

FORM OF ORDER SHEET

Court of _____

Case No.- 1164/2022

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	
1-	27/07/2022 Counsel inform by SMS on 4/10/22 <i>[Signature]</i>	<p>The appeal of Dr. Shahzad Ali Khan presented today by Mr. Junaid Anwar Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at Abbottabad on _____ Notices be issued to appellant and his counsel for the date fixed. <u>20-10-22</u></p> <p>By the order of Chairman <i>[Signature]</i> REGISTRAR</p>
	16.11.2022	<p>Appellant alongwith his counsel present. Preliminary arguments heard.</p> <p>Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days. To come up for submission of written reply/comments on 13.12.2022 before the S.B at Camp Court Abbottabad.</p> <p><i>[Signature]</i> (Salah-Ud-Din) Member (J) Camp Court Abbottabad</p>

Rs-100/-
Appellant Deposited
Security & Process Fee

[Signature]
18/11/22

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Dr. Shahzad Ali Khan

Versus

Govt: of KPK

..... Appellant

..... Respondents

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

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

Name:- Junaid Anwar Khan, ASC

Signature:- 

Dated:- 15-07-22

**BEFORE THE HONOURABLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. 1164 of 2022

Dr. Shahzad Ali KhanAPPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through
Chief Secretary, Khyber Pakhtunkhwa,
Peshawar etcRESPONDENTS.

SERVICE APPEAL

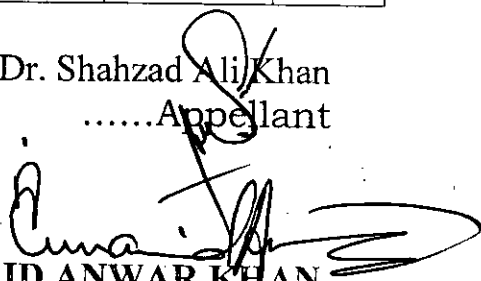
INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of Service Appeal alongwith affidavit.	1- 10
2	Correct addresses of the parties.	11- 12
3	Copy of the CNIC of the appellant.	"A"	13
4	Copies of the educational testimonials of the petitioner.	"B"	14
5	Copy of the service record.	"C"	15- 16
6	Copy of the notification.	"D"	17- 19
7	Copy of the notification.	"E"	20- 21
8	Copy of the departmental appeal.	"F"	22- 26
9	Copy of the notification dated 17.03.2022.	"G"	27- 35
10	Wakalat Nama.	36

Dated 15.07.2022

Dr. Shahzad Ali Khan
.....Appellant

Through


JUNAID ANWAR KHAN,
Advocate Supreme Court
Of Pakistan.

**BEFORE THE HONOURABLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. 1164 of 2022

Dr. Shahzad Ali Khan son of Muhammad
Fareed Swati resident of Fareed Bagh
Mandian, post Office Kotkay, Tehsil and
District Mansehra**APPELLANT**

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar.
3. Chief Minister, Khyber Pakhtunkhwa, Peshawar.
4. Minister Health Department, Khyber Pakhtunkhwa, Peshawar.
5. Section Officer (E-V), Government of Khyber Pakhtunkhwa, Peshawar.
6. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar. ... **RESPONDENTS.**

**SERVICE APPEAL UNDER SECTION 4
OF SERVICE TRIBUNAL ACT, 1974
READ WITH CLAUSE XIV OF
POSTING AND TRANSFER POLICY
AGAINST THE IMPUGNED NOTIFICATION
BEARING NO.SOH(E-V)/4-4/2022 DATED**

19.04.2022 WHEREBY THE APPELLANT
WAS DEPRIVED FROM PROMOTION
AND JUNIORS THAN THE APPELLANT
WERE PROMOTED BY THE
RESPONDENTS.

PRAYER: -

On acceptance of the instant service appeal, the impugned notification bearing No.SOH(E-V)/4-4/2022 dated 19.04.2022 issued by the respondents may please be set aside and the respondents may please be directed to promote the appellant against the post of Member of Services (BS-20) on regular basis and to issue notification in this regard forthwith or any other order or relief as this Honourable Tribunal deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Respectfully Sheweth!

1. That, the appellant is bonafide resident of Fareed Bagh Mandian Kotkay, Tehsil and District Mansehra.

(Copy of the CNIC of the appellant is annexed as annexure "A").

2. That, the appellant is a qualified Doctor and is performing his duties in the Management Cadre of the respondents' department.

(Copies of the educational testimonials of the appellant alongwith service record are annexed as annexure "B" & "C").

3. That, the appellant was initially inducted in the Health Department, Government of Khyber Pakhtunkhwa who was later on transferred and lastly posted as Medical Superintendent, King Abdullah Teaching Hospital, Mansehra vide notification bearing No.SOH(HD)/E-V/4-4/2020 dated 18.03.2020.

(Copy of the notification is annexed as annexure "D").

4. That, the appellant is performing his duties with great zeal and zest and never remained negligent in performance of his assigned duties.
5. That, the appellant is serving at King Abdullah Teaching Hospital, Mansehra from the last two year excellently.

6. That, the service of the appellant is nearly almost 30/31 years at his credit hence the appellant is senior most in the department for the purpose of promotion.
7. That, although the appellant was entitled for promotion but the respondents issued impugned notification dated 19.04.2022 in which the respondents never considered the appellant for promotion and thus junior than the appellant has been promoted and clear cut discrimination has been done with the appellant.

(Copy of the notification is annexed as annexure "E").

8. That, the appellant being aggrieved from the impugned notification filed a departmental appeal before the respondent No.1 but the same is still unattended to.

(Copy of the departmental appeal is annexed as annexure "F").

9. That, the appellant time and again visited the offices of the respondents for his consideration for promotion but in vain hence the appellant being

aggrieved from the impugned notification seeks the gracious indulgence of this Honourable Tribunal by way of instant service appeal, inter alia, on the following grounds: -

GROUNDS

- a. That, the impugned notification passed/issued by the respondents whereby juniors than the appellant were promoted is wrong, illegal, against the law and facts, arbitrary, fanciful, perverse, against the relevant law, rules and regulations, politically motivated, based on malafide, against the fundamental rights of the appellant hence being not maintainable, liable to be set aside.
- b. That, the relevant law, rules and regulations have blatantly bypassed/violated by the respondents and the relevant law, rules and regulations have never been taken into consideration by the respondents and thus the notification so passed

by the respondents have no legal sanctity in the eyes of law.

- c. That, no solid, valid, concrete or confidence inspiring reasons/justification has been given by the competent authority while depriving the appellant from legal and legitimate right of promotion.
- d. That, the respondents initially themselves prepared seniority list by way of notification dated 17.03.2022 but the same seniority list has never been taken into consideration by the respondents and thus the impugned notification being in clear conflict with the notification issued by the respondents themselves has no legal sanctity in the eyes of law.

(Copy of the notification dated 17.03.2022 is annexed as annexure "G").

- e. That, the appellant has 30/31 years unblemished service career without any stigma hence the appellant being senior most has every right to be promoted but the respondents while not considering the appellant for the purpose of promotion have committed height of injustice with the appellant.

