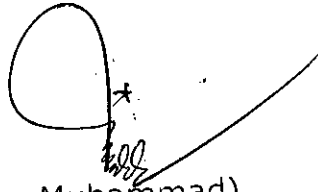


07.09.2022

Appellant in person present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present.

Appellant requested for adjournment on the ground that his counsel is busy in the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.



(Mian Muhammad)
Member (Executive)
Camp Court Swat

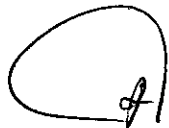


(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

06.10.2022

Appellant alongwith his counsel present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for official respondents present.

Learned counsel for the appellant sought adjournment on the ground that he is proceeding for appearance in cases fixed in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 10.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)
Member (J)
Camp Court Swat



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

8th June, 2022

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG for official respondents No. 1 to 3 present. Private respondents No. 4 to 59 are not present.

Written reply/comments on behalf of private respondents No. 4 to 59 not submitted despite numerous opportunities, therefore, their right for submission of written reply/comments is struck off. To come up for arguments on 05.07.2022 before the D.B at camp court Swat.

A


(Kalim Arshad Khan)
Chairman
Camp Court Swat


05.07.2022

Appellant present through counsel.

Noor Zaman Khattak, learned District Attorney for respondents present.

Counsel for the appellant was ready for arguments but from perusal of record, it is evident that some record is very much essential for just decision of case, therefore, learned District Attorney is directed to make sure the production of relevant record in view of Paras No.1 & 5 of comments. To come up for production of relevant record and arguments on 03.08.2022 before D.B at Camp Court, Swat.


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


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

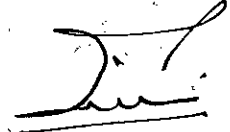
3.8.22

Due to summer vacation the case is adjourned to 7-9-22 for the same.



04.04.2022

Appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 to 59. Previous date was changed on Reader Note, therefore, private respondents be summoned through registered post to submit comments on 10.05.2022 before the S.B at Camp Court Swat.



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

10.05.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 to 59.

Vide previous order sheet, it was ordered that private respondents be summoned through registered post, however on perusal of the record, it transpired that the same have not been sent to the private respondents, therefore, in this respect explanation be called from the Muharrar. Private respondents No. 4 to 59 be summoned through registered post for submission of written reply/comments on 08.06.2022 before the S.B at Camp Court Swat.

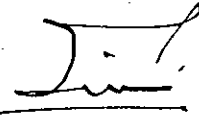


(Salah-Ud-Din)
Member (J)
Camp Court Swat

06.01.2022

Appellant alongwith clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 to 59. Written reply on behalf of official respondents No. 1 to 3 has already been submitted.

Vide previous order dated 05.11.2021, the appellant was directed to deposit publication fee within 07 days regarding summoning the private respondents through publication in newspaper daily "Mashriq" but the said fee has not been deposited by the appellant so far, therefore, the appellant is once again directed to deposit the requisite publication fee within 03 working days. Thereafter, private respondents be summoned through ordinary process as well as publication in daily "Mashriq" and to come up for written reply/comments on behalf of private respondents No. 4 to 59 on 07.02.2022 before the S.B at Camp Court Swat.



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

07.02.2022

Tour is hereby canceled .Therefore, the case is adjourned to 04.04.2022 for the same as before at Camp Court Swat.


Reader

05.10.2021

Appellant in person present. Mr. Asif Masood Ali Shah,
Deputy District Attorney for the respondents present.

Record shows that private respondents No. 4 to 59 were directed to be put on notice but fiasco. Office is once again directed to issue notices to all the private respondents (4 to 59) positively, failing which, proper action will be taken against the concerned Moharrir. Case is adjourned to 05.11.2021 before D.B at Camp Court Swat.



(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court, Swat



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

05.11.2021

Mr. Muhammad Javed Khan, Advocate, for the appellant present. Mr. Safiullah, Section Officer (II) alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for official respondents No. 1 to 3 present. Reply/comments on behalf of official respondents have already been submitted.

Learned counsel for the appellant submitted an application that in view of large number of private respondents, they be summoned through publication in newspaper. The application is allowed. Private respondents be summoned through ordinary process as well as publication in daily "Mashriq". Appellant is directed to deposit publication fee within 07 days. Adjourned. To come up for attendance as well as submission of reply/comments on behalf of private respondents and arguments before the D.B on 06.01.2022 at Camp Court Swat.



(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court Swat



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

4-1 .2020

Due to COVID19, the case is adjourned to

1/03/2020 for the same as before.

Reader

01.03.2021

Appellant present in person.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Perusal of record would reveal that the instant service appeal was admitted to regular hearing vide order sheet dated 04.03.2020. Parawise comments were submitted by official respondents but private respondents were not put on notice, therefore, all the private respondents No.4 to 59 be put on notice for the next date.

Case is adjourned to 04.05.2021 before D.B. at Camp Court, Swat.

(Mian Muhammad)
Member (E)
Camp Court, Swat

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

*Due to COVID19 therefore to
come up for the same on 05/03/21*

Reader

02.11.2020

Appellant in person present.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Jaffar Ali Assistant for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 04.01.2021 for arguments, before D.B at Camp Court, Swat.



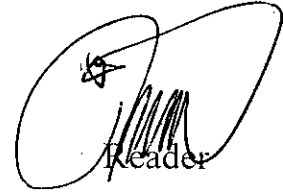
(Atiq ur Rehman Wazir)
Member(E)
Camp Court, Swat



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

02.01.2020

Due to COVID-19, the case is adjourned. To come up for the same on 05.08.2020, at camp court Swat.



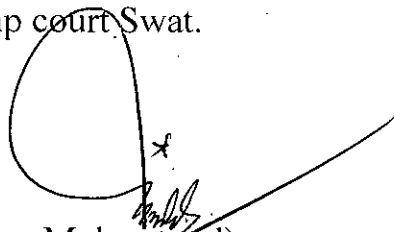
Reader

06.10.2020

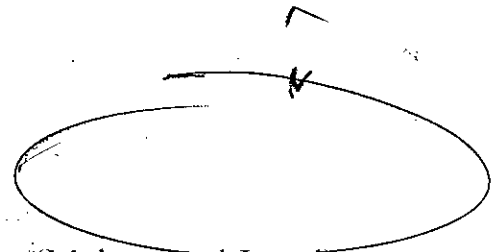
Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith Mr. Jafar Ali, Assistant and Mr. Amjad Ali, Assistant for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat.

Adjourned to 02.11.2020 for arguments before D.B at camp court Swat.




(Mian Muhammad)
Member(E)



(Muhammad Jamal)
Member
Camp Court Swat

03.02.2020

Learned counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney alongwith Dr. Younas Faisal Medical Officer and Jaffar Ali Assistant present. Representatives submitted written reply/comments. Learned counsel for the appellant seeks adjournment for arguments. Adjourn. To come up for preliminary arguments on 04.03.2020 before S.B at Camp Court Swat. Restraint order shall continue till the next date fixed.



Member
Camp Court, Swat.

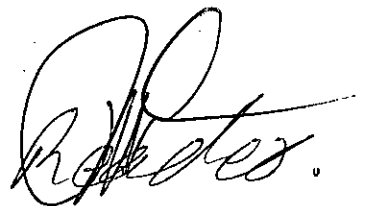
04.03.2020

Appellant with counsel present. Mr. Usman Ghani learned District Attorney present. Written reply/parawise comments have already been submitted on behalf of respondents. Parties stated that since parawise reply/comments have been submitted by the respondents therefore the present service appeal may be posted for arguments before D.B. Consequently the present service appeal is admitted for regular hearing and posted for rejoinder, if any, and arguments before D.B on 07.04.2020 at Camp Court Swat. Dr. Faisal Younas representative of respondent department be put to notice for the date fixed.



Member
Camp Court, Swat.

Due to corona virus today
to camp court swat has been
cancelled. To come up for the
same on 02/06/2020



Service Appeal No. 1063/2019

07.11.2019

Appellant alongwith his counsel present. None present on behalf of the respondents therefore, notices be issued to the respondents with the direction to direct the representative to attend the court and submit reply on the next date positively. Case to come up for reply and preliminary hearing on 04.12.2019 before S.B at Camp Court Swat. The restraint order shall continue till the next date.



(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

04.12.2019

Appellant in person present. Written reply not submitted. Zia-ul-Haq Computer Operator representative of respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 06.01.2020 before S.B at Camp Court, Swat.



Member
Camp Court, Swat

06.01.2020

Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Neither written reply on behalf of respondents submitted nor representative of the department is present, therefore, notices be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned to 03.02.2020 for written reply/comments before S.B at Camp Court Swat. The restraint order shall continue till the next date.



(Muhammad Amin Khan Kundi)
Member
Camp Court Swat

A. No. 1062/2019
Shamsher Ali vs Govt

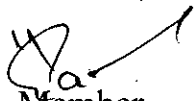
04.09.2019

Learned counsel for the appellant present. Heard.

The appellant (Office Assistant) has filed the present service appeal against the provisional seniority list of Office Assistant (BS-16) in the Health Department Khyber Pakhtunkhwa for the year 2019. Learned counsel for the appellant contended inter-alia that the impugned provisional seniority list is incorrect and that the respondent department is bent upon making promotions on the strength of the said provisional seniority list instead of Final Seniority list.

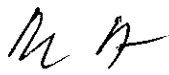
Let pre-admission notice be issued to the respondents for reply. Adjourn. To come up for reply of the respondents and preliminary hearing before S.B on 09.10.2019 at Camp Court, Swat.

In the meanwhile respondent department is directed to refrain from doing promotions on the strength of impugned provisional seniority list till the next date fixed.


Member
Camp Court, Swat

09.10.2019

Appellant in person and Mr. Zia-ul-Haq, Computer Operator attorney on behalf of respondent No. 3 present and submitted authority letter on behalf of respondent No. 3. Remaining respondents are not present nor notices were issued to them despite the fact that in the previous order sheet it was ordered that pre-admission notice be issued to the respondents for reply, therefore, fresh notices be issued to the respondents for reply. Case to come up for reply and preliminary hearing on 07.11.2019 before S.B at Camp Court Swat. In the meanwhile restraint order dated 04.09.2019 shall continue till the next date.




(Muhammad Amin Khan Kundi)
Member
Camp Court Swat.

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1062 /2019 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/08/2019	<p>The appeal of Mr. Shamsher Ali resubmitted today by Mr. Muhammad Javed Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 19/08/19</p>
2-	26-08-2019	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>04-09-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>


This is an appeal filed by Mr. Shamsheer Ali today on 09/08/2019 against the seniority list dated 17.4.2019 against which he preferred/made departmental appeal/ representation on 13.05.2019 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be flagged.
- 4- Sub rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondent.
- 5- Three copies/sets of the appeal along annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

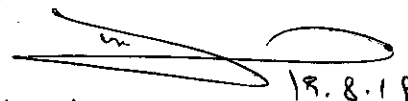
No. 1390/ST,

Dt. 09/8/2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M. Javid Khan Adv. Swat.

note:- Objection are removed
and resubmitted to day


18.8.19
M. Javid Khan
A.S.C

01.03.2021

Appellant present in person.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Perusal of record would reveal that the instant service appeal was admitted to regular hearing vide order sheet dated 04.03.2020. Parawise comments were submitted by official respondents but private respondents were not put on notice, therefore, all the private respondents No.4 to 59 be put on notice for the next date.

Case is adjourned to 04.05.2021 before D.B at Camp Court, Swat.

(Mian Muhammad)
Member (E)
Camp Court, Swat

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

06.10.2020

Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith Mr. Jafar Ali, Assistant and Mr. Amjad Ali, Assistant for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat.

Adjourned to 02.11.2020 for arguments before D.B at camp court Swat.

