

20<sup>th</sup> Oct, 2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Asst: AG for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. To come up for arguments on 27.12.2022 before D.B.



(Fareeha Paul)  
Member(Executive)




(Kalim Arshad Khan)  
Chairman


16.02.2022 Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 16.05.2022.

  
Reader

16.05.2022 None for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Previous date was adjourned through Reader note, therefore, notice for prosecution of appeal be issued to the appellant as well as her counsel. Adjourned. To come up for arguments before D.B on 13.06.2022 at camp court Abbottabad.


  
(Fareeha Paul)  
Member(E)


  
(Kaleem Arshad Khan)  
Chairman  
Camp Court Abbottabad

13.06.2022 Nemo for parties.

Noor Zaman Khan Khattak, learned District Attorney present.

Despite directions, parties were not put on notice. The concerned Moharrir is warned to be careful in future. Both the parties be put on notice for 18.08.2022 for arguments before D.B at Camp Court, Abbottabad.

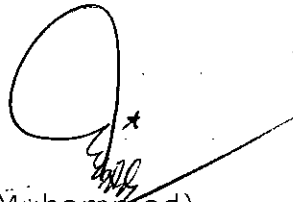
  
(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

23.12.2021

Appellant alongwith his counsel present. Mr. Riaz Ahmad Painsdakhel, Assistant Advocate General for official respondents No. 1 to 4 and Mr. Muhammad Shahab, Record Keeper as representative of respondents No. 2 to 4 present.

Vide previous order dated 18.11.2021, directions were issued for attendance of a well conversant officer from the Directorate General of Health alongwith complete service record of the appellant including the record available in the D.G Office and at the Local level in District Haripur. Neither any well conversant officer from Directorate General of Health is in attendance nor the concerned record was produced. It is directed that a well conversant officer from the Directorate General of Health Office alongwith the record mentioned above shall positively appear before the Tribunal and to come up for arguments before the D.B on 16.02.2022 at Camp Court Abbottabad. Learned Assistant Advocate General shall contact the concerned quarter for compliance of the directions.



(Mian Muhammad)  
Member (E)  
Camp Court A/Abad



(Salah-ud-Din)  
Member (J)  
Camp Court A/Abad

23.09.2021

Nemo for the appellant. Mr. Usman Ghani, District Attorney for official respondents No. 1 to 4 and Mr. Muhammad Shahab, Record Keeper (Litigation) as representative of respondents No. 2 to 4 present. None present on behalf of private respondents No. 6, 7 & 9 present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for arguments before the D.B on 18.11.2021 at Camp Court Abbottabad.

Notice also be issued to private respondents No. 6, 7 & 9 as well as their counsel for arguments for the date fixed.



(ATIQU-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT ABBOTTABAD



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

18.11.2021

Appellant alongwith his counsel present.

Muhammad Rasheed learned Deputy District Attorney for respondents present.

After hearing the arguments at certain length, it has been deemed appropriate to require the attendance of a well versant officer from the Directorate General of Health alongwith complete service record of the appellant including that available in the D.G Office and at the local level in District Haripur for perusal of this Tribunal before further arguments. The copy of this order be handed over to the learned Law Officer in attendance and he in term shall convey the same to the quarter concerned for compliance. To come up on 23.12.2021 before D.B at Camp Court, Abbottabad.



(Rozina Rehman)  
Member (J)



Chairman  
Camp Court, A/Abad

17.03.2021


Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney alongwith Dr. Ijaz Ahmad D.M.S for official respondents present.

Perusal of record would reveal that respondents No.5 to 15 are private respondents, out of whom respondents No.6, 7 & 9 have already submitted their comments and Mr. Khalid Rabbani Advocate and Mr. Tauqir Rehman Advocate have already submitted their Wakalat Nama in their favor but due to Reader's note on the preceding date, they are not before the Tribunal. For the ends of justice, these private respondents/their counsel be put on notice with last chance for arguments on 22/04/2021 before D.B at Camp Court, Abbottabad.



(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court A/Abad



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

22.4-21

*Due to COVID 19, case is adjourned  
to 23.9-2021 for the same.*

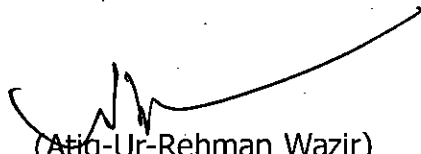
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Reader*

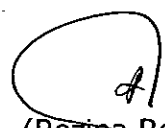
21.10.2020

Appellant present through representative.

Usman Ghani learned District Attorney alongwith Amjid Ali Assistant and Hazrat Shah S.O for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 16.12.2020 for arguments before D.B.

  
(Atiq-Ur-Rehman Wazir)  
Member (E)  
Camp Court, A/Abad

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad


Due to COVID-19 case is  
adjourned to 17-03-2021

  
Qh  
Reader

20.01.2020

Appellant in person present. Mr. Ziaullah, DDA for respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 18.02.2020 before D.B at camp court Abbottabad.

  
Member

  
Member  
Camp Court A/Abad

Due to covid ,19 case to come up for the same on 15/4/20 at camp court abbottabad.

  
Reader

Due to summer vacation case to come up for the same on 21/10/20 at camp court abbottabad.

  
Reader

19.11.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Mr. Imran, Junior Clerk and Mr. Muhammad Bashir, CT Technologist for respondents present. Appellant seeks adjournment as his counsel is not available today. Adjourn. To come up for arguments on 18.12.2019 before D.B at Camp Court, Abbottabad.


  
Member

  
Member  
Camp Court Abbottabad

18.12.2019

Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith M/S Amjid Ali, Assistant and Sher Bahadar, Coordinator for the respondents present. Appellant requested for adjournment on the ground that his counsel is ill and unable to attend the Tribunal today. Adjourned to 19.12.2019 for arguments before D.B at Camp Court Abbottabad.

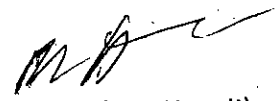
(Hussain Shah)  
Member  
Camp Court Abbottabad

  
(M. Amin Khan Kundi)  
Member  
Camp Court Abbottabad

19.12.2019

Appellant in person and Mr. Ziaullah, Deputy District Attorney alongwith M/S Amjid Ali, Assistant and Dr. Mushtaq Khan, Medical Superintendent for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 20.01.2020 for arguments before D.B at Camp Court Abbottabad.

(Hussain Shah)  
Member  
Camp Court Abbottabad


  
(M. Amin Khan Kundi)  
Member  
Camp Court Abbottabad



22.08.2019


Appellant in person present. Mr. Muhammad Bilal, learned Deputy District Attorney alongwith Mr. Amjad Ali, Assistant and Dr. Dildar, DMS for official respondents present. Appellant submitted an application for adjournment. Adjourned on cost of Rs. 3000/- to be paid on behalf of the appellant to the respondents. To come up for arguments on 19.09.2019 before D.B at Camp Court, Abbottabad.


  
Member

  
Member  
Camp Court A/Abad

19.09.2019

Appellant alongwith his counsel present. Mr. Muhammad Bilal, Deputy District Attorney alongwith Mr. Amjid Ali, Assistant for official respondents No. 1 to 4 and counsel for private respondents No. 6, 7 & 9 present. Learned counsel for the appellant requested for adjournment. Adjourned to 23.10.2019 for arguments before D.B at Camp Court Abbottabad.


  
(Hussain Shah)  
Member  
Camp Court Abbottabad

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

23.10.2019

Appellant in person present. Mr. Usman Ghani, District Attorney alongwith Mr. Amjid Ali, Assistant and Mr. M. Imran, Senior Clerk for respondents present. Appellant seeks adjournment as his counsel is not available today. Adjourn. To come up for arguments on 19.11.2019 before D.B at Camp Court, Abbottabad.

  
Member

  
Member  
Camp Court Abbottabad

15.04.2019

Counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Muhammad Imran, Clerk of Court for the respondents present.

Learned counsel for the appellant requests for adjournment due to over work before the Honourable Peshawar High Court, Bench Abbottabad today.

Adjourned to 18.06.2019 for arguments before D.B at camp court, Abbottabad.



Member



Chairman  
Camp court, A/Abad

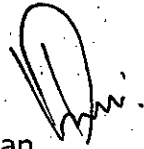
18.06.2019

Counsel for the appellant and Mr. Bilal Ahmad, DDA for the respondents present.

Learned counsel for the appellant requests for adjournment due his indisposition. Adjourned to 09.07.2019 for arguments before the D.B at camp court, Abbottabad.



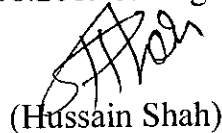
Member



Chairman  
Camp court, A/Abad

09.07.2019

Appellant in person present. Mr. Muhammad Bilal, Deputy District Attorney alongwith M/S Dr. Dildar Khan, Deputy Medical Superintendent, Amjid Ali, Assistant and Imran, Senior Clerk for official respondents No. 1 to 4 and counsel for private respondent 6, 7 & 9 present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned to 22.08.2019 for arguments before D.B at Camp Court Abbottabad.



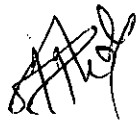
(Hussain Shah)  
Member  
Camp Court Abbottabad



(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

15.01.2019

Learned counsel for the appellant Mr. Muhammad Bilal learned Deputy District Attorney alongwith Dr. Dildar Khan Medical Superintendent for official respondents present. Learned counsel for private respondents No.7 & 9 also present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 18.03.2019 before D.B at camp court Abbottabad.



Member



Member

Camp Court Abbottabad

18.03.2019

Counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith M/S Dr. Dildar Khan, D.M, Amjid Ali, Assistant and Imran, Senior Clerk for official respondents No. 1 to 4 and counsel for private respondent No. 6 present. Learned counsel for private respondents No. 7 & 9 have sent an application for adjournment. Application is allowed. Adjourn. To come up for arguments on 15.04.2019 before D.B at Camp Court Abbottabad.



(M. Amin Khan Kundi)

Member

Camp Court Abbottabad




(M. Hamid Mughal)


Member

Camp Court Abbottabad

28.06.2018

Appellant Ghulam Akhtar in person present. M/S Qazi Muhammad Naeem, A.D, Muhammad Haroon, Assistant and Amjad Ali, Assistant on behalf of the official respondents alongwith Ziaullah, District Attorney present. Private respondents No. 6, 7 and 9 in person present. Private respondent No. 6 submitted an application for adjournment as his counsel is busy in the Chief Election Commissioner office. Granted. To come up for arguments on 17.09.2018 before the D.B at camp court, Abbottabad.