- f. That, the respondents have not advanced any strong, cogent and confidence inspiring reasons while refusing the promotion to the appellant.
- g. That, the appellant has never been called by the respondents nor the appellant was afforded an opportunity of being heard hence all the proceedings being carried out at the back of the appellant is against the settled principles of natural justice that no person should be condemned unheard.
- h. That, the appellant being senior most has been refused promotion whereas juniors than the appellant have been promoted hence clear cut discrimination has been done with the appellant by the respondents in a sheer malafide manner.
- i. That, the appellant has politically been victimized by the competent authority as all the process/proceedings have been carried out at the back of the appellant mere on the best of the political figures of the area whereas the appellant has not been afforded opportunity of being

heard hence all the proceedings are against the settled principle of natural justice.

j. That, relevant law, rules and regulations and even the seniority list by way of notification dated 17.03.2022 has completely been bypassed by the competent authority while carrying out the impugned proceedings regarding promotion.

k. That, it is well settled by now that the political figures have nothing to do with the promotion or other matters of the civil servants whereas in the instant case, the competent authority while making himself pawn in the hands of the political figures, issued the impugned notification regarding promotion which has no legal sanctity in the eyes of law.

l. That, the competent authority failed to exercise its powers in accordance with the relevant law, rules and regulations rather travelled beyond the powers so vested in it under the law.

m. That, the appellant has unblemished service career as the appellant is

performing his duties with great zeal and zest and never remained negligent in performance of his assigned duties. Similarly, neither any departmental nor any public complaint is available against the petitioner nor any negative remarks are available in the service record of the appellant.

- n. That, it is an inalienable right of the appellant to enjoy the protection of law and to be treated in accordance with law, rules and regulations but such right of the appellant has been infringed in a sheer malafide manner.
- o. That, the powers or jurisdiction are vested in authority to exercise it justly, fairly, honestly, judiciously and in accordance with law, rules and regulations but the respondents have transgressed upon their powers while dealing with the matter in hand.

.....PRAYER.....


It is, therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned

notification bearing No.SOH(E-V)/4-4/2022 dated 19.04,2022 issued by the respondents may please be set aside and the respondents may please be directed to promote the appellant against the post of Member of Services (BS-20) on regular basis and to issue notification in this regard forthwith or any other order or relief as this Honourable Tribunal deems fit and appropriate in the circumstances of the case, may also be issued/passed.

Dated 21.07.2022

Dr. Shahzad Ali Khan
.....Appellant

Through


JUNAID ANWAR KHAN,
Advocate Supreme Court
Of Pakistan.

AFFIDAVIT

I, Dr. Shahzad Ali Khan son of Muhammad Fareed Swati resident of Fareed Bagh Mandian, post Office Kotkay, Tehsil and District Mansehra, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing service appeal are true and correct and nothing has been concealed from this Honourable Court.

Dated 21.07.2022

Dr. Shahzad Ali Khan
(DEPONENT)

**BEFORE THE HONOURABLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR**

Service Appeal No. _____ of 2022

Dr. Shahzad Ali Khan son of Muhammad
Fareed Swati resident of Fareed Bagh
Mandian, post Office Kotkay, Tehsil and
District Mansehra**APPELLANT**

VERSUS

Government of Khyber Pakhtunkhwa through
Chief Secretary, Khyber Pakhtunkhwa,
Peshawar etc**RESPONDENTS.**

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

PETITIONER

Dr. Shahzad Ali Khan son of Muhammad
Fareed Swati resident of Fareed Bagh
Mandian, post Office Kotkay, Tehsil and
District Mansehra.

RESPONDENTS


1. Government of Khyber Pakhtunkhwa
through Chief Secretary, Khyber
Pakhtunkhwa, Peshawar.
2. Government of Khyber Pakhtunkhwa
through Secretary Health, Peshawar.
3. Chief Minister, Khyber Pakhtunkhwa,
Peshawar.
4. Minister Health Department, Khyber
Pakhtunkhwa, Peshawar.

5. Section Officer (E-V), Government of Khyber Pakhtunkhwa, Peshawar.
6. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.

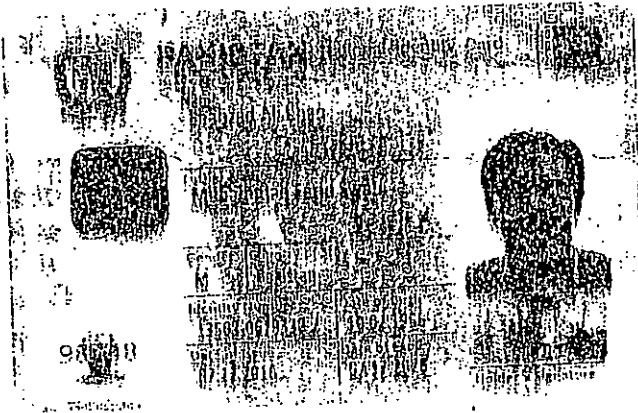
Dated 21.07.2022

Dr. Shahzad Ali Khan
..... Appellant

Through


JUNAID ANWAR KHAN,
Advocate Supreme Court
Of Pakistan.

13
Annexe
"A"



11-01 08781297
101 45 092572

الجمهورية الجزائرية الديمقراطية الشعبية

14
Annexure
B

جامعة پشاور

University of Peshawar
(Pakistan)

SESSION SUPPLEMENTARY - 1988

This is to certify

that CHASAD ALI KHAN

SON OF MUHAMMAD FARID SWATI

of the AYUB MEDICAL COLLEGE, ABBOTTABAD has obtained the Degree of

Bachelor of Medicine & Bachelor of Surgery

from this University at the Examination held in SEPTEMBER, 19 88, and that he/she is hereby authorised to practice **Medicine Obstetrics and Surgery**

Serial No 002043

Registration No. 83 - AMB - 758

Roll No. 47

18TH NOVEMBER, 19 88



Abdul Hamid
Registrar

Counicesignee

Abdul Hamid
Vice-Chancellor

ATTESTED

15

Annexure

Certificate No. 197/18

PROVINCIAL HEALTH SERVICES ACADEMY

HEALTH DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA

CERTIFICATE OF ACHIEVEMENT

AWARDED TO

Dr. Shahzad Ali Khan
District Health Officer, Manseltra

ON COMPLETION OF

FOUR MONTHS MANDATORY PROMOTIONAL TRAINING
FOR HEALTH MANAGEMENT CADRE (BS-19 TO BS-20)

FROM 26th February 2018 to 29th March 2018

OR

FROM 30th April 2018 to 31st July 2018

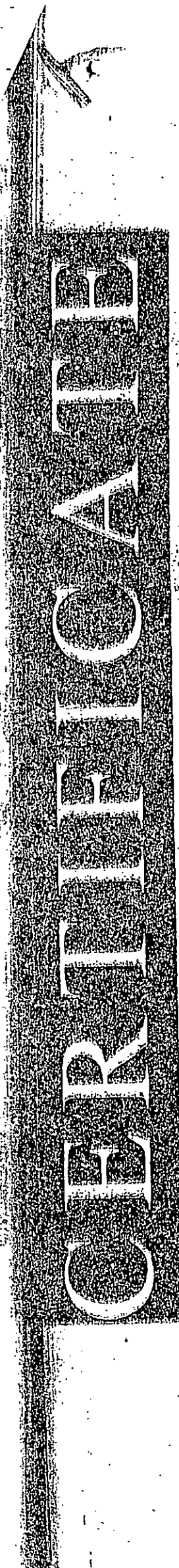
AT

PROVINCIAL HEALTH SERVICES ACADEMY PESHAWAR

Director HRD
PHSA Peshawar

Director General
PHSA Peshawar

ATTESTED

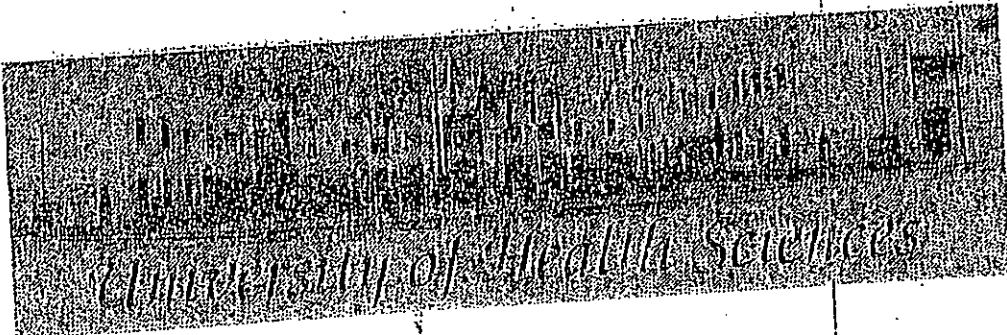


16
1

Serial No. 000613

Hon. No. 572

Registration No.