(Mian Muhammad)
Member(E)

(Muhammad Jamal)
Member
Camp Court Swat

02.11.2020

Appellant in person present.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Jaffar Ali Assistant for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 04.01.2021 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

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT**

Service Appeal No. 1062 /2019

Shamsher Ali

Vs

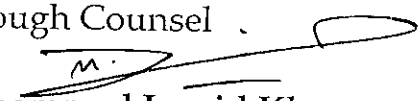
Govt. of KPK through Secretary Health and others

INDEX

S. #	Description of Documents	Annexures	Pages
1.	Service Appeal		1-12
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3	Addresses of the Parties		14-18
4	Copy of application for the suspension of the impugned seniority list		19-21
5	Copy of the appointment order dated 01/08/1982	"A"	22, 23
6	Copy of the office order dated 26/09/1994	"B"	24-26
7	Copy of the office order dated 31/12/2008 along with arrival report dated 01/01/2009	"C"	27, 28
8	Copy of the letter dated 17/04/2019	"D"	29-41
9.	Copy of the departmental appeal dated 13/05/2019	"E"	42-45
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Appellant

Through Counsel


Muhammad Javaid Khan

Advocate, Supreme Court of
Pakistan

Office: Allah-o-Akbar Masjid,
College Colony, Saidu Sharif, swat
Cell: 0343-960749

1

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT**

Service Appeal No. _____/2019

Shamsher Ali S/o Gul Sher R/o Afsar Abad, Saidu Sharif,
Tehsil Babozai, District Swat

.....Appellant

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa through Secretary Health
Khyber Pakhtunkhwa at Civil Secretariat Peshawar
- 2) Director General Health Services Khyber Pakhtunkhwa at
Peshawar
- 3) Medical Superintendent Saidu Group of Teaching Hospital
at Saidu Sharif, Swat
- 4) Sabir Hussain S/o Abdur Rauf Director General Health
Service (Office Assistant)
- 5) Imtiaz Hussain S/o Muhammad Hussain Director General
Health Service (Office Assistant)
- 6) Ghafoor Ur Rahman S/o Fazal Karim Director General
Health Service (Office Assistant)
- 7) Wahid Shah S/o Said Shah Director General Health Service
(Office Assistant)
- 8) Faizullah Khan S/o Raza Khan Director General Health
Service Peshawar (Office Assistant)

- 9) Subhanullah Khber Agency (Office Assistant)
- 10) Irshad Khaliq PGMI/HMC Peshawar (Office Assistant)
- 11) Gulab Khan PGMI / HMC Peshawar (Office Assistant)
- 12) Nasrullah PGMI / HMC Peshawar (Office Assistant)
- 13) Muhammad Parvaiz PGMI / HMC Peshawar (Office Assistant)
- 14) Ibrar Ahmad SHPD Peshawar (Office Assistant)
- 15) Khaliq Dad DHQ Hospital Bannu (Office Assistant)
- 16) Bakhtawar Shah DHO Charsadda (Office Assistant)
- 17) Safi Ur Rahman S/o Aziz Ur Rehman DHO Lakki (Office Assistant)
- 18) Wali Khan S/o Tahmas Khan KCD Peshawar (Office Assistant)
- 19) Miskeen Khan S/o Ashraf Khan Director General Health Service Peshawar (Office Assistant)
- 20) Muhammad Haroon Sher Ahmad BBS Teaching Hospital Abbottabad (Office Assistant)
- 21) Muhammad Gul S/o Rendi Gull Director General Health Service, Office (Office Assistant)
- 22) Shah Jehan S/o Bakht Rozi DHQ Hospital Charsada (Office Assistant)
- 23) Ijaz Ahmad Director General Health Service, Office (Office Assistant)
- 24) Aftab Ali Shah LRH Peshawar (Office Assistant)

- 25) Bahadar Khan MMC Mardan (Office Assistant)
- 26) Mir Wali Khan KGMC, Peshawar (Office Assistant)
- 27) Ikram Ullah KTH Peshawar (Office Assistant)
- 28) Khitab Jan S/o Nasrullah Shinwari DHQ Hospital Landi Kotal (Office Assistant)
- 29) Muhammad Ali S/o Bakht Mand STH, Swat (Office Assistant)
- 30) Hashmat Ali HMC, Peshawar (Office Assistant)
- 31) Asif Jan S/o Muhammad Yousaf KCD, Peshawar (Office Assistant)
- 32) Murad Ali S/o Hazrat Muhammad LRH, Peshawar (Office Assistant)
- 33) Aminullah Jan DT Lab, Peshawar (Office Assistant)
- 34) Bakht Biland S/o Malazai DHQ Dir Lower (Office Assistant)
- 35) Mukhtiar Ali S/o Abdur Razaq Sifwat Ghayur Memorial Hospital Peshawar (Office Assistant)
- 36) Sher Muhammad Jan AS Khyber Agency (Office Assistant)
- 37) Muhammad Ayub SMC Swat (Office Assistant)
- 38) Niaz Ali KMC, Peshawar (Office Assistant)
- 39) Zia Ullah Khan S/o Shokat Khan Food Lab Peshawar (Office Assistant)
- 40) Syed Amjad Ali Shah S/o Syed Munawar Shah DGHS, Office, Peshawar (Office Assistant)

- 41) Ali Haider S/o Aziz Ur Rahman MCC, Peshawar (Office Assistant)
- 42) Syed Sharif Hussain S/o Syed Qadam Hussain AS Kurram / DHS FATA (Office Assistant)
- 43) Muhammad Ullah AS Khyber Agency (Office Assistant)
- 44) Abdul Qudus S/o Muhammad Rauf DHO Office D.I.Khan (Office Assistant)
- 45) Firdos Khan S/o F.Hadi DHO Charsada (Office Assistant)
- 46) Shabir Ahmad S/o Khair Ur Rehman KTH Peshawar (Office Assistant)
- 47) Shah Hussain S/o Gul Haider PMI Swat (Office Assistant)
- 48) Daud Jan KTH Peshawar (Office Assistant)
- 49) Asmatullah S/o Ghulam Qadir DHS FATA (Office Assistant)
- 50) Sami Ullah SMC Swat (Office Assistant)
- 51) Muhammad Rauf BMC Bannu (Office Assistant)
- 52) Muhammad Salim LRH Peshawar (Office Assistant)
- 53) Muhammad Alam Director General Health Service Office Peshawar (Office Assistant)
- 54) Muhammad Ayaz S/o Muhammad Din Director General Health Office Peshawar (Office Assistant)
- 55) Kifayat Ur Rehman S/o Malik Zada Director General Health Service Office (Office Assistant)

- 56) Roidar Khan S/o Sardar Khan Director General Health Service Office (Office Assistant)
- 57) Sifatullah S/o Hidayatullah Director General Health Service Office (Office Assistant)
- 58) Muhammad Shafiq S/o Muhammad Younas Director General Health Service Peshawar (Office Assistant)
- 59) Jamal Ud Din S/o Guil Muhammad DHO Chitral (Office Assistant)

.....*Respondents*

Service Appeal Under Section 4 of Service Tribunal Act read with other relevant provisions against the Provisional Seniority List of Office Assistant (BS-16) in the Health Department Khyber Pakhtunkhwa for the year 2019, which was communicated to the appellant vide letter No. 4053-148/Personnel dated 17/04/2019, vide which the appellant has been placed at serial No. 86 illegally, unlawfully and unconstitutionally instead of serial No. 29 in accordance with the date of promotion / arrival dated 01/01/2009.

PRAYER:

On acceptance of this service appeal;

Firstly: The impugned placement of the appellants at serial No. 86 instead of serial No. 29/30 in the seniority list may be declared as illegal, unlawful and unconstitutional and the respondents may be directed to place the name of the appellants at Serial No. 29 and then place the name / case of the appellants before the first available meeting of the Provincial Selection Committee / Board for promotion to the post of Superintendent (BS-17) accordingly.

Secondly:

The respondents may be directed to grant promotion to the appellants from the date of eligibility along with all service back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favor of appellants against respondents.

②

Respectfully Sheweth:

The appellant submits as under:

1. That the appellant was appointed as Junior Clerk in the Health Department on 01/08/1982. (Copy of the appointment order dated 01/08/1982 is annexed herewith as annexure "A")
2. That later on the appellant was promoted to the post of Senior Clerk vide office order dated 26/09/1994. (Copy of the office order dated 26/09/1994 is attached herewith as annexure "B")
3. That the appellant was then promoted to the post of Office Assistant vide office order dated 31/12/2008. (Copy of the office Order dated 31/12/2008 along with arrival report dated 01/01/2009 is attached herewith as annexure "C")

4. That the respondent No. 2 communicated to the appellant impugned Provisional Seniority List vide letter dated 17/04/2019. (Copy of the letter dated 17/04/2019 is attached herewith as annexure "D")

5. That the appellant then filed department appeal before respondent No. 1 against the impugned seniority list on 13/05/2019. (Copy of the departmental appeal dated 13/05/2019 is attached herewith as annexure "E")

6. That being aggrieved from the illegal, unlawful and unconstitutional placement of the name of the appellant at Serial No. 86 of the seniority list instead of Serial No. 29/30, the appellant requests for placement of the name of the appellant at serial No. 29 of the seniority list inter alia on the following grounds amongst others.

9
GROUNDS:

i) That the placement of the name of the appellant at Serial No. 86 instead of serial No. 29 in the Seniority List is illegal, unlawful, unconstitutional.

ii) That if we go by the seniority list of the year 2019 in term of date of promotions then it is very much clear that the name of the appellant should have been placed at Serial No. 29 /30 instead of serial No. 86 for the following reasons.

a. The impugned Seniority List is correct to the extent of Serial Nos. 1 to 20 in term of date of promotion in respect to the stance of the appellant.

b. Serial No. 21 to 76 are Junior to the appellant in term of their date of

promotion as is evident from the impugned seniority list.

c. Serial No. 77 upto serial No. 85 are senior than the appellant in term of their date of promotion.

iii) That previously appellant was considered senior and eligible for promotion by the respondent No.2 vide letter dated 07/09/2017 and a writ of mandamus has been filed in respect of the same before the Honorable Peshawar High Court Mingora Bench. (Copy of the letter dated 07/09/2017 is attached herewith as annexure "F")

iv) That the impugned seniority list has been prepared in violation of section 8 of Civil Servant Act, 1973.

v) That the impugned seniority list has been issued in violation Article 4,10(a), 25 and 38(e) of the

Constitution of the Islamic Republic of
Pakistan, 1973.

- vi) That the impugned seniority list has been issued in violation of the judgments of the superior courts of the country.
 - vii) That other grounds not specifically raised will be argued with the permission of this Honorable Tribunal at the time of arguments.
7. That respondents Nos. 4 to 59 being necessary party are included in the list of respondents as per Rule 6(4) of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974, because the relief claim will affect their seniority.
8. That this appeal is being filed against the impugned seniority list dated 17/04/2019, against which a departmental appeal was

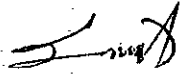

filed on 13/05/2019, which has not been decided as yet hence this appeal is within time and this Honorable Tribunal has got jurisdiction.

It, is therefore, humbly prayed that on on acceptance of this service appeal;

Firstly: the impugned placement of the appellant at serial No. 86 instead of serial No. 29/30 may be declared as illegal, unlawful and unconstitutional and the respondents may be directed to place the name of the appellant at Serial No. 29 and then place the name / case of the appellant before the first available meeting of the Provincial Selection Committee/ Board for promotion to the post of Superintendent (BS-17) accordingly.

Secondly: The respondents may be directed to grant promotion to the appellant from the date of eligibility along with all service back benefits.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant please.


Appellant
Through Counsel 
Muhammad Javaid Khan
Advocate, Supreme Court of
Pakistan

13

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT

Service Appeal No. _____/2019

Shamsher Ali

Vs

Govt. of KPK through Secretary Health and others

AFFIDAVIT

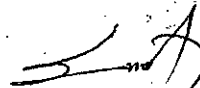
I, Shamsher Ali S/o Gull Sher R/o Mohallah Afsar Abad, Saidu Sharif, District Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

Identified by,



Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan

DEPONENT



Shamsher Ali

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT**

Service Appeal No. _____/2019

Shamsher Ali
Versus
Govt. of Khyber Pakhtunkhwa and others

Memo of Addresses

Address of the Appellant:

Shamsher Ali S/o Gul Sher R/o Afsar Abad, Saidu Sharif,

Tehsil Babozai, District Swat

CNIC No. 15602-0453242-5

Cell No. 0346-8540160

Addresses of the Respondents:

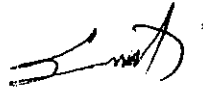
- 1) Govt. of Khyber Pakhtunkhwa through Secretary Health
Khyber Pakhtunkhwa at Civil Secretariat Peshawar
- 2) Director General Health Services Khyber Pakhtunkhwa at
Peshawar
- 3) Medical Superintendent Saidu Group of Teaching Hospital
at Saidu Sharif, Swat
- 4) Sabir Hussain S/o Abdur Rauf Director General Health
Service (Office Assistant)

- 5) Imtiaz Hussain S/o Muhammad Hussain Director General Health Service (Office Assistant)
- 6) Ghafoor Ur Rahman S/o Fazal Karim Director General Health Service (Office Assistant)
- 7) Wahid Shah S/o Said Shah Director General Health Service (Office Assistant)
- 8) Faizullah Khan S/o Raza Khan Director General Health Service Peshawar (Office Assistant)
- 9) Subhanullah Khber Agency (Office Assistant)
- 10) Irshad Khaliq PGMI/HMC Peshawar (Office Assistant)
- 11) Gulab Khan PGMI / HMC Peshawar (Office Assistant)
- 12) Nasrullah PGMI / HMC Peshawar (Office Assistant)
- 13) Muhammad Parvaiz PGMI / HMC Peshawar (Office Assistant)
- 14) Ibrar Ahmad SHPD Peshawar (Office Assistant)
- 15) Khaliq Dad DHQ Hospital Bannu (Office Assistant)
- 16) Bakhtawar Shah DHO Charsadda (Office Assistant)
- 17) Safi Ur Rahman S/o Aziz Ur Rehman DHO Lakki (Office Assistant)
- 18) Wali Khan S/o Tahmas Khan KCD Peshawar (Office Assistant)
- 19) Miskeen Khan S/o Ashraf Khan Director General Health Service Peshawar (Office Assistant)

- 20) Muhammad Haroon Sher Ahmad BBS Teaching Hospital Abbottabad (Office Assistant)
- 21) Muhammad Gul S/o Readi Gull Director General Health Service, Office (Office Assistant)
- 22) Shah Jehan S/o Bakht Rözi DHQ Hospital Charsada (Office Assistant)
- 23) Ijaz Ahmad Director General Health Service, Office (Office Assistant)
- 24) Aftab Ali Shah LRH Peshawar (Office Assistant)
- 25) Bahadar Khan MMC Mardan (Office Assistant)
- 26) Mir Wali Khan KGMC, Peshawar (Office Assistant)
- 27) Ikram Ullah KTH Peshawar (Office Assistant)
- 28) Khitab Jan S/o Nasrullah Shinwari DHQ Hospital Landi Kotal (Office Assistant)
- 29) Muhammad Ali S/o Bakht Mand STH, Swat (Office Assistant)
- 30) Hashmat Ali HMC, Peshawar (Office Assistant)
- 31) Asif Jan S/o Muhammad Yousaf KCD, Peshawar (Office Assistant)
- 32) Murad Ali S/o Hazrat Muhammad LRH, Peshawar (Office Assistant)
- 33) Aminullah Jan DT Lab, Peshawar (Office Assistant)
- 34) Bakht Biland S/o Malazai DHQ Dir Lower (Office Assistant)