  
Member

  
Chairman  
Camp court, A/Abad

17.09.2018

Appellant in person present. M/S Amjad Ali, Assistant and Jaffar Ali, Assistant for official respondents and private respondents No. 6, 7 and 9 in person present. Due to general strike of the bar, the case is adjourned. To come up for arguments on 12.11.2018 before the D.B at camp court, Abbottabad.

  
Member

  
Chairman  
Camp Court, A/Abad

12.11.2018


Due to retirement of the Hon'ble Chairman the Service Tribunal is incomplete. Tour to Camp Court Abbottabad has been cancelled. To come up for the same on 15.01.2019 at camp court Abbottabad.

  
Reader

A/Abad


17.01.2018

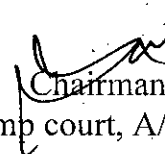
Appellant with counsel and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Haroon, Assistant for official respondents, private respondent no.6 in person and counsel for private respondents no. 7 and 9 present. Rejoinder submitted. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 20.02.2018 before D.B at camp court, Abbottabad.

  
Chairman  
Camp court, A/Abad.

20.02.2018

Counsel for the appellant and Additional AG alongwith Qazi Naeem AD and Muhammad Haroon Assistant for official respondent present. Private respondent No. 6 in person present and seeks adjournment on the ground of none availability of his counsel. Adjourned. To come up for arguments on 19.04.2018 before the D.B.

  
Member

  
Chairman  
Camp court, A/Abad.

19.04.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Amjad Ali, Asstt. and Muhammad Haroon, Assistant for the official respondents and private respondents No. 6, 7, and 9 in person present. The court time is over. Adjourned. To come up for arguments before the D.B on 28.06.2018 at camp court, Abbottabad.


  
Member

  
Chairman  
Camp court, A/Abad

66/16


25.08.2017

Appellant alongwith counsel and Mr. Muhammad Bilal, Deputy District Attorney alongwith Amjad Ali Assistant and Yar Gul, Senior Clerk for the official respondents and private respondents No. 6, 7 and 9 in person present. The learned DDA seeks time to submit written reply on behalf of respondents No. 3 & 4. Last opportunity is further extended to respondents No. 3 & 4 subject to payment of cost of Rs. 500/- which will be borne by them from their own pockets. To come up for written reply of respondents No. 3 & 4 and cost on 17.10.2017 before S.B at camp court, Abbottabad.

  
Chairman  
Camp Court, A/Abad

17.10.2017

Appellant in person and Mr. Muhammad Bilal, Deputy District Attorney alongwith Muhammad Haroon, Office Assistant for the respondents present. Written reply on behalf of respondents No. 3 & 4 also received. Cost of Rs. 500/- paid and receipt thereof obtained from the appellant. The appeal is assigned to D.B for rejoinder, if any, and arguments for 17.01.2018 at camp court, Abbottabad.

  
Chairman  
Camp court, Abbottabad.

16.02.2017

Appellant present in person and Mr. Amjad Ali, Assistant alongwith Mr. Muhammad Siddique, Sr.GP for the official respondents and private respondents No. 6, 7 and 9 present. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 21.04.2017 before S.B at camp court, Abbottabad.

MEMBER  
Camp Court, A/Abad

21.04.2017

Appellant in person, M/S Amjad Ali & Yar Gul, Assistants, for official respondents No. 1 & 2 alongwith Mr. Muhammad Siddique, Sr.GP for the official respondents and private respondents No. 6, 7 & 9 with their counsel present. Written reply by respondents No. 1, 2, 6, 7 and 9 submitted. The Worthy Chairman is on leave. On the request of learned Sr.GP another last chance is given to respondents No. 3 & 4 for submission of their written reply/comments 25.08.2017 before S.B at camp court, Abbottabad.

Registrar  
Camp Court, Abbottabad.

66/16

18.08.2016

Counsel for the appellant and Mr. Amjad Ali, Asstt. alongwith Mr. Muhammad Bilal, GP for the official respondents and counsel for private respondents No. 6, 7 and 9 present. Seeks adjournment. To come up for written reply/comments on 24.11.2016 before S.B at camp court, Abbottabad.

  
Chairman

Camp court, A/Abad.

24.11.2016

Appellant in person and Mr. Yar Gul, Assistant, Muhammad Naeem, Assistant Director, Muhammad Tufail, SO and Amjad Ali, Asstt. alongwith Mst. Bushra Bibi, Government Pleader for the official respondents No. 1 to 4, counsel for private respondent No. 6 present and requested for adjournment. Counsel for private respondents No. 7 & 9 present and submitted written reply. To come up for written reply of respondents No. 1 to 4 as well as private respondent No. 6 on 16.02.2017 before S.B at camp court, A/Abad by way of last opportunity.

  
Chairman

Camp Court, A/Abad




17.02.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was initially appointed as Radiographer vide appointment order dated 31.8.89 and was promoted from BPS-6 to BPS-9 on 2.5.2006 and that in pursuance of the same appellant took over charge in BPS-9 on 3.5.2006 but the same was erroneously entered in the service book of the appellant as 22.5.2006. That the appellant was senior and entitled to promotion as Chief Clinical Technician (BPS-16) but promotion was declined to him due to the said erroneous entry constraining the appellant to prefer departmental appeal on 8.9.2015 which was not responded and hence the instant service appeal on 19.1.2016

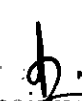
That the appellant is entitled to promotion and the erroneous entry liable to correction.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments before S.B on 18.5.2016 at Camp Court A/Abad.

  
Chairman  
Camp Court A/Abad

18.5.2016

Appellant in person, Mr. Muhammad Arshad, SO and Dr. Shaukat Hussain, DMS alongwith Mr. Muhammad Siddique, Sr.GP for official respondents No. 1 to 4 and counsel for private respondents No. 6, 7 & 9 present. Wakalatnama placed on file. Remaining respondents not present despite issuance of notice through registered post, hence proceeded ex-parte. To come up for written reply/comments of respondents No. 1 to 4, 6,7 & 9 on 18.08.2016 at camp court, Abbottabad.

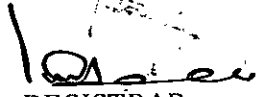


  
Chairman  
Camp court, A/Abad

Appellant Deposited  
Security & Process Fee

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 66 /2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	19.01.2016	<p>The appeal of Mr. Ghulam Akhtar resubmitted today by Mr. Syed Haseeb Haider 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</p> <p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>17-02-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p> 

The appeal of Mr. Ghulam Akhtar son Karam Bakhsh X-Ray Technician DHQ Hospital Haripur received to-day i.e. on 04.01.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of appointment order mentioned in para-1 of the memo of appeal (Annexure-A) is not attached with the appeal which may be placed on it.
- 2- Copies of letter dated 29.4.2014 and 6.7.2015 mentioned in para-10 of the memo of appeal (Annexure-I) are not attached with the appeal which may be placed on it.
- 3- Copy of impugned order is not attached with the appeal which may be placed on it.
- 4- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 5- 17 more copis/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 03 /S.T,


Dt. 04/01/2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Syed Haseeb Haider Adv. Haripur

Sir

Resubmitted after doing ~~the~~ doing  
The needfull.

Ghulam Akhtar  


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

Appeal No. 66 /2016

Ghulam Akhtar                      V/S                      Govt. of KPK etc.

**SERVICE APPEAL**


**I N D E X**

S.No.	Description	Annex	Pages
1	Service appeal alongwith affidavit, addresses of the parties		1-9
2	Copy of appointment order	"A"	10-12
3	Copy of appointment as X-Ray Technician in BPS-9 vide order No. 1996-2001 dated 02.05.2006	"B"	13
4	Copy of seniority list	"C"	14-16
5	Copy of service book	"D"	17-27
6	Copy of arrival/charge report dated 03.05.2006 as X-Ray Technician	"E"	28-
7	Copy of letter No. 3887-AE-VII dated 13.05.2014.	"F"	29-
8	Copy of correct seniority list dated 07.11.2014	"G"	30-32
9	Copy of letter of DG Health dated 24.07.2014	"H"	33
10	Copies of DG Health Services KPK letter No. 4919-AE-VII dated 29.04.2014 and 8662-AE-VII dated 06.07.2015	"I"	34- 35
11	Copy of reply letter of DHO Haripur dated 06.08.2015	"J"	36
12	Copy of departmental appeal dated 8.9.2015	"K"	37-38
13	Wakalat Nama		42

Dated: \_\_\_\_\_

**Appellant  
Ghulam Akhtar**

Through Counsel

  
**Syed Haseeb Haider**  
Advocate High Court  
At Haripur

1

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

A.W.P. Provincial  
Service Tribunal

Diary No. 06

Dated 04-1-2016

Appeal No. 66 /2016

Ghulam Akhtar S/O Karam Bakhsh X-Ray Technician DHQ Hospital  
Dhenda, Tehsil & District Haripur.

..... Appellant

***VERSUS***

1. Govt. of Khyber Pakhtunkhwa through Secretary Health Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
3. District Health Officer, Haripur
4. ✓ Medical Superintendent DHQ Hospital Haripur.
5. (5) Muhammad Arshad, Chief Clinical Technician Lady Reading Hospital Peshawar.
6. ✓ 16. - Ejaz Mahmood Qurashi S/O Ghulam Miskeen Chief Clinical Technician Ayub Teaching Hospital Abbottabad.
7. ✓ 17. - Muhammad Riaz Akhtar S/O Muhammad Rafiq Chief Clinical Technician BBSH Abbottabad.
8. (8) Mutahir Shah S/O Syed Muhammad Karim Shah Chief Clinical Technician DHQH Mardan.
9. ✓ 18. - Abdul Aziz S/O Haji Fazal Ahmed Chief Clinical Technician BBSH Abbottabad.
10. (10) Zard Ali Khan Chief Clinical Technician Lady Reading Hospital Peshawar.
11. (11) Mubasherin Chief Clinical Technician DHQ Charsadda.
12. (12) Afsar Khan Chief Clinical Technician Hayat Abad Medical Complex, Peshawar.
13. (13) Faheem Ullah S/O Habib Ullah Khan Chief Clinical Technician DHQH Bannu.
14. (14) Rizwan Ullah S/O Mehr Gul Khan Chief Clinical Technician KGNTH Bannu.
15. (15) Rashid Muhammad S/O Gul Muhammad Chief Clinical Technician DHO Lucky Marwat.