This is to Certify that

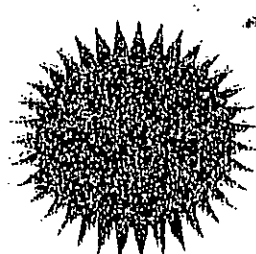
Shehzad Ali Khan

Son/Daughter of *Wahid Ahmad Farid Swati*

has successfully pursued and completed a course of studies in the Faculty of Community Medicine and Public Health and has been examined and found qualified. He/She has this day, is conferred the Degree of

Master of Public Health

at the examination held in July 2020



Ahmad

Registrar
Cahore, PAKISTAN

The
08 MAR 2021

Wahid Ahmad Farid Swati
Vice Chancellor

Kamran Naseem
Controller of Examinations

ATTEST

University of Health Sciences

This is to Certify that

Shahzad Ali Khan

Son/Daughter of Muhammad Farid Swati

Has successfully pursued and completed a course of studies in the Faculty of
Community Medicine and Public Health and has been examined and found
qualified. He/She has this day, is conferred the Degree of

Master of Public Health

Examination held in July 2008

Controller of Examinations

Government of Khyber Pakhtunkhwa
Health Department

Dated Peshawar the 18th March, 2020

17
Annexure
"D"

NOTIFICATION

NO. SOH(CID)/E-V/4-4/2020

The competent authority is pleased to transfer Dr. Shahzad Ali Khan (BS# 9) District Health Officer, Mansehra and post him as Medical Superintendent, King Abdullah Teaching Hospital Mansehra, in the best of public interest, with immediate effect.

Secretary Health
Government of Khyber Pakhtunkhwa

Encls. Of even No. & Date.

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Mansehra.
4. MS, King Abdullah Teaching Hospital, Mansehra.
5. DAO, District Mansehra.
6. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
7. PS to Minister for Health Department, Khyber Pakhtunkhwa.
8. PS to Secretary Health Department, Khyber Pakhtunkhwa.
9. Doctor concerned.
10. Personal file of the doctor concerned.

(Maleez Ur Rehman Shah)
Section Officer (E-V)

ATTESTED

Dated Peshawar the 18th March, 2020

NOTIFICATION

No.SOH(HD)/E-V/4-4/2020:- The competent authority is pleased to transfer Dr. Shahzad Ali Khan (BS#19) District Health Officer, Mansehra and post him as Medical Superintendent, King Abdullah Teaching Hospital Mansehra, in the best of public interest, with immediate effect.

**Secretary Health
Government of Khyber Pakhtunkhwa**

Endst of Even No & Date

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Mansehra
4. MS, King Abdullah Teaching Hospital, Mansehra.
5. DAO, District Mansehra.
6. Deputy Director (TI) Health Department, with the direction to upload the notification on official website.
7. PS to Minister for Health Department, Khyber Pakhtunkhwa.
8. PS to Secretary Health Department, Khyber Pakhtunkhwa.
9. Doctor concerned.
10. Personal file of the doctor concerned.

**(Hafeez Ur Rehman Shah)
Section Officer (E-V)**

Government of Khyber Pakhtunkhwa
Health Department

18

Dated Peshawar the 19th April, 2022

NOTIFICATION

NO. BOHE-VII-1/2022 On the recommendations of the Provincial Selection Board, in its meeting held on 07.04.2022, the following Member of Service (BS-19) doctors are hereby promoted to the post of Member of Service (BS-20), on regular basis, with immediate effect:-

S/NO	NAME OF DOCTORS	PRESENT POSTING
1	Dr. Muzeeb Ali	Director (M&E) Provincial Health Service Academy, Peshawar
2	Dr. Shahbaz Akhbar	Director General Health Services, Khyber Pakhtunkhwa
3	Dr. Fakhr Alam	Medical Superintendent, DHO Hospital, Hunar
4	Dr. Ubaid Hussain	Medical Superintendent, Sarkhad Hospital for Psychiatric Diseases, Peshawar
5	Dr. Tariq Melanood	Waiting for posting
6	Dr. Muhammad Anwarzeb	On deputation to Bacha Khan Medical College Mardan.
7	Dr. S. Muhammad	Principal KOA, Kohat
8	Dr. Shaikh Ali Khan	Regional Director, Malakand
9	Dr. Muhammad Saleem Khan	CEO, Faculty of Paramedical Institute, Peshawar
10	Dr. Fakhr-ud-Din	Medical Superintendent, Naseerullah Khan Oberoi Memorial Hospital, Peshawar
11	Dr. Aziz Inam	Waiting for posting
12	Dr. Nighat Muneer	On Deputation to Federal Government
13	Dr. Ghazal Sohal	Principal, PMT, Abbottabad.
14	Dr. Nasreen Akhbar	Medical Superintendent, Maternity Hospital Peshawar
15	Dr. Sobia Nadeem	Waiting for posting
16	Dr. Abdul Qadir	Director (Implementation) DGHS
17	Dr. Ghazal Saleem	Principal, Sindh Medical College
18	Dr. Agha Usman	Director of Health Services
19	Dr. Arshad Ali	Medical Superintendent, Type D Hospital, Shikohabad, Chareilly
20	Dr. Shaukat Ali	On deputation to Health Care Commission, Islamabad

PDA KPK

21.	Dr. Sahib Gul	Director, MNCH, DGHS, Peshawar
22.	Dr. Naseem Khan Afridi	Medical Superintendent, Cat-D Hospital Badabher Peshawar
23.	Dr. Muhammad Afsar Anwar	Director PHSA, Peshawar
24.	Dr. Fazal Maula	District Health Officer, Kohat
25.	Dr. Shamsur Rehman	PD Blood Transfusion Authority, Peshawar
26.	Dr. Abdu Gul	District Health Officer Lakki Marwat
27.	Dr. Adnan Taj	Director (Curative), DGHS, Peshawar
28.	Jawad Habib Khan	CEO, Blood Transfusion Authority, KP

2. The officers, on promotion will remain on probation for a period of one year or till retirement, as the case may be, in terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Consequent upon the above, officers mentioned at S/No.2,8,17,24,26 are allowed to actualized their promotion in BS-20 against their already occupied posts.

4. Posting transfer appointment, officers will be issued, later on

Secretary Health

Government of Khyber Pakhtunkhwa

No.1607-1618/Endst of even No. & Date

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Principal Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa
6. Director General Health Services, Khyber Pakhtunkhwa, Peshawar with the request of submit posting/actualization proposal of this Department of officers mentioned in Para-4 above.
7. Director General Provincial Health Services Academy Peshawar.
8. Section Officer (PSB) Establishment Department
9. All Concerned DHOs/MSs, Khyber Pakhtunkhwa.
10. All concerned District Accounts Officers, Khyber Pakhtunkhwa
11. Deputy Director (IT) Health Department.
12. PS to Minister for Health Department, Khyber Pakhtunkhwa.
13. PS to Secretary Health Department, Khyber Pakhtunkhwa.
14. PS to Special Secretary Health, Khyber Pakhtunkhwa
15. All concerned doctors.