- 35) Mukhtiar Ali S/o Abdur Razaq Sifwat Ghayur Memorial Hospital Peshawar (Office Assistant)
- 36) Sher Muhammad Jan AS Khyber Agency (Office Assistant)
- 37) Muhammad Ayub SMC Swat (Office Assistant)
- 38) Niaz Ali KMC, Peshawar (Office Assistant)
- 39) Zia Ullah Khan S/o Shokat Khan Food Lab Peshawar (Office Assistant)
- 40) Syed Amjad Ali Shah S/o Syed Munawar Shah DGHS, Office, Peshawar (Office Assistant)
- 41) Ali Haider S/o Aziz Ur Rahman MCC, Peshawar (Office Assistant)
- 42) Syed Sharif Hussain S/o Syed Qadam Hussain AS Kurram / DHS FATA (Office Assistant)
- 43) Muhammad Ullah AS Khyber Agency (Office Assistant)
- 44) Abdul Qudus S/o Muhammad Rauf DHO Office D.I.Khan (Office Assistant)
- 45) Firdos Khan S/o F.Hadi DHO Charsada (Office Assistant)
- 46) Shabir Ahmad S/o Khair Ur Rehman KTH Peshawar (Office Assistant)
- 47) Shah Hussain S/o Gul Haider PMI Swat (Office Assistant)
- 48) Daud Jan KTH Peshawar (Office Assistant)
- 49) Asmatullah S/o Ghulam Qadir DHS FATA (Office Assistant)
- 50) Sami Ullah SMC Swat (Office Assistant)

- 51) Muhammad Rauf BMC Bannu (Office Assistant)
- 52) Muhammad Salim LRH Peshawar (Office Assistant)
- 53) Muhammad Alam Director General Health Service Office Peshawar (Office Assistant)
- 54) Muhammad Ayaz S/o Muhammad Din Director General Health Office Peshawar (Office Assistant)
- 55) Kifayat Ur Rehman S/o Malik Zada Director General Health Service Office (Office Assistant)
- 56) Roidar Khan S/o Sardar Khan Director General Health Service Office (Office Assistant)
- 57) Sifatullah S/o Hidayatullah Director General Health Service Office (Office Assistant)
- 58) Muhammad Shafiq S/o Muhammad Younas Director General Health Service Peshawar (Office Assistant)
- 59) Jamal Ud Din S/o Guil Muhammad DHO Chitral (Office Assistant)



Appellant

Through Counsel

Muhammad Javaid Khan

Advocate, Supreme Court of
Pakistan

(19)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT

C.M No. _____ of 2019

In

Service Appeal No. _____/2019

Shamsher Ali

Vs

Govt. of KPK through Secretary Health and others

Application for suspension of the impugned seniority list and restraining the respondents from initiating any sort of proceedings for promotion to the post of Superintendents (BS-17) on the strength of the impugned Seniority List.

Respectfully Sheweth:

The applicant / appellant submits as under;

1. That the above mentioned service appeal has been filed before this Honorable Tribunal, in which no date of hearing has yet been fixed.
2. That the contents of the above mentioned service appeal along with the contents of the annexed documents may be considered as an integral part of this application.

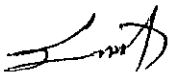
(A) 20

3. That there is a good prima facie case in favor of the applicant / appellant and balance of convenience is also in favor of grant of the order prayed for.


4. That there will an irreparable loss to the applicant / appellant in the shape of multiplicity of proceedings if the order prayed is not issued.

It is therefore, humbly prayed that on acceptance this application, an order prayed for may be passed, please.

Any other remedy which is just, appropriate and efficacious may also be awarded in favor of the appellant please.


Applicant / Appellant

Through Counsel


Muhammad Javaid Khan
Advocate, Supreme Court of
Pakistan

Dated: 08/08/2019

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, AT CAMP COURT SWAT

C.M No. _____ of 2019

In

Service Appeal No. _____/2019

Shamsher Ali

Vs

Govt. of KPK through Secretary Health and others

AFFIDAVIT

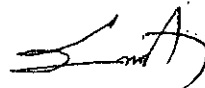
I, Shamsher Ali S/o Gull Sher R/o Mohallah Afsar Abad, Saidu Sharif, District Swat, do hereby solemnly affirm and declare on oath that all the contents of this Service Appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Honorable Court.

Identified by,



Muhammad Javaid Khan
Advocate, Supreme Court of Pakistan

DEPONENT



Shamsher Ali

Annex A

(22)

OFFICE ORDER.

Mr. Shamsheer Ali Ward Orderly is hereby promoted as J/clerk in HIS No. 5 w.e. 1-8-1982 against the existing vacancy.

(Dr. Nadir Khan, MBBS.)
District Health Officer,
Swat Saidu Sharif.

Dated 31/7/1982.

No 2694 P 10-5


Copy forwarded to the:-

- 1- A.D.H.O. Swat Saidu Sharif.
- 2- Mr. Shamsheer Ali of D.H.O. Office Swat.
- 3- Account clerk of D.H.O. Office Swat.

for information, and necessary action.

(Dr. Nadir Khan, MBBS.)
District Health Officer,
Swat Saidu Sharif.

S. ALI.

C-Te


No. 266/A-1

Date 2/2/82

From:- Director, Health Services, Govt. of Punjab

To:- Dr. D. Singh, District Health Officer, District: Muktsar

Subject:- APPOINTMENT OF A. S. [Name] as [Post] on temporary basis.
Memo, in connection with the report of interview dated 1.2.1982.

You are hereby advised that [Name] in the scale of Rs. 10,000 p.m. plus usual allowances is appointed to the post from the date of time.

[Name] is appointed to the post on temporary basis and your service can be terminated at any time with out any reason being assigned on a 14 days notice in writing with out any salary in line thereof.

4. [Name] will have to give a prior notice and will continue to work until your resignation is accepted and communicated to the concerned authority.

5. [Name] is appointed in accordance with the rules and orders relating to pay and allowances as applicable to the post, as issued by the Govt. for the State of Punjab.

6. [Name] is appointed on the condition that you will be required to your medical fitness certificate of a medical officer of health.

7. [Name] is appointed on the above mentioned conditions and you are requested to issue the necessary orders in C.R./E.O./C.D.

as D. Singh is a Government employee, which offer will be withdrawn.

[Signature]
District Health Officer,
District: Muktsar

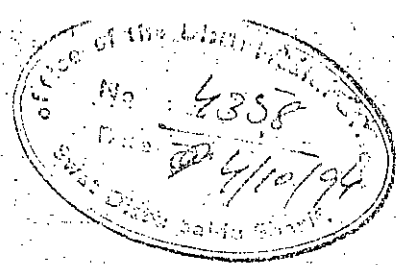
C.T.C
[Signature]

- No. _____
- 1/- To inform the Director, Health Services, Govt. of Punjab.
 - 2/- To charge the post to the concerned authority.
 - 3/- Accounts Section, Govt. of Punjab, for the purpose of the post.

S. N. [Name]
S.N. [Name]

District Health Officer,
District: Muktsar

Amee B



Handwritten marks: a square with 'X', a circle with '48', and a circle with '24'.

DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

OFFICE ORDER.

Consequent upon the approval accorded by the Departmental Promotion Committee, the following Junior Clerks of the Sub-Offices are heroby promoted to the posts of Senior Clerks B3S-7 with immediate effect:-

- | | |
|----------------------------|-------------------------------|
| 1. Mr. Ajsal Khan. | A.D.H.O, Lakkli. |
| 2. Abdul Qadeer. | D.D.H.S Abbottabad. |
| 3. Nazad Ali Shah. | DHQ: Hospital, Bannu. |
| 4. Aftab Ali Shah. | DHO, Office, Peshawar. |
| 5. Ibrar Ahmad. | M.S. Civil Hosp: Peshawar. |
| 6. Bahadar Khan. | DHO, Office, Mardan. |
| 7. Wasib Shah. | DHC, Office, Mardan. |
| 8. Muhammad Saleem. | DDHS, Office, Abbottabad. |
| 9. Shamsar Ali. | DHO, Office, Swat. |
| 10. Muhammed Amin. | M.S. DHQ: Hospital, Mardan. |
| 11. Muhammad Ramzan. | DHO, Office, DIKhan. |
| 12. Muhammad Aslam. | AHQ: Hospital, Miranshah. |
| 13. Hamid ud Din. | DHC, Office, Dir. |
| 14. Nisar Sada Khan. | AHQ: Hospital, Miranshah. |
| 15. Khalid Dadi Khan. | DHQ: Hospital, Bannu. |
| 16. Mumtaz Ahmed Gul. | DHC, Office, Peshawar. |
| 17. Saraj ul Arafeen. | DHO, Office, Chitral. |
| 18. Mansoor Hossain. | DHS, Office, DIKhan. |
| 19. Bakhtawar Shah. | Govt: L.R.H, Peshawar. |
| 20. Muhammad Ayub. | DHQ: Hospital, Chitral. |
| 21. Bakht Rashid. | Govt: L.R.H, Peshawar. |
| 22. Zafar Ali. | Govt: L.R.H, Peshawar. |
| 23. Shakir Ullah. | M.S. Civil Hosp: Peshawar. |
| 24. Sultan ul Arafeen. | DHC, Office, Mansehra. |
| 25. Mati Ullah. | AHQ: Hospital, Batkhela. |
| 26. Tariq Taj. | IHD. Children Hosp: Peshawar. |
| 27. Muhammad Hanif. | DHC, Office, Mansehra. |
| 28. Jamil ur Rehman. | I.D. Children Hosp: Peshawar. |
| 29. Saïd Abdul Kabir Shak. | DHC, Office Swat. |
| 30. Gul Hussain Shah. | DHQ: Hospital, Abbottabad. |
| 31. Muhammad Joneidar. | DHQ: Hospital, Abbottabad. |
| 32. Saïd ur Rehman. | MS, AHQ: Hospital, Miranshah. |
| 33. Muhammad Hamarung | DHC: Hospital, Abbottabad. |

C.T.C
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The Committee referred the names of the following Junior Clerks for promotion to the posts of Senior Clerks.

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1. Nisar Muhammad Junior Clerk attached to DHQ Hospital, due to Adverse Remarks in the ACR for the year, 1993.
2. Mr. Shahid Hussain Junior Clerk attached to DHO, Office, Abbottabad due to an Anti-Corruption case pending against him in the court.
3. Mr. Zeenat Khan J/Clerk attached to the Female Health Tech. School Hayatabad Peshawar being absent from duty.
4. Muhammad Rafiq DHO, Office, DIKhan/DTBC DIKhan deferred for want of A.C.Rs.

Accordingly the following postings and transfer of newly promoted Senior Clerks are hereby ordered in the public interest :-

S.No.	Name of Sr./Clerk.	From.	To.	Remarks.
1.	Mr. Ajmal Khan	O.C ADHC Lakki	O.C DHO Karak	Acquired the post.
2.	Mr. Abdul Qadeer	O/O DDHS Abbotabad.	DDHS Office Abbotabad	.do.
3.	Mr. Nazeer Ali Shah	DHQ Hosp; Bannu Office	DHO Bannu Office	.do.
4.	Mr. Aftab Ali Shah	DHO Peshawar Office	Dir. Lab. Pesh	.do.
5.	Mr. Ibrar Ahmad	MS Civil Hosp; Peshawar.	MS Civil Hosp; Peshawar.	.do.
6.	Mr. Bahadar Khan	DHO Mardan	DHO Mardan	.do.
7.	Mr. Wasib Shah	.do. ✓	DHO Mardan ✓	.do.
8.	Mr. Muhammad Saleem	DDHS A. Abad	DHO A. Abad	.do.
9.	Mr. Shamsur Ali ✓	DHO Swat	DDHS Swat ✓	.do.
10.	Mr. Muhammad Amin ✓	DHO Mardan ✓	DHO Swat ✓	.do.
11.	Mr. Muhammad Raizer	DHO DTK	DHS DTK	.do.
12.	Mr. Muhammad Aslam	AHO Miransha	MS Miransha	.do.
13.	Mr. Habibullah	AHO Dir	AHO Dir	.do.
14.	Mr. Hassan Saifullah	AHO Miransha	A.S. Wana	.do.
15.	Mr. Rafiq Ali	DHO Mardan, Bannu	DHO Hosp; Bannu	.do.
16.	Mr. Mustafa Javed Gill	DHO Peshawar	O/O DD EPI Peshawar	.do.
17.	Mr. Sirajul Arefeen	DHO Chitral	MS Dunit	.do.
18.	Mr. Manzoor Hussain	DDHS DTK	ADHC DTK	.do.
19.	Mr. Tahir Ahmad Shah	LPH Peshawar	APHC Mardan	.do.
20.	Mr. Muhammad Ayub	DHO Chitral	MS Dunit	.do.

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8

W/S

Office of the Distt: Health Officer
No. 3817
Date 30/12/08
Swat Distt: Saidu Sharif

OFFICE OF THE DISTRICT COORDINATION OFFICER

No. /38/DCO/Estt.

Dated the 30/12/2008

ORDER.

Consequent upon the recommendations of the Departmental selection/departmental Promotion-Committee, the District Coordination Officer, Swat (Competent Authority) has been pleased to order the promotion of Mr. Ghansher Ali, senior Clerk of the office of EDC Health Swat, as Assistant (B-14) against the vacant post on regular basis on the eve of the promotion of Mr. Abdul Chaffar, Assistant of the office of EDC Health Swat to the post of Superintendent (B-16) with effect from 01.1.2009.

DISTT: COORDINATION OFFICER SWAT.

No. 17405-7/38/DCO/Estt.

Copy forwarded to:-

- 1) The EDC Health Swat w/r to his Memo: No. 7565/HT dated 26.12.2008.
- 2) The District Accounts Officer, Swat.
- 3) Official concerned.

[Handwritten Signature]
DISTT: COORDINATION OFFICER SWAT.

