no: 19092**)

Now, **I have been recommended by the Public Service Commission** for the same post (District Specialist Pathology BPS-18) and I have submitted my verified documents to SO1. I request to kindly make my posting this time according to the proposal you have already approved or according to the merit score devised by public service commission. As per information I have obtained from PSC, **my merit score is 63/100** while the person for whom I have been victimized two times is having merit score of **52/100**. Further, I have done MCPS in Clinical Pathology which is the standard qualification for the post of pathologist at district level while the pathologist working in SGTH and Sheikh Zaid Hospital Saidu Sharif Swat are having M.Phil (from KMU) which can never be considered as a standard qualification for a clinical post.

Here is a brief comparison of my status vs the status of Pathologist working in Shaikh Zaid Hospital.

	Dr. Salimullah (me, the victim)	The doctor posted in Sheikh Zaid Hospital Swat.	Remarks
1	MCPS (Clinical Pathology)	M.Phil (Histopathology) from KMU. It is to be noted that KMU offers only a piece of paper to the students and no practical skills. I have been there for three years so better know about it. The situation has now improved a bit but the case under discussion is having the old degree.	M.Phil is a theoretical degree having no concern with clinical post so can never be considered as a standard qualification for a clinical post though they can be preferred (and are always preferred) for teaching posts. Further M.Phil is a single specialty degree so what will a person do as a pathologist in other fields.

ATTESTED *leaf*

2	MBBS from Khyber Medical college Peshawar	MBBS from Ayub Medical College Abbottabad	Both are standard colleges yet the merit of KMC is higher.
3	I was already working as acting pathologist before my posting as DS pathology.	He was working as demonstrator in Saidu Medical College Swat.	It is to be noted that he was posted on my place in NSKH Swat while I was kicked out from district Swat to Batkhela. I was again victimized for him when my posting was made against your approved proposal for Sheikh Zaid Hospital Swat.
4	My Merit Score in recent PSC interview is 63/100	His Merit score is 52/100.	Keeping all other facts aside, even if this merit score is being made a base for posting then it would be much easy to decide about whom should be posted where.
5	I am the only candidate having the degree of MCPS in Clinical Pathology in the whole list of candidates in PSC selectees. Further, I am the only candidate from the whole Pakistan who could get this qualification in the last two years.	The doctor concerned and majority of the PSC selectees are having M.Phil from KMU which I have already stated that it has no concern with practical work which is must for a District Pathologist. M.Phil (KMU version) is basically a theoretical degree and meant for teaching purpose only.	If these key posts are handed over to non technical people then how can we bring health reforms?
6	Since my arrival in NSKH, I have assumed the charge of Pathologist and have developed the laboratory and blood bank services there many folds. If I am asked to submit a detailed progress report, I will definitely submit it with actual data.	No development at all. If you kindly ask them for a progress report, they will definitely fail to provide a real one. The agonizing condition of lab. services can be confirmed from any doctor working there.	Shaikh Zaid Hospital and SGTH Swat are the main hospitals in Swat. The development of Laboratory and Blood Bank services over there is the need of time but the condition there is stagnant since long as no sincere Pathologist has been posted there so far and when you issued orders of posting me there, it was changed just to favor someone.
7	By the grace of almighty Allah, I have brought the level of our laboratory	M.Phil "Scholars" (KMU version) even don't know what QC (Quality control)	Running a lab with out QC is like measuring something without

ATTESTED *cel*

<p>and blood bank services to the level of any standard lab across the world in limited resources. I myself run QC material on the machines for most of the tests being done in our laboratory.</p>	<p>is, how it is run and interpreted? I think it is not their fault because they have never been taught this boring subject. If you kindly visit the hospital and make a demand for QC data of just one month, everything will become clear to you.</p>	<p>scale. Every day, thousands of investigations are sent to the outside labs just because the doctors in these three hospitals don't trust the inside labs. By the Grace of Allah our lab has now become a reference lab for doctors. My claim can be verified from any doctor working in NSKH Swat.</p>
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There are so many other technical points which I want to discuss but am scared of lengthening this letter so am avoiding it.

