


7th September, 2022


None for the appellant present. Mr. Kabirullah Khattak,

Addl: AG for respondents present.

This case was admitted to full hearing on 01.07.2021 by my learned predecessor directing the appellant to deposit the security and process fee within 10 days but since then till date neither appellant turned up nor security fee has been deposited as per order of the court. Dismissed in default. Consign.

2. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 7th day of September, 2022.*


(Farzeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

22.11.2021

Proper D.B is not available, therefore, case is
adjourned to 7.2.2022 for the same.



READER

7-02-2022 Due to retirement of
The Hon'ble Chairman the case
is adjourned to come up for
the same as before on 07-09-2022



Reader.

4936/2020

01.07.2021 Junior to counsel for the appellant present.
Preliminary arguments heard.

The appellant had approached the Hon'ble Peshawar High Court Peshawar through Writ Petition No. 5521-P/2019 and when the said Writ Petition came up for hearing before the said court, it was diverted to this Tribunal vide order dated 04.06.2021. In compliance with the said order, the Deputy Registrar (Judicial) of the Peshawar High Court Peshawar sent the file of the Writ Petition here vide his office letter No. 11006/Judicial dated 30.04.2020; and accordingly, the same was registered as Service Appeal No. 4936/2020. The appellant is required to file proper memorandum of appeal before the next date. However, the Writ Petition already treated as service appeal is admitted for regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 22.11.2021 before the D.B.


Chairman

11.08.2020

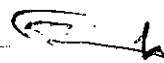
Nemo for the appellant.

Notice be issued to appellant/counsel for 19.10.2020
before S.B.


Chairman

19.10.2020


The legal fraternity is observing strike today, therefore, the
case is adjourned to 23.12.2020 on which date to come up for
preliminary hearing before S.B.


(Muhammad Jamal Khan)
Member (Judicial)

23.12.2020

Nemo for appellant.

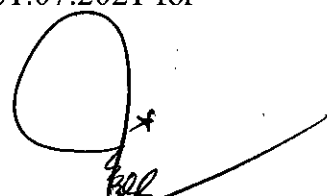
Notice be issued to appellant/counsel for 18.03.2021 for
preliminary hearing, before S.B.


(Rozina Rehman)
Member (J)

18.03.2021

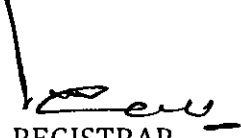
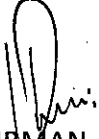

Nemo for appellant.

Notice be issued to appellant/counsel for 01.07.2021 for
preliminary hearing, before S.B.


(Mian Muhammad)
Member (E)

Form-A
FORM OF ORDER SHEET

Court of _____
Case No. 4936 /2020 _____

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	02/06/2020	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court Peshawar and the Hon'ble High Court vide its order dated 22.04.2020 treated the Writ Petition into an appeal and sent the same to this Tribunal for decision in accordance with law. The same may be entered in the Institution Register and put up to the worthy Chairman for further order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/06/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>09.06.2020</p> <p>Nemo for the appellant.</p> <p>Notices be issued to appellant/learned counsel for the next date of hearing.</p> <p>Adjourned to 11.08.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

*Noted for
11/8/2020
M.B.*

**THE
PESHAWAR HIGH COURT
PESHAWAR**



Ph: No. 091-9210149-158
Ext: No. 364

No. 11006 /Judl:
Dated Peshawar the 30/04/2020

From

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

To

✓ The Khyber Pakhtunkhwa,
Service Tribunal, Peshawar.

Subject

Writ Petition No. 5521-P of 2019.
Muhammad Shafiq...Versus.... Government of KPK etc.

AND.

Writ Petition No. 5522-P of 2019.
Shah Alam Khan...Versus.... Government of KPK etc.

Memo:

I am directed to send herewith the *titled cases Original files* alongwith all *annexures & copies of Judgments* dated 22.04.2019, passed by a *Hon'ble Division Bench* of this Court, for compliance.

DEPUTY REGISTRAR (J)

Encl:

As above.

(10)

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order or Proceedings	3
1	2
22.04.2020	<p><u>WP No.5521-P/2019.</u></p> <p>Present: Mr. Shahid Qayum Khattak, Advocate, for petitioner.</p> <p>Mr. Arshad Ahmad, AAG for respondents.</p> <p style="text-align: center;">*****</p> <p><u>IKRAMULLAH KHAN, J.-</u> Through the instant writ petition, petitioner has prayed for the following relief:</p> <p style="text-align: center;"><i>“It is, therefore, most humbly prayed that by accepting this writ petition:</i></p> <p><i>A. Respondents being responsible office bearer are duty bound to obey the command of law and Directions may please be issued to the concerned respondent to release the monthly salary of petitioner forthwith.</i></p> <p><i>B. Direct respondents to act in the matter in accordance to law and petitioner being legally appointed as Clinical Technician Dental is entitled for his monthly emoluments past, present and future.</i></p> <p><i>C. Strict action may please be taken against the concerned respondent for violation of rules and regulations on the behest of others.”</i></p> <p>2: As the relief asked for by the petitioner squarely falls within the terms and conditions of civil service of the petitioner and this Court is barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 to entertain such like petition. Therefore, this petition is converted into appeal and be sent to the</p>

Khyber Pakhtunkhwa Service Tribunal for disposal. However,
copies of the same be kept on record.

Announced:
22.04.2020.


JUDGE


JUDGE

VAKALATNAMA

IN THE PESHAWAR HIGH COURT PESHAWAR

W.P.No 5521/2019 ~~2020~~

M. Shafia

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS


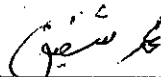
GOVT: OF KP & OTHERS

(RESPONDENT)
(DEFENDANT)

I/We M. Shafia

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

Dated. 18 / 2 / 2020

CLIENT

FILED TODAY
Deputy Registrar
18 MAR 2020

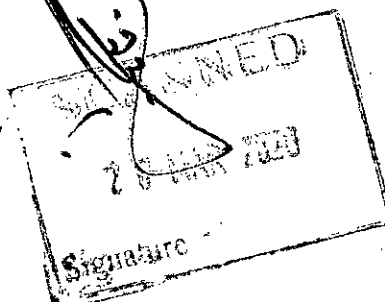
ACCEPTED
NOOR MOHAMMAD KHATTAK
CNIC NO. 15401-0705985-5
(BC-08-0853)


KAMRAN KHAN

&

SHAHZULLAH YOUSAFZAI
ADVOCATES

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



URGENT FORM

IN THE PESHAWAR HIGH COURT, PESHAWAR

TITLE

S - Appeal No 4936/20

Writ Petition No. _____/2019

Muhammad Shafiq..... Petitioner

Versus

Government of Khyber Pakhtunkhwa & others Respondents

1. Will you kindly treat the accompanying writ petition as urgent and in accordance with the provisions of Rules 9, Chapter 3-A, Rules orders of the High Court
2. The Grounds of urgency are:

That Petitioner has been legally appointed on 25/06/2019 but respondents are not paying monthly salary to petitioner and it is very difficult for petitioner for his and his family livelihood. As the matter is an urgent nature may please be fixed on priority basis.

Petitioner

Through



Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

Dated: 16 /10/2019

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.

CHECK LIST

1.	Case TitleVERSUS.....	
2.	Case is duly signed.	Yes	No
3.	The law under which the case is preferred has been mentioned.	Yes	No
4.	Approved file cover is used.	Yes	No
5.	Affidavit is duly attested and appended.	Yes	No
6.	Case and annexures are properly paged and numbered according to index.	Yes	No
7.	Copies of annexures are legible and attested. If not, then better copies duly attested have annexed.	Yes	No
8.	Certified copies of all requisite documents have been filed.	Yes	No
9.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	Yes	No
10.	Case is within time.	Yes	No
11.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	Yes	No
12.	Court fee in shape of stamp paper is affixed. [For writ Rs. 500, for other as required]	Yes	No
13.	Power of attorney is in proper form.	Yes	No
14.	Memo of addressed filed.	Yes	No
15.	List of books mentioned in the petition.	Yes	No
16.	The requisite number of spare copies attached [Writ petition-3, civil appeal (SB-2) Civil Revision (SB-1, DB-2)]	Yes	No
17.	Case (Revision/ Appeal/petition etc) is filed on a prescribed form.	Yes	No
18.	Power of attorney is attested by jail authority (for jail prisoner only)	Yes	No

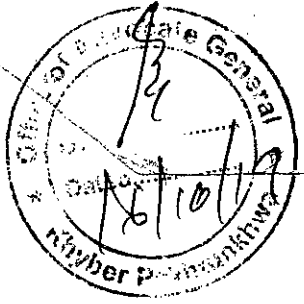
I/We certify that formalities/documentations as required in column 2 to 18 above, have been fulfilled.

Name:- Shahid Sajid Khattak
 Signature:- [Signature]
 Dated:- 16/10/2018

FOR OFFICE USE ONLY

Case:- _____
 Case received on _____
 Complete in all respect: Yes/ No, (If No, the grounds) _____
 Date in court:- _____

Signature _____
 (Reader)
 Date:- _____
 Countersigned:- _____
 (Deputy Registrar)



BEFORE THE PESHAWAR HIGH COURT
PESHAWAR

Writ Petition No. ⁵⁵²¹⁻ -P/2019

Muhammad Shafiq..... Petitioner

Versus

Government of Khyber Pakhtunkhwa & others Respondents

INDEX

S.No.	Description of Documents	Annexure	Pages
1.	Memo of appeal with Affidavit		1-5
2.	Address of the parties		6
3.	Copy of Advertisement	A	7
4.	Copy of qualification documents	B	8-15
5.	Copy of Minutes of DSC Meeting	C	16
6.	Copy of appointment Order	D	17
7.	Other documents		18-20
8.	Court Fee		21-22
9.	Wakalat Nama		23

31
Scanned USB Received
16 OCT 2019
Through
Signature

Dated: 16/10/2019

Petitioner

Shahid Qayum Khattak
Advocate, Supreme Court

OFF: 105-A Town Tower, University Road,
Jahingir Abad, Peshawar

FILED TODAY
Deputy Registrar
16 OCT 2019

Cell No. 0333-9195776

IN THE PESHAWAR HIGH COURT, PESHAWAR
OPENING SHEET FOR WRIT BRANCH

Date of filing: _____

District: _____

Case Type: Writ Petition Nature of Original Proceeding:

Category Code

5 0 7 1 7

(Categories and subcategories are given at the back of the Opening Sheet)

Review / Contempt of Court in respect of:

Writ of:

<input type="checkbox"/> Heabas Corpus	<input type="checkbox"/> Prohibition	<input checked="" type="checkbox"/> Mandamus	<input type="checkbox"/> Quo Warranto	<input type="checkbox"/> Certiorari
--	--------------------------------------	--	---------------------------------------	-------------------------------------

If Certiorari

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

Case pertains to

SB
 DB

Petitioner name	Muhammad Shafiq S/o Zalib Gul
Mobile No.	
Address	R/o Village Sara Chapar P.O Zargari Tall District Hangu
CNIC No.	14101-1059946-5
Email Address	

Counsel for Petit (s)	Shahid Qayum Khattak, Advocate Supreme Court of Pakistan
Mobile No.	0333-9195776
Address	105-A Town Tower, Jahangir Abad, Peshawar
CNIC No.	14202-1309333-3
Email Address	shahidshahlaw@yahoo.com

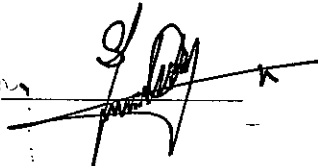
Respondents and Address	As per Address of the Parties.
-------------------------	--------------------------------

Original Order/ Action/ Inaction Complained of:
Respondent has denied payment of salary to petitioner

Prayer
It is therefore, most humbly prayed that on acceptance of this Writ Petition, this Hon'ble Court may graciously directed respondent to release monthly salary to petitioner etc

Law/ Rules/ governing the original proceedings/ actions/ Inaction
1. Constitution of Islamic Republic of Pakistan.
2. Service Rules

Signature



FILED TODAY

Deputy Registrar

16 OCT 2019

①

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 5521- -P/2019

Muhammad Shafiq S/o Zalib Gul R/o Village Sara Chapar
P.O Zargari Tall District Hangu Petitioner

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar
2. Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.
3. Medical Superintendent, Shaheed Farid Khan DHQ, Hospital Hangu
4. District Account Officer Hangu.
5. Account Officer, Shaheed Farid Khan DHQ, Hospital Hangu
..... Respondents

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

Respectfully Sheweth,

The petitioner humbly submits as under:-

1. That respondent No. 3 advertised several post of Technicians and Class-IV in "DAILY MUSHRIQ PESHAWAR" on 07/05/2019 for appointment in Shaheed Farid Khan DHQ, Hospital Hangu.
(Copy of advertisement is attached as Annexure "A")
2. That petitioner being fully qualified for the post of Clinical Technician Dental mentioned BPS-12 at serial No. 2 applied for the same post. (Copy of Documents are attached as Annexure "B")
3. That District Selection Committee was constituted and DSC meeting held on 27/05/2019 and completed the process of selection in accordance to law and being successful candidate petitioner has been issued his appointment order vide letter No. 1179-83/MS(H)/ Appointment Dated 25/06/2019. (Copy of the Minutes of DSC meeting and appointment order are attached as annexure "C" & "D")

FILED TODAY

Deputy Registrar

16 OCT 2019

(2)

4. That petitioner join his duty in accordance to law and is continuously performing his duties to the entire satisfaction of his superior and no opportunity of complaint whatsoever has been provide till date but respondents are not processing the monthly salaries of petitioner after the laps of sufficient time which is totally illegal, against the law and accordingly petitioner approaches all the concerned for release of his salaries but of no avail.
5. That now petitioner left with no other alternate or efficacious remedy, hence, challenges the action, an-action, unlawful exercise of power and authority and violation of Constitution of Islamic Republic of Pakistan before this Hon'ble Court on the following amongst other ground.