(Tehmas Ayyub)
Section Officer (E-V)

19

21	Dr. Habibullah	Director, MNGH, DGHIS Peshawar
22	Dr. Nazeer Akhbar Abbasi	Medical Superintendent, Cat. D Hospital Badaber Peshawar
23	Dr. Muhammad Asghar Anwar	Director PHBA, Peshawar
24	Dr. Fazal Mulla	District Health Officer, Kohat
25	Dr. Ghulam Rehman	TD Blood Transfusion Authority, Peshawar
26	Dr. Abdul Gul	District Health Officer, Laki Marwat
27	Dr. Aftab Ullah	Director (Careless), DGHIS Peshawar
28	Jawad Habib Khan	CEO, Blood Transfusion Authority, KP

The officers on promotion will remain on probation for a period of one year or till retirement, as the case may be, in terms of Section-6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1980.

3. Consequently upon the above, officers mentioned at S/No. 2, 9, 17, 24, 28 are allowed to actualize their promotion in BS-20, against their already occupied posts.

4. Posting/transfer orders for the above mentioned officers will be issued, later on.

PPDA KPK

SECRETARY HEALTH
GOVERNMENT OF KHYBER PAKHTUNKHWA

No. 1607-1618 /End of even No. & Date.
Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Principal Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. DSO to Chief Secretary, Khyber Pakhtunkhwa.
6. Director General Health Services, Khyber Pakhtunkhwa, Peshawar. With the request to submit posting/actualization proposal to this Department of officers mentioned in para 4 above.
7. Director General Provincial Health Services Academy, Peshawar.
8. Section Officer (P&A) Establishment Department.
9. All concerned District Magistrate, Khyber Pakhtunkhwa.
10. All concerned District Executive Officers, Khyber Pakhtunkhwa.
11. Deputy Director (P&A) Establishment Department.
12. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
13. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
14. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
15. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
16. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
17. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
18. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
19. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.
20. P&A Officer (P&A) Establishment Department, Khyber Pakhtunkhwa.

19/4/2022
(JEMMA SYUD)
SECTION OFFICER (E.V)

Government of Khyber Pakhtunkhwa
Health Department

20
Annexure
E

Dated Peshawar the 19th April, 2022

NOTIFICATION

No. DPH/VI/4-1/2022. On the recommendations of the Provincial Selection Board, in its meeting held on 07.04.2022, the following Member of Service (BS-19) doctors are hereby promoted to the post of Member of Service (BS-20), on regular basis, with immediate effect:-

S/N	NAME OF DOCTOR	PRESENT POSTING
1	Dr. Mansoor Ali	Director (M&E) Provincial Health Service Academy, Peshawar
2	Dr. Bishveen Ahlud	Director General Health Services, Khyber Pakhtunkhwa
3	Dr. Fakire Alam	Medical Superintendent, DHQ Hospital, Buner
4	Dr. Ubaid Hussain	Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar
5	Dr. Tariq Mahmood	Waiting for posting
6	Dr. Muhammad Aurangzeb	On deputation to Bacha Khan Medical College Mardan.
7	Dr. S. Muhammad	Regional Director, Kohat
8	Dr. Shehbaz Ali Khan	Regional Director, Malakand
9	Dr. Muhammad Saleem Khan	CEO, Faculty of Paramedic Institute, Peshawar
10	Dr. Fakir-Ud-Din	Medical Superintendent, Naseerullah Khan Buttor Memorial Hospital, Peshawar
11	Dr. Ayaz Iqbal	Waiting for posting
12	Dr. Nighat Munir	On Deputation to Federal Government
13	Dr. Ghayoorullah	Principal, RIMT, Abbottabad.
14	Dr. Nasir Ahmad	Medical Superintendent, Maternity Hospital Peshawar
15	Dr. Gulzar Khan	Waiting for posting
16	Dr. Abdul Qadir	Project Implementation, DGHS
17	Dr. Faris Saleem	Medical Health Officer, Swabi
18	Dr. Asim Ullah	On deputation to Health Services
19	Dr. Amir Ali	Medical Superintendent, Type-D Hospital, Charsadda
20	Dr. Ghayoorullah	On deputation to Health Services Commissioner,

Health Department

Dated: Peshawar the 19th April, 2022**NOTIFICATION**

No.SOH(E-V)/4-4/2022:- On the recommendations of the Provincial Selection Board, in its meeting held on 07.04.2022, the following Member of Service (BS-19) doctors are hereby promoted to the post of Member of Service (BS-20) on regular basis, with immediate effect:-

S/No	Name of Doctors	Present posting
1.	Dr. Maqsood Ali	Director (M&E) Provincial Health Service Academy, Peshawar
2.	Dr. Shaheen Afridi	Director General Health Services, Khyber Pakhtunkhwa
3.	Dr. Fakhre Alam	Medical Superintendent, DHQ Hospital, Buner
4.	Dr. Ubaid Hussain	Medical Superintendent, Sarhad Hospital for Psychiatric Disease, Peshawar
5.	Dr. Tariq Mehmood	Waiting for posting
6.	Dr. Muhammad Aurangzeb	On deputation to Bacha Khan Medical College Mardan
7.	Dr. S Muhammad	Hospital KDA, Kohat
8.	Dr. Shaukat Ali Khan	Regional Director, Malakand
9.	Dr. Muhammad Saleem Khan	CEO, Faculty of Paramedic Institute, Peshawar
10.	Dr. Fakhr-Ud-Din	Medical Superintendent, Naseerullah Khan Babar Memorial Hospital, Peshawar
11.	Dr. Ayaz Imran	Waiting for Posting
12.	Dr. Nighat Murad	On Deputation to Federal Government
13.	Dr. Shaukat Sohail	Principal, PIMT, Abbotabad
14.	Dr. Nasreen Akhtar	Medical Superintendent Maternity Hospital Peshawar
15.	Dr. Gul-e-Rana	Waiting for posting
16.	Dr. Abdul Latif	Director (Implementation) DGHS
17.	Dr. Basit Saleem	District Health Officer Swabi
18.	Dr. Abid Hussain	Director DHIS DGHS Office
19.	Dr. Akhtar Ali	Medical Superintendent, Type-D Hospital Shabqadar Charsadda
20.	Dr. Shahid Yunis	On deputation to Health Care Commission, KP

21

22	Dr. Sahib Ullah	Director, MNCH, DGHS Peshawar
23	Dr. Nazeem KHAN/ANOL	Medical Superintendent, Qat. D Hospital Badaber Peshawar
24	Dr. Muhammad Afsar Anwar	Director PHBA, Peshawar
25	Dr. Haza Maula	District Health Officer, Kohat
26	Dr. Mansoor Rehman	PIJ Blood Transfusion Authority, Peshawar
27	Dr. Abdul Qadir	District Health Officer, Lakki Marwat
28	Dr. Adnan Talib	Director (Curative), DGHS Peshawar
29	Jawad Habib Khan	CEO, Blood Transfusion Authority, KP

The officers on promotion will remain on probation for a period of one year or till retirement, as the case may be, in terms of Section-6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule-15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

Consequent upon the above, officers mentioned at S/No. 2, 8, 17, 24, 26 are allowed to actualize their promotion in GS-20, against their already occupied posts. Posting/transfer orders of the above mentioned officers will be issued, later on.