Respected sir: The Shaikh Zaid hospital (Newly constructed Casualty) and SGTH (Central Hospital and Saidu Hospital) Swat are the three main hospitals of Swat which drain the major portion of patients from the whole Swat including patients from far flung areas of Swat like Kalam and Otror. It even deal with patients from District Shangla and Buner too. It is a fact that a hospital depends upon the laboratory services for better diagnosis and hence better management. At present the diagnostic services in these three hospitals are in the hands of two non technical pathologists which I think is not fair with the people of Swat.

It is therefore requested in your honor to kindly consider my plea in the best interest of the people of Swat and I assure you that I will InshaAllah uplift the diagnostic services there like I did in NSKH Swat.

(I am sorry for any errors, omissions or use of inappropriate, unofficial words and request that these may please be overlooked)

Thanking you in anticipation.

Yours Obediently:

Dr. Salimullah *Salimullah*

**District Specialist Pathology (BPS-18)
Nawaz Sharif Kidney Hospital, Swat
CNIC# 15602-3757009-3
Contact# 0345 9523012**

Date: 10th November 2017

ATTESTED

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To,

The Secretary Health
Government of Khyber Pakhtunkhwa

Subject: Arrival report as District Specialist Pathology, BPS-18

Sir,

With all regards it is stated that I have been appointed as **District Specialist Pathology, BPS-18** on regular basis through recommendation by Khyber Pakhtunkhwa Public Service Commission, vide Health Department notification **No: SOH-I/(HD)3-5/2017** Dated: 8th January 2018, **Serial No: 7**. Currently I am working on the same post in Nawaz Sharif Kidney Hospital on adhoc basis and now want to be posted in one of the following hospitals in order of priority, according to the merit score devised by Public Service commission and relevance of qualification to the post:

1. **Sheikh Zaid Hospital Saidu Sharif Swat**
2. **Saidu group of teaching hospitals, Swat**
3. **Nawaz Sharif Kidney hospital, Swat**

It is further stated that I have grievances about my previous postings which were two times made against my apparent right. I had a verbal communication with honorable secretary health regarding my grievances and also submitted two applications (Details given below):

1. One application having confidential attachment was handed over to the honorable secretary health in his office on 26th October 2017. A copy of the same application without confidential attachment was again submitted in diary section with diary no: **19092** Dated: 13th November 2017.
2. Another application with diary no: **19130** Dated: 13th November 2017 was submitted after the Public Service commission recommendation.

I am not submitting the copies of these applications again as the record can be checked from **E-Office**.

These two applications may please be considered in my new posting order.

Thanking you in anticipation.

Date: 9th January, 2018

Dr. Salimullah
S/o Hidayatullah
CNIC# 15602-3757009-3
District Specialist Pathology (Adhoc)
Nawaz Sharif Kidney Hospital Swat
Contac No. 0345 9523012
Email: salimkmc@hotmail.com

ATTESTED

Salimullah
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(44)

BEFORE THE HONORABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA

WAKALAT NAMA

S.A. No. _____-M/2018

Titled

Dr. Salimullah **VERSUS** The Govt of K.P. and others.

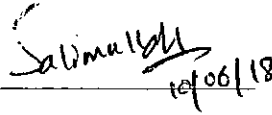
I/We **Dr. Salimullah S/o Hidayatullah R/o Gambar Tehsil Babozai , District Swat.**

do hereby appoint **Sabir Shah Advocate, High Court (s).**

in the above mentioned case, to do all or any of the following acts, deeds and things:-

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

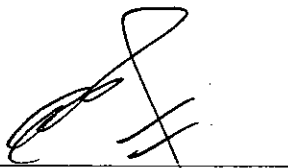
IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this 10/06/2018

Signature of Executant(s). 

Dr. Salimullah

CNIC No. 15102-3757009-3

ATTESTED & ACCEPTED BY:



SABIR SHAH,
Advocate, High Court (s)

S - 8.9, Continental Plaza, Makanbagh, Mingora Swat Ph: 0946-725180

"A"

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

Form A&B Ser. Tribunal

No.