GROUND:

- a. That non releasing of monthly salary of petitioner is illegal, without lawful authority.
- b. That petitioner has been legally appointed after complying all the codal formalities but still after laps of almost 4 months petitioner has not been paid his due salary which is totally against the law and rules.
- c. That once petitioner has been appointed after due process of law then respondents can not denied to him his monthly salary as the same amount to force labor.
- d. That withholding of monthly salary of an employee is against the rules and regulation equally un-Islamic. The superior Court of the Country in its various judgment categorically stated that monthly salary of an employee can not be withheld as punishment.
- e. That otherwise to principle of locus poenitentiae is very much clear and vest rights accrued to petitioner after his appointment and he is fully entitled to receive his monthly salary.

FILED TODAY

Deputy Registrar

16 OCT 2019

(3)

- f. That as per Constitution of Pakistan all the citizen of Pakistan are equal before the law and equal protection of law is available to all the citizen of the state and being a citizen of Pakistan petitioner is entitled to be treated in accordance with law.
- g. That the action of not releasing salary to petitioner is political motivated and just to please them refuses to release the monthly salary of the not only of petitioner but of the whole lot appointed after due process of law.
- h. That it is the constant view of the superior judiciary that political interference in public office must be restrained.
- i. That strict action is required to be taken against concerned respondent who are not releasing the salary of petitioner on the whim and wishes of others.
- j. That Petitioner also seeks permission of this Hon'ble Court to raise additional points at the time of arguments.

It is, therefore, most humbly prayed that by accepting this Writ Petition,

- A) Respondent being responsible office bearer are duty bound to obey the command of law and Directions may please be issued to the concerned respondent to release the monthly salary of petitioner forthwith.
- B) Direct respondents to act in the matter in accordance to law and petitioner being legally appointed as Clinical Technician Dental is entitled for his monthly emoluments past, present and future.
- C) Strict Action may please be taken against the concerned respondent for violation of rules and regulation on the behest of others.

FILED TODAY

Deputy Registrar

16 OCT 2019

Any other relief which has not been specifically prayed for but deem appropriate in the circumstances of the case may also be granted


(9)

INTERIM RELIEF

It is also prayed that this Honorable Court, during the pendency of the titled writ petition, to safe guard the rights of petitioner, the respondents may kindly be directed to release monthly salary for the current month and onward, till the final disposal of instant petition.

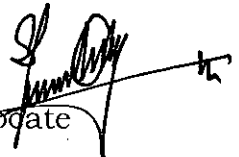

Appellant / Petitioner

Through


Shahid Qayum Khattak
Advocate, Supreme Court

Dated: /10/2019

Certified that as per instruction of my client no such Petition has been filed before this Hon'ble Court.


Advocate

FILED TODAY
Deputy Registrar
16 OCT 2019

5

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 521- -P/2019

Muhammad Shafiq..... Petitioner

Versus

Government of Khyber Pakhtunkhwa & others Respondents

AFFIDAVIT

I, Muhammad Shafiq S/o Zalib Gul R/o Village Sara Chapar P.O Zargari Tall District Hangu, do hereby solemnly affirm and declare on Oath that the contents of the accompanying Writ Petition are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Court.

[Signature]
Deponent

Identified by

NIC No. 14101-1059946-5

Mob No. 0330-2345112

[Signature]
Shahid Qayum Khattak
Advocate

No. 10633

Certified that the above was verified on solemnly affirmation before me in office, this 16 day of Oct 2019 by M. Shafiq s/o Zalib Gul Hangu who was identified by Shahid Qayum who is personally known to me:

[Signature]
Oath Commissioner
Peshawar High Court, Peshawar.

Nadra verified

FILED TODAY
Deputy Registrar
16 OCT 2019

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: Muhammad Shafiq

Father's / Husband's Name: Zafib Gul

Gender: M Country of Issue: Pakistan

Identity Number: 14101-1059946-5 Date of Birth: 03.01.1997

Date of Issue: 04.02.2019 Date of Expiry: 04.02.2029

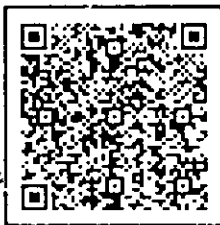
59679

219107748301766

Holder's Signature

14101-1059946-5

قوم علی خیل تپہ میرداس
خیل، ذاک خانہ، علی، تحصیل
ضلع اورنگزیب
سرحد چیمبرن، ذاک خانہ زرگری، علی
ضلع پٹیو



101181122538

عثمان یوسف مبین
Registrar General of Pakistan

کشیورہ کارڈ ملے پر قریبی لیز کیس ڈال دیں

219107748301766

Census 1998 Database [x]

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

Other Information that does not appear on card [x]

Place of Birth بنگو بنگو

Religion Islam

(6)

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. -P/2019

Muhammad Shafiq..... Petitioner

Versus

Government of Khyber Pakhtunkhwa & others Respondents

ADDRESS OF THE PARTIES

APPELLANT

Muhammad Shafiq S/o Zalib Gul
R/o Village Sara Chapar P.O Zargari Tall District Hangu

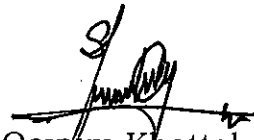
RESPONDENTS

1. Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar
2. Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.
3. Medical Superintendent, Shaheed Farid Khan DHQ, Hospital Hangu
4. District Account Officer Hangu.
5. Account Officer, Shaheed Farid Khan DHQ, Hospital Hangu

Petitioner

Through

Dated: /10/2019


Shahid Qayum Khattak
Advocate Supreme Court
of Pakistan

FILED TODAY
Deputy Registrar
16 OCT 2019

Annexure - B



DOMICILE



Numberdar
NASRULLAH JAN
Shanawari (Naryab)

I declare that I am born of parents who are
Permanently domiciled in N.W.F.P and having been born in this province

Mr. / Miss. / Mrs. MUHAMMAD SHAFIQ S/O, D/O, W/O. ZAHIB COME

Was born at Distt. HANGU Tehsil. Thal

Village / Mohallah SARA CHAPARI

Date 15.6.2010 Sign / Thumb Imp: M. Syed Jee

In the pursuance to the above declaration Dated 15.6.2010 filed by MUHAMMAD SHAFIQ

I have been satisfied through verification Over-Leaf that the said is born of parents who are permanent residents of

Distt: HANGU Tehsil Thal N.W.F.P and having been born within it.

~~It is hereby certified accordingly that the above Declaration is true~~

Deputy
District Officer
Revenues & Estate

Day 15/6 Month June Year 2010 No. 32109 Date 15/6/2010

Countersigned
District Officer
Revenues & Estate

Accepted

8

تصدیق نامہ

جناب عالی! شہر/ضلع
 تقدیر کی جاتی ہے کہ کسی / صحتہ ولد / خزانہ
 ساکن محلہ / گاؤں / پنجر تحصیل
 جسے منقر تو اہل سرہ جھسی
 کا لکھ پیرا آئی اور مستقل رہائی باشندگان ہیں۔ اور میں ذاتی طور پر جانتا ہوں کہ اس کے والدین / بھائی / بہن کے پیرا آئی باشندگان ہیں اور یہ لکھے شہرتی ہیں

تقدیر کنندہ کا نام خان زمان مس ہمدہ / حیثیت

دستخط ہمدہ اور تاریخ

صاحب لکھ پیرا خان متناظر اور صاحب

خان زمان

Maulak Khan Zaman,
Village: Shanawari

Teh: Hangu Distt: Kohat

جناب عالی!

Numbar (a)
NASRULLAH /
Shanawari (N)
14101-0805297

حسب تقدیر از پنجان زمان صحتہ تحصیل محل
 رپورٹ عرض ہے کہ کسی / صحتہ محلہ / صحتہ
 محمد شفیع ولد ذالاب بیکو والدین متناظر اور صاحب کا / کی پیرا آئی اور مستقل رہائی باشندگان ہیں۔

تقدیر کنندہ کا نام نور اللہ خان ہمدہ / حیثیت

دستخط ہمدہ اور تاریخ

طالب کار شناختی نمبر 14101-1978726-1

1076/2010

(9)



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION KOHAT

Khyber Pakhtunkhwa (Pakistan) DETAILED MARKS CERTIFICATE Secondary School Certificate Examination

S.No. KB 231015

Enrol No. 026-KHT/IKPHU-11 **SESSION 2013 (ANNUAL)**



Roll No. 66105 **SCIENCE GROUP**

Name. Muhammad Shafiq Father's Name. Zalib Gul

Regular Student of: Iqra Model Public School Kacha Pakha Kahi Hangu

Subjects	Marks Alloted						Marks Obtained					In Words	
	9Th			10Th			In Figures						
	Thry	Pract	Total	Thry	Pract	Total	9Th	10Th	Thry	Pract	Total		
1. English	75	-	75	75	-	150	44	--	51	--	95	Ninety-Five	
2. Urdu	75	-	75	75	-	150	39	--	50	--	89	Eighty-Nine	
3. Islamiyat (Comp)	75	-	75	--	--	75	42	--	--	--	42	Forty-Two	
4. Pakistan Studies	--	--	--	75	--	75	--	--	34	--	34	Thirty-Four	
5. Mathematics	75	-	75	75	-	150	53	--	55	--	108	One Hundred Eight	
6. Physics	65	10	75	65	10	150	43	6	30	9	88	Eighty-Eight	
7. Chemistry	65	10	75	65	10	150	43	9	40	9	101	One Hundred One	
8. Biology	65	10	75	65	10	150	35	7	40	9	91	Ninety-One	
Total						1050	Total					648, B	Six Hundred Forty-Eight Only

Date of Birth: 03-01-1997 (Three January Nineteen Hundred & Ninety-Seven.)

Remarks

Note:- Errors/Omissions excepted.

Result Date: 15-06-2013

Issue Date: 15-06-2013

Computer Cell, BISE, Kohat
(Naveed*)

Checked by:

Controller of Examinations

Attested



(10)

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

KOHAT

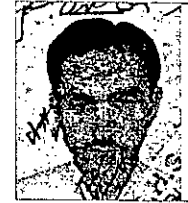
Khyber Pakhtunkhwa (Pakistan)

DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination

BISE KOHAT
KHYBER PAKHTUNKHWA

S.No. KB 237145

HUMANITIES (Part-II)



Roll No: 55245

SESSION 2017 (ANNUAL)

Reg. No. 26061-PVT/KHT-2014

Name MUHAMMAD SHAFIQ

Father's Name ZALIB GUL

Private candidate of:

District Hangu

Subjects	Marks Allotted	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	36	--	33	--	69	Sixty-Nine
Urdu	200	33	--	41	--	74	Seventy-Four
Islamic Education	50	20	--	--	--	20	Twenty Only
Pakistan Studies	50	--	--	27	--	27	Twenty-Seven
Islamic History	200	65	--	55	--	120	One Hundred Twenty Only
Civics	200	49	--	62	--	111	One Hundred Eleven
Islamic Studies	200	58	--	50	--	108	One Hundred Eight

Total : 1100

529-D Five Hundred Twenty-Nine Only

Note: Errors / Omissions excepted.