PPDA KPK

SECRETARY HEALTH
GOVERNMENT OF KHYBER PAKHTUNKHWA

No. 1607-1618

(End of even No. & Date)

- Copy to the:-
- 1- Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
 - 2- Principal Secretary to Governor, Khyber Pakhtunkhwa.
 - 3- Secretary to Government of Khyber Pakhtunkhwa, Establishment Department.
 - 4- Accountant General, Khyber Pakhtunkhwa, Peshawar.
 - 5- IASO to Chief Secretary, Khyber Pakhtunkhwa.
 - 6- Director General Health Services, Khyber Pakhtunkhwa, Peshawar. With the request to submit posting/actualization proposal to this Department of officers mentioned in para above.
 - 7- Director General, Provincial Health Services Academy, Peshawar.
 - 8- Section Officer (I) Establishment Department.
 - 9- All concerned officers, Establishment Department, Khyber Pakhtunkhwa.
 - 10- All concerned District Health Officers, Khyber Pakhtunkhwa.
 - 11- Deputy Commissioner, Peshawar.
 - 12- Deputy Commissioner, Lakki Marwat.
 - 13- Deputy Commissioner, Kohat.
 - 14- Deputy Commissioner, Mardan.
 - 15- Deputy Commissioner, Nowshera.
 - 16- Deputy Commissioner, Peshawar.
 - 17- Deputy Commissioner, Peshawar.
 - 18- Deputy Commissioner, Peshawar.
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 - 97- Deputy Commissioner, Peshawar.
 - 98- Deputy Commissioner, Peshawar.
 - 99- Deputy Commissioner, Peshawar.
 - 100- Deputy Commissioner, Peshawar.

(Signature)
19/9/2022
SECTION OFFICER (E.V)

21.	Dr. Sahib Gul	Director, MNCH, DGHS, Peshawar
22.	Dr. Naseem Khan Afridi	Medical Superintendent, Cat-D Hospital Badabher, Peshawar
23.	Dr. Muhammad Afsar Anwar	Director PHSA, Peshawar
24.	Dr. Fazal Maula	District Health Officer, Kohat
25.	Dr. Shamsur Rehman	PD Blood Transfusion Authority, Peshawar
26.	Dr. Abdu Gul	District Health Officer Lakki Marwat
27.	Dr. Adnan Taj	Director (Curative), DGHS, Peshawar
28.	Jawad Habib Khan	CEO, Blood Transfusion Authority, KP

2. The officers, on promotion will remain on probation for a period of one year or till retirement, as the case may be, in terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Consequent upon the above, officers mentioned at S/No.2,8,17,24,26 are allowed to actualized their promotion in BS-20 against their already occupied posts.

4. Posting transfer appointment, officers will be issued, later on

Secretary Health

Government of Khyber Pakhtunkhwa

No.1607-1618/Endst of even No. & Date

Copy to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Principal Secretary to Governor, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, Establishment Department
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa
6. Director General Health Services, Khyber Pakhtunkhwa, Peshawar with the request of submit posting/actualization proposal of this Department of officers mentioned in Para-4 above.
7. Director General Provincial Health Services Academy Peshawar.
8. Section Officer (PSE) Establishment Department
9. All Concerned DHOs/MSs, Khyber Pakhtunkhwa.
10. All concerned District Accounts Officers, Khyber Pakhtunkhwa
11. Deputy Director (IT) Health Department.
12. PS to Minister for Health Department, Khyber Pakhtunkhwa.
13. PS to Secretary Health Department, Khyber Pakhtunkhwa.
14. PS to Special Secretary Health, Khyber Pakhtunkhwa
15. All concerned doctors.

(Tehmas Ayyub)
Section Officer (E-V)

CS-NO 1768 WILE

17-5-20

22
ANNEXURE
"F"

To,

THE CHIEF SECRETARY,
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED NOTIFICATION DATED 19.04.2022
WHEREBY THE APPELLANT WAS
DEPRIVED FROM PROMOTION AND THE
JUNIORS THAN THE APPELLANT HAVE
BEEN PROMOTED.

Respected Sir,

It is submitted that:

1. That, the appellant was initially inducted in the Health Department, Government of Khyber Pakhtunkhwa who was later on transferred and lastly posted as Medical Superintendent, King Abdullah Teaching Hospital, Mansehra vide notification bearing No.SOH(HD)/E-V/4-4/2020 dated 18.03.2020.

(Copy of the notification is annexed herewith).

2. That, the appellant is performing his duties with great zeal and zest and never remained negligent in performance of his assigned duties. Similarly, neither any departmental nor any public complaint is

available against the appellant rather the long service record of the appellant is cogent and unblemished.

3. That, the petitioner is serving at King Abdullah Teaching Hospital, Mansehra from the last two year excellently.

4. That, the service of the appellant is nearly almost 30/31 years at his credit hence the petitioner is senior most in the department for the purpose of promotion.

5. That, although the petitioner being senior most was entitled for promotion but the respondents issued impugned notification dated 19.04.2022 in which the respondents never considered the appellant for promotion and thus junior then the appellant has been promoted and clear cut discrimination has been done with the appellant.

(Copy of the notification is annexed herewith).

6. That, the relevant law, rules and regulations have blatantly bypassed/ violated by the respondents and the relevant law, rules and regulations have never been taken into consideration by the department and thus the notification

so passed by the department have no legal sanctity in the eyes of law.

7. That, no solid, valid, concrete or confidence inspiring reasons/ justification has been given by the competent authority while depriving the appellant from legal and legitimate right of promotion.
8. That, the department initially themselves prepared seniority list by way of notification dated 17.03.2022 but the same seniority list has never been taken into consideration by the department and thus the impugned notification being in clear conflict with the notification issued by the department themselves has no legal sanctity in the eyes of law.

(Copy of the notification dated 17.03.2022 is annexed herewith).

9. That, the appellant has 30/31 years unblemished service career without any stigma hence the appellant being senior most has every right to be promoted but the department while not considering the appellant for the purpose of promotion have committed height of injustice with the appellant.

14. That, relevant law, rules and regulations and even the seniority list by way of notification dated 17.03.2022 has completely been bypassed by the competent authority while carrying out the impugned proceedings regarding promotion.
15. That, it is well settled by now that the political figures have nothing to do with the promotion or other matters of the civil servants whereas in the instant case, the competent authority while making himself pawn in the hands of the political figures, issued the impugned notification regarding promotion which has no legal sanctity in the eyes of law.
16. That, the competent authority failed to exercise its powers in accordance with the relevant law, rules and regulations rather travelled beyond the powers so vested in it under the law.
17. That, the appellant has unblemished service career as the petitioner is performing his duties with great zeal and zest and never remained negligent in performance of his assigned duties. Similarly, neither any departmental nor any public complaint is available against

the appellant nor any negative remarks are available in the service record of the appellant hence the legal and legitimate rights of the petitioner cannot be taken away by the respondents.

18. That, it is an inalienable right of the appellant to enjoy the protection of law and to be treated in accordance with law, rules and regulations but such right of the appellant has been infringed in a sheer mala fide manner.

.....PRAYER.....

It is, therefore, most humbly requested that the impugned notification dated 19.04.2022 may please be set aside and the appellant may please be promoted to the post of Member of Service (BS-20) with all benefits.

Dated 14.05.2022

Dr. SHAUZAID ALI KHAN,
Medical Superintendent,
King Abdullah Teaching Hospital,
Mansehra.

27

Annexure G



Government of Khyber Pakhtunkhwa,
Health Department

Dated Peshawar the 17th March, 2022

NOTIFICATION

NO. SOH(E-V)/Management Cadre/BS-19/2021 In pursuance of Section-8 (1) of Khyber Pakhtunkhwa Civil Servants Act, 1973, read with Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Final Seniority List of Member of Service (BS-19) Health Department Government of Khyber Pakhtunkhwa as stood on 01.01.2021, duly communicated by Director General Health Services Khyber Pakhtunkhwa, Peshawar vide letter No. 8166/AE-I dated 03.06.2021 is hereby notified/ circulated after the approval by the Competent Authority (Chief Secretary, Khyber Pakhtunkhwa).