APPEAL No. 796 of 20 12

Dv. Salimullah

Appellant/Petitioner

Versus

Chief Sarg. KP/14 Pesh.

RESPONDENT(S)

✓
Notice to Appellant/Petitioner

*Dv. Salimullah S/o Hidayat
R/o Qambar Tehsil Babuzai
Distt. Swat Presently Posted at
Nawaz Sharif Kidney Hospital Distt. Swat*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 8-2-2019 at 8:00AM

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

at camp court Swat

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

"A"

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

713

No.

APPEAL No..... 796 of 20 18

Dr. Salimullah

Appellant/Petitioner

Versus

Chief Secy: KPSC Pesh.

RESPONDENT(S)

Counsel

Notice to Appellant/Petitioner

Sahar Shahi
Advocate High Court
Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 8-2-2019 at 8:00 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

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

بعدالت سروس ٹریبیونل خیر بخندخواہ مکمل کرہ کوات

قیمت ایک روپیہ	کورٹ فیس
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مورخہ 8/2/2019 ۲۰۱۹ منجانب ایبلانٹ

مقدمہ ذالتر سلیم اللہ بنام جینے سیلر ٹری خیر بخندخواہ وغیرہ

دعوئی سروس اپیل جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی وجواب دہی و کل کاروائی متعلقہ آن مقام سروس ٹریبیونل مکمل کرہ کبلدے منجانب اس ایسٹریٹس ایڈوکیٹس

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب

دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و

نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔

اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے

سب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل

صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

المرقوم 8 ماہ فروری ۲۰۱۹

العبد گواہ شدہ العبد
بمقام سروس ٹریبیونل مکمل کرہ کوات

Accepted
کے لئے منظور ہے
Attested

سید

DR. SAMULAH

"B"

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

No.

TB

Appeal No..... 776 of 20 18

..... Sidra ul Haq Appellant/Petitioner

Versus

..... Chief Secy. KPLA Pesh. Respondent
Respondent No..... 3

Notice to: —

Was Secy. KPLA, Presently Posted
at Sheikh Zaid Hospital Swat

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... 3rd day of March at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 13/4

Day of..... March 20 19

at Camp Court Swat

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

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

“B”

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

TB

No.

796

Appeal No..... of 20 18

Sahimullah.....Appellant/Petitioner

Versus

Chief Secy. K.P.K. Pesh......Respondent

Respondent No.....

Chief Secy. Govt. of K.P.K. Peshawar

• Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....3-4-2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

- Given under my hand and the seal of this Court, at Peshawar this.....^{13/4}.....

Day of.....March.....20 19

at Camp Court Surat

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

“B”

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

TB

No.

Appeal No. 796 of 2018

Salimullah Appellant/Petitioner

Versus

Chief Secy. H. Pk. P. Sh. Respondent

Respondent No. 2

Notice to: —

Secy. Health Dept. of Khyber Pakhtun
Khwa Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 3/4/18 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 13/1/18

Day of March 20 18

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No. 791 of 20

S. Ali Muhammad, Health Deptt. Peshawar
Appellant/Petitioner

Versus

Chief Secy. Govt. of K.P.K. Peshawar
Respondent

Respondent No. 1

Chief Secy. Govt. of K.P.K. Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 10-6-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 10/6/19

Day of April 20 19

at Camp Court Swat

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

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

“B”

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

No.

TB

Appeal No.....796..... of 20 18

.....Sabirullah.....Appellant/Petitioner

Versus

.....Chief Supt. to Pk Peshawar.....Respondent

Respondent No.....2.....

Notice to: —

Supt. Health Sect. of Pk Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....10.....6.....20.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Given under my hand and the seal of this Court, at Peshawar this.....10/6.....

Day of.....April.....20 18

at Camp Court Buzat

[Handwritten signature]

[Handwritten signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

113

No.

Appeal No. 796 of 20 18

Sabirullah

Appellant/Petitioner

Versus

Chief Secy: K P S Peshawar

Respondent

Respondent No. Representative of

Amjad Ali, Assistant Officer of the

Notice to: —

DG, Health K P S Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 1-7-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Given under my hand and the seal of this Court, at Peshawar this 17/6.....