..... Respondents

Respondents No-5,  
8, and 10 to 15,  
placed ex-parte  
vidu order dt:  
18-5-2016.

Filed to-day

Registrar

4/1/16.

re-submitted to-day  
and filed.

Registrar

19/1/16.

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**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT OF 1974 AGAINST THE PROMOTION ORDER DATED 24.07.2013 PASSED BY THE DIRECTOR GENERAL HEALTH SERVICES WHEREBY THE APPELLANT HAS BEEN DEFERRED FROM THE PROMOTION OF BPS-16 AS CHIEF CLINICAL TECHNICIAN WHILE HIS JUNIORS RESPONDENTS NO.5 TO 15 PROMOTED WITHOUT REASON AND RHYME AGAINST THE SERICES RULES AND REGULATION.**

**PRAYER:- *On acceptance of the instant appeal, the promotion order dated 24.07.2013 passed by Respondent No.2 may please be set aside and appellatant may please be promoted from X-Ray Technician (BPS-9) to Chief Clinical Technician Radiology (BPS-16) with all back benefits from the date his juniors Respondents No. 5 to 15 were promoted as Chief Clinical Technician Radiology .***

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***Respectfully Sheweth:-***

The brief facts arise in the instant service appeal are following:-

1. That the appellatant got employment in Respondent Department as Radiographer in BPS-6 on 31.08.1989. Copy of appointment order is attached as **Annexure "A"**
2. That after rendering 16 years continuous spotless service, the appellatant was appointment as X-Ray Technician in BPS-9 vide order No. 1996-2001 dated 02.05.2006. Copy of order dated 02.05.2006 is annexed as **Annexure "B"**.
3. That respondents/department circulated Seniority list of X-Ray Technician of BPS-9 in which my date of appointment as X-Ray Technician was wrongly mentioned as 22.05.2006 instead of 02.05.2006. Copy of seniority list is annexed as **Annexure "C"**.
4. That incorrect seniority list was challenged by the appellatant for correction on the basis of appointment order dated

02.05.2006 entries in Service Book at Page-15. Copy of service book is annexed as **Annexure "D"**.

5. That the appellant took charge as X-Ray Technician on 03.05.2006 which was duly accepted by MS DHQ Hospital Haripur. Copy of arrival/charge report dated 03.05.2006 is annexed as **Annexure "E"**.
6. That the department after thorough investigation and conducting several inquiries correct the date of appointment as X-Ray Technician (BPS-9) on 02.05.2006 instead of 22.05.2006 vide Director General Health Services KPK through letter No. 3887-AE-VII dated 13.05.2014. Copy of letter dated 13.05.2014 is annexed as **Annexure "F"**.
7. That the above mentioned letter, correct the seniority list was issued on 07.11.2013. Copy of correct seniority list is annexed as **Annexure "G"**.
8. That on the basis of correct seniority list, the appellant approached the department for promotion as Chief Radiology Technician (BPS-16) in response the DG Health KPK intimated that the case of promotion of the appellant would be dealt with under the relevant rules vide letter No. 4659-AE-VII dated 24.07.2014. Copy of letter dated 24.07.2014 of DG Health is annexed as **Annexure "H"**.
9. That all the efforts of appellant are fruitless and the appellant is still running between the pillar and poll for his lawful promotion.
10. That on the basis of baseless application in which the Department without having approach through appellant immediate superior have put another inquiry. In which the matter was referred to DHO Haripur vide DG Health

Services. KPK letter No. 4919-AE-VII dated 29.04.2015 and 8662-AE-VII dated 06.07.2015 are as **Annexure "I"**.

11. That after conducting inquiry by the DHO Haripur submitted his reply to the DG Health Services regarding the factual position vide letter No. 8272 dated 06.08.2015 which was delivered to the appellant on 10.08.2015. Copy of letter of DHO Haripur dated 06.08.2015 is annexed as **Annexure "J"**.
12. That on receipt of factual position/clarification of appellant's appointment there was no need to delayed the appellant legitimate, legal and due promotion by Departmental authority but they are bent upon to deffer or avoid promotion as Chief Clinical Technician Radiology on the basis of one or the other lame pretext.
13. That feeling aggrieved, the appellant filed departmental appeal to the respondent No.2 on 08.09.2015 for promotion of the appellant from BPS-9 to BPS-16 as Respondents 5 to 15 are Juniors to appellant. Copy of departmental appeal dated 8.9.2015 is attached as **Annexure "K"** but respondents/department kept the appellant assured on one or the other pretext that he would be given his due right of promotion but without any result till today, hence the instant appeal is filed inter-alia on the following grounds:-

**GROUND**S

- (a) That the impugned order dated 07.11.2013 is illegal, unlawful, without lawful authority, passed in slipshod and cursory manner without adhering to the departmental rules and regulation, set forth for the promotion of appellant.



- (b) That the appellant is entitled to be promoted from Junior Clinical Technician (Radiology) BPS-9 to Chief Clinical Technician Radiology BPS-16 w.e.f 24.07.2013 as the appellant is senior to Respondents No.5 to 15.
- (c) That as per Article 25 of Constitution of Islamic the public of Pakistan 1973 as well as service laws and principal of equality, if juniors to the appellant are promoted in BPS-16 then the appellant is entitled to be promoted from BPS-9 to BPS-16 that respondents/ department suppose to promote the appellant after rectification of date of appointment in BPS-9 i.e. 02.05.2006 instead of 22.05.2006 and issuance of revised/ final seniority list of Junior Clinical Technician in 2014 in BPS-16, hence the appellant has been seriously discriminated.
- (d) That when law prescribe something which is to be done in a particular manner that must be decree in that manner and not other-wise, it is settled principal of law that the appellant being senior from Respondents No. 5 to 15 is eligible to be promoted in BPS-16 on 24.07.2013.
- (e) That there is no other remedy available to appellant except the invocation of jurisdiction of Honourable Service Tribunal and this Honourable Service Tribunal has got every jurisdiction to entertain and adjudicate upon this matter.
- (f) That the appeal of the appellant is within the period of limitation.

It is therefore most humbly prayed that on acceptance of the instant appeal:-

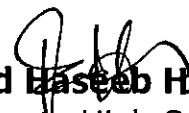
- (i) That the promotion order dated 24.07.2013 may please be set aside and respondents/department be directed to promote the appellant from X-Ray Technician (BPS-9) to Chief Clinical Technician Radiology (BPS-16) with effect from the date of 24.07.2013 while Respondents No. 5 to 15 are junior to the appellant with all service back benefits.
- (ii) Any other relief which the court may think fit and proper may also be granted to the appellant.

Dated: \_\_\_\_\_



**Appellant  
Ghulam Akhtar**

Through Counsel



**Syed Baseeb Haider**  
Advocate High Court  
At Haripur

**VERIFICATION**

Verified on oath that 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 Honourable Court.

Dated: \_\_\_\_\_



**Appellant  
Ghulam Akhtar**

7

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

**Ghulam Akhtar**

**V/S**

**Govt. of KPK etc.**

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

**APPELLANT**

Ghulam Akhtar S/O Karam Bakhsh X-Ray Technician DHQ Hospital Dhenda,  
Tehsil & District Haripur.

**RESPONDENTS**


1. Govt. of Khyber Pakhtunkhwa through Secretary Health Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa Peshawar.
3. District Health Officer, Haripur
4. Medical Superintendent DHQ Hospital Haripur.
5. Muhammad Arshad, Chief Clinical Technician Lady Reading Hospital Peshawar.
6. Ejaz Mahmood Qurashi S/O Ghulam Miskeen Chief Clinical Technician Ayub Teaching Hospital Abbottabad.
7. Muhammad Riaz Akhtar S/O Muhammad Rafiq Chief Clinical Technician BBSH Abbottabad.
8. Mutahir Shah S/O Syed Muhammad Karim Shah Chief Clinical Technician DHQH Mardan.
9. Abdul Aziz S/O Haji Fazal Ahmed Chief Clinical Technician BBSH Abbottabad.
10. Zard Ali Khan Chief Clinical Technician Lady Reading Hospital Peshawar.
11. Mubasherin Chief Clinical Technician DHQ Charsadda.
12. Afsar Khan Chief Clinical Technician Hayat Abad Medical Complex, Peshawar.
13. Faheem Ullah S/O Habib Ullah Khan Chief Clinical Technician DHQH Bannu.
14. Rizwan Ullah S/O Mehr Gul Khan Chief Clinical Technician KGNTH Bannu.
15. Rashid Muhammad S/O Gul Muhammad Chief Clinical Technician DHO Lucky Marwat.

Dated: 04-1-2016



**Appellant**

Through Counsel



**Syed Naseeb Haider**  
Advocate High Court  
At Haripur

8

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

**Ghulam Akhtar                      V/S                      Govt. of KPK etc.**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Ghulam Akhtar S/O Karam Bakhsh X-Ray Technician DHQ Hospital Dhenda, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of foregoing service appeal are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Court.

Dated: 4-1-2016

  
Deponent  
Ghulam Akhtar

9

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

**Ghulam Akhtar**

**V/S**

**Govt. of KPK etc.**

**SERVICE APPEAL**

**CERTIFICATE**

I, Ghulam Akhtar S/O Karam Bakhsh X-Ray Technician DHQ Hospital Dhenda,  
Tehsil & District Haripur do hereby certify that I have not filed any service  
appeal before this Honourable Court on this subject matter/issue.

Dated: 4-1-2016



**Appellant  
Ghulam Akhtar**

Through Counsel



**Syed Haseeb Haider  
Advocate High Court  
At Haripur**

Annex "A"

10

No. 2986

21-8-89

FROM:

the Medical Superintendent,  
DHQ HOSPITAL, ABBOTTABAD.

To:

Mr. Ghulam Akhter S/O Karam Bux,  
Vill: & P.O. Jahri Teh: Haripur,  
Distt: Abbottabad.