It is certified that the Seniority List is final and un-disputed.

Secretary Health
Government of Khyber Pakhtunkhwa

No. 1065-1675 Endst. Of even No. & Date.
Copy to the:-

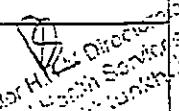
1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa.
4. Section Officer (PSB), Establishment Department, Khyber Pakhtunkhwa.
5. Section Officer (R-II), Establishment Department, Khyber Pakhtunkhwa.
6. Director General Health Services, Khyber Pakhtunkhwa, Peshawar, with reference to his letter quoted above. The notified Final Seniority List is attached and with the request to circulate the same amongst all concerned for information and record.
7. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
8. Manager Government Printing Press, Peshawar for Gazette notification.
9. PS to Minister for Health Department, Khyber Pakhtunkhwa.
10. PS to Secretary Health Department, Khyber Pakhtunkhwa.

(Signature) 17/3/2022.
(TG-IMAS/YYUB)
SECTION OFFICER (E-V)
Section Officer (E-V)
Health Department
Khyber Pakhtunkhwa

28

FINAL SENIORITY LIST OF MEMBERS OF SERVICE (BPS-19) OF HEALTH DEPARTMENT AS STOOD ON 01/01/2021

Sl: No.	Name of Officer(s) with academic qualification.	Date of Birth and Domicile	Date of 1st entry into Govt. Services & BPS	Date of induction in the Management Cadre by Option / PSC & BPS	Regular appointment/promotion to the present post.			Present appointment with date.
					Date of Promotion	BPS	Method of recruitment/ appointment	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
R. 1.	Dr. Mushtaq Ahmad Khan S/O Sher Ali Khan, MBBS/MPH	02.08.1961/ Peshawar.	12.04.1989 /BS-17	By Option 14.07.2009/BS-17	i) 14.11.2017 ii) 04.01.2019	BS-18 BS-19	By Promotion BY Promotion	DGHS Office.
2.	Dr. Maqsood Ali S/O Noor Zaman, MBBS/MBA in Health Management, MPH	02.01.1963/ Nowshera	22.04.1989/B S-17	By Option 14.07.2009/BS-17	14.11.2017 04.01.2019	BS-18 BS-19	By Promotion BY Promotion	Chairman, HCC Section Officer (S.V.) Health Department Peshawar
R. 3.	Dr. Aqeel Jan Bangash s/o Hyder Gul, MBBS, EMBA Health Management	2.2.1962/ Orakzai Agency:	10.09.1990 /BS-17	By Option 14.07.2009/BS-17	i) 10.9.2009 ii) 06.03.2013	BS-18 BS-19	By Promotion By Promotion	MS Cat. D Hospital Mahari Peshawar
4.	Dr. Shaheen Afridi D/O Zar Khan, MBBS, MPH	30-07.1966/ Peshawar.	15-05-1991 /BS-17	By Option 14.07.2009/BS-17	i) 10.9.2009 ii) 05.03.2013	BS-18 BS-19	By Promotion By Promotion	MD Health Foundation
5.	Dr. Fakhre Alam s/o Gul Ajab Khan, BDS, MPH	3.4.1965/ Karak	01.10.1991 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS, DHQH, Karak.
6.	Dr. Ubaid Hussain s/o Ashio Hussain, MBBS, MPH	7.10.1964/ Peshawar	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i) 10.9.2009 ii) 06.03.2013	BS-18 BS-19	By Promotion BY Promotion	MS Cat. D Hospital Nahaqi, Peshawar.
7.	Dr. Tariq Mehmood s/o Latif Khan, MBBS, DHPM	12.11.1965 Mohmand	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i) 10.9.2009 ii) 06.03.2013	BS-18 BS-19	By Promotion BY Promotion	At the disposal of MMC, Mardan
8.	Dr. Muhammad Aurangzeb s/o Saadullah Khan, MBBS, MPH	15.4.1965/ Mardan	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i) 10.9.2009 ii) 21.10.2013	BS-18 BS-19	By Promotion BY Promotion	Deputy DHO Mardan


 Director Health Services
 Health Department
 Peshawar

9.	Dr.S.Muhammad Samin s/o S.Muhammad Shafiq. MBBS	8.9.1962/ Kohat	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i)10.9.2009 ii)06.03.2013	BS-18 BS-19	By Promotion BY Promotion	DHO Kohat
10.	Dr.Shaukat Ali Khan s/o Gul Nawaz Khan. MBBS/MPH	10/06/1965 Dir	09.12.1991 /BS-17	By Option 31.03.2015 /BS-18	10.09.2009 14.11.2017	BS-18 BS-19	By Promotion By Promotion	MS DHQ Timergara
11.	Dr.Muhammad Saleem Khan s/o Hakim Khan. MBBS, DHPM, MPH	10.8.1965/ Abbottabad	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i)10.09.2009 ii)21.10.2013	BS-18 BS-19	By Promotion BY Promotion	ADG HRM
12.	Dr.Shahzad Ali Khan s/o Muhammad Farid Swati., MBBS, MPH	10.02.1966 Manshera	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i)10.09.2009 ii)21.10.2013	BS-18 BS-19	By Promotion BY Promotion	MS KATH, Manshra.
13.	Dr.Fakhruddin s/o Asad Din, MBBS, DHPM, Master of PHC Management	Karak/ 1.1.1965	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i)10.9.2009 ii)06.03.2013	BS-18 BS-19	By Promotion BY Promotion	MS, Services Hospital, Peshawar. Section Officer (SW)
14.	Dr.Inamullah Khan s/o Ihsanullah MD (Kabul). DHPM	2.6.1951/ Swat.	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	i)10.9.2009 ii)06.03.2013	BS-18 BS-19	By Promotion By Promotion	Coordinator, (PH) DHO of Peshawar Office. Swat.
15.	Dr.Ayaz Imran s/o Syed Imran Shah, MBBS	05.01.1963/ Banagram	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	28.02.2017 01.10.2018	BS-18 BS-19	By Promotion By Promotion	Deputy Director DHDC Abbottabad
16.	Dr. Nighat Murad D/O Dr. Murad Ali. MBBS, MPH	11.07.1966/ Peshawar	09.12.1991 /BS-17	By Option 14.07.2009/BS-17	10.09.2009 01.10.2018	BS-18 BS-19	By Promotion By Promotion	On Deputation to Federal Government of Health Dept
17.	Dr.Shaukat Sohail s/o Fazli Karim. MBBS. DHPM. MPH	1.10.1962/ Pesh.	14.04.1992 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Principal, PIMT, Abbottabad.
18.	Dr. Nasreen Akbar D/O Akbar Khan. MBBS, DHPM, MPH	4-4-65/ N.W. Agency	09-09-1993 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS Maternity Hospital Pesh
19.	Dr. Guie Rana D/O Sareed Ali Bangash	18-2-63/ Orakzai Agy	09-09- 1993/BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS, W&C Hosp: Kohat
20.	Dr.Abdul Latif s/o Masood Khan MBBS, MPH, DHPM	14.4.1967/ Mardan	10.11.1993 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS, Bacha Khan Medical Complex Swabi.
21.	Dr.Basit Saleem s/o Pirzada M Saleem. MBBS, DHPM, MPH	7.3.1966/ Mardan	10.11.1993 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS DHQ Mardan
22.	Dr.Abid Hussain s/o Iqbal Hussain, MBBS, MPH	25.7.1967/ Swat	10.11.1993 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Director DHIS DGHS office