Remarks :

MI

Result Date: 04-08-2017

Issue Date: 04-08-2017

Computer Cell BISE, Kohat
(I_Daud)*

Checked by :

Controller of Examinations

Attested
[Signatures]

S.No. 1147

Roll No. 51477

TWO YEARS PARAMEDICAL DIPLOMA
Khyber Pakhtunkhwa Medical Faculty Peshawar (Pakistan)

Session 2014-2015

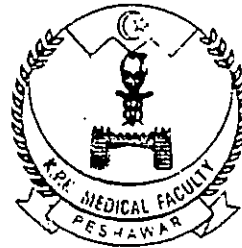
This is to Certify that MUHAMMAD SHAFIQ Son/ Daughter of ZALIB GUL

and a student of GOVT PARA MEDICAL INSTITUTE OF MEDICAL TECHNOLOGIES ABBOTTABAD Bearing Reg. No. 2014/MF/PIMT/DIK/DT/SS/5

having passed the prescribed examination held in JANUARY, 2017 is this day admitted by the Khyber Pakhtunkhwa Medical Faculty Peshawar, to the Diploma DENTAL Technology in C Grade.

Checked By [Signature]

Verified By [Signature]



[Signature]
Chief Executive Officer

Result Deceleration Date 27-April-2017 Print Date and Time 29-June-2017 3:06:16PM

Note:- Error(s) & omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate



Faculty of Paramedical and Allied Health Sciences (FPMA)

Khyber Pakhtunkhwa DETAILED MARKS CERTIFICATE

Registration No: 2014/MF/PIMT/DIK/DT/SS/5

Student Name MUHAMMAD SHAFIQ

Son/Daughter of ZALIB GUL

Institute GOVT PARA MEDICAL INSTITUTE OF MEDICAL TECHNOLOGIES ABBOTTABAD



Course Diploma New Course Technology DENTAL

SubjectName	Total Marks	Passing Marks	Theory	Viva	Total Obtained	Result
Semester: 1 Session: JANUARY 2017 Roll No: 23388						
Anatomy	100	50	33	17	50	Pass
Physiology	100	50	40	10	50	Pass
BioChemistry	100	50	46	10	56	Pass
Computer Skill	50	25	15	10	25	Pass
Sub-Total	350				181	
Semester: 2 Session: MAY 2015 Roll No: 23600						
Pathology	100	50	46	4	50	Pass
Pharmacology	100	50	42	10	52	Pass
English	100	50	52	0	52	Pass
Islamiat	50	25	32	0	32	Pass
Public Health	100	50	38	12	50	Pass
First Aid & Patient Safety	50	25	20	6	26	Pass
Sub-Total	500				262	
Semester: 3 Session: DECEMBER 2015 Roll No: 81769						
I-Applied Anatomy, Pathology, Microbiology & CP	100	50	38	12	50	Pass
II-Oral Medicine, Sugery-I & CP	100	50	38	12	50	Pass
Medical Ethics	50	25	21	4	25	Pass
Sub-Total	250				125	
Semester: 4 Session: JANUARY 2017 Roll No: 51477						
English	100	50	51	0	51	Pass
Pak-Study	50	25	30	0	30	Pass
I-DENTAL MANAGEMENT, RADIOGRAPHY & CP	100	50	49	16	65	Pass
II-DENTAL PATHOLOGY & PROCEDURE & CP	100	50	51	17	68	Pass
Sub-Total	350				214	
Grand Total	1450		642	140	782	

Checked By [Signature]

Verified By [Signature]

Chief Executive Officer
Faculty of Paramedical & Allied Health Sciences,
Khyber Pakhtunkhwa

Result Declaration Date: Thursday, 27 April, 2017

Issue Date & Time:

Friday, June 30, 2017 4:33:57 pm

Note: Error/Omission excepted. Any mistake in above particulars must be intimated within 15 days of the receiving of this certificate.

CP Means Clinical Practice

Attested

[Signature]

(13)

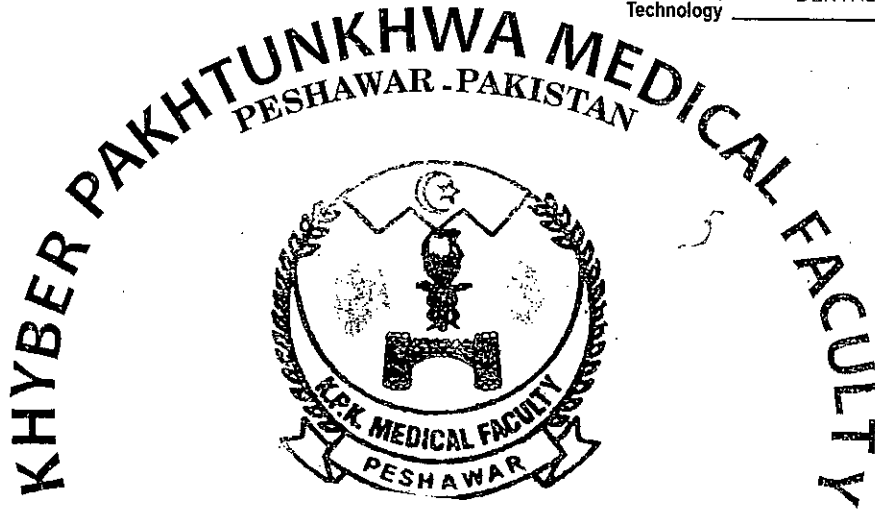
Serial No 3739

Batch No _____

Roll No 51477

Examination Session January- 2017

Technology DENTAL



Renewal Of Diploma

REGISTRATION / ENROLMENT

Valid for five years

The Diploma registration of Mr / Miss / Mrs. MUHAMMAD SHAFIQ Son / Daughter of

ZALIB GUL bearing Registration No. 2014/mf/pimt/dik/dt/ss/5 Enrolment / Provisional

Diploma Serial No. 1147 Dated 05-07-2017 is hereby renewed.

from 05-July-17 to 04- July-2022

Prepared by: [Signature]
 Checked by: [Signature]
 Verified by: [Signature]

[Signature]
SECRETARY

Khyber Pakhtunkhwa
 Medical Faculty Peshawar

Attested
[Signature]

No. 84-169 PIMT/ATD.

Dated: 15 - 01 / 2016

Paramedical Institute of Medical Technologies



Ayub Medical Institution Abbottabad

COURSE COMPLETION CERTIFICATE

Attested
[Signature]

(19)

This is to certify that Mr. /Miss./Mrs. MUHAMMAD SHAFIQ
Son/D/W/of ZALIR Gen
has successfully completed 2 years Diploma course in DENTAL TECHNOLOGY
which commenced from 01-01-2014 and completed on 31-12-2015

During his/her stay in this institute, his/her moral character and conduct remained Good his training was full time and residential.

[Signature]
VICE PRINCIPAL
Vice Principale
Medic. P.I.M.T. by
Abbottabad

Note:
This certificate is not substitute of diploma to be issued by KPK Medical Faculty.

(15)

AYUB TEACHING HOSPITAL & AMC ABBOTTABAD



DENTISTRY SECTION

Ph. #: (0992) 383157

R./ F10/Dent/AMC&ATH/3555

Date: 31-12-2015

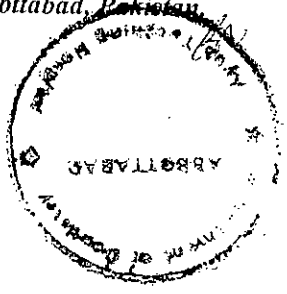
TRAINING CERTIFICATE

It is to certify that **Mr. MUHAMMAD SHAFIQ S/O ZALIB GUL**, has completed one year Paramedical Training from 1st January 2015 to 31st December 2015 in Dentistry Section, Ayub Teaching Hospital Abbottabad. He obtained training about handling of dental materials & assisting Dental Surgeons during various clinical procedures in the following disciplines of Dentistry.

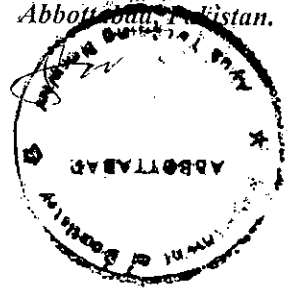
- | | |
|------------------------|-------------------|
| 1. Oral Surgery | 4. Prosthodontics |
| 2. Orthodontics | 5. Periodontology |
| 3. Operative Dentistry | 6. Radiology |

During his stay, he was found obedient and punctual.

Dr. Muhammad Fayyaz,
Incharge Prosthodontics,
Dentistry Section,
Ayub Medical College & ATH,
Abbottabad, Pakistan.



Prof. Dr. Iram Abbas,
Vice Principal & Head,
Dentistry Section,
Ayub Medical College & ATH,
Abbottabad, Pakistan.



Attested
[Signatures]

MINUTES OF THE DISTRICT SELECTION COMMITTEE(DSC)MEETING REGARDING RECRUITMENT OF CLASS-IV, SWEEPER & DIFFERENT CATEGORIES OF TECHNICIANS AT SHAHEED FARID KHAN DHQ HOSPITAL HANGU HELD ON 27.05 .2019.

In compliance of advertisement published in "Daily Mashriq" dated 07.05.2019 regarding the recruitment of ~~class-iv~~ different categories of Technicians a meeting of District Selection committee was held on 27.5.2019 in the office of the undersigned. The following participated in the meeting.

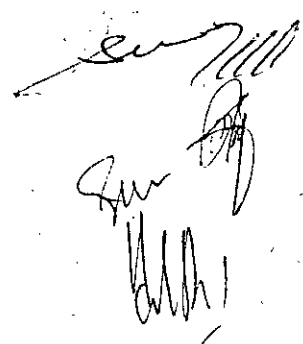
1. Dr. Haleem Ur Rehman Medical Superintendent S.F.K DHQ Hosp: Hangu
2. Dr. Muhammad Samin District Health Officer Hangu.
3. Mr. Sheraz Khan Deputy Director DGHS Office Peshawar
4. Dr. Muhammad Tariq DMS S.F.K Hospital Hangu.
5. Dr. Surat Khan Senior Medical Officer S.F.K DHQ Hosp: Hangu

The meeting was started with recitation of Holy Quran. Consequently the chairman welcomed all the participants and briefed regarding the DSC meeting in connection with the recruitment of all the posts as mentioned above. All Documents will be verified from concerned Faculty/ Board. In case of documents found fake direct termination and legal action will be taken.

The candidates applied for each category according to there qualification advertised on 07/05.2019. consequently the candidates were interviewed on 27.05.2019. After detail interview the merit lists were recommended and finalized for appointment by the committee.

The meeting was ended with vote of thanks.

- Dr. Muhammad Samin District Health Officer Hangu (Member)
- Mr. Sheraz Khan Deputy Director DGHS Office Peshawar (Member)
- Dr. Muhammad Tariq DMS S.F.K Hospital Hangu (Member)
- Dr. Surat Khan SMO S.F.K (DHQ) Hosp: Hangu (Member)
- Dr. Haleem Ur Reham MS SHF (DHQ) Hosp: Hangu (Chairman)




Medical Superintendent,
Shaheed Farid Khan DHQ, Hospital Hangu

Dated 03/06/2019

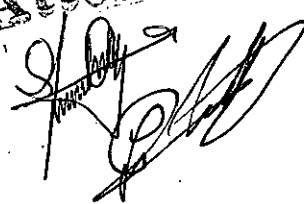
No. 1040-4/2MS (DHQ) Appointment
Copy for information to:

1. The Director General Health Services, Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Hangu.
3. All members of DSC.