C.T.C
1/2

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28

03

30/12/08

TO,

The Executive District Officer,
Health District Swat.

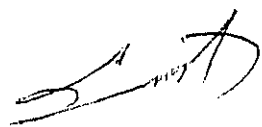
Subject:- CHARGE REPORT.

R/Sir,

In compliance office order issued by the District
Coordination Officer Swat bearing Endst: No.17405-07/38/DCO/Estt:
Dated 30/12/2008, I have resumed the charge of Office Assistant
BPS-14 on the eve of my promotion from Senior Clerk to Office Assistant
BPS-14 to day on 01/01/2009 FN.

Report is submitted for ~~your~~ your kind information and
further necessary action please.

Dated 01/01/2009.


SHAMSHER ALI
OFFICE ASSISTANT
EDO(Health) Office
Swat.

*Recd
For action
EDO (Health) Swat*

*C.F.C
[Signature]*

Annex D

(29)

(29)

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to The Director General
Health Services Peshawar and not to any official by name
Office Ph: 091 - 2210269 Peshawar, Fax: 091 - 2210167, Fax: 091 - 2210230

No 4053-148 /Personnel

Dated: 17/04/2019

1. Director General PHSA, Khyber Pakhtunkhwa.
2. Director Health Services Tribal District Khyber Pakhtunkhwa, Pesh.
3. All Principals, Medical Colleges in Khyber Pakhtunkhwa.
4. All District Health Officers in Khyber Pakhtunkhwa.
5. All Medical Superintendents DHQ Hospitals in Khyber Pakhtunkhwa.
6. All Hospital Directors, MTI, in Khyber Pakhtunkhwa.
7. M.S Services Hospital/MASMH Peshawar/SGSMH Peshawar/GNKB Memorial Hospital Kohat Road Peshawar/Maternity Hospital Peshawar.
8. In-charge Food Testing Lab. Khyber Pakhtunkhwa.
9. In-charge Drug Testing Lab. Khyber Pakhtunkhwa.

SUBJECT: PROVISIONAL SENIORITY LIST OF OFFICE ASSISTANT (BS-16) IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA FOR THE YEAR 2019.

Memo,

Provisional Seniority lists of Office Assistant BPS-16 serving in the Provincial Health Department Khyber Pakhtunkhwa, prepared by this Directorate is enclosed herewith with the remarks to circulate the same amongst all concerned working under your control for their information and confirmation about accuracy of the list.

Moreover the seniority list is also uploaded on website www.dghskp.gov.pk and can visit over there.

In case of any objection with regard to the contents of the seniority list, the same may please be communicated to this Directorate for correction and rectification within one month positively after the receipt of this communication.

C-7-e
15

Addl: D.G (HRM)
Directorate General Health Services,
Khyber Pakhtunkhwa, Peshawar

Cc:-

- ① Director DHIS DGHS, Office Khyber Pakhtunkhwa for information with the request to upload the attached seniority list of Office Assistants (BS-16) Health services Khyber Pakhtunkhwa on the website mentioned above.

② All Indaba & Section DGHS

FINAL SENIORITY LIST OF OFFICE ASSISTANT/ AUDITORS/ STENOGRAPHERS IN HEALTH DEPARTMENT KHYBER PAKHTUNKHWA

S.NO.	NAME OF OFFICIAL	NOMENCLATURE	DATE OF APPOINTMENT AS a) JR. CLERK b) SR. CLERK c) ASSISTANT d) STENO TYPIST e) Sr. Steno GRAPHER	PLACE OF POSTING	DATE OF BIRTH/ DOMICILE	DATE OF RETIREMENT	REMARKS
1.	Amanullah S/O Inayatullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 23.04.1979 b. 02.01.1990 c. 31.03.2003	DHO Peshawar	04.08.1959 Peshawar	03.08.2019	
2.	Faiz Ul-Haq S/O Noor Ul-Haq	c. Office Assistant	c. 16-06-2003	DHS FATA.	02-09-1972 Charsadda	01-09-2032	
3.	Muhammad Sadiq S/O Muhammad Afzal	c. Office Assistant	C. 07-01-2004	GMC D.I Khan	06-04-1967 D.I Khan	05-04-2027	
4.	Akbar Khan S/O Gul Akber	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.12.1978 b. 12.05.1990 c. 10.02.2004	KGCN, Peshawar	15.04.1960/ Peshawar	14.04.2020	
5.	Fazal Rahim S/O Amir.	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.07.1981 b. 01.08.1990 c. 16.02.2004	SGTH, Swat.	03.02.1960/ Swat	02.02.2020	
6.	Adeel Ahmad S/O Zaharullah	c. Office Assistant	c) 04.11.2004	AHQ, Hospital Ghallanai	10.04.1978/ Charsadda	09.04.2038	
7.	Sher Asghar khan S/O Ajab Gul	c. Office Assistant	c) 04.11.2004	DGHS Office	01.01.1972/ Khyber District	31.12.2031	
8.	Ghani ur Rahman	a. junior clerk b. Senior clerk c. Office Assistant	a. 19.06.1978 b. 02.01.1990 c. 23.09.2005	DHO Mardan	01.04.1960/ Mardan	31.03.2020	
9.	Ihsanullah S/O Awal Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.12.1978 b. 23.01.1991 c. 23.09.2005	KMC Peshawar	12.08.1960 Peshawar	11.08.2020	
10.	Hamidullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.03.1980 b. 25.04.1991 c. 23.09.2005	W/Children Hospital, Bannu	08.06.1959/ Bannu	07.06.2019	
11.	Abdur Rahim S/O Abdul Qayyum	a. Junior clerk b. Senior clerk c. Office Assistant	a. 03.04.1980 b. 25.04.1991 c. 23.09.2005	DHQ, Mardan	02.02.1963/ Mardan	01.02.2023	

Ghulam Muhammad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.05.1980 b. 22.01.1992 c. 23.09.2005	DHQ Hospital Bajour	05.02.1960/ Bajour	04.02.2020	
Abdul Manan S/O Luqman	b. Steno typist c. Sr.S. Stenographer	b. 07.07.1987 c. 22.09.2006	MMM Teaching Hospital DI Khan	10.03.1960/ DI Khan	09.03.2020	
Latif Ahmad S/O Muhammad Khan	b. Steno typist C. Sr.S. Stenographer	b. 13.07.1987 c. 22.09.2006	STH Swat	22.05.1964/ Swat	21.05.2024	
Noor Sitarul Mulk	a. Junior clerk b. Senior clerk c. Office Assistant	a. 29.06.1980 b. 22.11.1992 c. 22.09.2006	DHO Chitral	15.01.1962/ Chitral	14.01.2022	
Muhammad Javed	a. Junior clerk b. Senior clerk c. Office Assistant	a. 18.09.1980 b. 22.11.1992 c. 22.09.2006	BBS Abbottabad	11.08.1962/ Abbottabad	10.08.2022	
Zauq Akhtar	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.10.1980 b. 22.11.1992 c. 22.09.2006	DHO Mansehra	02.02.1962/ Mansehra	01.02.2022	
Muhammad Waris	a. Junior clerk b. Senior clerk c. Office Assistant	a. 21.12.1980 b. 22.11.1992 c. 22.09.2006	LRH Peshawar	15.04.1962/ Peshawar	14.04.2022	
Ijaz Hussain S/O Ghulam Abbas Qureshi	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.07.1981 b. 22.11.1992 c. 22.09.2006	DHQ H: DI Khan	15.06.1962/ DI Khan	14.06.2022	
Muhammad Khaliq S/O Fazal Khaliq	c. Office Assistant	c. 01.01.2008	NBM Peshawar	24.02.1972 Malakand	23.02.2032	
Sabir Hussain S/O Abdur.Rauf	a. Junior clerk b. Senior clerk c. Office Assistant	a. 05.03.1983 b. 27.05.1991 c. 10.02.2009	DGHS Office	12.04.1960/ Peshawar	11.04.2020	
Imtiaz Hussain S/O Muhammad Hussain	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.02.1984 b. 20.09.1992 c. 10.02.2009	DGHS Office	19.04.1964/ Peshawar	18.04.2024	
Ghafoor ur Rahman S/O Fazal Karim	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.05.1984 b. 20.03.1994 c. 10.02.2009	-do-	05.03.1960/ Peshawar	04.03.2020	
Wahid Shah S/O Said Shah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.05.1984 b. 20.03.1994 c. 10.02.2009	-do-	13.03.1964/ Peshawar	12.03.2024	
Faizullah Khan S/O Raza Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 16.01.1982 b. 22.11.1992 c. 15.04.2009	DGHS Peshawar	12.12.1962/ Peshawar	11.12.2022	

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26.	Subhanullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 08.02.1982 b. 22.11.192 c. 15.04.2009	Khyber Agency	18.04.1960/ Khyber Agency	17.04.2020	
27.	Irshad Khaliq	a. Junior clerk b. Senior clerk c. Office Assistant	a. 06.02.1985 b. 22.11.1992 c. 15.04.2009	PGMI/HMC Peshawar	10.06.1963/ Peshawar	09.06.2023	
28.	Gulab Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 02.01.1979 b. 26.09.1994 c. 15.04.2009	-do-	29.05.1959/ Lakki Marwat	28.05.2019	
29.	Nasrullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 04.12.1981 b. 26.09.1994 c. 15.04.2009	-do-	13.03.1961/ Peshawar	12.03.2021	
30.	Muhammad Parvaiz	a. Junior clerk b. Senior clerk c. Office Assistant	a. 27.01.1982 b. 26.09.1994 c. 15.04.2009	-do-	20.04.1960/ Peshawar	19.04.2020	
31.	Ibrah Ahmad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.03.1982 b. 26.09.1994 c. 15.04.2009	SHPD Peshawar	05.02.1963/ Peshawar	04.02.2023	
32.	Khaliq dad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 11.10.1982 b. 26.09.1994 c. 15.04.2009	DHQ Hospital Bannu.	01.03.1962/ Bannu.	28.02.2022	
33.	Bakhtawar Shah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 30.11.1982 b. 26.09.1994 c. 15.04.2009	DHO: Charsadda	07.02.1964/ Mohmand Agency	06.02.2024	
34.	Safi-ur-Rahman S/O Aziz ur Rehman	a. Junior clerk b. Senior clerk c. Office Assistant	a. 09.03.1983 b. 26.09.1994 c. 15.04.2009	DHO Lakki	05.01.1962/ Lakki Marwat	04.01.2022	
35.	Wali Khan S/O Tahmas Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.04.1984 b. 02.03.1994 c. 01.05.2009	KCD Peshawar	08.02.1961/ Peshawar	07.02.2021	
36.	Miskeen Khan S/O Ashraf Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.05.1984 b. 02.03.1994 c. 11.05.2009	DGHS Peshawar	24.02.1965/ Peshawar	23.02.2025	
37.	Muhammad Haroon Sher Ahmad	c. Office Assistant (PSC)	c. 18.05.2009	BBS Teaching Hospital Abbottabad	01.01.1982/ Abbottabad	31.12.2042	
38.	Muhammad Gul S/O Readi Gull	a. Junior clerk b. Senior clerk c. Office Assistant	a. 17.05.1984 b. 03.02.1994 c. 10.09.2009	DGHS, Office	20.04.1965/ Peshawar	19.04.2025	

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39.	Shah Jehan S/O Bakht Rozi	a. Junior clerk b. Senior clerk c. Office Assistant	a. 22.11.1984 b. 03.02.1994 c. 10.09.2009	DHQ Hospital Charsadda	16.02.1961/ Peshawar	15.12.2021
40.	Ijaz Ahmad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 22.11.1984 b. 09.02.1995 c. 10.09.2009	DGHS, Office	02.05.1964/ Peshawar	01.05.2024
41.	Aftab Ali Shah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 02.05.1981 b. 26.09.1994 c. 03.11.2009	LRH Peshawar	12.10.1960/ Peshawar	11.10.2020
42.	Bahadar Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 16.03.1982 b. 26.09.1994 c. 03.11.2009	MMC Mardan	20.06.1961/ Mardan	19.06.2021
43.	Mir Wali Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 16.04.1983 b. 30.06.2000 c. 03.11.2009	KGMC, Peshawar	01.01.1961 /Charsadda	05.07.2019
44.	Ikram Ullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 25.08.1983 b. 30.06.2000 c. 03.11.2009	KTH Peshawar	22.09.1962/ Peshawar	21.09.2022
45.	Khitab Jan S/O Nasrullah Shinwari	a. Junior clerk b. Senior clerk c. Office Assistant	a. 10.10.1983 b. 30.06.2000 c. 03.11.2009	DHQ Hospital Landi Kotal	07.10.1964/ Khyber Agency	06.10.2024
46.	Muhammad Ali S/O Bakht Mand	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.04.1983 b. 30.06.2000 c. 03.11.2009	STH, Swat	01.01.1961/ Swat	31.12.2021
47.	Hashmat Ali	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.01.1984 b. 30.06.2000 c. 03.11.2009	HMC, Peshawar	01.10.1962/ Peshawar	30.09.2022
48.	Asif Jan S/O Muhammad Yousaf	a. Junior clerk b. Senior clerk c. Office Assistant	a. 28.03.1984 b. 30.06.2000 c. 03.11.2009	KCD, Peshawar	01.04.1965/ Peshawar	31.03.2025
49.	Murad Ali S/O Hazar Muhammad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 09.05.1984 b. 30.06.2000 c. 03.11.2009	LRH, Peshawar	24.12.1962/ Swabi	23.12.2022
50.	Aminullah Jan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.05.1984 b. 30.06.2000 c. 03.11.2009	DT Lab., Peshawar	02.01.1962/ Peshawar	01.01.2022
51.	Bakht Biland S/O Malazai	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.06.1984 b. 30.06.2000 c. 03.11.2009	DHO Dir Lower	10.01.1965/ Swat	09.01.2025