Sub:

OFFER OF APPOINTMENT.

Memo:

Reference your application and interview  
dated 19.8.1989.

You are hereby appointed as a temporary Radiographer, against  
the vacant post: \_\_\_\_\_ in the Revised Basic Scale No. \_\_\_\_\_ (6)

i.e. 725-28-1285. plus usual allowances.


Your appointment is for a period of one year on  
probation and your services will be extended on your satisfactory  
work and conduct.

Your service are liable to be terminated any time  
without notice and any cause assigned, and when your service are  
so terminated you shall not be paid any compensation whatsoever  
for the unexpired period as mentioned above.

The appointment is subject to Physical fitness.

You shall not be entitled for any Ta/DA for  
presenting yourself for medical examination ~~not~~ for joining your  
first appointment.

If you accept the offer on above noted conditions  
please report to the Medical Officer (I) DHQ Hospital, Abbottabad  
with in three days from the receipt of this letter.

  
Medical Superintendent,  
DHQ Hospital, Abbottabad.

No.

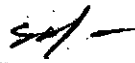
/PF, dated Abbottabad the \_\_\_\_\_

Copy is forwarded to the :-

1. Medical Officer (I) DHQ Hospital, Abbottabad.
2. ~~Mr~~ account Section M.S. Office.

for information and necessary action.

J. Jalil/  
+++++

  
Medical Superintendent,  
DHQ Hospital, Abbottabad.

Date of termination of appointment	Reason of termination (such as promotion transfer, dismissal, etc.)	Signature of the Head of the Office or other Attesting Officer	LEAVE		Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
			Nature and duration of leave taken	Period		
10	Sanction for related to government work	[Signature]		Annual leave	[Signature]	
11	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
12	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
13	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
14	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
15	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
16	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
17	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
18	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
19	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	
20	Sanction for 1 year of service	[Signature]		Sanctioned as a Kharidgudh	[Signature]	

Medical Superintendent

Medical Superintendent

Medical Superintendent

Medical Superintendent

Medical Superintendent

1	2	3	4		5		6	6
Name of post	Whether substantive or officiating and whether permanent or temporary.	if officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II	Rs.	Pt.	Rs.	Pt.	Other emoluments falling under the term "Pay"	Date of appointment
1065-54-1875 Radiologist M.H.S. Teaching Hospital	Substantive Permanent		1281/-	A	1281/-	A		10/1/51
1490-72-2595	Substantive Permanent		1337/-	A	1337/-	A		11/1/51
1065-54-1875 Radiologist M.H.S. Teaching Hospital	Substantive Permanent		1389/-	A	1389/-	A		11/1/51

In pursuance of the Amendment of Schedule 1 of the Pay Band and Pay Scale 1991  
 W.P.P. Pay Band  
 Pay Band to the Revised Pay Scale (B-6)  
 of Rs. 1065-54-1875  
 with effect from 1-1-1991.  
 With effect from 1-1-1991.

Amount of  
 Pay Band

✓

1065-54-1875  
 Radiologist  
 M.H.S. Teaching Hospital

Pay @ Rs. 1389/- A

1490-72-2595

Pay @ Rs. 1389/- A

✓

Attested by  
 M.H.S. Teaching Hospital

M.H.S. Teaching Hospital  
 M.H.S. Teaching Hospital  
 M.H.S. Teaching Hospital

Signature of Government servant

Date  
 11/1/51

Signature  
 M.H.S. Teaching Hospital



Name — *[Handwritten Name]*

2. Nationality and Religion — *[Handwritten]*

3. Residence — *[Handwritten Address]*

4. Father's name and residence — *[Handwritten]* P. No. 249502

5. Date of birth by Christian era as nearly as can be ascertained — 30-01-1963 *[Handwritten]*

6. Exact height by measurement — 5-6" *[Handwritten]* Thirtieth of JAN. NH & Sixty three of January - 11 - Sixty three

7. Personal mark for identification — *[Handwritten]* Wound scar on the fore head

8. Left hand thumb and finger-impressions of (Non-gazetted) officer: — *[Handwritten]* ID / JM - ATD - 2716 / w

Little Finger.

Ring Finger.

Middle Finger.

Fore Finger.

Thumb.

9. Signature of Government servant — *[Handwritten Signature]*

*[Handwritten]* Matrix & qualified Radiographer.

10. Signature and designation of the Head of the Office or other Attesting Officer —


*[Handwritten Signature]*  
Medical Superintendent  
D.H.O. Hospital - Abbottabad

Note — The entries in this page should be renewed or re-attested at least every five years, and the signatures in lines 9 and 10 should be dated.

Finger-prints need not be taken afresh every 5 years under this rule.

*[Handwritten]* Attested  
*[Handwritten Signature]*  
Medical Superintendent  
D.H.O. Teaching Hospital  
Haripur

1	2	3	2		5		6
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.). Volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	
			Rs.	Ps.	Rs.	Ps.	
725-18-1185 Anesthesiologist P.M.O. Hospital, Madras					725/- 100/-	725/- 100/-	31/8/1941
					725/- 100/-	725/- 100/-	1/8/1941
					752/- 100/-	752/- 100/-	1/20/1941
165-54-1875 Anesthesiologist					1287/- 100/-	1287/- 100/-	5/11/1941

Attested  
  
 Medical Superintendent  
 S.M.O. Teaching Hospital  
 Madras

⑤ Annex II

13  
ANNEXURE "B"

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (HEALTH) HARIPUR

OFFICE ORDER

Based on the recommendations made by the departmental selection committee during its meeting held on 27/04/2006, Mr Gulam Akhtar S/O Karam Bakhsh Radiographer BPS-6 working against the post of X-Ray Technician BPS-9 is hereby appointed against post of X-Ray Technician BPS-9 in DHQ Hospital Haripur, being qualified. His previous service as Radiographer will be treated towards pension purpose only.

Sd/-  
Executive District Officer,  
(Health) Haripur.

~~No. 1906-2001/PF-/Est. Dated: Haripur, the 02/05/2006.~~

Cc.

1. Director General Health Services NWFP Peshawar
2. District Coordination Officer, Haripur
3. Medical Superintendent DHQ Hospital Haripur.
4. District Officer Finance Department Haripur.
5. District Accounts Officer Haripur.
6. Official concerned.

Executive District Officer,  
(Health) Haripur.

(Sajjad),

Attest  
DHQ Hospital  
Haripur



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

No. 7565-650 /AE-VII  
Dated. 7/1/11 2013. **ANNEXURE C**

To,

1. The Principals, KMC/ KCD Peshawar.
2. The Principal, AMC Abbottabad.
3. The Principal Bacha Khan Medical College, Mardan.
4. The Director Health Services, FATA Peshawar.
5. The Medical Superintendents,  
Govt: LRH, KTH, HMC Peshawar.
6. The Medical Superintendent,  
Saïdu Group of Teaching Hospital Swat.
7. The Medical Superintendent,  
Ayub Teaching Hospital Abbottabad.
8. The Medical Superintendent,  
Khalifa Gul Nawaz Teaching Hospital, Bannu.
9. The Medical Superintendent,  
Mufti Mehmood Memorial Teaching Hospital D.I. Khan
10. The Medical Superintendent,  
ID Children Hospital, Peshawar.
11. The Medical Superintendent,  
Women & Children Hospital, GT Road Peshawar.
12. The Medical Superintendent,  
Govt: City Hospital, Kohat Road Peshawar.
13. The Medical Superintendent,  
Police and Services Hospital, Peshawar.
14. The Medical Superintendent,  
Mardan Medical Complex, Mardan.
15. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
16. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.
17. The All Medical Superintendents, DHQ/ AHQ Hospital in KPK/FATA.
18. The All Agency Surgeons in FATA/ FRs.
19. The All Executive District Officers (Health) in Khyber Pakhtunkhwa Province.

Subject: FINAL SENIORITY LIST OF JUNIOR CLINICAL TECHNICIAN  
(RADIOLOGY) BS-09 OF HEALTH DEPARTMENT KHYBER-  
PAKHTUNKHWA.

Memo: Enclosed please find a Final Seniority List of Junior Clinical Technidian (Radiology) BS-09 of Health Department Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR.

No. 7651-52 /AE-VII

Copy forwarded to the:-


1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, Health Department Peshawar.
2. President, PMA, Khyber Pakhtunkhwa, Health Department Peshawar.

Attended  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur

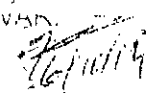
DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR.