Medical Superintendent,
Shaheed Farid Khan DHQ, Hosp: Hangu

Attested



16-A

BETTER COPY

MINUTES OF THE DISTRICT SELECTION COMMITTEE (DSC) MEETING REGARDING RECRUITMENT OF CLASS-IV, SWEEPER & DIFFERENT CATEGORIES OF TECHNICIANS AT SHAHEED FARID KHAN DHQ HOSPITAL HANGU HELD ON 27.05.2019.

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1. Dr. Haleem Ur Rehman Medical Superintendent S.F.K DHQ Hospital Hangu.
2. Dr. Muhammad Samin District Health Officer Hangu.
3. Mr. Sheraz Khan Deputy Director DGHS Office Peshawar.
4. Dr. Muhammad Tariq DMS S.F.K Hospital Hangu.
5. Dr. Surat Khan Senior Medical Officer S.F.K DHQ Hospital Hangu.

The meeting was started with recitation of Holy Quran. Consequently the chairman welcomed all the participants and briefed regarding the DSC meeting in connection with the recruitment of all the posts as mentioned above. All Documents will be verified from concerned Faculty/Board. In case of documents found fake, direct termination and legal action will be taken.

The candidates applied for each category according to there qualification advertised on 07.05.2019, consequently the candidates were interviewed on 27.05.2019. After detail interview the merit lists were recommended and finalized for appointment by the Committee.

The Meeting was ended with vote of thanks

Dr. Muhammad Samin District Health Officer Hangu (Member)

Mr. Sheraz Khan Deputy Director DGHS Office Peshawar (Member)

Dr. Muhammad Tariq DMS S.F.K Hospital Hangu (Member)

Dr. Surat Khan SMO SFK (DHQ) Hospital Hangu (Member)

Dr. Haleem Ur Rehman MS SHF (DHQ) Hospital Hangu (Chairman)

Medical Superintendent

Shaheed Farid Khan DHQ, Hospital Hangu

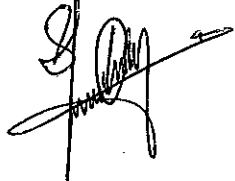
No.1040-42/MS (DHQ) Appointment

Dated:03/06/2019

Copy for information to:

1. The Director General Health Services, Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Hangu
3. All Members of DSC

Attested



Medical Superintendent

Shaheed Farid Khan DHQ, Hospital Hangu

APPOINTMENT ORDER

Consequent upon the approval/ recommendations of the Departmental Selection Committee in its meeting, interview held in the office of the Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu on 27/05/2019. Mr. Muhammad Shafiq S/O Zalib Gul is hereby appointed as Dental Technician BPS-12 at Farid Khan Shaheed DHQ Hospital Hangu, against the vacant post on regular basis @ (13320-9600-42120) plus usual allowances are admissible under the Govt. services rules subject the following terms and condition.

Terms and Condition:

1. This order is subject to the verification of all original documents from the issuance authority/production of equivalence certificate from the Khyber Pakhtunkhwa Medical Faculty Peshawar, if applicable/registration from the Khyber Pakhtunkhwa Medical Faculty Peshawar.
2. He/She will initially be on probation for a period of one year under the rules extendable further for a period of one year.
3. He/She can be dispensed without any notice during the probation period of his/her work, if his/her conduct found unsatisfactory.
4. He/She will be governed by the govt. of Khyber Pakhtunkhwa Civil Servant Act, 1973 and the laws applicable to the civil servants under the rules made their under.
5. He/She will be entitled to annual increment as per existing policy.
6. He/She will produce medical fitness certificate issued by the Medical Superintendent.
7. No TA/DA is admissible for joining the duty.
8. He/She will be bound to produce an affidavit on Rs.30 stamp paper that he/she will serve on present posting station and will not try for his transfer to any other facility/station/out district and will also not pressurize politically or others for their transfer etc.
9. The Appointee shall require to sign a bound on a stamp paper value Rs.50 that he/she will serve in this Health Department Hangu for minimum period of 05 years, in case of leaving within 05 years then he/she will deposit Rs.500, 000/- in Govt. treasury.
10. The appointee shall be bound to perform any duty assigned by the undersigned as per Govt. rules.
11. If he wishes to resign at any time, one month notice or one month salary in lieu thereof will be deposited in Govt. treasury.

If he/she accepts the above mentioned terms & conditions he/she should report to the undersigned within 14 days of the receipt of this office order and submit original documents along with one set of photocopy for verification from the concerned board/university/medical faculty, if applicable. in case he/she fails to report for duty within stipulated period of time, this appointment order will automatically stand cancelled and the next candidate in the merit list (waiting) will be considered for appointment

1179-83

No. _____ /MS(H)/Appointment
Copy forwarded to the following for information:

1. Director General Health Services, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. District Account Officer Hangu.
3. Establishment/Accounts of this office
4. Official concerned

Medical Superintendent
Shaheed Farid Khan DHQ
Hospital Hangu
dated 25 / 16 /2019

Medical Superintendent
Shaheed Farid Khan DHQ
Hospital Hangu

Attested

(17-A)

BETTER COPY

**OFFICE OF THE MEDICAL SUPERINTENDENT
FARID KHAN SHAHEED DHQ HOSPITAL HANGU**

PH:092-5621508

No. _____/DHQH/App

Dated _____/____/2019

APPOINTMENT ORDER

Consequent upon the approval/recommendations of the Departmental Selection Committee in its meeting interview held in the office of the Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu on 27/05/2019. **Mr. Muhammad Shafiq S/O Zalib Gul** is hereby appointed as **Dental Technician BPS-12** at Farid Khan Shaheed DHQ Hospital Hangu, against the vacant post on regular basis @ (13320-9600-42120) plus usual allowances are admissible under the Govt services rules subject the following terms and conditions:-

Terms and Conditions:-

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2. He/She will initially be on probation for a period of one year under the rules extendable further for a period of one year.
3. He/She can be dispensed without any notice during the probation period of his/her work if his/her conduct found unsatisfactory.
4. He/She will be governed by the Govt of Khyber Pakhtunkhwa Civil Servant Act, 1973 and the laws applicable to the civil servants under the rules made their under.
5. He/She will be entitled to annual increment as per existing policy.
6. He/She will produce Medical fitness Certification issued by the Medical Superintendent.
7. No.TA/DA is admissible for joining the duty.
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11. If he wishes to resign to any time, one month notice or one month salary in lieu thereof will be deposited in Govt treasury.

If he/she accepts the above mentioned terms & Conditions he/she should report to the undersigned within 14 days of the receipt of this office order and submit original documents along with one set of photocopy for verification from the concerned board/university/medical faculty, if applicable, in case he/she fails to report for duty within stipulated period of time, this appointment order will automatically stand cancelled and the next candidate in the merit list (waiting) will be considered for appointment.

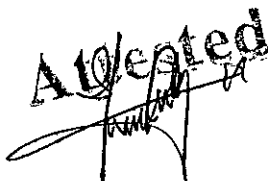
**Medical Superintendent
Shaheed Farid Khan DHQ
Hospital Hangu**

No.1179-83/MS(H)/Appointment

Dated:25.06.2019

Copy forwarded to the following for information:

1. Director General Health Services, Govt of Khyber Pakhtunkhwa, Peshawar
2. District Accounts Officer Hangu.
3. Establishment/Accounts of this office.
4. Official concerned.

Accepted


**Medical Superintendent
Shaheed Farid Khan DHQ
Hospital Hangu**



(18)

Faculty of Paramedical and Allied Health Sciences, (FPMA) Khyber Pakhtunkhwa



86/D-5 SCHOOL ROAD UNIVERSITY TOWN PESHAWAR
Ph = 091-9216008 Fax = 091-9216538 website: www.fpma.edu.pk Email: info@fpma.edu.pk

No. 1354 /FPMA/Ver/Sec

Dated: 17. 1. 2020

To,

The Medical Superintendent,
Shaheed Farid Khan DHO,
Hospital Hangu.

Subject: **VERIFICATION.**

Memo;

Reference your letter No. 1436/DHOH/Medical dated 10/07/2019 on
the subject noted above.

The particulars of the following Diploma's have been checked with
the official record and the remarks are as under.

S.No	Name	Father Name	Technology	Roll No	Session	Remarks
01	Adnan Haider	Noor Ghulam Haider	Pathology	42482	01-2018	VERIFIED
02	Abdul Qadir	Wali Zad Shah	Pathology	50022	02-2011	VERIFIED
03	Aamir Nabi	Turab Khan	Dental	51725	12-2015	VERIFIED
04	Muhammad Shafiq	Zalib Gul	Dental	51477	01-2017	VERIFIED
05	Abdullah	Abdul Jabar	Dental	30838	01-2017	VERIFIED
06	Muhammad Kashif Ullah	Khurshid Sultan	Surgical	42540	01-2018	VERIFIED
07	Aiman	Abdul Sattar	Surgical	51955	01-2017	VERIFIED
08	Arif Ullah	Mirza Khan	Radiology	22145	07-2018	VERIFIED

Prepared by: (Anwar Zeb)

Checked by: (Shahid)

Verified by: (Khial Muhammad)

Sign based on above verification.

(// // // //) aw
Chief Executive Officer,

Faculty of Paramedical & Allied Health
Sciences, Khyber Pakhtunkhwa

Note:

- i) This letter has official FPMA Seal
- ii) The Original Diplomas of Session 01-2017 onwards is having Water Mark.
- iii) The employment authority advised to check on FPMA official website also

Attested

Continued with
main document

18-A

BETTER COPY

**Faculty of Paramedical and Allied Health
Sciences, (FPMA) Khyber Pakhtunkhwa**

86/D-5 School Road University Town, Peshawar

No.1254/FPM/Ver/Sec

Dated :17.7.2019

To,

**The Medical Superintendent,
Shaheed Farid Khan DHQ,
Hospital Hangu.**

Subject:- **VERIFICATION**

Memo;

Reference your letter No.1436/DHQ/Medical dated 10.07.2019 on the subject noted above.

The particulars of the following Diploma's have been checked with the official record and the remarks are as under:-

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2.	Abdul Qadir	Wali Zad Shah	Pathology	50022	02-2011	VERIFIED
3.	Aamir Nabi	Turab Khan	Dental	51725	12-2015	VERIFIED
4.	Muhammad Shafiq	Zalib Gul	Dental	51477	01-2017	VERIFIED
5.	Abdullah	Abdul Jabar	Dental	30838	01-2017	VERIFIED
6.	Muhammad Kashif Ullah	Khurshid Sultan	Surgical	42540	01-2018	VERIFIED
7.	Aiman	Abdul Sattar	Surgical	51955	01-2017	VERIFIED
8.	Arif Ullah	Mirza Khan	Radiology	22145	07-2018	VERIFIED

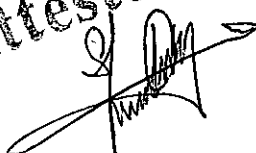
Prepared by (Anwar Zeb) _____ Checked by (Shahid) _____ Verified (Khial Muhammad)

Sign based on above verification

**Chief Executive Officer,
Faculty of Paramedical & Allied Health
Sciences, Khyber Pakhtunkhwa**

Not:-

- i) This letter has official FPMA Seal
- ii) The Original Diplomas of Session 01-2017 onwards is having Water Mark.
- iii) The employment authority advised to check on FPMA official website also.

Attested


(19)

**OFFICE OF THE MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL KDA KOHAT**

EXPERIENCE CERTIFICATE

It is certified that **Mr. Muhammad Shafiq s/o Zalib Gul** has worked as **Trainee Dental Technician** in DHQ Hospital KDA Kohat for a period of 06 months w.e.f 01/01/2018 to 30/06/2018.

During his stay with us his conduct remained satisfactory.

Hasbi

Senior Dental Surgeon
DHQ Teaching Hospital Kohat

DENTAL SURGEON
DHQ Hospital, KDA, Kohat

Attested

[Signature]



Office of the
Accountant General

Food & Fertilizer Subsidy

Department of Agriculture

B. O. H. O. Hangu

Date: _____

District Accounts Officer
Hangu

POSSESSING OF SOURCE OF INCOME APPLICANTS
CANDIDATES OF SHARDA KUMAR HANU DHO HOSPITAL
HANGU.