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52.	Mukhtiar Ali S/O Abdur Razaq	a. Junior clerk b. Senior clerk c. Office Assistant	a. 17.11.1984 b. 30.06.2000 c. 30.05.2011	Sifwat Ghayur Memorial Hospital Peshawar	11.08.1964/ Peshawar.	10.08.2024
53.	Sher Muhammad Jan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.12.1984 b. 30.06.2000 c. 03.11.2009	AS Khyber Agency	05.05.1961/ NWA	04.05.2021
54.	Muhammad Ayub	a. Junior clerk b. Senior clerk c. Office Assistant	a. 10.02.1985 b. 30.06.2000 c. 03.11.2009	SMC Swat	10.03.1966/ Swat	09.03.2026
55.	Niaz Ali	a. Junior clerk b. Senior clerk c. Office Assistant	a. 03.03.1985 b. 30.06.2000 c. 03.11.2009	KMC, Peshawar	15.02.1963/ Peshawar	14.02.2023
56.	Zia ullah Khan S/O Shokat Khan	a) Jr. Clerk. b) Sr. Clerk c) Office Assistant	04.12.1982 30-06-2000 03.11.2009	Food Lab Peshawar	01.04.1964/ Peshawar	31-04-2024
57.	Syed Amjad Ali Shah S/O Syed Munawar Shah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 07.05.1985 b. 30.06.2000 c. 03.11.2009	DGHS, Office, Peshawar	30.03.1966/ Charsadda	29.03.2026
58.	Ali Haider S/O Aziz ur Rahman	a. Junior clerk b. Senior clerk c. Office Assistant	a. 08.06.1985 b. 30.06.2000 c. 03.11.2009	MCC, Peshawar	10.10.1965/ Peshawar	09.10.2025
59.	Syed Sharif Hussain S/O Syed Qadam Hussain	a. Junior clerk b. Senior clerk c. Office Assistant	a. 17.06.1985 b. 30.06.2000 c. 03.11.2009	AS Kurram / DHS FATA	02.04.1964/ Kurram	01.04.2024
60.	Muhammad Ullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.09.1985 b. 30.06.2000 c. 03.11.2009	AS Khyber Agency	18.05.1966/ Khyber Agency	17.05.2026
61.	Abdul Qudus S/O Muhammad Rauf	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.11.1985 b. 25.08.2001 c. 30.05.2011	DHO Office D.I.Khan	05.06.1966/ DI Khan	04.06.2026
62.	Firdos Khan S/O F. Hadi	a. Junior clerk b. Senior clerk c. Office Assistant	a. 16.12.1985 b. 25.08.2001 c. 30.05.2011	DHO Charsadda.	01.04.1966/ Peshawar	31.03.2026
63.	Shabir Ahmad S/O Khair-ur- Rehman	a. Junior clerk b. Senior clerk c. Office Assistant	a. 24.08.1983 b. 24.01.2002 c. 30.05.2011	KTH Peshawar	03.01.1962 Bannu	02.01.2022
64.	Shah Hussain S/O Gul Haider	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.10.1985 b. 24.01.2002 c. 30.05.2011	PMI Swat	03.06.1963/ Swat	02.06.2023

65.	Daud Jan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 24.11.1985 b. 24.01.2002 c. 30.05.2011	KTH Peshawar	02.05.1966/ Charsadda	01.05.2026	
66.	Asmatullah S/O Ghulam Qadir	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.03.1986 b. 10.02.2004 c. 30.05.2011	DHS FATA	25.02.1966/ DI Khan	24.02.2026	
67.	Sami Ullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 26.01.1986 b. 24.01.2002 c. 30.05.2011	SMC Swat	02.03.1963/ Swat	01.03.2023	
68.	Muhammad Rauf	a. Junior clerk b. Senior clerk c. Office Assistant	a. 24.02.1986 b. 10.02.2004 c. 30.05.2011	BMC Bannu	01.09.1967/ DI Khan	31.08.2027	
69.	Muhammad Salim	a. Junior clerk b. Senior clerk c. Office Assistant	a. 08.09.1986 b. 10.02.2004 c. 30.05.2011	LRH Peshawar	02.03.1968/ Peshawar	01.03.2028	
70.	Muhammad Alam	a. Steno typist b. as S.S. Stenographer	a. 05.11.1997 b. 12.03.2012	DGHS Office Peshawar	15.01.1972/ Charsadda	14.01.2032	
71.	Muhammad Ayaz S/O Muhammad Din	a. Steno typist b. S. S. Stenographer	a. 19.08.2004 b. 12.03.2012	DGHS Office Peshawar	26.03.1979/ Peshawar	25.03.2039	
72.	Kifayat ur.Rehman S/O Malik Zada	a. Junior clerk b. Senior clerk c. Office Assistant	24.01.1985 23.10.1995 30.03.2012	DGHS Office	21.04.1966/ Peshawar	20.04.2026	
73.	Roidar Khan S/O Sardar Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 13.05.1985 b. 23.10.1995 c. 30.03.2012	DGHS Office	01.04.1961/ Peshawar.	31.03.2021	
74.	Sifatullah S/O Hidayatullah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 22.04.1986 b. 29.04.2000 c. 17.12.2012	DGHS Office	23.01.1968/ Peshawar	22.01.2028	
75.	Muhammad Shafiq S/O Muhammad Younas	a. Junior clerk b. Senior clerk c. Office Assistant	a. 24.04.1986 b. 29.04.2000 c. 17.12.2012	DGHS Peshawar	15.09.1963/ Peshawar	14.09.2023	
76.	Jamal ud Din S/O Gul Muhammad	a. Junior clerk b. Senior clerk c. Office Assistant	a. 26.10.1981 b. 22.11.1992 c. 03.04.2012	DHO Chitral	15.06.1961/ Chitral	14.06.2021	
77.	Main Irshad S/O Fazal Amir	a. junior clerk b. Senior clerk c. Office Assistant	a. 26.01.1986 b. 24.01.2002 c. 10.06.2005	NSKH Swat	01.05.1962 Swat	30.04.2022	

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Amir

	Khan Bahader S/O Amir Haider	a. Junior Clerk b. Senior Clerk c. Assistant	a. 21.08.1984 b. 25.08.2001 c. 24.01.2008	DHQ Hospital Daggar Buner	12.03.1961 Buncr	11.03.2021	
1.	Farid Iqbal	a. Junior clerk b. Senior clerk c. Office Assistant	a) 27.07.1983 b) 30.05.1993 c) 30.05.2008	W&C Hospital Kohat	01.04.1965/ Karak	31.03.2025	
2.	Khan Bahadar S/O Ali Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 03.09.1984 b. 01.07.2000 c. 25.10.2008	DHO Kohat	10.01.1961/ Karak	09.01.2021	
1.	Fazal Subhan S/O Fateh Sher	a. Junior Clerk b. Senior Clerk c. Assistant	a. 12.02.1995 b. 03.03.2005 c. 26.08.2008	DHQ Hospital Upper Dir	24.04.1960	23.04.2020	
2.	Taimor Wali Khan	a. Junior Clerk b. Senior Clerk c. Office Assistant	b) 10.11.1990 c) 26.08.2008	DHO Upper Dir	07.03.1965/ Chitral	06.03.2025	
3.	Abdar Khan S/O Muhammad Azam Khan	c. Office Assistant	c. 26.08.2008	DHO Upper Dir	01.04.1971/ Upper Dir	31.03.2031	
4.	Hazrat Hayat S/O Mian Amroon	a. Junior clerk b. Senior clerk c. Office Assistant	a. 02.03.1986 b. 10.06.2005 c. 31.12.2008	DHO Shangla	01.03.1967 /Shangla	28.02.2027	
35.	Maroof Shah	a. Junior clerk b. Senior clerk c. Office Assistant	a. 20.09.1987 b. 10.06.2005 c. 31.12.2008	DHO Shangla	01.01.1964/ Shangla	31.12.2023	
86.	Shamsher Ali S/O Gul Sher	c. Junior clerk d. Senior clerk c. Office Assistant	a. 01-08-1982 b. 26-09-1994 c. 01-01-2009	DHO Swat	05-06-1964	04-06-2024	
87.	Muhammad Nabi	a. Junior clerk b. Senior clerk c. Office Assistant	a. 01.12.1985 b. 01.08.2001 c. 10.06.2009	DHO Lower Dir.	15.08.1967/ Dir Lower	14.08.2027	
88.	Said Rahim Shah	a. Junior Clerk b. Senior Clerk c. Assistant	a. 16.06.1991 b. 17.03.2008 c. 27.02.2009	DHO Office Buner	05.02.1969	04.02.2029	
39.	Sohrab Khan S/O Abdul Salam	a. Junior Clerk b. Senior Clerk c. Assistant	26.11.1984 09.02.1995 05.10.2009	Mian Rashid Hussain Hosp Pabbi Nowshera			
10.	Muhammad Sabir S/O Qazi M. Akram	a. Junior clerk b. Senior clerk c. Office Assistant	a. 12.03.1983 b. 01.07.2000 c. 19.12.2009	Metal Hosp Dadar Mansehra	15.03.1965	14.03.2025	

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91.	Abdul Hakim S/O Abdul Qadim	a. Junior clerk b. Senior clerk c. Office Assistant	a.29.01.1984 b.30.06.2000 c.20.02.2010	DHO Hangu	30.04.1960/ Kohat	29.04.2020
92.	Asghar Khan S/O Muhammad Dawood	a. Junior clerk b. Senior clerk c. Office Assistant	a. 15.07.1987 b. 07.02.2007 c. 21.05.2010	STH, Swat	27.05.1968/ Swat	26.05.2028
93.	Mahboob Ali Khan S/O Muhammad Akram	a. Junior clerk b. Senior clerk c. Office Assistant	a. 30.04.1984 b. 30.06.2000 c. 13.07.2010	MASM Peshawar	15.11.1961 Peshawar	14.11.2021
94.	Muhammad Saleem S/O Kalu Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 03.05.1982 b. 26.09.1994 c. 14.10.2010	DHO Abbottabad	06.04.1962/ Abbottabad	05.04.2022
95.	Munawar Khan S/O Nazar Gul	a. Junior clerk b. Senior clerk c. Office Assistant	a. 03.09.1984 b. 03.06.2000 c. 15.11.2010	DHQ (H) Lakki Marwat	31.07.1963 Lakki Marwat	30.07.2023
96.	Amal Sardar S/O Gul Haider Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a. 22.10.1984 b. 30-06-2000 c. 08.12.2010	DHO Karak	15.01.1963/ Karak	14.01.2023
97.	Fazal Dad S/O Mir dad Khan	a. Junior clerk b. Senior clerk c. Office Assistant	a ?????????? b. 29.09.2001 c. 27.01.2011	DHO Karak	02.01.1967 Karak	01.01.2027
98.	Zafar Ali S/O Abdul Qayyum	a. Junior clerk b. Senior clerk c. Office Assistant	a.16.12.1985 b.24.01.2002 c.21.11.2011	DHO Charsadda	03.01.1964/ Charsadda	02.01.2024
99.	Sher Azam Khan S/O Saeed Muhammad	a. Junior clerk b. Senior clerk c. Office Assistant	a.19.08.1996 b.08.09.2008 c.05.01.2012	DHQ Hospital Upper Dir	01.04.1974/ Upper Dir	31.03.2034
100.	Nowsher Khan S/O Fazle Rahim	a. Junior clerk b. Senior clerk c. Office Assistant	a.03.06.1985 b.30.06.2000 c.25.11.2013	DHO Mardan	20.06.1963/ Charsadda	19.06.2023
101.	Zamarud Shah S/O Said Azam	a. Junior clerk b. Senior clerk c. Office Assistant	a.10.09.1985 b.01.07.2000 c.25.11.2013	DHQ Hosp Swabi	02.01.1962/ Swabi	01.01.2022
102.	Inyatullah S/O Habibullah	a. Steno Typist b. Sr. S Stenographer	a. 01.09.1987 b. 09-10-2015	DGHS KPK, Peshawar	20.01.1967/ Peshawar	19.01.2027
103.	Khurshid Anwar	a. Steno Typist b. Sr. S Stenographer	a.08.12.1988 b.09-10-2015	SMC Swat	02.02.1963/ Peshawar	01.02.2022
104.	Sultan Ali S/O Tehmat Khan	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	LRH Peshawar	02.06.1964/ Karak	01.06.2029