30

23.	Dr. Akhtar Ali s/o Dilawar Khan, BDS, MPH	13.12.1963/ Charsadda	21.11.1994 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS, DHQH, Charsadda.
24.	Dr. Shahid Yunis s/o Haji Shad Muhammad, MBBS, DHPM, MPH, Masters in Hospital Management	1.12.1965/ Swabi	28.05.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	On deputation to UHC Secretariate w.e. from 1.3.21
25.	Dr. Sahib Gul S/O Juma Gul, MBBS, DHPM/MBA (HPM)	2.2.1964/ Kohistan	28.05.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Director MCH DGHS office
26.	Dr. Naseem Khan Afridi s/o Ayo Khan Afridi, MBBS, M.Sc Epidemiology & Biostatistics	11.6.1966/ F.R. Pesh:	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS Car; D Hospital Badaber Peshawar
27.	Dr. Muhammad Afsar Anwar s/o Muhammad Anwar Khan, MD (Kabul), M.Sc Public Health in International Health Develop	13.12.1963/ Swat	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Director PHS Section Officer (IV) Health Department Peshawar
28.	Dr. Fazal Maula s/o Abdul Wadood, MBBS, MPH	01.06.1965/ Bajaur	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	MS, Sifwat Ghayur Memorial Hosp: Pesh.
29.	Dr. Shamsur Rehman s/o Gul Rehman Afridi, MBBS, MPH	25.12.1966/ FR Kohat	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	PD Blood Transfusion, Peshawar.
30.	Dr. Abdu Gul s/o Abbas Khan, MBBS, MPH	16.01.1967/ S.W.A	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	DHO, Laidi Marwat
31.	Dr. Adnan Taj s/o Taj Muhammad, MBBS, DHPM, MPH, Masters in Hospital Management	4.1.1967/ Peshawar	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Director Curative DG Health Office.
32.	Dr. Jawad Habib Khan s/o Habibullah Khan, MBBS, MBA in Health Management/MPH	24.11.1963/ Peshawar	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	Blood Transfusion Authority, KP
33.	Dr. Muhammad Fayyaz Ali s/o Abdur Rehman, MD (Kab), MPH	23.3.1962/ Pesh:	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 31.08.2016	BS-18 BS-19	By Promotion By Promotion	DHO, Dir Upper. Director H. & Director General Health Service Peshawar

31

34.	Dr.Muhammad Ishaq Khan s/o Muhd Younas, MBBS	12.10.1961/ FR Peshawar.	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 09.11.2016	BS-18 BS-19	By Promotion By Promotion	DDHO Peshawar
35.	Dr.Mushaq Ahmad s/o Ali Gohar Khan, MBBS, DHPM/MPH	28.11.1964/ Abbottabad	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 09.11.2016	BS-18 BS-19	By Promotion By Promotion	DHO, Manshra.
36.	Dr.Muhammad Tariq s/o Muhammad Junaid JMD/MPH	6.10.1961/ Swabi	15.09.1997 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 09.11.2016	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Swabi
37.	Dr.Shakirullah s/o Syed Mashal Bacha, MD (Kabul), DHPM	1.1.1964 / Mardan	27.11.1998 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 22.02.2017	BS-18 BS-19	By Promotion By Promotion	MS Type-D Hospital, Toru Mardan.
38.	Dr.Muhammad Ehsan Waheed s/o Muhammad Hussain Khan Waheed, MBBS, MPH	15.11.1965/ DLKhan	27.11.1998 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 09.11.2016	BS-18 BS-19	By Promotion By Promotion	Principal PMTI DI Khan
39.	Dr.Shahzad Faisal s/o Asmatullah, MBBS, MPH	16.3.1969/ Peshawar	27.11.1998 /BS-17	By Option 14.07.2009/BS-17	28.02.2017 01.10.2018	BS-18 BS-19	By Promotion By Promotion.	Hospital Director, FIMC, Peshawar
40.	Dr.Syed Nasir Shah S/O Syed Akhtar Shah, MBBS/DHPM/MPH	01.10.1964/ Kohat	27.11.1998 /BS-17	By Option 14.07.2009/BS-17	14.11.2017 04.01.2019	BS-18 BS-19	By Promotion By Promotion	MS DHQ Banagram Hospital
41.	Dr. Syed Jamal Akbar S/O Fazal Akbar, MBBS, MPH	Orakzai Agy: 19-07-62	11.03.1999 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Principal Public Health School Nishtar Abad
42.	Dr. Safia D/O Sultan Hussain Khan, MBBS, MPH	09-07-1972/ Swat.	16-08-1999 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Principal, Public Health School, Pesh
43.	Dr.Muhammad Rehman Afridi S/O Muhammad Younas, MBBS, MPH	23.03.1969/ Khy Agy:	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	PD Malaria, KP
44.	Dr. Jamal Abdul Nasir S/O Mukhtiar Ahmad, MD (Kabul), DHPM, MPH	11.11.1965/ Charsadda.	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Director Admin DGHS, Office
45.	Dr. Naeem Shah S/O Saeed Shah, MBBS, M.Sc (INT-PH)	05.04.1970/ Kohat.	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHQH Kohat
46.	Dr.Muhammad Shuaib Khan S/O Muhammad Saeed, MBBS, MPH	03.11.1969/ Kafak	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Kohat in Polio Prog
47.	Dr.Siraj Muhammad S/O Khaista Muhammad, MBBS, MPH	15.02.1968/ Mardan.	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	MS, City Hosp: Kohat Road, Peshawar.

32

48.	Dr. Abdul Qaddus S/O Abdul Karim, DHPM, MPH	15.12.1969/ Khy Agy.	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	MS DHQH Parachinar
49.	Dr. Ahmad Faisal S/O Muhammad Safdar, MBBS, MPH	16.10.1971/ Abbottabad.	16-09-2000 /BS-17	By Option 14.07.2009/BS-17	28.02.2017 01.10.2018	BS-18 BS-19	By Promotion By Promotion	MS Mental Hospital Dadar
50.	Dr. Syed Muhammad Idrees S/O Syed Bakht Badshah / MBBS, MPH	08.02.1971/ Bajaur Agy	01.07.2001 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHO Charsadda
51.	Dr. Wali Khan S/O Sewal Khan, MBBS, DHPM, MPH	30.03.1966/ Khyber Agy	01.07.2001 /BS-17	By Option 14.07.2009/BS-17	22.09.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	D. Director Health Foundation
52.	Dr. Muhammad Qasim s/o Aqal Khan, MBBS, MPH	20.01.1969/ Khyber Agy	01.07.2001 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	I/C PDSRU KP Section Officer Health Department
53.	Dr. Anisa Afridi D/O Muhammad Anwar Afridi, MBBS, MPH/MSc Intern, Health DGO.	24.08.1969 / Khyber Agy	01.07.2001 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Provincial Coordinator MNCH Program NMD
54.	Dr. Muhammad Naeem Awan S/O Muhammad Bashir, MBBS, M.Sc International Health	22.02.1974 / Mansehra	04.07.2002 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	MS, Saibu Group of Hospital Swat
55.	Dr. Muhammad Akram Shah s/o Suieman Shah, MBBS, Dip: in Public Health & Hospital Admr.	20.4.1972/ Nowshera	04.07.2002 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Director, EPI Federal Government
56.	Dr. Sadiq Shah S/O Said Badshah, MBBS, MPH,	07.10.1969/ Khyber Agy	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	22.09.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Waiting for Posting
57.	Dr. Azmatullah Khan s/o Nasrullah Khan, MBBS, MPH, MBA	26.7.1972/ Peshawar	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHO Peshawar