Day of June 20 19

of Comp Court Sweet

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

7B

Appeal No. 796 of 20 8.

Salimullah Appellant/Petitioner

Versus

Chief Secy: Health Dept: Pesh Respondent
Respondent No. 2

Notice to: —

Secy: Health Dept: Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 1-7-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 17/6.....

Day of June 20 19



at Camp Court Swat

[Handwritten signature]

[Handwritten signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

بار کونسل نمبر: bc-102323	سیریل نمبر: 52198
بار ایسوسی ایشن نمبر:	
رابطہ نمبر: 03339452775	
 	
ڈسٹرکٹ بار ایسوسی ایشن سوات	

بعدالت جناب: سرورسٹر جنرل کیمپ ڈاکٹر اور اسٹوڈنٹ

منجانب: سرورسٹر جنرل کیمپ ڈاکٹر اور اسٹوڈنٹ	دعویٰ اور خواست: کوئی اسٹوڈنٹ
ڈاکٹر سلیم اللہ بنام حکومت سوات	علت نمبر: 796/2017 (2)
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام کیمپ ڈاکٹر اور اسٹوڈنٹ کیلئے رول نمبر 796/2017 کو مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کاروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ، اور درخواست برائے سرسبزگی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کاروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی - مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،

لہذا کالت نامہ لکھ دیا کہ سندر ہے

Dr. Waqar Khan

مقام کیمپ ڈاکٹر اور اسٹوڈنٹ کے لئے منظور ہے۔

ایڈوکیٹ دستخط:

المرقوم: 01/07/2017

دفتر رول نمبر 796/2017

"B"

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

No.

Appeal No..... of 20

796

18

T/B

Appellant/Petitioner

Sakimullah

Versus

Chief Secy

16/11/18

Respondent

Respondent No.....

2

Notice to: -

Secy, Health Deptt of Khyber Pakhtunkhwa

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

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

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

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

..... of.....20

10/17 July

19

Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

7B

Appeal No.....776..... of 20 18

.....Sarwar Shah.....Appellant/Petitioner

Versus

.....Chief Secy. Govt. P. Sta......Respondent

Representative for P. Sta. No. 2
Respondent No.....

Notice to: —

Amjad Ali Assistant Through Secy
Health Dept. of KPK Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....3-7-18.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

9/11

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

Day of.....July.....20 19

at Camp Court Secret

12/17

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TB

Appeal No. of 20

796 18

..... Appellant/Petitioner
Saleemullah

Versus

..... Respondent
Chief Secy, KPK Pesh

Respondent No. Representative

Notice to: -

*Amjad Ali Assistant through Secy,
Health Govt. of KPK Peshawar*

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

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

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

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

Day of.....20

Sep 19

at Camp Court Secret

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

713

Appeal No..... of 20

796

18

..... Appellant/Petitioner

Saleemullah
Versus

..... Respondent

Chief Secy. P.P.S. Pesh.

Respondent No.....

2

Notice to: -

Secy. Health Govt. of K.P.K.P.

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

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

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

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

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

Day of.....20

Sep

19

11/14

at Camp Court Swat

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

513

Appeal No. 796 of 20 18

Sabirullah Appellant/Petitioner

Versus

Chief Secy. to P.S. Respondent

Respondent No. 7

Notice to:

Chief Secy. Court of P.S.
Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 7-10-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 11th.....