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105.	Fazli Raziq S/O Khan Raziq	a. Steno Typist b. Sr. S Stenographer	a. 04.10.1989 b. 09-10-2015	KTH Peshawar	15.01.1970/ Charsadda	14.01.2030
106.	Mohammad Rafiq	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	KMC Peshawar	27.03.1961/ Peshawar	26.03.2021
107.	Muhammad Manzoor S/O Abdul Rahim	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	ATH Abbottabad	15.10.1963/ Abbottabad	14.10.2023
108.	Alangir Khan	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	MMC Mardan	01.04.1967/ Mardan	31.03.2027
109.	Shoukat Ali	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	KMC Peshawar	30.11.1961/ Peshawar	29.11.2021
110.	Waheed-uz- Zaman	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	KMC Peshawar	20.09.1974/ Peshawar	19.09.2034
111.	Sikandar Hayat S/O Fazal Rahim	a. Steno Typist b. Sr. S Stenographer	a. 23.08.1989 b. 09-10-2015	SGTH Swat	08.03.1984/ Swat	07.03.2044
112.	Naseem Khan	a. Junior Clerk b. Senior Clerk c. Office Assistant	a. 23-11-1986 b. 02-12-2000 c. 28.03-2017	DHS.FATA.Peshawar	12-09-1965 Peshawar	11-09-2025
113.	Zafar Iqbal S/O Dad Khan	a. Junior Clerk b. Senior Clerk c. Office Assistant	a. 01-12-1986 b. 02-12-2000 c. 28-03-2017	DHS FATA Peshawar	11-11-1968 Peshawar	10-11-2028
114.	Inayat Sbah	a. Junior Clerk b. Senior Clerk c. Office Assistant	a. 27-12-1986 b. 02-12-2000 c. 28-03-2017	DGHS KPK	05-10-1962 Peshawar	04-10-2022
115.	Ilyas Masih	a) Jr. Clerk b) Sr. Clerk	17.03.1981 22.11.1992	DGHS Office Peshawar	19.06.1961-Peshawar	18.06.2021
116.	Muhammad Asif S/O Ghulam Sarwar	a. Junior Clerk b. Senior Clerk c. Office Assistant	a.04.10.1981 b.09.12.1992 c.04.01.2018	District Health Officer, Mansehra,	01.01.1963/ Mansehra	31.12.2022
117.	Muhammad Rafiq S/O Muhammad Farid	a. Junior Clerk b. Senior Clerk c. Office Assistant	21-01-1982 22-11-1992 04.01.2018	DHQ, Hosp: Haripur.	14-03-1962 Abbottabad.	13-03-2022
118.	Muhammad Ayub S/O Nadir Khan	a) Jr. Clerk b) Sr. Clerk	01.12.1982 26.09.1994	DHO Chitral	01.03.1963/ Chitral	28.02.2023
119.	Bakht Rashid S/O Khan Mahmood	a) Jr. Clerk b) Sr. Clerk	04.12.1982 26.09.1994 04.01.2018	DHO Mardan	11.01.1961/ Mardan	10.01.2021
120.	Muhammad Jahangir S/O Khan Bahadar	a) Jr. Clerk b) Sr. Clerk	09.03.1983 26.09.1994	BBT Hosp Abbottabad	20.01.1961/ Abbottabad	19.01.2021

21.	Shahid Hussain S/O Guham Serwar	a) Jr. Clerk b) Sr. Clerk	01.06.1981 30.06.2000 04.01.2018	DHO Abbottabad	03.04.1962/ Abbottabad	02.04.2022	
22.	Zul Qarnain S/O Malik Khan Muhammad	a) Jr. Clerk b) Sr. Clerk	01.10.1983 30.06.2000 04.01.2018	DHO Tank	01.10.1960 Dera ismail Khan	30.09.2020	
23.	Muhammad Nawaz	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	13.10.1983 30.06.2000 04.01.2018	MS Landi Kotal	18.10.1965 Khyber Agency	17.10.2025	
24.	Sadaqat Khan S/O Mastan Khan	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	30.04.1984 30.06.2000 04.01.2018 04.01.2018	DHO Peshawar	22.12.1965/ Peshawar	21.12.2025	
25.	Lal Mir Khan S/O Mir Zaman Khan	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	05.08.1984 30.06.2000 04.01.2018	DHQ Hosp: Mardan	10.10.1961/ Mardan	09.10.2021	
26.	Sajjad Ali S/O Saadullah	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	25.09.1984 30.06.2000 04.01.2018	DHO Abbottabad	25.12.1963/ Abbottabad	24.12.2023	
27.	Muhammad Qurash	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	18.03.1985 30.06.2000 04.01.2018	As Khyber Agency	01.01.1966/ Mardan	31.12.2025	
28.	Muhammad Feroz S/O Dil Feroz	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	01.01.1984 01.07.2000 04.01.2018	DHO Swat	01.01.1963/ Swat	31.12.2023	
129.	Muhammad Rafiq S/O Durrany	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	12.01.1985 01.07.2000 04.01.2018	DHQ Hosp: Haripur	16.04.1966/ Swat.	15.04.2026	
130.	Qazi Fayaz ud Din S/O Qazi Jalal ud Din	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	17-02.1985 01.09.2001 04.01.2018	DHO Kohat	23.04.1963 / Kohat	22.04.2023	
131.	Shaukat Khan S/O Khan Mahmood	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	10.09.1985 01-09-2001 04.01.2018	DHQ hosp: Mardan	03.04.1962/ Mardan	02.04.2022	
132.	Farid ul Haq S/O Nadir ul Haq	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	20.10.1985 01-09-2001 04.01.2018	DHO Karak	10.02.1967/	09.02.2027	

133.	Mohammad Rafiq S/O Ghulam Mustafa	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	20.10.1985 01.09.2001 04.01.2018	DHO Kohat	01.03.1961 Karak	28.02.2021	
134.	Saeed Akhter S/O Banat Shah	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	22.10.1985 01-09.2001 04.01.2018	DHO Hangu	12.02.1965/ Karak	1.02.2025	
135.	Mohammad Din S/O Bahar ud Din	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	26.10.1985 01.09.2001 04.01.2018	DHQ Hosp Kohat	14.08.1965 Karak	13.08.2025	
136.	Muhammad Naem S/O Muhammad Azeem	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	01-01-2002 04.01.2018 04.01.2018	DHS FATA	01-11-1970 D.I Khan	31-10-2030	
137.	Malik Zaheer S/O Abdul-Jalil	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	23-10-1983 24-01-2002 04.01.2018	TB Control Mansehra.	20-01-1984	19-01-2044	
138.	Noor Elahi S/O Malik Aman	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	16.12.1985 01.02.2002 04.01.2018	KAT Hosp: Mansehra.	04.02.1967/ Mansehra	03.02.2027	
139.	Muhammad Ibrahim Khan S/O Buzurg Khan	a) Jr. Clerk. b) Sr. Clerk c) Office Assistant	23.12.1985 24.01.2002 04.01.2018	DHO Chitral	16.02.1967/ Chitral	15.02.2027	
140.	Doctor-Khan S/O Mir Shahbaz Khan	a) Jr. Clerk. b) Sr. Clerk c) Office Assistant	15.01.1986 24.01.2002 04.01.2018	DHO Karak	10.03.1964/ Karak	09.03.2024	
141.	Syed Sardar Ali shah S/O Syed Sher Badshah	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	22.01.1986 24.01.2002 04.01.2018	Govt: Maternity Hospital Pesh.	26.04.1967 Charsadda	25.04.2027.	
142.	Khalid Khan S/O Mian Gul	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	19.12.1982 10.02.2004 04.01.2018	DHQ Hosp: Mardan	20.04.1962/ Mardan	19.04.2022	
143.	Ghulam Sarwar S/O Ghulam Sadceq	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	14.05.1984 10.02.2004 04.01.2018	DHO Mardan	15.03.1964/ Mardan	14.03.2024	
144.	Kamran S/O Muhammad Younis	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	30.04.1986 10.02.2004 04.01.2018	KAT Hosp: Mansehra	31.12.1964/ Mansehra	30.12.2024.	

145.	Ahmad Nawaz Khan S/O Muhammad Khalil Khan	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	03.05.1986 10.02.2004 04.01.2018	DHQ Hosp Battagram	01.11.1960/ Manselira	31.10.2020	
146.	Riaz Muhammad S/O Nisar Muhammad	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	01.07.1986 10.02.2004 04.01.2018	DHO Charsadda	20.03.1967/	19.03.2027	
147.	Khizar Hayat S/O Gulistan	a) Jr. Clerk b) Sr. Clerk c) Office Assistant	01.05.1981 16.02.2004 04.01.2018	DHQ Hospital Swabi	18.03.1963/ Swabi	17.03.2023	

Dr. M. J. Khan
 DIRECTOR GENERAL HEALTH, SERVICES
 KHYBER PAKHTUNKHWA PESHAWAR

Dr. M. J. Khan

Dr. M. J. Khan

Annex E

Reqd

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OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT Phone No: 0946-9240139, Fax No: 0946-9240215
Email: edchswat@yahoo.com

No. 11110

IDF

Dated: 13 /05/2019

To,

The Director General Health Services
Khyber Pakhtunkhwa Peshawar

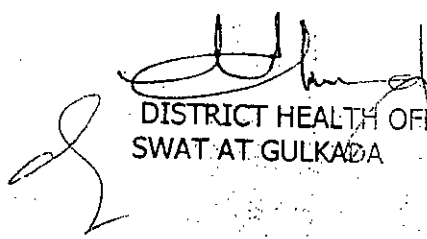
Subject:-

APPEAL FOR CORRECTION IN THE PROVISIONAL SENIORITY LIST OF
OFFICE ASSISTANT (BPS-16) WITH SUBSEQUENTLY REQUEST FOR THE
GRANT OF PROMOTION TO THE POST OF SUPERINTENDENT (BPS-17).

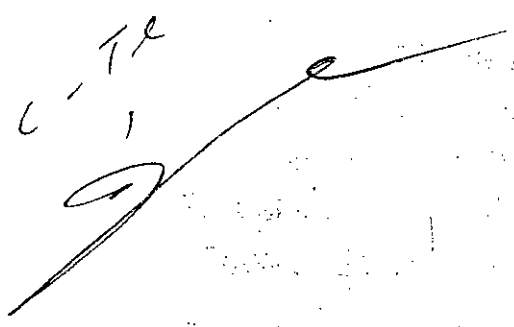
Memo.

Reference your office letter No. 4053-148/Personnel dated 17/4/2019.

I have the honour to submit herewith an appeal on the subject cited above submitted by Mr. Shamsheer Ali Office Assistant of this office for favourable consideration and further forwarding to the honourable Secretary Health Govt: of Khyber Pakhtunkhwa Peshawar ,Please.


DISTRICT HEALTH OFFICER
SWAT AT GULKADA

Afzal Khan *****/

C-TR
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To

The Secretary Health
Govt: of Khyber Pakhtunkhwa Peshawar.

Through: Director General Health Services, Peshawar & District Health
Officer Swat.

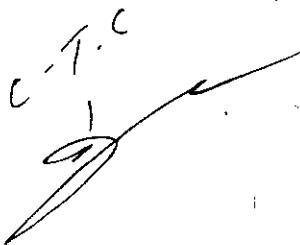
Subject: APPEAL FOR CORRECTION IN THE PROVISIONAL SENIORITY
LIST OF OFFICE ASSISTANT (BS-16) WITH SUBSEQUENT
REQUEST FOR THE GRANT OF PROMOTION TO THE POST OF
SUPERINTENDENT (BS-17)

R/Sir,

Reference Directorate General Health Services Khyber
Pakhtunkhwa Peshawar covering letter No. 4053-148/Personnel
dated 17/04/2019 received vide this office diary No. 3622 dated
26/04/2019 regarding seniority list of Assistant.

I have the honour to submit the following few facts for your
kind information and favorable consideration please.

1. That I was promoted as Assistant under the District Cadre
Policy in the year 2008 vide District Coordination Officer
Swat Office Order No. 17405-7/38/DCO/Estt: dated
30/12/2008 under the relevant rules and regulation.
2. That the Health department was included my name in the
seniority list of Assistant at **S. No. 86** issued vide
Directorate General Health Services, Khyber Pakhtunkhwa
Peshawar office letter No. 4053-148/Personnel dated
17/04/2019. **Whereas my actual position is S.No 29.**

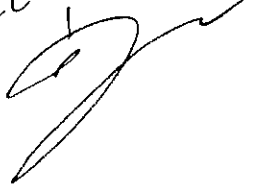
C-T.C


(22)

(44)

3. That my annual performance evaluation report / No enquiry certificate were asked for by your good Office for Promotion to the Post of Superintendent BPS 17 vide letter No. 14058-092/Personnel (promotion) dated 07/09/2017 which were already sent by District Health Officer Malakand vide letter No.8857/PF 21 dated 12/09/2017.
4. That surprisingly my name has been dropped down in the seniority list without assigning any reason subjecting me to injustice and compromised the transparency of seniority. The officials shown senior to me in the provincial seniority list are actually junior to me in the cadre of (a) Junior Clerk (b) Senior Clerk and (c) Assistant.
5. That neither I was declared surplus employee of the Health Department nor my services were placed to the surplus pool for further adjustment after repealing of District Government Act on 15/05/2012.
6. Let suppose for a while. If my case is being considered under surplus pool policy. The rules 6 (a) is clear enough and fully protects my rights of seniority. The Govt of Khyber Pakhtunkhwa has amended Appointment, Promotion and transfer rules 1989 vide Notification No. SOR-1E&AD)1780(VOL-IV) dated 28/05/2002 and added new sub rule Para 3 after sub Para (2) in rules 17 as follow

cc: T.c

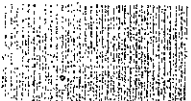


Rules 17 (3):- In the event of merger/restructuring of the Departments, attach Departments or subordinate offices. The inter-seniority of civil Servants affected by the merger /regular appointment to a cadre or post

Rules 6 (a):- In case of surplus employee could be adjusted in the respective cadre of his parent department he shall regain his original seniority in that cadre.

(33)

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7. Sir, it will appropriate to quote in example as a precedent that the Health Department has promoted all those paramedics, who had been promoted under the District cadre policy which their seniority intact.

Keeping in view the above facts, it is humbly requested to please restore my original seniority position and place me at **S.No.29 in the said seniority list instead of 86 and also process my promotion case to the post of superintendent BS-17 which is due since long.**

Yours Obediently

Shamsheer Ali
Assistant BPS 16
DHO Office Swat

mob: 0346 8540160

Dated : 13/5/2019.