The undersigned is directed to inform that the Government of Haryana has decided to provide financial assistance to the candidates of Sharada Kumar Hanu DHO Hospital Hangu. The candidates are required to submit the following documents to the undersigned for verification of their source of income. The documents to be submitted are as follows: 1. Income Tax Return for the last three years. 2. Bank statements for the last three years. 3. Affidavit of the candidate regarding the source of income. 4. Any other document as may be required. The candidates are requested to submit the documents as early as possible to avoid any delay in the process. The undersigned is also directed to inform that the Government of Haryana has decided to provide financial assistance to the candidates of Sharada Kumar Hanu DHO Hospital Hangu. The candidates are required to submit the following documents to the undersigned for verification of their source of income. The documents to be submitted are as follows: 1. Income Tax Return for the last three years. 2. Bank statements for the last three years. 3. Affidavit of the candidate regarding the source of income. 4. Any other document as may be required. The candidates are requested to submit the documents as early as possible to avoid any delay in the process.

ACCOUNTS OFFICER (CM & ...)

20-11

BETTER COPY

OFFICE OF THE
ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA PESHAWAR

Phone:091-9211250-53

No.T-23(33)/C & C/DAO Hangu/444

Dated:09.10.2019

To,

District Accounts Officer

Hangu.

Subject:- POSSESSING OF SOURCE-I OF NEWLY APPOINTED CANDIDATES FO SHAHEED FARID KHAN DHQ HOSPITAL HANGU.

The undersigned is directed to refer to your letter No.DAO/HU/2019-20/1881 dated 20.08.2019 on the subject cited above and to say that it may be ensured that these posts are filled up by the competent forum under the rules. The observations raised in your referred letter are genuine. The Medical Superintendent may address all the issues highlighted. As far as inquiry is concerned your office may, if deemed appropriate make provisional payment through the system till finalization of the inquiry if all other codal formalities are completed by the Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu.

Accepted


ACCOUNTS OFFICER (CM&I)

**BEFORE THE HONORABLE HIGH COUR PESHAWAR TKHYBER
PAKHTUNKHWA**

5521

Write petition no: -P/2019

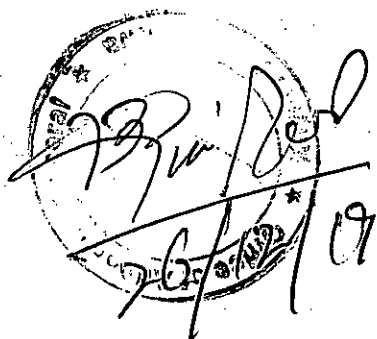
Muhammad Shafiq S/O Zalib Gul R/O Vill: Sra Chapar
PO Zargiri Tehsil Thall District Hangu Petitioner

VERSUS

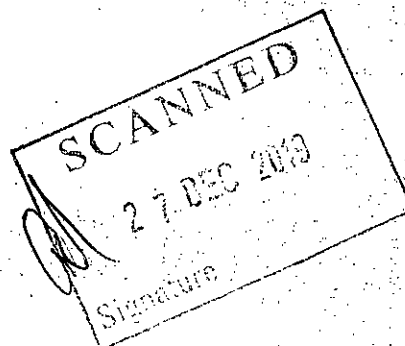
1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Peshawar.
 2. Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.
 3. Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu.
 4. District Account officer Hangu.
 5. Account officer Shah Farid Khan DHQ Hospital Hangu
- (Respondents)

INDEX

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4	Bio Metric record	"C"	6-8
5	Affidavit		9



Medical Superintendent,
Shaheed Farid Khan DHQ,
Hospital Hangu respondent No.3





FILED TODAY
Deputy Registrar
26 DEC 2019

6
✓

**BEFORE THE HONORABLE HIGH COUR PESHAWAR TKHYBER
PAKHTUNKHWA**

Write petition no: -P/2019

Muhammad Shafiq S/O Zalib Gul R/O Vill: Sra Chapar
PO Zargiri Tehsil Thall District Hangu Petitioner

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Health, Peshawar.
2. Director General Health Services, Government of Khyber Pakhtunkhwa, Peshawar.
3. Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu.
4. District Account officer Hangu.
5. Account officer Shah Farid Khan DHQ Hospital Hangu.

..... (Respondents)

Para wise comments on behalf of respondent No. 3

Preliminary objections:

- I. That the petitioner has got no cause of action to file the instant petition;
- II. That the petitioner has stopped by his own action and conduct;
- III. That the petition is not maintainable in its present form;
- IV. That the petitioner has not come before the honorable Court with clean hands;
- V. That the petitioner is not "aggrieved" person within the meaning of article 199 of the constitution of Pakistan;
- VI. That the writ petition is efficient on account of mis joinder & non joinder;

Respectfully Sheweth

FACTS:-

1. That is Correct, the respondent No: 3 has advertised the posts of Technicians & Class-IV in Daily Mushriq Peshawar on 7.5.2019 in Shaheed Farid Khan DHQ Hospital Hangu (Annexed-A)
2. That is Correct, as (Annexed -A)
3. That is Correct. (Copy of minutes is DSC is (annexed-B)
4. That is Correct. Bio metric record is hereby (annexed-C)
5. That is incorrect as respondent No.3 (Authority) has not violated the rules and submit the case to District Accounts office Hangu in time.

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Deputy Registrar

26 DEC 2019

(2)

GROUNDS

- a. That is correct; the respondent No.3 has followed the protocol of releasing of salary of the petitioner.
- b. That is correct; the petitioner has been appointed after complying all the codal formalities.
- c. That is correct; detail as Para (a)
- d. That is correct; detail as para (a)
- e. That is correct; the petitioner after his appointment is fully entitled to receive salary.
- f. That is correct;
- g. That the action of not releasing of petitioner salary has not been taken by respondent No.3
- h. That is correct.
- i. That is correct.
- j. No comments.


Medical Superintendent,
Shaheed Farid khan DHQ,
Hospital Hangu

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Deputy Registrar
26 DEC 2019



OFFICE OF THE MEDICAL SUPERINTENDENT,
SHAHEED FARID KHAN DHQ HOSPITAL HANGU

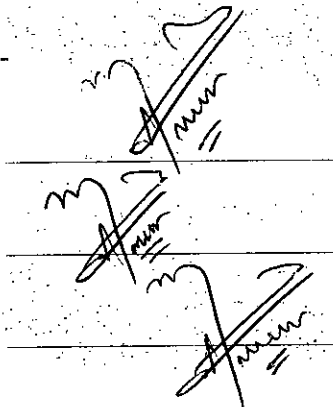
No. _____/DHQH/Medical


Dated: _____/_____/2019

AUTHORITY

Dr. Wilayat Khan Deputy Medical Superintendent BPS-17 at Shaheed Farid Khan (DHQ) Hospital Hangu is hereby authorized to attend the Honorable Peshawar High Court on behalf of the undersigned.

His specimen signatures are as under:-




Medical Superintendent,
Shaheed Farid Khan DHQ,
Hospital Hangu

FILED TODAY
Deputy Registrar
26 DEC 2019

(65)

Annexure
'B'

**MINUTES OF THE DISTRICT SELECTION COMMITTEE(DSC)MEETING REGARDING
RECRUITMENT OF CLASS-IV, SWEEPER & DIFFERENT CATEGORIES OF TECHNICIANS
AT SHAHEED FARID KHAN DHQ HOSPITAL HANGU HELD ON 27.05 .2019.**

In compliance of advertisement published in "Daily Mashriq" dated 07.05.2019 regarding the recruitment of ~~class-iv~~ different categories of Technicians a meeting of District Selection committee was held on 27.5.2019 in the office of the undersigned. The following participated in the meeting.

1. Dr. Haleem Ur Rehman Medical Superintendent S.F.K DHQ Hosp: Hangu
2. Dr. Muhammad Samin District Health Officer Hangu.
3. Mr. Sheraz Khan Deputy Director DGHS Office Peshawar
4. Dr. Muhammad Tariq DMS S.F.K Hospital Hangu.
5. Dr. Surat Khan Senior Medical Officer S.F.K DHQ Hosp: Hangu

The meeting was started with recitation of Holy Quran. Consequently the chairman welcomed all the participants and briefed regarding the DSC meeting in connection with the recruitment of all the posts as mentioned above. All Documents will be verified from concerned Faculty/ Board. In case of documents found fake, direct termination and legal action will be taken.

The candidates applied for each category according to their qualification advertised on 07.05.2019, consequently the candidates were interviewed on 27.05.2019. After detail interview the merit lists were recommended and finalized for appointment by the committee.

The meeting was ended with vote of thanks.

Dr. Muhammad Samin District Health Officer Hangu (Member)

Mr. Sheraz Khan Deputy Director DGHS Office Peshawar (Member)

Dr. Muhammad Tariq DMS S.F.K Hospital Hangu (Member)

Dr. Surat Khan SMO SFK (DHQ) Hosp: Hangu (Member)

Dr. Haleem Ur Reham MS SHF (DHQ) Hosp: Hangu (Chairman)

Medical Superintendent,
Shaheed Farid Khan DHQ, Hospital Hangu

No. 1040-42MS (DHQ) Appointment

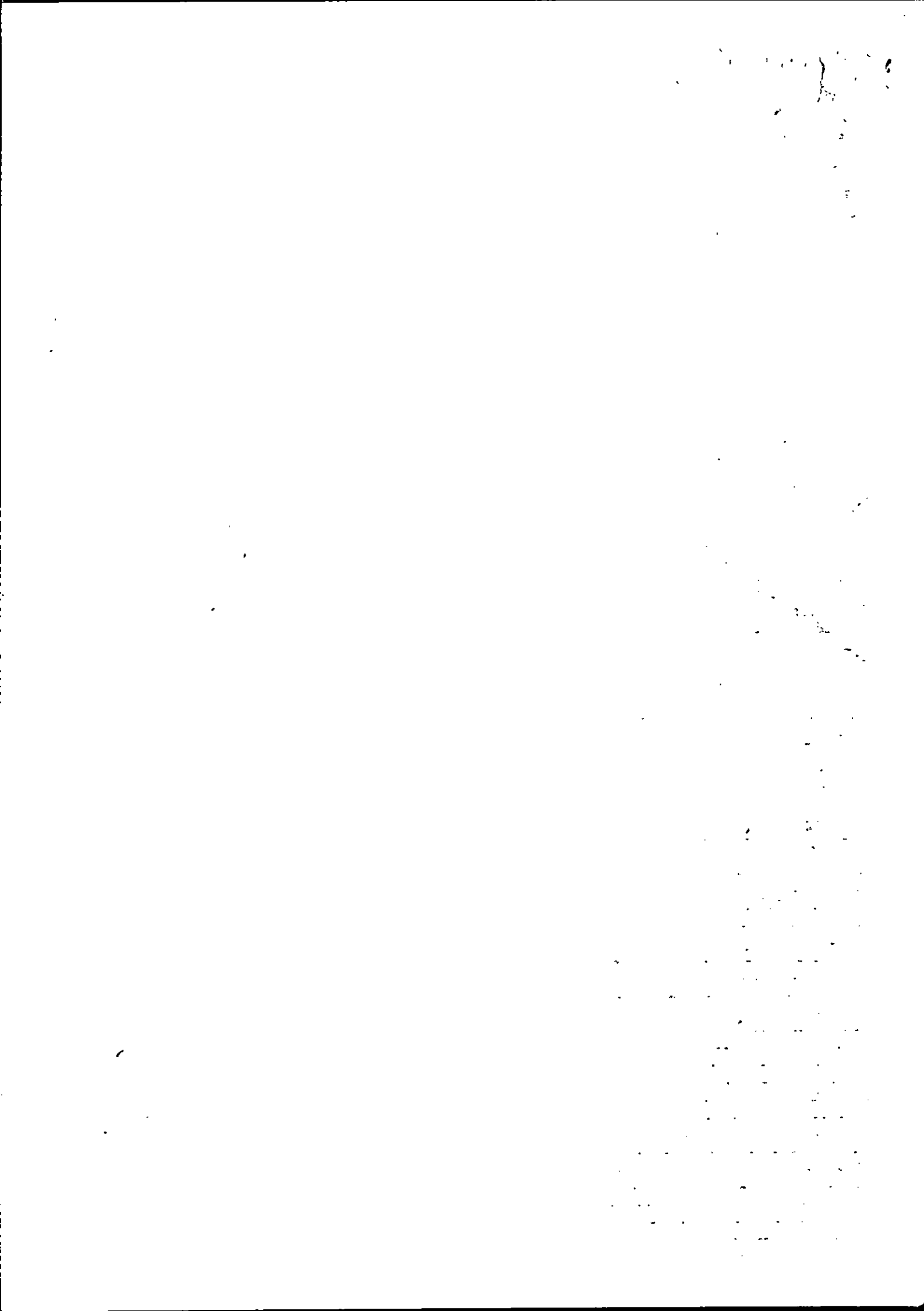
Dated 03/06/2019

Copy for information to:

1. The Director General Health Services, Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Hangu.
3. All members of DSC.