**Final Seniority List of Junior Clinical Technician (Radiology) BS-09 in the Health Department Khyber Pakhtunkhwa.**

S.No	Name/ Father's Name	a (Old Nomenclature With BPS) b New Nomenclature after restructuring	Date of Joining Govt: Service/ promotion/ up-gradation to BS-09	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1.	Ghulam Akhtar	Radiographer BS-06 X-Ray Tech:BS-09	31-08-1989 02-05-2006	DHOH Abbottabad	30-01-1963 Haripur	29-01-2023
2.	Saif-ur-Rehman S/O Saifullah	Radiographer BS 06 JCT (Radiology) BS-09	14-09-1976 10.05.2006	G&M Hosp: Dadar	19-01-1957 Manshra	18-01-2017
3.	Imran Ahmad S/O Muhammad Abdul Hayye	Radiographer BS-06 JCT (Radiology) BS-09	01.09.1988 10.05.2006	DHO Tank	01.04.1967/ Tank	
4.	Rehmatullah	Radiographer BPS-06 JCT (Radiology) BS-09	03-10-1989 10.05.2006	HMC Peshawar	02-04-1965 Karak	01-04-2025
5.	Zarnoosh Khan	Radiographer BPS-06 JCT (Radiology) BS-09	09-10-1989 10.05.2006	DHQ Hosp: Charsadda	08-02-1969 Charsadda	07-02-2029
6.	Wajid Ali Shah S/O Muhammad Shah	Radiographer BPS-06 JCT (Radiology) BS-09	10-10-1989 10.05.2006	KTH Peshawar	01-02-1971 Charsadda	31-01-2031
7.	Wali ur Rahman S/O Turab Khan	Radiographer BPS-06 JCT (Radiology) BS-09	13-11-1989 10.05.2006	DHQ Hosp: Battagram	05-04-1966 Nowshera	04-04-2026
8.	Maazullah	Radiographer BPS-06 JCT (Radiology) BS-09	16-11-1989 10.05.2006	Peshawar	06-02-1969 Charsadda	05-02-2029
9.	Syed Mehfooz	Radiographer BPS-06 JCT (Radiology) BS-09	16-11-1989 10.05.2006	Swabi	30-07-1969 Swabi	29-07-2029
10.	Saeed ud din	Radiographer BPS-06 JCT (Radiology) BS-09	29-11-1989 10.05.2006	Maternity Hosp: Peshawar	19-03-1969 Peshawar	19-03-2029
11.	Muhammad Arshad S/O Noor Rehman	Radiographer BPS-06 JCT (Radiology) BS-09	30-11-1989 10.05.2006	DHO Manshra	19-04-1965 Manshra	18-04-2025
12.	Muhammad Asif	DRA BPS-5 Radiographer BPS-06 JCT (Radiology) BS-09	01-10-1987 27-11-1990 10.05.2006	LRH Peshawar	22-08-1970 Mardan	21-08-2030
13.	Ifikhar Ahmed M. Younis	Radiographer BPS-06 JCT (Radiology) BS-09	09-01-1990 10.05.2006	G&M Hosp: Dadar	14-05-1963 Manshra	13-05-2023
14.	Shakirullah S/O Sultan Saeed	Radiographer BPS-06 JCT (Radiology) BS-09	23-01-1990 10.05.2006	DHO Dir Lower	01-08-1967 Dir Lower	31-07-2027
15.	Zaheer Ahmed	Radiographer BPS-06 JCT (Radiology) BS-09	25-01-1990 10.05.2006	DHO. A.Abad	24-02-1966 Abbottabad	23-02-2023
16.	Mohd. Asif S/O Umar Gul Khan	Radiographer BPS-06 JCT (Radiology) BS-09	08-06-1990 10.05.2006	DHQH Bannu	04-01-1971 Bannu	03-01-2031
17.	Mohd. Munir S/O Jehangir Khan	Radiographer BPS-06 JCT (Radiology) BS-09	13-06-1990 10.05.2006	BBSH Abbottabad	08-01-1969 Abbottabad	07-01-2029
18.	Wahcedullah	Radiographer BPS-06 JCT (Radiology) BS-09	13-06-1990 10.05.2006	DHO Bannu	10-04-1972 Bannu	09-04-2032
19.	Jan Bahadar Khan S/O Muhammad Yar Khan	Radiographer BPS-06 JCT (Radiology) BS-09	17-06-1990 10.05.2006	DHO Bannu	07-02-1963 Bannu	16-02-2023
20.	Wajid Ali	Radiographer BPS-06	01-07-1990	LRH.peshawar	12-05-1969	11-05-2029

  
 Medical Superintendent  
 D.H.Q. Teaching Hospital  
 Haripur

KHYBER PUKHTUNKHWA, PESHAWAR

2-11-14  


16

	Muhammad Ali Khan Ziyad	JCT Radiology B-09	05.03.2014	Marwat Police Hosp: Peshawar	Bannu 26.06.1993	
	Naveed Shahzad	JCT Radiology B-09	05.03.2014	Police Hosp: Peshawar	15.01.1987	
381.	Asif Asghar	JCT Radiology B-09	06.03.2014	Police Hosp: Peshawar	15.03.1986	
382.	Sayyar Khan S/O Rustam Khan	JCT Radiology B-09	30.04.2014	DHO Mardan	20.06.1977/ Mardan	

Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

*[Handwritten signature]*  
26/4/14

*Attest*  
*[Handwritten signature]*  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur

1. Name— *محمد علی*

Nationality and Religion— *مسلمان*

**ANNEXURE "D"**

3. Residence— *قصاب چتری - آبیٹ آباد - تحصیل میرپور*

4. Father's name and residence— *محمد علی*

P. No. 249502

5. Date of birth by Christian era as nearly as can be ascertained— 30-01-1963 *(Thirty)*

6. Exact height by measurement— 5-6" *Thirtieth of JAN. NH & Sixty three of January - 11 - 11 - Sixty three*

7. Personal mark for identification— *wound scar on the fore head*

8. Left hand thumb and finger-impressions of (Non-gazetted) officer:— *IV Jm. A.T.D. - 2716/w*

Little/Finger.

Ring Finger.

Middle-Finger.

Fore Finger.

Thumb.

9. Signature of Government servant— *Officer*

*Matrix & qualified Radiographer.*

10. Signature and designation of the Head of the Office or other Attesting Officer— *Medical Superintendent D.H.Q. Hospital - Abhottabaq*

Note—The entries in this page should be renewed or re-attested at least every five years, and the signatures in lines 9 and 10 should be dated.

Finger prints need not be taken afresh every 5 years under this rule.

1	Name of post	Rs.	Ps.	Rs.	Ps.	2	3	4	5	6	7	8
	725-18-185 Cardiographer P.H.D. Hospital Hill					725 1200			725 1200		31/8/1991	Signature of Government servant
						725 1200			725 1200		1/12/1991	
						725 1200			725 1200		1/12/1991	
	165-54-1875 Cardiographer					725 1200			725 1200		1/6/1991	

Signature of Government servant

Date of appointment

Other emoluments falling under the term "Pay"

Additional pay for officiating

Pay in substantive post

If officiating state—  
(i) substantive appointment or  
(ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II

Whether substantive or officiating and whether permanent or temporary.

Name of post

Rs. Ps. Rs. Ps. Rs. Ps.

Signature of Government servant



8 9 10 11 12 13 14 15 18

Signature of Government servant

Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Signature of the Head of the Office or other Attesting Officer

Signature of the Head of the Office or other Attesting Officer

Allocation of leave on average pay up to 4 months (for earned leave not exceeding 120 days) for which leave salary is debitable to another Government

Nature and duration of leave taken

Period

Government to which debitable

Appointed as a Pathologist D.H.S. Hospital Abbottabad M.S. Letter No 2986/PDF dated 21-8-89 & Sanctioning of Extension of 7 months leave from 1/11/89 - 7 months period. M. S. M. M. Medical Superintendent, M.H.O. Hospital - Abbottabad

Signature of Government servant

Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Signature of the Head of the Office or other Attesting Officer

Allocation of leave on average pay up to 4 months (for earned leave not exceeding 120 days) for which leave salary is debitable to another Government

Nature and duration of leave taken

Period

Government to which debitable

Annual leave from 31/8/89 to 30/11/89

Medical Superintendent, M.H.O. Hospital - Abbottabad

Service resumed from 1/12/89 to 30/11/90

Medical Superintendent, M.H.O. Hospital - Abbottabad

Pay fixed in Revised Pay No. 1 vide Govt. of N.W.F.P. Finance Deptt. Peshawar Letter No. 11 (11) 1-1789 11-8-1991.

Medical Superintendent, M.H.O. Hospital - Abbottabad

Transferred to M.C. Hospital, Mingora

via M.S. Letter No 2409 dated 9-11-91 and D.H.S. Hospital Dir. in letter no 8106-9 dated 9-11-91

Medical Superintendent, M.H.O. Hospital - Abbottabad

Signature of Government servant

Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Signature of the Head of the Office or other Attesting Officer

Allocation of leave on average pay up to 4 months (for earned leave not exceeding 120 days) for which leave salary is debitable to another Government

Nature and duration of leave taken

Period

Government to which debitable

Medical Superintendent, M.H.O. Hospital - Abbottabad

Signature of Government servant

Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Signature of the Head of the Office or other Attesting Officer

Allocation of leave on average pay up to 4 months (for earned leave not exceeding 120 days) for which leave salary is debitable to another Government

Nature and duration of leave taken

Period

Government to which debitable

Medical Superintendent, M.H.O. Hospital - Abbottabad

1		2		3		4		5		6		7	
Name of post		Whether substantive or officiating and whether permanent or temporary.		if officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II		Pay in substantive post		Additional pay for officiating		Other emoluments falling under the term "Pay"		Date of appointment	
						Rs.	Ps.	Rs.	Ps.				
1065-54-1875		~										10/1/1971	
Radioisotope lab		~										13/1/1971	
DATER STRIPPER		~										17/1/1971	
1490-72-2555		~										1/9/1971	

OFFICE OF ACCOUNTS GENERAL  
 W.P. POLKAR  
 Secy Genl to the Revenue Dept Scale 1971  
 Pay Band in the Revenue Dept Scale 1971  
 of Rs. 1065-54-1875  
 @ Rs. 1227/5  
 with next increment of 112/1971.

Actuarial Control  
 Paid Function Band

Rs. 1389/-  
 Ps. 1389/-

Rs. 1878/-  
 Ps. 1878/-

Signature of Government servant  
 10/1/1971  
 13/1/1971  
 17/1/1971  
 1/9/1971  
 1/9/1971

8	9	10	11	12	13		14	15
					Nature and duration of leave taken	Allocation of periods of leave on average pay up to 4 months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		
Date of appointment	Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the Office or other Attesting Officer	Period	Government to which debitable	Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
1-12-82	<i>[Signature]</i> Medical Officer M. Subramanian	30/11/81	AN Annual increment	<i>[Signature]</i> District Health Officer M. Subramanian		30-11-81	<i>[Signature]</i> District Health Officer M. Subramanian	
1-12-82	<i>[Signature]</i> District Health Officer M. Subramanian	30/11/82	AN Annual increment	<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian	
1-12-82	<i>[Signature]</i> District Health Officer M. Subramanian	30/11/82	AN Annual increment	<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian	
1-12-83	<i>[Signature]</i> District Health Officer M. Subramanian	31/12/83	AN Transfer to DPH Hospital, Hampden side Div. DTS AM end of Av. 24-26/1-199.	<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian	
1-12-83	<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian	
1-12-83	<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian			<i>[Signature]</i> District Health Officer M. Subramanian	