S.T.
[Signature]
DHO

C.T.C
[Signature]

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

All communications should be addressed to the Director General
Health Services Peshawar and not to any official by name.
Exchange Ph: 091-9210187 - 196 Fax: 091-9210130
Web: www.healthkp.gov.pk <https://www.facebook.com/dghspromotioncell/>



No. 499 Personnel Promotion Dated 27 /09/2017 **MOST IMMEDIATE**

To,

1. The Principal, (KGM College Peshawar), (KCD Peshawar), (BMC Bannu), (KMC Peshawar).
2. The Director Health Services, (FATA) Peshawar.
3. The Hospital Directors MTIs, (LRH), (HMC), (KGN, Bannu), (MMC Mardan).
4. District Health officers, (Mardan), (Mansehra), (Swabi), (Kohat), (Upper Dir), (Shangla), (Malakand), (Charsadda), (Lakki Marwat), (Kohistan), (Lower Dir), (Peshawar).
5. The Medical Superintendents, (DHQ Hospital, Haripur) (AHQ, Hospital Ghallanai) (DHQ, Hosp: Swabi) (SGT Hosp: Swat) (DHQ Hosp: DI Khan) (DHQ Hosp: Nowshera) (W&C Hospital Kohat) (DHQ Hospital, Shangla) (SHPD Peshawar) (Services Hospital Peshawar) (Molvi Ameer Shah Hosp: Peshawar) (AHQ Hospital Landi Kotal).
6. In-charge Drug Testing Laboratory Hayatabad Peshawar.
7. Agency Surgeon (Bajaur), (Khyber Agency).

Subject: **SUBMISSION OF PERs/ NO ENQUIRY CERTIFICATE.**
Memo.

I am directed to refer to the subject noted above and to request to furnish requisite documents respect of Office Assistants (BS-16) mentioned against their names in connection with their promotions to the post of Office Superintendent (BS-17), up to 30-09-2017 positively.

S.No	Name.	Place of Posting.	Documents Required.
1.	Muhammad Shafiq	DHQ Hospital, Haripur	PERs 2011 up to 2016. No Enquiry Certificate.
2.	Akbar Khan	KGMC, Peshawar	PERs 2004 up to 2016 No Enquiry Certificate.
3.	Adel Ahmad	AHQ, Hospital Ghallanai	PER 2004.
4.	Ghani ur Rahman	DHO Mardan	PERs 2015 up to 2016 No Enquiry Certificate.


5.	Abdur Rahim	DHQ, Swabi	PERs 2005 up to 2016 No Enquiry Certificate.
6.	Ghulam Muhammad	A/S Bajour Agency	PERs 2005 up to 2016 No Enquiry Certificate.
7.	Latif Ahmad	STH Swat	No Enquiry Certificate.
8.	Zauq Akhtar	DHO Mansehra	PERs 2006 up to 2016 No Enquiry Certificate.
9.	Parvez Gul	DHQ Haripur	PERs 2006 up to 2016 No Enquiry Certificate.
10.	Muhammad Waris	LRH Peshawar	PERs 2006 up to 2016 No Enquiry Certificate.
11.	Nisar Muhammad	DHO Swabi	PERs 2006 up to 2016 No Enquiry Certificate.
12.	Ijaz Hussain	DHQ H: DI Khan	PERs 2007 up to 2016 No Enquiry Certificate.
13.	Muhammad Khaliq	DHQ Hosp: Nowshera.	PERs 2008 up to 2016 No Enquiry Certificate.
14.	Farid Iqbal	W&C Hospital Kohat	PERs 2007 up to 2016 No Enquiry Certificate.
15.	Khan Bahadar	DHO Kohat	PERs 2003 up to 2016 No Enquiry Certificate.
16.	Tamor Wali Khan	DHO Upper Dir	PERs 2008 up to 2016 No Enquiry Certificate.
17.	Abdar Khan	DHO Upper Dir	PERs 2008 up to 2016 No Enquiry Certificate.
18.	Hazrat Hayat	DHO Shangla	PERs 2008 up to 2016 No Enquiry Certificate.
19.	Maroof Shah	DHQ Hospital, Shangla	PERs 2008 up to 2016 No Enquiry Certificate.
20.	Shamsher Ali	DHO Malakand	PERs 2009 up to 2016 No Enquiry Certificate.
21.	Umar Hayat	DHS (FATA)	PERs 2009 up to 2013 & 2016 No Enquiry Certificate.
22.	Sabir Hussain	DGHS Office	PERs 2009 & 2013 up to 2016 No Enquiry Certificate.
23.	Abdul Haleem	-do-	PERs 2009 & 2011 up to 2016 No Enquiry Certificate.
24.	Imtiaz Hussain	DGHS Office	PERs 2014 up to 2016 No Enquiry Certificate.
25.	Ghafoor ur Rahman	-do-	PERs 2009 up to 2016 No Enquiry Certificate.
26.	Wahid Shah	-do-	PERs 2009 & 2011 up to 2016 No Enquiry Certificate.
27.	Subhanullah	Khyber Agency	PERs 2009 up to 2016 No Enquiry Certificate.
28.	Faizullah	DGHS Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
29.	Irshad Khaliq	PGMI/HMC Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
30.	Hassan Gul	KCD Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.

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31.	Gulab Khan	-do-	PERs 2009 up to 2016 No Enquiry Certificate.
32.	Nasrullah	-do-	PERs 2009 up to 2016 No Enquiry Certificate.
33.	Muhammad Parvaiz	-do-	PERs 2009 up to 2016 No Enquiry Certificate.
34.	Ibrar Ahmad	SHPD Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
35.	Khaliq dad	BMC Bannu	PERs 2010 up to 2016 No Enquiry Certificate.
36.	Bakhtawar Shah	DHO: Charsadda	PERs 2009 up to 2016 No Enquiry Certificate.
37.	Ghulam Mustafa	KGMC Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
38.	Shakirullah	Police/ Services Hospital Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
39.	Safi-ur-Rahman	DHO Lakki	PERs 2009 up to 2016 No Enquiry Certificate.
40.	Wali Khan	MCD Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
41.	Miskeen Khan	DGHS Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
42.	Muhammad Haroon	DHO Kohistan	PERs 2009 up to 2016 No Enquiry Certificate.
43.	Muhammad Nabi	DHO Lower Dir.	PERs 2009 up to 2016 No Enquiry Certificate.
44.	Muhammad Gul	DGHS, Office	PERs 2012 up to 2016 No Enquiry Certificate.
45.	Enah Jehan	Molvi Ameer Shah Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
46.	Ijaz Ahmad	DGHS, Office	No Enquiry Certificate.
47.	Taslim Ali	HMC, Peshawar.	PERs 2009 up to 2016 No Enquiry Certificate.
48.	Abid Ullah	Khalifa Gul Nawaz Hospital, Bannu	PERs 2009 up to 2016 No Enquiry Certificate.
49.	Akbar Ali Shah	LRH, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
50.	Bahadar Khan	MMC Mardan	PERs 2009 up to 2016 No Enquiry Certificate.
51.	Mir Wali Khan	KGMC, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
52.	Iqram Ullah	KMC, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
53.	Muhtab Jan	AHQ Hospital Landi Kotal	PERs 2009 up to 2016 No Enquiry Certificate.
54.	Muhammad Ali S/O Bakht Mand	STH, Swat	PERs 2009 up to 2016 No Enquiry Certificate.
55.	Hashmat Ali	HMC, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
56.	Asif Jan	MCD, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
57.	Murad Ali	LNH, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.
58.	Aminullah Jan	Drug Testing Lab., Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.

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59.	Bakht Biland Malazai	S/O	STH, Swat	PERs 2009 up to 2016 No Enquiry Certificate.
60.	Mukhtiar Ali		DHO, Peshawar	PERs 2009 up to 2016 No Enquiry Certificate.



Assistant Director (P-II)

Directorate General Health Services,
Khyber Pakhtunkhwa Peshawar.

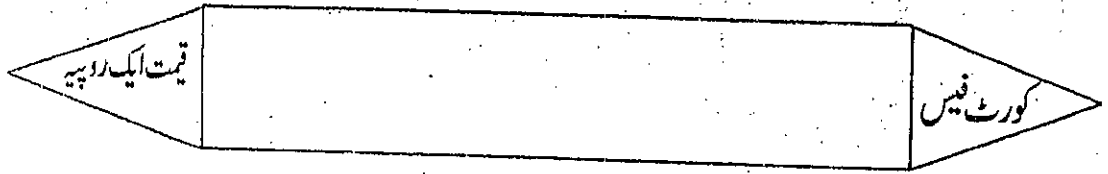
C.c.

PA to Director General Health Services Khyber Pakhtunkhwa Peshawar.

Sped. I. Jamood Bukhari

C - T.C


بعدالت خیرتوخواء سروس ٹریڈنگ کمپ کورٹ تمام قلم کردہ سوائے



مورخہ 8 آگست 19۱۹ء منجانب ایپلینٹ
مقدمہ شمشیر علی بنام حکومت وغیرہ
دعویٰ سروس ایپل
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام قلم کردہ ایپلینٹ کیلئے محمد جاوید خان اینڈ کوکسٹے کو مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے کے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا یہ مقدمہ کے سبب سے ہوگا 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 کہ سند رہے

المرقوم 8 ماہ آگست 19۱۹ء

واہ شہدہ العبد
شمشیر علی ولد علی
مکملہ افسر آباد سید شریف سوات

بمقام ایپل کورٹ سوات
M. Javid Khan
A.S.C
0343 960 7492

Accepted by
[Signature]

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

SERVICE APPEALS NO. 1062, 1063 & 1064 OF 2019

1. Shamsher Ali (Junior Clerk, presently Office Assistant);
2. Fazal Subhan (Junior Clerk, presently Office Assistant),
3. Mian Irshad (Junior Clerk, presently Office Assistant)..... **Appellants**

Versus

Govt. of Khyber Pakhtunkhwa and others.....**Respondents**

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Appellants have got neither cause of action nor locus standi to file the instant Appeals.
2. That the Appellants have filed the instant Appeals just to pressurize the Respondents.
3. That the instant Appeals are against the prevailing Law and Rules.
4. That the Appeals are not maintainable in its present form and also in the present circumstances of the issue.
5. That the Appellants have filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellants have not come to the Tribunal with clean hands.
7. That the Appeals are time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant Appeals are bad for mis-joinder and non-joinder of the necessary parties.

ON FACTS:

1. Para No. 1 pertains to record.
2. Para No. 2 Pertains to record.
3. Para No. 3 is correct to the extent that the Appellants were promoted as Office Assistants BPS-16 by the District Coordination Officer Swat under District Cadre/Policy without obtaining NOC and by passing the Health Department Khyber Pakhtunkhwa.
4. Para No. 4 is correct to the extent that the Provisional Seniority List is issued by the Directorate General Health Services Khyber Pakhtunkhwa.
5. Para No. 5 is correct to the extent that 2nd Appeal against the Seniority List filed by the Appellants which were forwarded by District Health Officer Swat on 13/05/2019 to DGHS office. Previously to these Appeals, the Appellants also submitted a similar 1st Appeal on 4 & 10/01/2018 (Annex-A & B) which were discussed in the Scrutiny Committee Meeting held on 26/02/2018 during which it was decided to submit a self-contained case to the Govt. for advice (Annex-C). Accordingly a detailed case was sent to the Govt. of Khyber Pakhtunkhwa Health Department vide this Directorate letter No. 3023/Personnel (Promotion) dated 04/04/2018 for advice (Annex-D) but they never approached Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar within stipulated times of 90-days after filing their 1st Appeal on 4 & 10/01/2018 hence on score of this single point their 2nd appeal is not maintainable.
6. Para No. 6 no comments being formal.

ON GROUNDS

- i. Para-i is incorrect. The Appellants were parts and parcel of Health Department but by introducing Local Govt. Act, 2001 by the Govt. Khyber Pakhtunkhwa, they become the parts of District Govt. headed by District Coordination Officer. The District Govt. promoted them as Office Assistant in spite of the fact that they were most junior in the Provincial Cadre. According to Govt. Notification dated 15/01/2002, the Provincial Cadre posts of BPS-15 and below of the Provincial Health Department were converted into District cadre, so they were promoted as Office Assistant in District cadre and not in Provincial cadre. According to Civil Service Act, 1973, fixation of Seniority Para-6 an employee from one cadre to other cadre will be adjusted in seniority in the bottom, so on repealing the act and abolishing of District Cadre the promotes of District Cadre. Health Department have been incorporated in the seniority list of Provincial Cadre from the date of repealing of the Act, i.e. w.e.f. 15/05/2012.
- ii. in reply to Para-ii it is submitted that:
 - a. The officials from Serial No. 1 to 75 were promoted on provincial level Seniority lists to the post of Office Assistant on the basis of seniority while the Appellants were promoted by District Govt. on 10/06/2005.

26/08/2008, 01/01/2009 and became the part of District Cadre, so they were excluded from the provincial cadre seniority list at that time which they never challenged. They were included again in the Seniority list after repealing of the Local Govt. Act, i.e. 15/05/2012 and correctly placed their name in seniority list of Health Department.

- b. Incorrect. The Appellants were promoted in District Cadre in spite of the fact that they were most junior in the Provincial Seniority list of Senior Clerk of sub-cadre of Health Department.
 - c. The officials at S#-77 to 85 were promoted by the District Govt. prior to the Appellants, so they were shown correctly senior than Appellants in the seniority list.
-
- iii. Para-iii pertains to record.
 - iv. Para-iv is incorrect. The seniority list has been prepared strictly in accordance under section (8) of KP the Civil Servant Act, 1973 and Rule (17) of KP APT Rules 1989.
 - v. Para-v is incorrect. The seniority list was issued according to Section (8) of KP Civil Servant Act 1973 and Rule 17 of KP APT Rules 1989, there is no question arises regarding violation of Constitution of 1973 of Islamic Republic of Pakistan. Initially the Appellants were in the sub-cadre of Health Department and after promulgation of Local Govt. System in Pakistan under the Constitution of 1973 of Islamic Republic of Pakistan in the year 2000, they avail their promotion in the District Govt. Cadre by Quitting themselves from Health Department due to which their names were excluded from the seniority list of Sub-Cadre of Health Department. After repealing Local Govt. Act, in the 2012 under constitutional provision after which the Appellants again applied to join the Sub-Cadre of Health Department KP and after acceptance of their application they were placed rightly according to Section (8) of KP Civil Servant Act, 1973 read with Rule 17 of KP APT Rules 1989.
 - vi. Para-vi is incorrect. The seniority list has been prepared strictly in accordance under Section (8) of KP the Civil Servant Act, 1973 and Rule (17) of KP APT Rules 1989 hence no violation of judgment of Superior Courts of Pakistan.
 - vii. Para-vii is no comments being formal.
 7. No comments formal.
 8. No comments. Pertains to record.