Medical Superintendent,
Shaheed Farid Khan DHQ, Hosp: Hangu

[Handwritten signature]



Government of Khyber Pakhtunkhwa, Health Department

Attendance Status Report

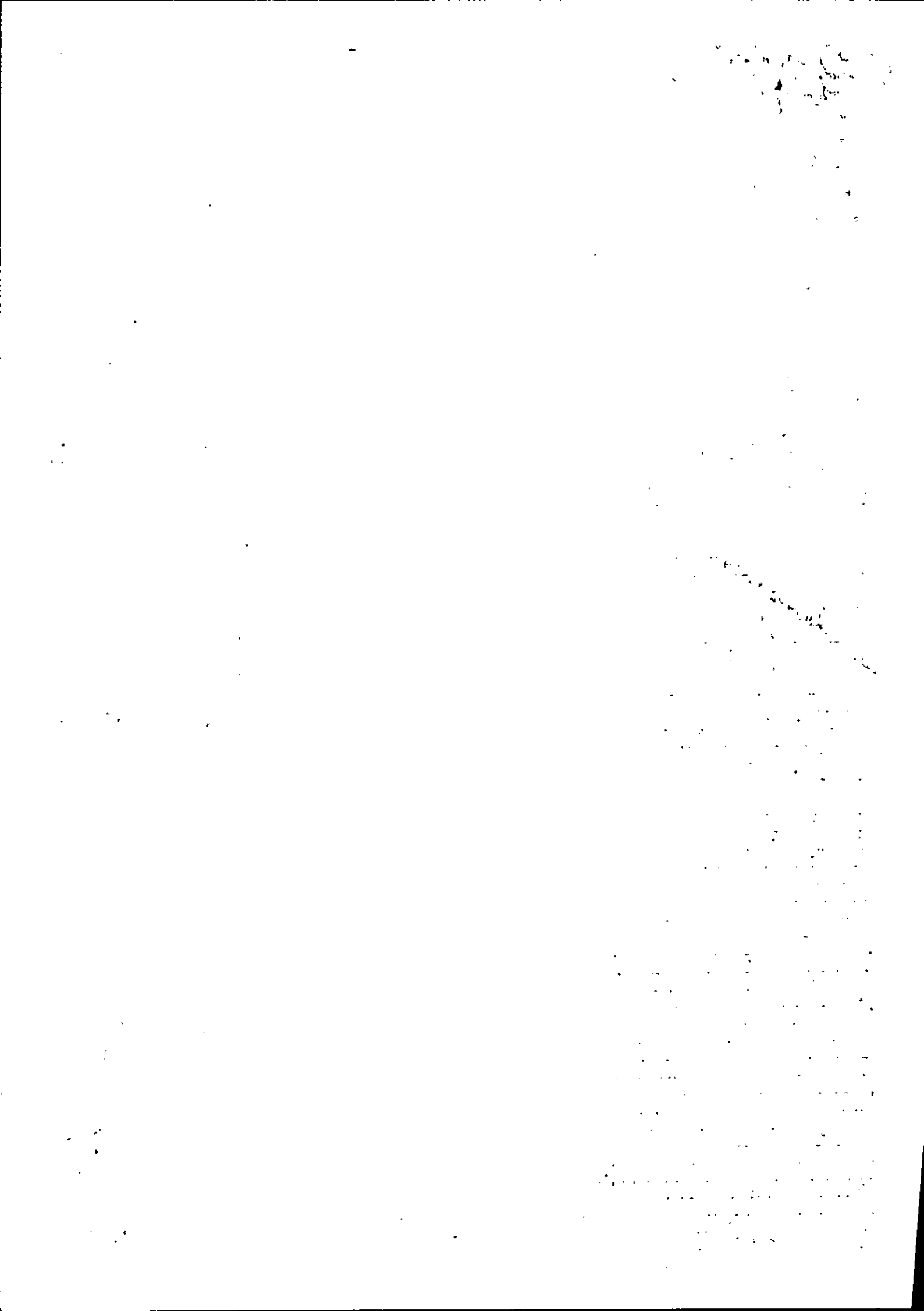
From 01-07-2019 To 11-12-2019

(6)

Amir Khan

Name: Muhammad Shafiq, Father Name: Zalib Gul
 Designation: Clinical Technician (Dental) BPS: 12, Department: Dental Department,
 Biometric: 67281

S#	Date	Shift	Short Leave	TimeIn	TimeOut	Duration	Status
1.	Mon, 01 July 2019		-	-	-	00:00:00.000000	Off
2.	Tue, 02 July 2019		-	-	-	00:00:00.000000	Off
3.	Wed, 03 July 2019		-	-	-	00:00:00.000000	Off
4.	Thu, 04 July 2019		-	-	-	00:00:00.000000	Off
5.	Fri, 05 July 2019		-	-	-	00:00:00.000000	Off
6.	Sat, 06 July 2019		-	-	-	00:00:00.000000	Off
7.	Sun, 07 July 2019		-	-	-	00:00:00.000000	Off
8.	Mon, 08 July 2019		-	-	-	00:00:00.000000	Off
9.	Tue, 09 July 2019		-	-	-	00:00:00.000000	Off
10.	Wed, 10 July 2019		-	-	-	00:00:00.000000	Off
11.	Thu, 11 July 2019		-	-	-	00:00:00.000000	Off
12.	Fri, 12 July 2019		-	9:15 am	12:07 pm	02:52:08.000000	Present
13.	Sat, 13 July 2019		-	8:47 am	12:57 pm	04:09:58.000000	Present
14.	Sun, 14 July 2019		-	-	-	00:00:00.000000	Off
15.	Mon, 15 July 2019		-	8:32 am	1:23 pm	04:51:04.000000	Present
16.	Tue, 16 July 2019		-	8:30 am	1:02 pm	04:31:25.000000	Present
17.	Wed, 17 July 2019		-	8:32 am	12:59 pm	04:27:19.000000	Present
18.	Thu, 18 July 2019		-	8:46 am	1:02 pm	04:16:24.000000	Present
19.	Fri, 19 July 2019		-	8:31 am	12:04 pm	03:32:26.000000	Present
20.	Sat, 20 July 2019		-	8:34 am	1:05 pm	04:30:27.000000	Present
21.	Sun, 21 July 2019		-	-	-	00:00:00.000000	Off
22.	Mon, 22 July 2019		-	8:30 am	12:59 pm	04:28:11.000000	Present
23.	Tue, 23 July 2019		-	8:33 am	1:02 pm	04:29:05.000000	Present
24.	Wed, 24 July 2019		-	8:35 am	1:00 pm	04:25:18.000000	Present
25.	Thu, 25 July 2019		-	8:31 am	1:28 pm	04:56:59.000000	Present
26.	Fri, 26 July 2019		-	8:32 am	11:58 am	03:26:06.000000	Present
27.	Sat, 27 July 2019		-	8:37 am	1:03 pm	04:25:18.000000	Present
28.	Sun, 28 July 2019		-	-	-	00:00:00.000000	Off
29.	Mon, 29 July 2019		-	8:39 am	1:02 pm	04:22:26.000000	Present
30.	Tue, 30 July 2019		-	8:44 am	1:01 pm	04:16:49.000000	Present
31.	Wed, 31 July 2019		-	8:35 am	1:00 pm	04:24:55.000000	Present
32.	Thu, 01 August 2019		-	8:44 am	12:59 pm	04:14:58.000000	Present
33.	Fri, 02 August 2019		-	8:41 am	12:06 pm	03:24:34.000000	Present
34.	Sat, 03 August 2019		-	8:32 am	1:01 pm	04:29:51.000000	Present
35.	Sun, 04 August 2019		-	-	-	00:00:00.000000	Off
36.	Mon, 05 August 2019		-	8:27 am	12:59 pm	04:32:11.000000	Present
37.	Tue, 06 August 2019		-	8:32 am	1:02 pm	04:29:28.000000	Present
38.	Wed, 07 August 2019		-	8:40 am	1:00 pm	04:20:35.000000	Present
39.	Thu, 08 August 2019		-	8:31 am	1:01 pm	04:29:29.000000	Present
40.	Fri, 09 August 2019		-	8:34 am	11:58 am	03:24:09.000000	Present
41.	Sat, 10 August 2019		-	8:46 am	12:58 pm	04:11:43.000000	Present
42.	Sun, 11 August 2019		-	-	-	00:00:00.000000	Off
43.	Mon, 12 August 2019		-	-	-	00:00:00.000000	Off
44.	Tue, 13 August 2019		-	-	-	00:00:00.000000	Off
45.	Wed, 14 August 2019		-	-	-	00:00:00.000000	Off
46.	Thu, 15 August 2019		-	-	-	00:00:00.000000	Off
47.	Fri, 16 August 2019		-	8:45 am	12:08 pm	03:22:58.000000	Present
48.	Sat, 17 August 2019		-	8:42 am	1:01 pm	04:19:01.000000	Present
49.	Sun, 18 August 2019		-	-	-	00:00:00.000000	Off
50.	Mon, 19 August 2019		-	8:34 am	1:02 pm	04:28:35.000000	Present
51.	Tue, 20 August 2019		-	8:37 am	-	00:00:00.000000	Present
52.	Wed, 21 August 2019		-	8:33 am	1:06 pm	04:33:33.000000	Present
53.	Thu, 22 August 2019		-	8:31 am	12:58 pm	04:27:14.000000	Present
54.	Fri, 23 August 2019		-	8:34 am	11:58 am	03:24:44.000000	Present
55.	Sat, 24 August 2019		-	8:35 am	12:59 pm	04:24:06.000000	Present
56.	Sun, 25 August 2019		-	-	-	00:00:00.000000	Off
57.	Mon, 26 August 2019		-	8:34 am	12:59 pm	04:24:56.000000	Present
58.	Tue, 27 August 2019		-	8:38 am	1:02 pm	04:23:42.000000	Present
59.	Wed, 28 August 2019		-	8:36 am	1:00 pm	04:23:30.000000	Present
60.	Thu, 29 August 2019		-	8:46 am	1:00 pm	04:13:38.000000	Present
61.	Fri, 30 August 2019		-	8:41 am	12:00 pm	03:19:17.000000	Present



6

Name: Muhammad Shafiq, Father Name: Zalib Gul
 Designation: Clinical Technician (Dental) BPS: 12, Department: Dental Department,
 Biometric: 67281