Service transferred from 1-12-81 to 30-11-82

Service transferred from 1-12-82 to 30-11-83

Service transferred from 1-12-83 to 31-12-83

Service transferred from 1-12-83 to 30-11-84

Service transferred from 1-12-84 to 30-11-85

Service transferred from 1-12-85 to 30-11-86

Service transferred from 1-12-86 to 30-11-87

Service transferred from 1-12-87 to 30-11-88

Service transferred from 1-12-88 to 30-11-89

Service transferred from 1-12-89 to 30-11-90

Service transferred from 1-12-90 to 30-11-91

Service transferred from 1-12-91 to 30-11-92

Service transferred from 1-12-92 to 30-11-93

Service transferred from 1-12-93 to 30-11-94

Service transferred from 1-12-94 to 30-11-95

Service transferred from 1-12-95 to 30-11-96

Service transferred from 1-12-96 to 30-11-97

Service transferred from 1-12-97 to 30-11-98

Service transferred from 1-12-98 to 30-11-99

Service transferred from 1-12-99 to 30-11-00

Medical Officer  
District Health Officer  
M. Subramanian

Medical Officer  
District Health Officer  
M. Subramanian

Medical Officer  
District Health Officer  
M. Subramanian

Signature of Government servant		Date of appointment		Other emoluments falling under the term "Pay"		Additional pay for officiating		Pay in substantive post		If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II		Whether substantive or officiating and whether permanent or temporary.		Name of post	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
			Rs.	Pt.	Rs.	Pt.	Rs.	Pt.	Rs.	Pt.					
1440-72-2535	1440-72-2535														
Police Inspector Police Constable Harampur	HT/PT		1957/10												
			2026/- PM												
			2097/- PM												
			1887/-												
			2097/-												
			2170/- PM												

12/1/57  
12/30/55  
12/1/56  
12/1/57  
12/1/57  
12/1/57  
12/1/57

HT/PT  
HT/PT  
HT/PT  
HT/PT  
HT/PT  
HT/PT  
do



1	Name of post	2	Whether substantive or officiating and whether permanent or temporary.	3	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Ph) Volume II	4		Pay in substantive post	5		Additional pay for officiating	6	Other emoluments falling under the term "Pay"	Date of appointment
						Rs.	Ps.			Rs.	Ps.			
	R.G. TBCO AID					2243	1/2 P.M.	2243	1/2 P.M.					1-12-98
	<del>do</del>					2316	1/2 P.M.	2316	1/2 P.M.					1-12-99
	<del>do</del>					2389	1/2 P.M.	2389	1/2 P.M.					1-12-2000
	1446-73-2535					Pay Rs.	2462	1/2 P.M.	2462	1/2 P.M.				1-12-2001

15 21

7	13		14	15
Date of appointment	LEAVE		Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
8	9	10	11	12
Signature of Government servant	Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the Office or other Attesting Officer
Nature and duration of leave taken		Allocation of periods of leave up to 4 months (or earned leave not exceeding 120 days) for which leave salary is payable to another Government	Period	Government to which debitible
<i>[Signature]</i>	<i>[Signature]</i> D.T.B.CO. Abbottabad	Announced in Service Book 30/79	D.T.B.CO. Abbottabad	Announced in Service Book 30/79
<i>[Signature]</i>	<i>[Signature]</i> D.T.B.CO. Abbottabad	Announced in Service Book 30/79	D.T.B.CO. Abbottabad	Announced in Service Book 30/79
<i>[Signature]</i>	<i>[Signature]</i> D.T.B.CO. Abbottabad	Announced in Service Book 30/79	D.T.B.CO. Abbottabad	Announced in Service Book 30/79
<i>[Signature]</i>	<i>[Signature]</i> D.T.B.CO. Abbottabad	Announced in Service Book 30/79	D.T.B.CO. Abbottabad	Announced in Service Book 30/79
<i>[Signature]</i>	<i>[Signature]</i> D.T.B.CO. Abbottabad	Announced in Service Book 30/79	D.T.B.CO. Abbottabad	Announced in Service Book 30/79

*[Handwritten notes and signatures in the right margin, including "S-1 P-7 active" and "2389/K.P.1/P"]*

1	2	3	4			5	6	7
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Ph), Volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment		
			Rs.	P.S.	P.S.			
2160-110-5460	New Dewan omnibus vis.	w	Pay Rs- 3700/-	✓	1-12-2001	2001		
B-6 CR 2160-110-5460	Dewan omnibus vis.	w	3810/-		1-12-2002			
2160-110-5460 radiographer	— do —		Pay Rs- 3700/- P.M.		7-5-02 P.M.			
— do —			Rs. 3810/- P.M.		1-12-2002			

A.O. No. 213/02  
 P.S. 10/02  
 7/3/02  
 P.S. 10/02  
 P.S. 10/02  
 P.S. 10/02





1	2	3	4	5	6	
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment
BPS-6. 2160-110-SH60 Radiographer.			Rs. 3920/- Pay: Rs. (3810/-) P.M.			1-12-2003
		Wrong entries as on 1-12-2003 2 1-12-2004 are rectified for Rs. 3920/- P.M. x Rs. 4030/P.M. respectively.	Rs. 4030/- Pay Rs. (3920/-) P.M.			1-12-04
		Medical Superintendent District Head Quarters Hospital H A R I P U R				
		Receipt of appeal against W.P. No. 12/7/2005 on behalf of D.O. in competent authority at District, R/Giothar. Shuklam Akhtar approached and submitted this appeal against the Red Entry of the predecessor MIS, who in the DCO accepted the appeal against the directed to ignore the Red Entry of W.P. No. 12/7/2005. Service - DOK. For future, no case or attention be extended to such Red Entry remarks as put-ups against R/G yashwanth Shuklam Akhtar.				

8	9	10	11	12	13		14	15	
Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8		Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the Office or other Attesting Officer	LEAVE		Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant	
Signature of Government servant		Allocation of periods of leave on average pay up to 4 months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		Government to which debitable		Period			
Nature and duration of leave taken									
<i>W. V.</i>	30.11.03	Annual Increment		<i>W. V.</i>			<i>W. V.</i>	02-6-03	
<i>W. V.</i>	30.11.03	Annual Increment	Medical Superintendent District Head Quarter Hospital H A B I P U R M	<i>W. V.</i>			<i>W. V.</i>	Same as found from 08.5.03 to 30.11.03.	
<i>W. V.</i>	30.11.04	Annual Increment	Annual Increment allowed.	<i>W. V.</i>			<i>W. V.</i>	Social Security from 1.12.03 to 30.11.04	
<i>W. V.</i>	30.11.05	Warning	Issued warning vide DCO Haripur order NO. A-III/4(3)KC/578-79/DCO dated 31-1-05.	<i>W. V.</i>			<i>W. V.</i>	D. V. Jais	
<i>W. V.</i>	30.11.05	Warning	Warning issued upon completion of disciplinary proceedings against you and in view of report of the major committee, you are hereby warned to remain careful & discharge your official responsibilities on the contrary you will be taken seriously and stern disciplinary action will be taken against you under the prevailing rules.	<i>W. V.</i>			<i>W. V.</i>	D. V. Jais	

RECEIVED  
 DISTRICT HEAD QUARTER HOSPITAL  
 H A B I P U R M  
 07/05

1	2	3	4	5	6
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"
BS-6 (Rs. 2160-110-5460) Radio grapher. Revised BPS-2005 BS-6 (Rs. 2485-125-6235)	When entry as on 1-7-05 to rectified for Rs. 4610/- PM.	District Head Quarter Hospital HABIPUR	Rs. 4630/- (3920/-) (4485/-) Rs. 4610/- ✓	Rs. ✓	1-12-2004. ✓ 1-7-05 ✓
—do— X-Ray Technician. BPS-9 (Rs. 2770-165-7720)	Pay Fixed in BS-9:— i) Next higher Stage ii) Premature increment	District Head Quarter Hospital HABIPUR	4735/- 4750 (4760/-) 165/-	✓ ✓ ✓	1-12-2005 ✓ 22-5-2006. ✓
<p style="text-align: center;">Total Pay Fixed = (4925/-) 4915/-</p> <p style="text-align: center;">All cuttings at this page are attested.</p> <p style="text-align: right;">Medical Superintendent D.H.O Hospital Haripur</p>					

8	9	10	11	12	13		14	15
					Nature and duration of leave taken	Allocation of periods of leave on average pay up to 4 months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		
Signature of Government servant	Signature and designation of the Head of the Office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the Head of the Office or other Attesting Officer	Period	Government to which debitable	Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant
	<p><i>[Signature]</i>            Medical Superintendent            District Head Quarter Hospital  <b>H A R I P U R</b></p>	<p>30/6/2005</p>	<p>Revision A Basic Pay Scales - 2005 vide Govt. A Nuff. Finance Deptt. Poshawara Circular letter No. F.D.(PRC)1-V 2005 dt. 09-7-2005.</p>	<p><i>[Signature]</i>            Medical Superintendent            District Head Quarter Hospital  <b>H A R I P U R</b></p>	<p>11/7</p>	<p>Government of India</p>	<p><i>[Signature]</i>            Sanchal B. S. 3001            by Mr. EDO Health            No. 4405 dt. 16/7/05</p>	
	<p><i>[Signature]</i>            Medical Superintendent            District Head Quarter Hospital  <b>H A R I P U R</b></p>	<p>30/11/05</p>	<p>Annual Increment</p>	<p><i>[Signature]</i>            Medical Superintendent            District Head Quarter Hospital  <b>H A R I P U R</b></p>	<p>11/7</p>	<p>Government of India</p>	<p><i>[Signature]</i>            T-162            11/7            dt. 2-26-2005            and ref. att. dt.</p>	
	<p><i>[Signature]</i>            Medical Superintendent            D.H.Q. Hospital            Haripur</p>	<p>21/2/06</p>	<p>Appointed/ Adjusted as X-Ray Technician in BS-9 vide EDO Health Haripur office order No. 279-84 dt. 22.5.06.</p>	<p><i>[Signature]</i>            Medical Superintendent            D.H.Q. Hospital            Haripur</p>	<p>11/7</p>	<p>Government of India</p>	<p><i>[Signature]</i>            Service Verified from A/Roll of Pay Bill w dt. 1-12-2004 to 30-11-2005.</p>	
	<p><i>[Signature]</i>            Medical Superintendent            D.H.Q. Hospital            Haripur</p>	<p>30/11/05</p>	<p>Appointed/ Adjusted as X-Ray Technician from BPS 6 to BPS 7 vide EDO Health Haripur office order No. 196-2001/PF/Estt. dt. 02/05/2006 (2006)</p>	<p><i>[Signature]</i>            Medical Superintendent            D.H.Q. Hospital            Haripur</p>	<p>11/7</p>	<p>Government of India</p>	<p><i>[Signature]</i>            Medical Superintendent            District Head Quarter Hospital  <b>H A R I P U R</b></p>	