PRAYER:

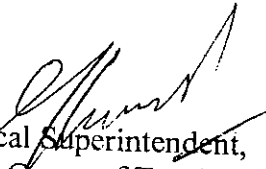
It is therefore humbly prayed that on acceptance of the comments, the instant Appeal may very graciously be dismissed with cost.



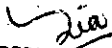
Secretary Health, Khyber Pakhtunkhwa.
Respondent No. 01



Director General Health Services,
Khyber Pakhtunkhwa.
Respondent No. 02



Medical Superintendent,
Saidu Group of Teaching
Hospitals at Saidu Shareef Swat
Respondent No. 03

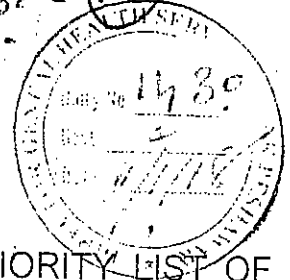


MEDICAL SUPERINTENDENT,
Saidu Teaching Hospital,
Saidu Sharif, Swat.,

To,

The Director General Health
Services Khyber Pakhtunkhwa
Peshawar

Annex -



Subject:- APPEAL REGARDING ISSUANCE OF SENIORITY LIST OF
OFFICE ASSISTANT ON DATED 01-01-2018.

R/Sir,

With reference to letter No. 05-85/Personal (Promotion) dated, 01-01-2018 and issuance of Seniority list of Office Assistant on dated, 01-01-2018.

It is humbly requested that:-

1. That the Office Assistant (appellants) namely, Mr. Abdar Khan, Mr. Taimur Wali, Mr. Fazli Subhan and Mr. Sher Azam Khan were promoted to Office Assistant on 26-08-2008 vide District Coordination Officer Upper Dir order No. 7983-89 dated, 26-08-2008 (Copy of Order is attached as Annexure-"A"). The Representative of Provincial Government had been nominated his representative to attend the process of Promotion of Office Assistant, the representative of Secretary Health Khyber Pakhtunkhwa attended the DPC meeting as member of the Provincial Government, the meeting held in the office of District Coordination Officer Upper Dir.
2. In the seniority list previously issued by your kind office in the year 2011 our names are reflected at S.No. 87 and 88, (Seniority list as Attached as Annexure-"B") in second seniority list issued on 31-05-2017 our names are mentioned at S.No. 32 and 33 (seniority list is attached as Annexure-"C"). It is important to mention here that in recently issued seniority list vide letter No, refer above our name are reflected at S. No. 97, 98 and 99 instead of 32 & 33, which is against the prevailing policy and to deprived the deserving officials from their legal rights.
3. The appeal regarding District Cadre promotions the Service Tribunal Peshawar accepted the appeal of Mr. Khalil-Ur-Rehman in appeal NO. 988/2006 (Decision of Service Trabunil is attached as Annexure-"D").
4. The employees promoted in the year 2009 by Provincial Government are mentioned in recent seniority list before us, it is pertinent to mentioned here that we have been promoted to office Assistant in the year 2008.

Therefore, you kind honour is requested to please considered our seniority with effect from 26-08-2008 instead of 15-05-2012 as we are promoted to office Assistant in the year 2008. The appeal is submitted for your kind information and further necessary action.

Dated, 04-01-2018.

The Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

PROVISIONAL SENIORITY LIST OF OFFICE ASSISTANTS/AUDITORS/ STENOGRAPHERS IN
HEALTH DEPARTMENT, KHYBER PAKHTUNKHWA

1286-223
10/11/18

Annex - B

Kindly refer to your covering letter No. 5-/85/Personnel (Promotions) dated 01-01-2018
the subject noted above.

We have the honour to submit the following few lines for your kind consideration.

1. Mr Mian Irshad and others were promoted by the then DCO Shangla after observing all codal formalities vide his office order No. 2960-66/DCO(SH) dated 09-06-2005.
2. Later on the DCO Shangla withdrawn the said promotion order vide his office order No. 4954-55/DCO(SH) dated 05-10-2005.
3. Feeling aggrieved the affected Govt. Servants filed a case against the impugned withdrawal order in Service Tribunal Khyber Pakhtunkhwa.
4. The Service Tribunal decided the cases in favour of the affected employees vide decision dated 12-09-2007 (copy attached).
5. The DCO Shangla and Directorate General Health Services Khyber Pakhtunkhwa Peshawar endorsed and implemented the decision by issuing the restoration order and inclusion of names in the seniority list of the category concerned accordingly.
6. The issue once settled was being followed by the other District Governments also.
7. By the passage of time, our names came closer to the top of the seniority list of office assistants.
8. Now all of a sudden our names have been shuffled to the bottom of the seniority list on the reason that our seniority will be counted w.e.f 15/05/2012 i.e. the date of adjustment from surplus pool.
9. Sir, after studying the surplus pool policy, we are astonished that the devolution in no meanings comes under the said policy (photocopy attached for ready reference)
10. It is to point out that Mr Murad Ali of District Buner being party in the same case and serving under the devolved status has rightly been promoted to the post of Chief PHC Technician BPS-16 and to the post of Technologist BPS-17 on 28-04-2010 and 11-05-2012 respectively, without going through such bottlenecks.
11. With due respect and honour it is stated that at this stage considering the devolution policy as surplus pool policy tantamount to a sort of legislation while the scrutiny committee being part and parcel of the implementing entity has got no authority concern and responsibility of legislation. As per surplus pool policy there must be proper abolition of surplus post by the finance department and during surplus pool period there is no mechanism of promotion at all.

It is therefore very humbly requested that our original seniority positions w.e.f the actual date of promotions may kindly be restored so as the court decision is implemented in letter's spirit in full rather than pick and choose.

Yours Obediently,

1. ✓ Mian Irshad, Office Assistant, DHQ Hospital Batakhele.

2. ✓ Hazrat Hayat, Office Assistant, THQ Hospital Besham.

3. ✓ Maroof Shah, Office Assistant, DHO Office Shangla.

4. ✓ Shamsher Ali, Office Assistant, DHO Office Swat.

5. ✓ Asghar Khan, Office Assistant, MS Office, SGTH Swat.

22/11/18

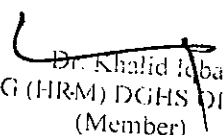
Annex - A

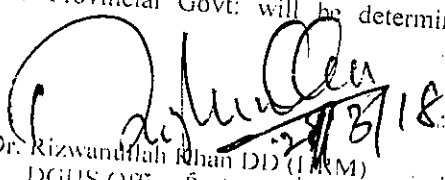
Minutes of the Scrutiny Committee meeting held on 26-02-2018 11:00 AM in the Office of ADG (Admin) of DGHS Office Peshawar.

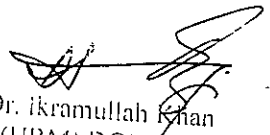
A complaint was received from the Office Assistants of Provincial Health Department regarding seniority of those Office Assistants, who were promoted by the District Government during the period from 2001 to 2012 by giving them the seniority from the date of their promotion in the District Local Government.

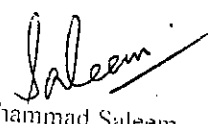
This issue was discussed in the Scrutiny Committee meeting held on 12-12-2017 and it was decided that the Office Assistants promoted by the District Local Government be placed in the seniority list of Provincial Health Department from date of repealing of the Local Government Act 2001 w.e.f 15-05-2012, in the light of 'fixation' of seniority of Civil Servants Act 1973 para-6, so accordingly their names were incorporated in the seniority list of Provincial Health Department from the date of dissolution of Local Government Act 2001 w.e.f 15-05-2012 and circulated the provisional seniority list, on which the Office Assistants who were promoted by District Government have made a representation requesting for their seniority from the date of their promotion in the District Government.

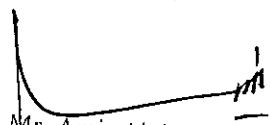
This point was again discussed in the Scrutiny Committee meeting held on 26-02-2018 and decided that a self contained case may be prepared and submitted to the Government for advice in the matter is to how the inter-see seniority of the officials promoted by District Local Government and Provincial Govt. will be determined according to Rules.



Dr. Khalid Iqbal
ADG (HRM) DGHS Office Peshawar
(Member)

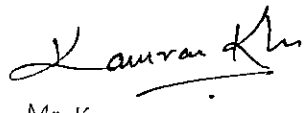

Dr. Rizwanullah Khan DD (HRM)
DGHS Office Peshawar
(Member)

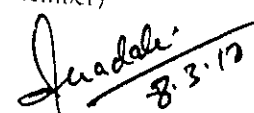

Dr. Ikramullah Khan
Dir (HRM) DGHS Office
(Member)


Dr. Mohammad Saleem
Dir (Implementation) DGHS Office
(Member)


Mr. Amir Abdullah
Superintendent (EPI)
DGHS Office Peshawar
(Member)


Mr. Miskeen Khan
Office Assistant
DGHS Office Peshawar
(Member)


Mr. Kamran Khan
AD (ADMN)
DGHS Office Peshawar
(Member)


Dr. Capt. Shad Ali
ADG (ADMIN)
DGHS Office Peshawar
(Chairman)

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

Annex B



2023 /Personnel (promotion) Dated 04/08/2018

To,

The Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department Peshawar.

Subject: - ADVICE REGARDING SENIORITY LIST OF OFFICE ASSISTANT (BS-16) HEALTH DEPARTMENT.

Dear Sir,

I have the honour to state that in 2001 the Government of Khyber Pakhtunkhwa had promulgated the Local Govt: Act and converted the posts in BPS-15 and below of Provincial Health Department into the District Cadres vide Govt: of N.W.F.P. Establishment/Admin Department notification bearing No. SOR-II/(E&AD)1(20)/98-Vol.III dated 15.01.2002 (Copy attached Annexure-A).

The District Govt: had promoted senior clerks to the post of Office Assistant in the District Cadre during the period from 2001 to 2012.

The said Act was repealed through Khyber Pakhtunkhwa Local Govt: Act 2012 w.e.f. 15.05.2012 (copy attached at Annexure B) and all local Government created under the said law stand dissolved.

This Directorate vide letter No.2035/Admn: dated 28/02/2005 (Copy Attached at annex C) wherein, it was clearly mentioned at Para IV, that no proper procedure i.e. circulating of Provisional/Final Seniority List etc: adopted by DCOs. Rather in some of the districts employees having very low Seniority position have been promoted in preference to the senior most employees of the joint Seniority list issued by the DGHS Office which is in violation of Appointment/Promotion Rules, as a result thereof Health Department can face litigation in the court of Law.

The case was taken up with the Establishment Department vide Health Department vide No. SOH-III/10-4/2005 dated 31/5/2005 (copy attached at Annex D). Reply of the said letter received from the Establishment Department letter No. SOR-II(E&AD)1(20)2004 dated 23/06/2005 (copy attached for ready reference at Annex E) wherein, it was clearly mentioned that Health Department may follow the provision of Local Government system with letter and spirit.

The case was again taken up to your good honor vide this Directorate letter No. 6405/Admn dated 06/08/2005 (copy attached at Annex F) and explained our view points again in detail but no fruitful result is received till to date.

The said district cadre policy was circulated vide this Directorate letter No. 7060-83/Admn/Personnel dated 14/09/2005 (copy attached at Annex G) for ready reference).

The Seniority of those office Assistants who were promoted in District cadre was incorporated in the Provincial Seniority list from the date of their promotion in the respective Districts on which objection was raised by the Office Assistants of Provincial Cadre Health Department on which a Scrutiny committee was constituted at Directorate level.

In their 1st meeting held on 12.12.2017 the committee has unanimously decided that the office assistant promoted by the District Govt: be given seniority from the date of repealing/dissolution of Local Govt: Act 2001 i.e. 15.05.2012. Accordingly it was done and the Provisional Seniority list of office assistants was circulated vide letter No.5-85/Personnel (promotion) dated 01.01.2018 (Copy attached at Annex H).

On circulation of Provisional Seniority list the office Assistants promoted by the District Govt: raised objection on it and requested for seniority from the date of their promotion rather from the date of repealing/dissolution of the Act 2001 on the plea they were rightly been promoted by the District Govt: as per decision of Service Tribunal (Copy attached at Annex I).

This case was again discussed in the 2nd Scrutiny committee meeting held on 26.02.2018 and it was decided to seek advice of the Govt: on the following points.

1. That what will be the status of the officials who have been promoted by the District Govt: after dissolution of the District Govt: in the light of Establishment/Admin Department letter dated 15.01.2002 (Copy attached as Annex. A).
2. The Office Assistants of Provincial Health Department Cadre objected on the seniority of Office Assistants promoted by the District Govt: the main plea of the Office Assistants of Health Department is that when the District Govt. dissolved i.e 15/05/2012 their seniority may be counted from the date of dissolution of District Govt. and not from the date of their promotion as the seniority may be fixed as and when they are redundant/dissolution of District Govt. which seems to be genuine. As the same points has already been raised by the Health Department which needs further considerations.

It is requested that advice of the Govt may kindly be conveyed as to whether the seniority of the officials promoted by the District Govt: is determined from the date of their promotion or from the date of dissolution of the Act, 2001 w.e.f. 15.05.2012 i.e on the analogy of surplus pool policy which is already been in vogue

ADDITIONAL DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.

9/2/18