Director H.R.M. Division
General Health Services
Khyber Pakhtunkhwa

	Dr. Ihtiar Ali S/O Pto Ali/ Aurakzai Agency: MBBS, DHPM, MPH	04.02.1966/ Orakzai Agy	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	MS Moulvi Amir Shah Memorial Hospital Peshawar
59.	Dr. Niaz Muhammad Afridi S/O Shamshad Khan Afridi/ Khyber Agency: MBBS, DHPM, MPH	03.04.1967/ Khyber Agy	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DD DHDC Swat
60.	Dr. Sher Khan Afridi S/O Muhammad Akram Khan, MBBS, MPH.	01.04.1973/ Khyber Agy	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	29.10.2013 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Director HRM DGHS Office.
61.	Dr. Ikramullah Khan s/o Hidayatullah Khan, MBBS, MPH	20.11.1973/ Peshawar	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	22.09.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Director Public Health DGHS Office, Pesh
62.	Dr. Tariq s/o Fazli Raziq, MPH	20.03.1969/ Swat	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	22.09.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DDHO Bunir
63.	Dr. Asghar Khan s/o Mohabat Khan, MBBS, DHPM, MPH	14.04.1973/ Swabi	23.07.2005 /BS-17	By Option 14.07.2009/BS-17	22.09.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Chief HSRU Section Officer Health Department
64.	Dr. Muhammad Rahim Khattak s/o Gul Rahim, MBBS, MPH	4.3.1962/ Karak	23.01.1988 /BS-17	By Option 07.05.2018 /BS-19	24.06.2014 14.04.2017	BS-18 BS-19	By Promotion By Promotion	DHO DI KHAN
65.	Dr. Jehanzeb Khan s/o Ihsanullah Khan, MBBS, MPH	1.1.1965/ Swabi	14.04.1982 /BS-17	By Option 07.05.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Peshwar.
66.	Dr. Qazi Sabih-ud-Din s/o Qazi Ghulam Mustafa, MBBS, MPH	1.1.1965/ Malakand Ag	31.07.1993 /BS-17	By Option 07.05.2018 /BS-19	24.06.2014 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Attached to DHO, Malakand
67.	Dr. Farhad Khan s/o Pordil Khan, MBBS, MPH	1.2.1964/ Charsadda	28.5.1997 /BS- 17	By Option 07.05.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	MS W&C Charsadda
68.	Dr. Kalimullah Khan s/o Eid Gul, MBBS, MPH	27.03.1965/ Karak	15.09.1997 /BS-17	By Option 07.05.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHO Swabi
69.	Dr. Abdul Wahed Khan S/O Abdul Hamid Khan, MBBS, MPH	3.11.1968/ FR Tank	15.09.1997 /BS-17	By Option 07.05.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	DHO Shangla

Director H.R.M. Directorate
General Health Services
Peshawar

34

70.	Dr. Ihsanullah s/o Ghulam Muhammad, MBBS/MPH	20.2.1963/ Tank	27.11.1998 /BS-17	By Option 07.05.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHO Tank
71.	Dr. Shahab Ahmad s/o Abdul Rehman, MBBS, MPH	24.4.1968/ Charsadda	27.11.1998 /BS-17	By Option 07.05.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	KATH Manshra
72.	Dr. Muhammad Hayat s/o Muhammad Amir, MBBS, MPH	24.3.1963/ Mardan	15.04.1992 /BS-17	By Option 10.09.2018 /BS-19	24.06.2014 14.11.2017	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Nowshera
73.	Dr. Tariq Khan s/o Rasool Khan, MBBS, MPH	16.10.1964/ Swat	31.07.1993 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	SGTH Swat
74.	Dr. Waseem Ahmad s/o Qazi Muhammad Saleem, MBBS, MPH	8.6.1966/ Mansehra	31.07.1993 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHQB, Haripur
75.	Dr. Mian Habibur Rehman s/o Fazlur Rehman, MBBS, MPH	4.4.1966/ Mardan	15.09.1997 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	PMO, DHQB, Mardan
76.	Dr. Shah Faisal s/o Ronaq Zaman Khanzada, MBBS, MPH	27.5.1967/ Swabi	15.09.1997 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	DHO, Abbotabad
77.	Dr. Sardar Aurangzeb s/o Sardar Muhammad Ashraf, MBBS, MPH	17.3.1963/ Abbottabad	23.01.1988 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHQB, Haripur
78.	Dr. Saeedullah Khan s/o Mukarram Khan, MD, MPH	20.4.1963/ Swat	27.11.1998 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	SGTH Swat
79.	Dr. Khan Bahadar s/o Gul Akbar, MBBS, MPH	02.02.1968/ KurramAgy	27.11.1998 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 14.11.2017	BS-18 BS-19	By Promotion By Promotion	DMS Charsadda
80.	Dr. Shahzada Muhammad Haiderul Mulk s/o Shahzada Muhi Mutaal Mulk, MBBS, MPH	1.4.1968/ Chitral	27.11.1998 /BS-17	By Option 10.09.2018 /BS-19	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	DHO, Chitral
81.	Dr. Muhammad Khalil Akhtar s/o Muhammad Yousaf Khan, MBBS, MPH	25.3.1965/ Dj Khan	27.11.1998	By Option 07.05.2018/BS-18	15.11.2017 25.01.2021	BS-18 BS-19	By Promotion	Deputy Chief HSRU
82.	Dr. Javed Iqbal s/o Amir Bahadar, MBBS, MPH	10.1.1963/ Dir	27.11.1998	By Option 07.05.2018/BS-18	06.04.2015 26.09.2017	BS-18 BS-19	By Promotion By Promotion	Attached to DHO Dir Lower

وکالت نامہ

سرورس ٹریڈنگ فیبر پتو خواہ تھاور

بعد الت جناب

ڈاکٹر شہزاد مسلمان نام

بنام

مکتوبہ دہلیہ

دعویٰ یا جرم

سرورس ایپیل

مخائب

باعث تحریر آنگہ
تھاور کلبیلہ

مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی بمقام

جسٹس انور خان ایڈووکیٹ سپریم کورٹ آف پاکستان

بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ اختیار خاص رو برو عدالت حاضر ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوں اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر یا بروز پکھری کے اوقات کے آگے یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل سائنسہ پرداختہ صاحب مشل کردہ ذات خود اور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی ایپیل نگرانی دائر کرنے، نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم بیان دینے اور سپرد نالی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت ایپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا ڈگری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا ہنگی علیحدہ پیروی مختیار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت ایپیل اور ایپیل کے واسطے کسی دوسرے وکیل یا پیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو نورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختیار نامہ لکھ دیا ہے کہ مندر ہے۔

مضمون مختیار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

الرقوم 21 جولائی 2022

Accepted

وکیل

ڈاکٹر شہزاد مسلمان

سرورس

"B"

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

TB

No.

Appeal No. 1164 of 20 22

Dr. Shahzad Ali Khan Appellant/Petitioner

Versus

Chief Secy (Health) Respondent

Respondent No. 6

Notice to: - Director General Health Services
KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13-12-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 24th

Day of Nov 2022

At Camp Court Abbottabad

Riaz
 Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

TB

No.

Appeal No. 1164 of 20 22

Dr. Shahzad Ali Khan Appellant/Petitioner

Versus

Chief Secy (Health) Respondent

Respondent No. 1

Notice to: —

Govt of KPK Through chief secretary Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13-12-22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

office Notice No. dated.

Given under my hand and the seal of this Court, at Peshawar this 24th

Day of Nov 20 22

at Camp Court Abbotabad

SECRETARY
CHIEF SECRETARY
Govt. of Khyber Pakhtunkhwa
Peshawar

Riaz
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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