MEDICAL SUPERINTENDENT  
 D.H.Q. HOSPITAL  
 H A R I P U R

MEDICAL SUPERINTENDENT  
 D.H.Q. HOSPITAL  
 HARIPUR

Date of appointment

1	2	3	4		5		6
			Rs.	Ps.	Rs.	Ps.	
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II	Pay in substantive post		Additional pay for officiating		Other emoluments falling under the term "Pay"
			Date of appointment				
B-9-Rs:3770-165-776 X-Ray Techni- Other Hospital, Hampi.	2003 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR. PAY FIXED IN THE REVISED BASIC PAY SCALES 2001 OF RS.165-110-54650 AT RS.3770 P.M.W.E.F. 1-12-2001 WITH NEXT Increment on	Pay fixed on 1-6-1891 M B-6 on 1-6-1891	Rs.	Ps.	Rs.	Ps.	N.W.F.P. Peshawar M. B. Shah
			Pay Rs: 5080 P.M.				
B-9-Rs:3770-165-776 X-Ray Techni- Other Hospital, Hampi.	2003 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P. PESHAWAR. PAY FIXED IN THE REVISED BASIC PAY SCALES 2001 OF RS.165-110-54650 AT RS.3770 P.M.W.E.F. 1-12-2001 WITH NEXT Increment on	Pay fixed on 1-6-1891 M B-6 on 1-6-1891	Rs.	Ps.	Rs.	Ps.	N.W.F.P. Peshawar M. B. Shah
			Pay Rs: 5080 P.M.				

2003  
OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR.  
PAY FIXED IN THE REVISED BASIC  
PAY SCALES 2001  
OF RS.165-110-54650  
AT RS.3770 P.M.W.E.F. 1-12-2001  
WITH NEXT Increment on

2003  
OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR.  
PAY FIXED IN THE REVISED BASIC  
PAY SCALES 2001  
OF RS.165-110-54650  
AT RS.3770 P.M.W.E.F. 1-12-2001  
WITH NEXT Increment on

X-Ray Techn. B-9

8	Signature of Government servant	Date of appointment	13		14	15		
			Nature and duration of leave taken	Allocation of periods of leave on average pay up to 4 months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government			Signature of the Head of the Office or other Attesting Officer	Reference to any recorded punishment or censure, or reward or praised of the Government servant

T. 2139  
13.6.2006  
Armed force pay from  
1.12.2003 to 31.5.2006  
= Rs 3522/-

S (2)

Pay @ Rs 1915/- per Annum  
retiring on 1.6.2006  
Services verified  
from 1.12.03 to 30.11.06.

Medical Superintendent  
D.H.O Hospital  
Haripur

Services verified  
upto 1.12.06 to 30.11.2007

Annual Increment allowed

Medical Superintendent  
D.H.O Hospital  
Haripur

30.06

Medical Superintendent  
D.H.O Hospital  
Haripur

17.6. Retired fixed vide following

Medical Superintendent  
D.H.O Hospital  
Haripur

Annual increment allowed

Medical Superintendent  
D.H.O Hospital  
Haripur

30.11.2007  
01.12.2008 Ann. fixed in revised pay scale  
vide FO No P. 2700/2008

Medical Superintendent  
D.H.O Hospital  
Haripur

add

1	2	3	4		5		6	7
			Rs.	Ps.	Rs.	Ps.		
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.), Volume II	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment		
X <sup>Reg</sup> Tech DHO Hosp Hampur							14-06-08 Suspension Srinagar	
X <sup>Reg</sup> Tech - DHO Hosp							17 <sup>12</sup> / <sub>2008</sub>	
X <sup>Reg</sup> Tech - DHO Hosp				Rs. 7500/- PM			01-12-2008	
X <sup>Reg</sup> Tech - DHO Hosp				Rs. 7500/- PM			31 <sup>12</sup> / <sub>2008</sub> AM	



8	9	10	11	12	13		14	15	
					LEAVE				
					Nature and duration of leave taken	Allocation of periods of leave on average pay up to 4 months (or earned leave not exceeding 120 days) for which leave salary is debitable to another Government		Reference to any recorded punishment or censure, or reward or praised of the Government servant	
						Period	Government to which debitable		
					<p>Suspended from Services M.E.F. - 15/06/08          vide EDO(H) office order NO:          ESH: 2986-90/E-I/EDO(H) dated 14/06/08.</p>		<p>MEDICAL SUPERINTENDENT          D.H.Q HOSPITAL          HARIPUR</p>		
					<p>Re-Instated in Service with effect from 15-06-2008          vide EDO Health Haripur letter NO 5844-47/ESH/PE dated 19/06/08</p>		<p>Ed. No 72845/-          by P.O. Haripur No 5006-8          dated 11-06-08          No. 36422/</p>		
					<p>Annual Increment allowed</p>		<p>1203 ✓          No. 36422/          Service Dept. No. 11/08          1-12-2007 to 30-11-2008</p>		
					<p>Transfer from D.H.Q. Hospital Haripur To          EDO Health Haripur vide letter NO 5844-5/ESH dated 19/12/2008</p>		<p>12/2008          12/2008          2008</p>		

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

30 <sup>11</sup>/<sub>2008</sub> FM

31 <sup>12</sup>/<sub>2008</sub> FM

Medical Superintendent  
D.H.Q Hospital  
Haripur

Medical Superintendent  
D.H.Q Hospital  
Haripur

Medical Superintendent  
D.H.Q Hospital  
Haripur

Medical Superintendent  
D.H.Q Hospital  
Haripur

BPS-09(3820-230-10720)

X Ray Tech.  
E.D.O.H. office

Pay Rs 7500/-pm

2007  
OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR  
PAY FIXATION IN THE UNIFIED BASIC  
PAY SCALES

OF RS 3185-190-8885-B-2

At Rs 5845/- M.W.F.P. 1-07-2007  
With Next Increment on 1-12-2007

Rs 7730/- =  $\frac{12}{2009}$

52  
5845/9  
08  
7270/9

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar

2008  
OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P. PESHAWAR  
PAY FIXATION IN THE UNIFIED BASIC  
PAY SCALES I

OF RS 3820-230-10720

AT RS 7270/-  
With Next Increment on

Accounts Officer  
Pay Fixation Party N.W.F.P. Peshawar

BPS-9(3820-230-10720)

JCT. Redology

Pay Rs 17960/-

$\frac{12}{2010}$  FN

Part II by which the leave is governed.

Department \_\_\_\_\_ Date of attaining the age of 55 years \_\_\_\_\_

LEAVE ON MEDICAL CERTIFICATE SUBJECT TO A MAXIMUM OF 12 MONTHS (18 MONTHS ON MEDICAL CERTIFICATE FROM MEDICAL BOARD OR MEDICAL COMMITTEE)

Remarks (Extraordinary or any other kind of special leave may be shown in this column)

Signature of attesting officer

Leave taken

Total leave taken up-to-date

From	To	Y	M.	D.	Y.	M.	D.
------	----	---	----	----	----	----	----

10/9/48

Transfer from D.H.Q Hospital Haripur to E.P.O.H. Hospital at K.H.C. S.N. Khan

vide letter no 5812-50/154 dt 19-12-48.

M.D. Grews  
Executive District Officer  
(Health) Haripur.

10/9/48

Assume duty at E.P.O.H. office

M.D. Grews  
Executive District Officer  
(Health) Haripur.

Annual increment allowed.

Services Verified 11  
w.e.f. 1-12-2008 to 30-11-2009.

GENERAL

BASIC

1072

~~MEDICAL SUPERINTENDENT  
D.H.Q HOSPITAL  
HARIPUR~~

~~MEDICAL SUPERINTENDENT  
D.H.Q HOSPITAL  
HARIPUR~~

hawal

Annual Increment allowed

Service Verified from  
w.e.f. 1-12-2009 to 30-11-2010

~~MEDICAL SUPERINTENDENT  
D.H.Q HOSPITAL  
HARIPUR~~

~~MEDICAL SUPERINTENDENT  
D.H.Q HOSPITAL  
HARIPUR~~

**FORM OF LEAVE ACCOUNT**

**Leave Account of Permanent Government Servants and Government**

Name of Government Servant \_\_\_\_\_

Date of attaining the age of 55 years 60 years \_\_\_\_\_

Serial No.	PERIOD OF DUTY				LEAVE EARNED		LEAVE AT CREDIT		ON AVERAGE	
	From	To	Y.	M.D.	Y.	M.D.	Y.	M.D.	From	To
1					On average pay at 1/11th 1/22nd of column 4		On average pay subject to a maximum 4/2 months column (18+5)		10	11
2					On half-average pay 1/11th 1/22nd of column 4		On average pay in excess of 4/2 months column (18+19+5+7) (-)		11	12
3					On average pay at 1/11th 1/22nd of column 4		On half average pay column (20+6)			
4					On half-average pay 1/11th 1/22nd of column 4		On average pay subject to a maximum 4/2 months column (18+5)			
5					On average pay at 1/11th 1/22nd of column 4		On average pay in excess of 4/2 months column (18+19+5+7) (-)			
6					On half-average pay 1/11th 1/22nd of column 4		On half average pay column (20+6)			
7					On average pay at 1/11th 1/22nd of column 4		On average pay subject to a maximum 4/2 months column (18+5)			
8					On half-average pay 1/11th 1/22nd of column 4		On average pay in excess of 4/2 months column (18+19+5+7) (-)			
9					On average pay at 1/11th 1/22nd of column 4		On half average pay column (20+6)			
10					On half-average pay 1/11th 1/22nd of column 4		On average pay subject to a maximum 4/2 months column (18+5)			
11					On average pay at 1/11th 1/22nd of column 4		On average pay in excess of 4/2 months column (18+19+5+7) (-)			
12					On half-average pay 1/11th 1/22nd of column 4		On half average pay column (20+6)			

*Handwritten notes:*  
 17-11-55  
 17-11-55

The leave accounts of the Press employees for whom Forms F.R. 9B

ON AVERAGE LEAVE  
 (EN) 01 0 0

Against Col. 7  
 Against column 8 (column 11 + 12 not to exceed 12 months)

On M.C. or for Pilgrimage, Rest and Recreation, Education Ex-Pakistan, etc. Against column 8 (column 11 + 12 not to exceed 12 months)

Entitled to leave from 1st day of month to 31st day of month (1st day of month to 31st day of month)

Rate of leave (Rs.)