S#	Date	Shift	Short Leave	TimeIn	TimeOut	Duration	Status
62.	Sat, 31 August 2019		-	8:30 am	1:13 pm	04:42:40.000000	Present
63.	Sun, 01 September 2019		-	-	-	00:00:00.000000	Off
64.	Mon, 02 September 2019		-	8:30 am	1:34 pm	05:04:10.000000	Present
65.	Tue, 03 September 2019		-	8:37 am	1:13 pm	04:35:48.000000	Present
66.	Wed, 04 September 2019		-	8:45 am	1:12 pm	04:26:59.000000	Present
67.	Thu, 05 September 2019		-	8:39 am	1:00 pm	04:20:23.000000	Present
68.	Fri, 06 September 2019		-	8:29 am	11:59 am	03:30:53.000000	Present
69.	Sat, 07 September 2019		-	8:27 am	1:28 pm	05:00:50.000000	Present
70.	Sun, 08 September 2019		-	-	-	00:00:00.000000	Off
71.	Mon, 09 September 2019		-	8:23 am	1:00 pm	04:36:21.000000	Present
72.	Tue, 10 September 2019		-	8:32 am	12:51 pm	04:18:34.000000	Present
73.	Wed, 11 September 2019		-	8:39 am	1:44 pm	05:04:55.000000	Present
74.	Thu, 12 September 2019		-	8:35 am	1:04 pm	04:29:37.000000	Present
75.	Fri, 13 September 2019		-	8:28 am	11:59 am	03:31:12.000000	Present
76.	Sat, 14 September 2019		-	8:21 am	12:59 pm	04:38:00.000000	Present
77.	Sun, 15 September 2019		-	-	-	00:00:00.000000	Off
78.	Mon, 16 September 2019		-	8:30 am	1:17 pm	04:46:34.000000	Present
79.	Tue, 17 September 2019		-	8:41 am	12:59 pm	04:18:12.000000	Present
80.	Wed, 18 September 2019		-	8:38 am	1:25 pm	04:46:54.000000	Present
81.	Thu, 19 September 2019		-	8:25 am	1:26 pm	05:00:36.000000	Present
82.	Fri, 20 September 2019		-	8:35 am	11:59 am	03:24:16.000000	Present
83.	Sat, 21 September 2019		-	8:33 am	1:04 pm	04:30:28.000000	Present
84.	Sun, 22 September 2019		-	-	-	00:00:00.000000	Off
85.	Mon, 23 September 2019		-	8:39 am	1:10 pm	04:31:09.000000	Present
86.	Tue, 24 September 2019		-	8:28 am	1:54 pm	05:26:13.000000	Present
87.	Wed, 25 September 2019		-	8:46 am	1:39 pm	04:52:05.000000	Present
88.	Thu, 26 September 2019		-	8:31 am	1:16 pm	04:45:04.000000	Present
89.	Fri, 27 September 2019		-	8:30 am	-	00:00:00.000000	Present
90.	Sat, 28 September 2019		-	8:36 am	1:24 pm	04:48:05.000000	Present
91.	Sun, 29 September 2019		-	-	-	00:00:00.000000	Off
92.	Mon, 30 September 2019		-	8:28 am	1:29 pm	05:01:01.000000	Present
93.	Tue, 01 October 2019		-	8:37 am	12:58 pm	04:20:58.000000	Present
94.	Wed, 02 October 2019		-	8:50 am	12:55 pm	04:04:42.000000	Present
95.	Thu, 03 October 2019		-	8:42 am	1:13 pm	04:31:18.000000	Present
96.	Fri, 04 October 2019		-	8:43 am	-	00:00:00.000000	Present
97.	Sat, 05 October 2019		-	8:38 am	12:18 pm	03:39:23.000000	Present
98.	Sun, 06 October 2019		-	-	-	00:00:00.000000	Off
99.	Mon, 07 October 2019		-	8:28 am	1:22 pm	04:54:11.000000	Present
100.	Tue, 08 October 2019		-	8:46 am	1:40 pm	04:53:41.000000	Present
101.	Wed, 09 October 2019		-	8:40 am	1:18 pm	04:37:44.000000	Present
102.	Thu, 10 October 2019		-	8:37 am	1:14 pm	04:36:27.000000	Present
103.	Fri, 11 October 2019		-	8:36 am	-	00:00:00.000000	Present
104.	Sat, 12 October 2019		-	8:45 am	1:56 pm	05:10:43.000000	Present
105.	Sun, 13 October 2019		-	-	-	00:00:00.000000	Off
106.	Mon, 14 October 2019		-	8:40 am	-	00:00:00.000000	Present
107.	Tue, 15 October 2019		-	8:47 am	1:01 pm	04:13:32.000000	Present
108.	Wed, 16 October 2019		-	-	-	00:00:00.000000	Off
109.	Thu, 17 October 2019		-	8:29 am	-	00:00:00.000000	Present
110.	Fri, 18 October 2019		-	9:18 am	12:10 pm	02:51:39.000000	Present
111.	Sat, 19 October 2019		-	8:13 am	1:09 pm	04:55:50.000000	Present
112.	Sun, 20 October 2019		-	-	-	00:00:00.000000	Off
113.	Mon, 21 October 2019		-	8:37 am	1:42 pm	05:04:47.000000	Present
114.	Tue, 22 October 2019		-	8:21 am	11:59 am	03:37:52.000000	Present
115.	Wed, 23 October 2019		-	8:20 am	12:23 pm	04:03:41.000000	Present
116.	Thu, 24 October 2019		-	8:29 am	-	00:00:00.000000	Present
117.	Fri, 25 October 2019		-	8:27 am	12:01 pm	03:33:25.000000	Present
118.	Sat, 26 October 2019		-	8:39 am	1:02 pm	04:23:24.000000	Present
119.	Sun, 27 October 2019		-	8:25 am	1:01 pm	04:36:03.000000	Present
120.	Mon, 28 October 2019		-	8:40 am	1:06 pm	04:26:11.000000	Present
121.	Tue, 29 October 2019		-	8:41 am	1:34 pm	04:53:14.000000	Present
122.	Wed, 30 October 2019		-	8:35 am	1:01 pm	04:25:24.000000	Present
123.	Thu, 31 October 2019		-	8:32 am	1:39 pm	05:06:35.000000	Present
124.	Fri, 01 November 2019		-	8:01 am	12:04 pm	04:03:39.000000	Present
125.	Sat, 02 November 2019		-	8:41 am	1:04 pm	04:23:16.000000	Present
126.	Sun, 03 November 2019		-	-	-	00:00:00.000000	Off
127.	Mon, 04 November 2019		-	8:36 am	12:47 pm	04:11:08.000000	Present

2

Name: Muhammad Shafiq, Father Name: Zalib Gul
Designation: Clinical Technician (Dental) BPS: 12, Department: Dental Department,
Biometric: 67281

S#	Date	Shift	Short Leave	TimeIn	TimeOut	Duration	Status
128.	Tue, 05 November 2019		-	6:07 am	-	00:00:00.000000	Present
129.	Wed, 06 November 2019		-	8:28 am	12:43 pm	04:14:38.000000	Present
130.	Thu, 07 November 2019		-	8:45 am	1:19 pm	04:34:01.000000	Present
131.	Fri, 08 November 2019		-	8:20 am	-	00:00:00.000000	Present
132.	Sat, 09 November 2019		-	8:56 am	1:29 pm	04:32:17.000000	Present
133.	Sun, 10 November 2019		-	-	-	00:00:00.000000	Off
134.	Mon, 11 November 2019		-	7:53 am	1:04 pm	05:10:50.000000	Present
135.	Tue, 12 November 2019		-	8:41 am	1:13 pm	04:32:04.000000	Present
136.	Wed, 13 November 2019		-	8:43 am	1:39 pm	04:56:23.000000	Present
137.	Thu, 14 November 2019		-	8:32 am	1:07 pm	04:34:41.000000	Present
138.	Fri, 15 November 2019		-	8:39 am	12:11 pm	03:32:09.000000	Present
139.	Sat, 16 November 2019		-	8:39 am	1:09 pm	04:30:09.000000	Present
140.	Sun, 17 November 2019		-	-	-	00:00:00.000000	Off
141.	Mon, 18 November 2019		-	8:45 am	1:08 pm	04:22:29.000000	Present
142.	Tue, 19 November 2019		-	8:33 am	1:01 pm	04:28:18.000000	Present
143.	Wed, 20 November 2019		-	8:29 am	1:02 pm	04:33:08.000000	Present
144.	Thu, 21 November 2019		-	8:48 am	1:01 pm	04:12:19.000000	Present
145.	Fri, 22 November 2019		-	8:37 am	12:00 pm	03:22:45.000000	Present
146.	Sat, 23 November 2019		-	-	-	00:00:00.000000	Off
147.	Sun, 24 November 2019		-	-	-	00:00:00.000000	Off
148.	Mon, 25 November 2019		-	8:40 am	12:33 pm	03:52:49.000000	Present
149.	Tue, 26 November 2019		-	-	-	00:00:00.000000	Off
150.	Wed, 27 November 2019		-	8:40 am	12:53 pm	04:12:18.000000	Present
151.	Thu, 28 November 2019		-	1:00 pm	-	00:00:00.000000	Present
152.	Fri, 29 November 2019		-	8:29 am	11:59 am	03:29:55.000000	Present
153.	Sat, 30 November 2019		-	8:31 am	12:58 pm	04:27:02.000000	Present
154.	Sun, 01 December 2019		-	-	-	00:00:00.000000	Off
155.	Mon, 02 December 2019		-	7:24 am	1:01 pm	05:37:04.000000	Present
156.	Tue, 03 December 2019		-	8:31 am	12:59 pm	04:28:09.000000	Present
157.	Wed, 04 December 2019		-	-	-	00:00:00.000000	Off
158.	Thu, 05 December 2019		-	8:35 am	1:32 pm	04:56:55.000000	Present
159.	Fri, 06 December 2019		-	8:35 am	11:58 am	03:23:36.000000	Present
160.	Sat, 07 December 2019		-	8:44 am	12:58 pm	04:13:49.000000	Present
161.	Sun, 08 December 2019		-	-	-	00:00:00.000000	Off
162.	Mon, 09 December 2019		-	8:33 am	12:58 pm	04:24:47.000000	Present
163.	Tue, 10 December 2019		-	8:34 am	1:01 pm	04:26:58.000000	Present
164.	Wed, 11 December 2019		-	8:35 am	1:02 pm	04:26:54.000000	Present

BEFORE THE HONORABLE HIGH COURT PESHAWAR TKHYBER
PAKHTUNKHWA

Write petition no: -P/2019

Shah Alam Khan S/O Ibrahim Khan R/O Meshto Banda Bagatoo Tehsil and District
Hangu Petitioner

VERSUS

Medical Superintendent Shaheed Farid Khan DHQ Hospital Hangu
..... (Respondents NO.3)

AFFIDAVIT

I, Dr. Wilayat Khan Deputy Medical Superintendent, Shaheed Farid Khan DHQ Hospital Hangu do hereby solemnly affirm and declare that the content of the accompanying reply on behalf of Medical Superintendent S.F.K DHQ Hospital Hangu respondent No.3 is true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.

Identified by

[Signature]
Advocate General,
RPK Peshawar
[Signature]

[Signature]
Dr. Wilayat Khan
Deputy Medical Superintendent,
S. F. K DHQ Hospital Hangu

CNIC# 14101-704926-9
Mobil# 0333-9296832

-FILED TODAY

Deputy Registrar
26 DEC 2019

17670
I verified that the above was verified on solemn affirmation before me on the day of Dec 19 26 Nilayat Khan Peshawar who was identified by A.G.
Who is personally
A.G.
26/12/19
Commissioner
Peshawar High Court, Peshawar

BEFORE THE HONALBE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No.5521-P/2019

Muhammad Shafiq S/o Zalib Gul R/o Village
Sara-Chapper P.O Zargari Tall District Hangu. PETITIONER


Versus


District Accounts officer Hangu.

..... RESPONDENT

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S.NO	Description of Documents	Annexure	Pages
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03	District Accounts Office Hangu (Shortcomings/Deficiencies in written)	"A"	04
04	Chairman of DDAC Hangu: letter dated 30/07/2019.	"B"	05
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DEPONENT
District Accounts Officer
Hangu


24/12/19
W.P Copy Received
For A.G.

SCANNED
26 DEC 2019
Signature

FILED TODAY

Deputy Registrar

24 DEC 2019.

1. THE RECORDS
24 DEC 2010

BEFORE THE HONALBE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No.5521-P/2019

Muhammad Shafiq S/o Zalib Gul R/o Village
Sara Chapper P.O Zargari Tall District Hangu. **PETITIONER**

Versus

District Accounts officer Hangu. **RESPONDENT**

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

Respectfully Sheweth,

PRILIMINARY OBJECTIONS.

1. That the petitioner has got no cause of action.
2. That the petition is time barred.
3. That the petition is not maintainable in the present forum.
4. That the petition is bad for mis-joinder & Non-joinder of necessary parties.
5. That the petitioner has not come to this court with clean hands.
6. That the petition is barred by law.
7. That the Hon'ble court with respect has no jurisdiction.

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 4 ARE AS UNDER:-

1. Pertain to Respondent No.3.
2. Pertain to Petitioner.
3. Pertain to Respondent No.3.
4. Incorrect, the Respondent No.3 has submitted Source-1 and other connected documents of the Petitioner to this office for releasing of salaries but this office returned the same documents with the some shortcomings / deficiencies in written, but the Para 7 is still stand. (Photocopy attached) **"Annexure "A"**.
5. No Comments.