Day of Sep.....20 19

at Camp Court Secret

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

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

**BEFORE THE KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL AT MINGORA**

In Re;

Service appeal .No. 796 /2018

*Dr. Salimullah vs Chief Secretary The Govt. of Khyber
Pukhtunkhwa & others*

COMMENTS / REPLY ON BEHALF OF RESPONDENT NO.3

Respectfully Sheweth:

*Comments / Reply on behalf of respondent No. 3 are being
submitted as under:-*

PRELIMINARY OBJECTION:

- 1) Petitioner has no locus standi to file the instant appeal.*
- 2) Petitioner is not entitled to any relief through instant appeal.*
- 3) Petitioner has concealed and twisted material facts from this august Court, therefore, on this sole ground the appeal is liable to be dismissed in limini.*
- 4) That, the appeal is also liable to be dismissed in limini for mis-joinder and non-joinder of necessary party.*
- 5) That, the dispute between the contesting parties needs pro and contra evidence which cannot be settled in instant appeal.*

- 6) Because the appellant has got no *locus standi* or cause of action against the answering Respondent.
- 7) That with utmost respect and veneration to this Honorable Court, this Honorable Court has got no jurisdiction, to entertain the matter in hand.

ON FACTS:

- 1) *Para No.1 of the appeal does not relate to the answering respondent.*
- 2) *Para No.2 of the appeal does not require any answer being irrelevant.*
- 3) *Para No.3 of the appeal does not require any answer being irrelevant.*
- 4) *Para No.4 of the appeal as drafted needs no comments.*
- 5) *Para No.5 of the appeal is in correct hence denied, basically the need of merit list is for interview and qualification and not for posting, transfer. The respondent No.2 is the authority to post or transferred any officer, being illegible candidate, the answering respondent requested through an application to respondent No.2 for transferring the answering respondent from Nawaz Sherif Kidney Hospital to Sheikh Zaid Hospital Saidu Sharif Swat against the vacant post consultant pathologist and respondent No.2 honored the request / application filed by the answering respondent.*

- 6) *Para No.6 of the appeal is also not relevant with answering respondent hence denied.*
- 7) *Para No.7 of the appeal is also not relevant with answering respondent, therefore, does not need to be replied.*
- 8) *Para No.8 of the appeal is incorrect, hence denied.*
- 9) *Para No.9 of the appeal is also not relevant with answering respondent, therefore, does not need to be replied.*
- 10) *Para No.10 of the appeal is also not relevant with answering respondent, therefore, does not need to be replied.*

GROUNDS:-

- a) *Ground "a" of the appeal is incorrect, hence denied.*
- b) *Ground "B" of the appeal is incorrect, hence denied.*
- c) *Ground "C" of the appeal is incorrect, hence denied.*
- d) *Ground "D" of the appeal is incorrect, hence denied.*

It is therefore, humbly prayed that the appeal may please be dismissed with cost throughout.

Respondent No. 3 through counsel



Iftikhar Ahmed (Senior)
Advocate, High Court

BEFORE THE KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL AT MINGORA

In Re;

Service appeal .No. 796 /2018

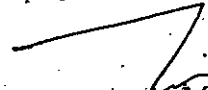
*Dr. Salimullah vs Chief Secretary The Govt. of Khyber
Pukhtunkhwa & others*

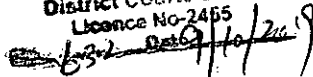
AFFIDAVIT

*I, Dr. Waseem Khan, do hereby state on oath that the contents
of comments are true and correct as per information provided by my
client and nothing has been concealed therein intentionally.*


Dr. Waseem Khan

ATTESTED


Tariq Aziz Advocate
OATH COMMISSIONER
District Courts Swat
Licence No-2465


6/3/2018

"B"

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

TB

No.

796
 Appeal No. Salomullah of 20 18
 Appellant/Petitioner

Chief Secy. KPK Pesh
 Versus Respondent

Respondent No. 2
Secy. Health, Govt. of KPK Peshawar

Notice to: —

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

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

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

Given under my hand and the seal of this Court, at Peshawar this.....
 Day of.....Oct.....20 19

at Camp Court Swat

[Signature]

[Signature]

Registrar,
 Khyber Pakhtunkhwa Service Tribunal
 Peshawar.

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

"A"

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

TB

No.

APPEAL No. 796 of 20 18

Saleemullah

Appellant/Petitioner

Versus

Chief Secy: 14 PK Pesh:

RESPONDENT(S)

Representative

Amjed Khan Assistant

Notice to Appellant/Petitioner

through Secy: Health 14 PK Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 0-1-2020 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 Buzat

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

Appeal No. 796 of 20 18
Salimullah Appellant/Petitioner

Chief Secy. to Pk Pesh. Respondent

Respondent No. 2
Secy. Health Govt. of Pk Pesh.