GROUNDS:

- a. Reply as per Para "4".
- b. Incorrect, Meanwhile the Chairman of DDAC Hangu issued a letter to the undersigned illegal appointments have been made by the Respondent No. 3 may not process the salaries of the newly appointment till the completion of enquiry. The commissioner Kohat Division has ordered / enquiry to dig out the facts of corruption of newly recruited appointment made by the Respondent No. 3(Photocopy attached). **"Annexure "B"**.

FILED TODAY
Deputy Registrar
24 DEC 2019

The undersigned wrote a letter to the Accountant General Khyber Pakhtunkhwa Peshawar vide this office memo No.1887/DAO/HU/Payroll/2019-20, dated 20/08/2019 for guideline to enable this office to process the salaries of the petitioner. **"Annexure "C"**

The Accountant General Khyber Pakhtunkhwa directed the undersigned to make provisional payment to the new appointment made by the Respondent No.3, till the finalization of inquiry if all other codal formalities are completed by Medical Superintendent. After two days the Accountant General Khyber Pakhtunkhwa telephonically directed to stop the process of salaries of the newly recruited employees **"Annexure" D"**.

The Chairman of DDAC Hangu issued another letter to this office for none processing of salaries of the newly appointed employees with the directions to the Chief Minister Khyber Pakhtunkhwa to conduct an inquiry against the appointment made by the Respondent No. 3 through Secretary Health. **"Annexure "E"**.

The undersigned wrote another letter to the Accountant General Khyber Pakhtunkhwa Peshawar for advice regarding the processing of salaries of the newly recruited employees vide this office memo No.2223/DAO/HU/Admn/2019-20 dated 06/12/2019.Reply of which is still awaited. **"Annexure" F"**.

c. Reply as per Para "b" above.

d. No comments.

e. Incorrect, the as per Para "b" above.

f. Correct.

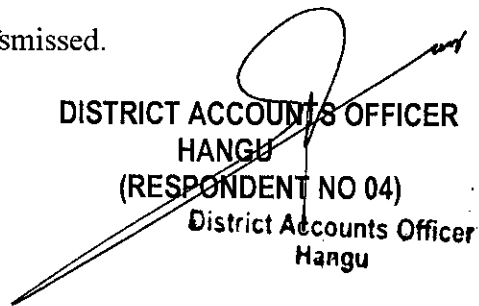
g. Incorrect, reply as per Para"4" above.

h. No comments.

i. Incorrect; the view of this office all the requirements / shortcomings may kindly be completed in all respect to process / release the salary.

j. No comments.

It is therefore requested that the case may please be dismissed.


DISTRICT ACCOUNTS OFFICER
HANGU
(RESPONDENT NO 04)
District Accounts Officer
Hangu

FILED TODAY
Deputy Registrar
24 DEC 2019

BEFORE THE HONALBE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No.5521-P/2019

Muhammad Shafiq S/o Zalib Gul R/o Village
Sara Chapper P.O Zargari Tall District Hangu. **PETITIONER**

Versus

District Accounts officer Hangu. **RESPONDENT**

AFFIDAVIT

I Mr. Ghulam Dastagir, Assistant Accountant of District Accounts Office Hangu, do solemnly affirm & declare on oath that the contents of Parawise comments on behalf of Respondent No. 04 are true and correct to the best of my knowledge and belief that nothing has been concealed from this Hon' able court.

DEPONENT

CNIC#14203-6065132-3

0223 9245282

Identified by

[Signature]
Advocate General
Khyber Pakhtunkhwa
Peshawar. *[Signature]*


No: 12791
Certified that the above was verified on solemnly affirmation before me in office, this 26 th day of Dec 2019 by Ghulam Dastagir s/o A.A Hangu who was identified as A.G. Who is personally known to me:
<i>[Signature]</i> Oath Commissioner Peshawar High Court, Peshawar

Nadra verified


FILED TODAY
Deputy Registrar
24 DEC 2019

The following 18 numbers of service books along with source I forms in respect of newly appointees in shaheed Farid Khan DHQ Hospital Hangu are returned with the following observations.

- 1: CNIC numbers of the officials may be got verified from NADRA office Hangu.
- 2: Employment Exchange registration card in respect of Class IV Employees and attested copies of all relevant documents may also be furnished to this office.
- 3: A copy of minutes of meeting be furnished.
- 4: Position codes of the post on each Source- I form may be recorded.
- 5: Copy of the advertisement may also be attached.
- 6: As per directives of Mr. Shah Faisal Khan chairman DDAC/MPA PK-83 that the pay of newly appointees in Shahid Farid Khan Hospital Hangu made by MS Haleem ur Rehman may not be processed till the completion of enquiries to dig out the facts in this regard. (Copy attached for your perusal).
- 7: A certificate may be given on each source I form that no any enquiries is pending against the newly appointees.


District Accounts Officer
Hangu

18 service Books along with source I of the newly appointees received by hand.


6/8/2019
Salman Durrani


District Accounts Officer
Hangu

05

(B)



OFFICE OF THE CHAIRMAN DDAC/

MEMBER PROVINCIAL ASSEMBLY KHYBER PAKHTUNKHWA PK-83

HANGU

No. 027 /DDAC/H

Dated: 30/07/2019

To

The District Account Officer,
Hangu.

Subject:-

NON PROCESSING OF SALARY DOCUMENTS OF NEWLY APPOINTED CANDIDATES OF SHAHEED FARID KHAN DHQ HOSPITAL HANGU MADE BY MS. HALEEM UR REHMAN.

Dear Sir!

Please refer to the subject noted above.

Based on complaints and without the consent of the undersigned, illegal appointments have been made by MS Mr. Haleem ur Rehman. The Commissioner Kohat, Division Kohat has already ordered enquiry to dig out the facts of corruption made in this regard.

Therefore till the completion of enquiry the documents of the appointed candidates may not be processed/kept pending.

SHAH FAISAL KHAN
CHAIRMAN DDAC
MPA-83 HANGU

Endst: No. & Date Even.

Copy to.

1. The Commissioner, Kohat Division, Kohat.
2. The Deputy Commissioner, Hangu.

SHAH FAISAL KHAN
CHAIRMAN DDAC
MPA-83 HANGU

Important
Rafiq
21/7.

District Account Officer
Hangu

06

OFFICE OF THE DISTRICT ACCOUNTS OFFICE HANGU

No. DAO/Hu/2019-20 / 1881

dated: 20/8/2019

The Accountant General
Khyber Pakhtunkhwa
Peshawar.

Subject: Possessing of source-I/salary of newly appointed candidates of Shaheed Farid Khan DHQ Hospital Hangu.

Memo:

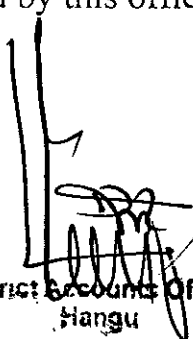
Kindly refer to the subject noted above.

The MS Shaheed Farid Khan DHQ Hospital Hangu has been appointed 18 numbers of employees in various cadres and submitted source -I along with service books to this office for activation of pay.

It is for your kind informations that Mr. Shah Faisal Khan chairman DDCA/MPA KPK Pk-83 has intimated to this office that the appointments have been mad by the MS Hangu are illegal, without the consent of under signed. The commissioner Kohat division kohat has already ordered enquiry to dig out the facts in this regards. Therefore till the completion of enquiry the documents of newly appointed candidates may not be processed/kept pending (copy attached).

It is further stated that this office returned all the source-I of newly appointed candidates with certain observations. (Copy of observation attached for ready reference please).

In the above circumstances this office may please be guided that the pay of the newly appointees will be processed after completion of all observations raised by this office except at S No-6 or other wise.


District Accounts Officer
Hangu


District Accounts Officer
Hangu



Office of the
Accountant General

Khyber Pakhtunkhwa Peshawar

Phone: 091 9 11250-53

No T-23 (33)/C & C/DAO Hangu/ 1/1/16

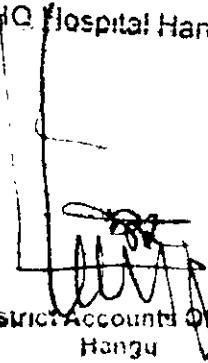
Dated 1/1/2016

To

District Accounts Officer,
Hangu

Subject POSSESSING OF SOURCE OF NEWLY APPOINTED
CANDIDATES OF SHAHEED FARID KHAN DHO HOSPITAL
HANGU.

The undersigned is directed to refer to your letter No DAO/HU/2019/201881 dated 20.03.2016 on the subject cited above and to say that it may be ensured that these posts are filled up by the competent forum under the rules. The observations raised in your referred letter are genuine. The Medical Superintendent may address all the issues highlighted. As far as inquiry is concerned, your office may, if deemed appropriate, make provisional payment through the system till finalization of the inquiry if all other codal formalities are completed by the Medical Superintendent Shaheed Farid Khan DHO Hospital Hangu.


District Accounts Officer
Hangu

ACCOUNTS OFFICER (CM & I)



Shah Faisal Khan

MEMBER PROVINCIAL ASSEMBLY
KHYBER PAKHTUNKHWA
MPA PK-83 CHAIRMAN DDAC HANGU
☎ 0925-621340 ☎ 0331-9292917



No. 05 /DDAC/Hangu

Dated: 21/10/2019

To

— The District Accounts Officer,
Hangu.

Subject:- NON PROCESSING OF SALARY DOCUMENTS OF NEWLY APPOINTED CANDIDATES OF SHAHEED FARID KHAN DHQ HOSPITAL HANGU MADE BY MS HALEEM UR REHMAN.

Dear Sir!

Reference your office letter No. DAO/HU/Admn/2019-20/1988 dated 20-09-2019 on the above noted subject.

It is apprised the Chief Minister Khyber Pakhtunkhwa has already directed Secretary Health to conduct inquiry, copy of the CM Directive is enclosed herewith.

It is therefore, requested that the case may be kept pending till the report of inquiry officer and the direction by the Chief Minister Khyber Pakhtunkhwa.

SHAH FAISAL KHAN
CHAIRMAN DDAC
MPA-83 HANGU

District Accounts Officer
Hangu

09

OFFICE OF THE DISTRICT ACCOUNTS OFFICER, HANGU

No. DAO.HU/Admn/2019-20/2223

dated: 6-12-19

To

The Accountant General,
Khyber Pakhtunehaw
Peshawar.

Subject:- Processing of Source-1 of Newly Appointed candidates of Shaheed Farid Khan DHQ Hospital Hangu.


Memo:


Kindly refer to your ^{file} memo NoT-23(33)/C&C/DAO Hangu 444 dated 9.10.2019 on the above subject.

In this connection it is submitted that this office was telephonically directed by worthy Accountant General Khyber Pakhtunkhwa that the salaries of the newly recruited employees of the Shaheed Farid Khan DHQ Hospital Hangu may not be processed due to some irregularities in recruitment process, as reported by CM secretariat.

Now an application from these newly recruited employees addressed to the undersigned and others has been received wherein they are requested for processing of their salaries (copy enclosed).

It is therefore requested that this office may kindly be updated and advised regarding processing of salaries of these employees.


District Accounts Officer
Hangu


District Accounts Officer
Hangu.



قلمی شناختی کارڈ
14203-6065132-3



محمد علی محمد
والدہ شہزادہ
شناختی علامت دائیں ہاتھ پر نشان لگوانا
May 1 1987

219107741625639



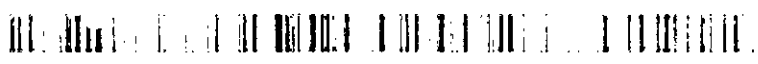
TX7B9P 14203-6065132-3

قلمی شناختی کارڈ دائیں ہاتھ پر نشان لگوانا
شناختی علامت دائیں ہاتھ پر نشان لگوانا

قلمی شناختی کارڈ دائیں ہاتھ پر نشان لگوانا
شناختی علامت دائیں ہاتھ پر نشان لگوانا

14203-2024

219107741625639



Census 1988 Database [x]

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

Other Information that does not appear on card [x]

Place of Birth: کراچی
Religion: Islam
Father's Name: محمد علی محمد

Digitl Signature [x]