Notice to: —

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

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... 10/14

Given under my hand and the seal of this Court, at Peshawar this.....
Day of.....20 19

at Camp Court Swat

[Handwritten signature]

[Handwritten signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

T13

Appeal No. 796 of 20 18

Dr. Salimullah Appellant/Petitioner

Versus

Chief Secy: 14 P.K. Pesh. Respondent

The Chief Secy: 14 P.K. Pesh. Respondent No. 127

Notice to:

Direction to direct the representative to attend the court

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

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

15/12

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

Day of.....Jan.....20

at Camp Court Suwat

By the way last chance Notice

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TB

Appeal No..... 796 of 20 18

..... *Dr. Salimullah* Appellant/Petitioner
Versus

..... *The Chief Secy. KP&K Pesh* Respondent
Respondent No..... 2

Notice to:

Secy: Health Govt: of KP&K Peshawar
Direction to direct the representative to attend

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

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

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

Day of..... 20

Jan:

20

15/14

at Camp Court Swat

By the way last chance notice

Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

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

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 419-20/ST Dated 14-02 2020


To

1. The Accounts Officer (Pension) Accountant General,
Government of Khyber Pakhtunkhwa,
Peshawar.
2. Sher Baz Section Officer Office of the Secretary Health Department,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - ORDER IN APPEAL NO. 796/2018, DR. SALIM ULLAH.

I am directed to forward herewith a certified copy of order dated 04.02.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 796/2018

Dr. Salimullah, District Specialist Pathology, Nawaz Sharif Kidney Hospital Swat

Appellant

VERSUS

1. Chief Secretary, Khyber Pakhtunkhwa
2. Secretary Health Department, Khyber Pakhtunkhwa and others

Respondents

Respectfully Sheweth:

Preliminary Objections

- i. That the appellant has got no cause of action to file the appeal in hand.
- ii. That the appellant has not come to this Hon'ble Tribunal with clean hands.
- iii. That the appellant estopped by his conduct from filing the instant appeal.
- iv. That the appeal is bad for miss-joinder and non-joinder of parties.
- v. That the appellant has got no cause of action.
- vi. That the appellant being a Civil Servant liable to serve anywhere in the province in the interest of the public and has no vested right to remain at a certain posts.

Facts

1. Pertains to record.
2. Pertains to record.
3. Correct; however, experience certificate to the doctor concerned as Assistant Professor of Pathology (BS-18) was issued by Khyber Medical University, Peshawar.
4. Pertains to record.
5. Incorrect. Basically, merit list is for seniority purposes. The posting/transfer proposal of all the recommendee doctors was approved by the Competent Authority and they were accordingly posted against their cadre vacant posts including Dr. Salimullah, at Nawaz Sharif Kidney Hospital Swat, being local resident of the said area.
6. Correct. However, the Competent Authority regretted his appeal.

7. Correct. The impugned notification was issued with the approval of the competent authority in the interest of the public after considering all the pros and cons.
8. Incorrect. As explained at Para 05 above.
- 9-10 Incorrect. In terms of section 10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, "Every Civil Servant shall be liable to serve anywhere within or outside the Province in any post under the Federal government, or any Provincial Government or local authority, or a corporation or body set up or established by any such Government" hence the appellant has no legal right to raise a grievance against his posting done in light of prevailing rules and with the approval of competent authority.

Grounds

- a-c The posting notification of the doctor concerned has been issued strictly in accordance with Section 10 of Khyber Pakhtunkhwa Civil Servants Act 1973. A Civil Servant is not entitled to claim posting at a certain post for a period of his choice.
- d. The respondents also request permission to raise additional grounds at the time of arguments

It is, therefore, mostly humbly prayed that the appeal filed by the doctor concerned may be dismissed with cost.


Secretary Health
Khyber Pakhtunkhwa Peshawar
for Respondent No (1 & 2)