ANNEXURE

E

To The Medical Superintendent,  
DHQ Hospital Haripur.

Subject: Arrival Report

I have the honour to submit  
my arrival report today 03.05-2006.

(FN) as X-ray Technician in DHQ Hospital  
Haripur vide Executive District Officer  
Health Haripur letter no. 1996-200/Estt  
dt. 02.05-2006.

Kindly accept my arrival report  
as X-ray Technician.

Yours Obediently,

<sup>Gulam</sup>  
Gulam Akhtar

X-ray Tech DHQ  
Hospital Haripur.

Estt  
Arrival accepted  
for further mgs

03/05/2006

Medical Superintendent  
DHQ Teaching Hospital  
Haripur



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

No. 3887 /AE-VII

Dated 13/5 /2014

To,

The Medical Superintendent,  
District Headquarter Hospital,  
Haripure.

Subject: -  
Dear Sir,

APPLICATION FOR CORRECTING SENIORITY.

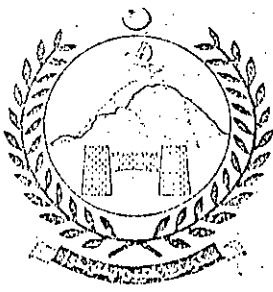
I am directed to refer to your letter NO. 3137/transfer dated 22.11.2013, on the subject noted above and to state that the Mr. Ghulam Akhter JCT (Radiology) has been included in the seniority list of JCT (Radiology) w.e.f. 02.05.2006.

**Assistant Director (P-III)  
Directorate General Health Services,  
Khyber Pakhtunkhwa, Peshawar.**

*7/2/14*

*Attest*

Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur



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

No. 7565-650 /AE-VII  
Dated. 7/1/11 2013. **ANNEXURE** (c) 9

To,

1. The Principals, KMC/ KCD Peshawar.
2. The Principal, AMC Abbottabad.
3. The Principal Bacha Khan Medical College, Mardan.
4. The Director Health Services, FATA Peshawar.
5. The Medical Superintendents,  
Govt: LRI, KTH, HMC Peshawar.
6. The Medical Superintendent,  
Saidu Group of Teaching Hospital Swat.
7. The Medical Superintendent,  
Ayub Teaching Hospital Abbottabad.
8. The Medical Superintendent,  
Khalifa Gul Nawaz Teaching Hospital, Bannu.
9. The Medical Superintendent,  
Mufti Mehmood Memorial Teaching Hospital D.I.Khan
10. The Medical Superintendent,  
ID Children Hospital, Peshawar.
11. The Medical Superintendent,  
Women & Children Hospital, GT Road Peshawar.
12. The Medical Superintendent,  
Govt: City Hospital, Kohat Road Peshawar.
13. The Medical Superintendent,  
Police and Services Hospital, Peshawar.
14. The Medical Superintendent,  
Mardan Medical Complex, Mardan.
15. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
16. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.
17. The All Medical Superintendents, DHQ/ AHQ Hospital in KPK/FATA.
18. The All Agency Surgeons in FATA/ FRs.
19. The All Executive District Officers (Health) in Khyber Pakhtunkhwa Province.

Subject: FINAL SENIORITY LIST OF JUNIOR CLINICAL TECHNICIAN  
(RADIOLOGY) BS-09 OF HEALTH DEPARTMENT KHYBER  
PAKHTUNKHWA.

Memo:

Enclosed please find a Final Seniority List of Junior Clinical Technidian (Radiology) BS-09 of Health Department Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR.

No. 7651-52 /AE-VII

Copy forwarded to the:-


1. PS to Secretary to Govt: of Khyber Pakhtunkhwa, Health Department Peshawar.
2. President, PMA, Khyber Pakhtunkhwa, Health Department Peshawar.

Attested  
Medical Superintendent  
D.H.O. Teaching Hospital  
Haripur

DIRECTOR GENERAL HEALTH SERVICES  
KHYBER PUKHTUNKHWA, PESHAWAR.

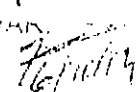
**Final Seniority List of Junior Clinical Technician (Radiology) BS-09 in the  
Health Department Khyber Pakhtunkhwa.**

S.No	Name/ Father's Name	a (Old Nomenclature With BPS) b New Nomenclature after restructuring	Date of Joining Govt: Service/ promotion/ up-gradation to BS-09	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1.	Ghulam Akhtar	Radiographer BS-06 X-Ray Tech: BS-09	31-08-1989 02-05-2006	DHOH Abbottabad	30-01-1963 Haripur	29-01-2023
2.	Saif-ur-Rehman S/O Saifullah	Radiographer BS-06 JCT (Radiology) BS-09	14-09-1976 10.05.2006	G&M Hosp: Dadar	19-01-1957 Manshra	18-01-2017
3.	Imran Abiad S/O Muhammad Abdul Hayye	Radiographer BS-06 JCT (Radiology) BS-09	01.09.1988 10.05.2006	DHO Tank	01.04.1967/ Tank	
4.	Rehmatullah	Radiographer BPS-06 JCT (Radiology) BS-09	03-10-1989 10.05.2006	HMC Peshawar	02-04-1965 Karak	01-04-2025
5.	Zarnoosh Khan	Radiographer BPS-06 JCT (Radiology) BS-09	09-10-1989 10.05.2006	DHQ Hosp: Charsadda	08-02-1969 Charsadda	07-02-2029
6.	Wajid Ali Shah S/O Muhammad Shah	Radiographer BPS-06 JCT (Radiology) BS-09	10-10-1989 10.05.2006	KTH Peshawar	01-02-1971 Charsadda	31-01-2031
7.	Wali ur Rahman S/O Turab Khan	Radiographer BPS-06 JCT (Radiology) BS-09	13-11-1989 10.05.2006	DHQ Hosp: Battagram	05-04-1966 Nowshera	04-04-2026
8.	Mauzullah	Radiographer BPS-06 JCT (Radiology) BS-09	16-11-1989 10.05.2006	Peshawar	06-02-1969 Charsadda	05-02-2029
9.	Syed Mehfooz	Radiographer BPS-06 JCT (Radiology) BS-09	16-11-1989 10.05.2006	Swabi	30-07-1969 Swabi	29-07-2029
10.	Saeed ud din	Radiographer BPS-06 JCT (Radiology) BS-09	29-11-1989 10.05.2006	Maternity Hosp: Peshawar	19-03-1969 Peshawar	19-03-2029
11.	Muhammad Arshad S/O Noor Rehman	Radiographer BPS-06 JCT (Radiology) BS-09	30-11-1989 10.05.2006	DHO Manshra	19-04-1965 Manshra	18-04-2025
12.	Muhammad Asif	DRA BPS-5 Radiographer BPS-06 JCT (Radiology) BS-09	01-10-1987 27-11-1990 10.05.2006	LRH Peshawar	22-08-1970 Mardan	21-08-2030
13.	Ifikhar Ahmed M. Younis	Radiographer BPS-06 JCT (Radiology) BS-09	09-01-1990 10.05.2006	G&M Hosp: Dadar	14-05-1963 Manshra	13-05-2023
14.	Shakirullah S/O Sultan Saeed	Radiographer BPS-06 JCT (Radiology) BS-09	23-01-1990 10.05.2006	DHO Dir Lower	01-08-1967 Dir Lower	31-07-2027
15.	Zaheer Ahmed	Radiographer BPS-06 JCT (Radiology) BS-09	25-01-1990 10.05.2006	DHO. A. Abad	24-02-1966 Abbottabad	23-02-2023
16.	Mohd. Asif S/O Umar Gul Khan	Radiographer BPS-06 JCT (Radiology) BS-09	08-06-1990 10.05.2006	DHQH Bannu	04-01-1971 Bannu	03-01-2031
17.	Mohd. Munir S/O Jehangir Khan	Radiographer BPS-06 JCT (Radiology) BS-09	13-06-1990 10.05.2006	BBSH Abbottabad	08-01-1969 Abbottabad	07-01-2029
18.	Waheedullah	Radiographer BPS-06 JCT (Radiology) BS-09	13-06-1990 10.05.2006	DHO Bannu	10-04-1972 Bannu	09-04-2032
19.	Jan Bahadar Khan S/O Muhammad Yar Khan	Radiographer BPS-06 JCT (Radiology) BS-09	17-06-1990 10.05.2006	DHO Bannu	07-02-1963 Bannu	16-02-2023
20.	Wajid Ali	Radiographer BPS-06	01-07-1990	LRH. peshawar	12-05-1969	11-05-2029

  
 Medical Superintendent  
 D.H.O. Teaching Hospital  
 Haripur

KHYBER PUKHTUNKHWA, PESHAWAR

7-11-14

  
 7/11/14





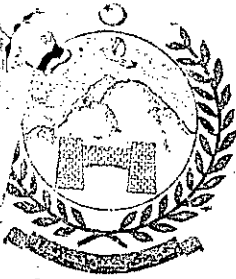
	hammad Ali Khan Ziyad	JCT Radiology B-09	05.03.2014	Marwat Police Hosp: Peshawar	Bannu 26.06.1993
	Naveed Shahzad	JCT Radiology B-09	05.03.2014	Police Hosp: Peshawar	15.01.1987
381.	Asif Asghar	JCT Radiology B-09	06.03.2014	Police Hosp: Peshawar	15.03.1986
382.	Sayyar Khan S/O Rustam Khan	JCT Radiology B-09	30.04.2014	DHO Mardan	20.06.1977/ Mardan

Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

*[Handwritten signature]*  
6/4/14

*A. Faris*

*[Handwritten signature]*  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

ANNEXURE H

No. 4659 /AE-VII

Dated 24/7/2014.

MS No. 520-08-08-14  
D.M.S.  
Head Clerk  
F&C

To

The Medical Superintendent,  
DHQ Hospital Haripur.

SUBJECT: APPEAL FOR PROMOTION AS CHIEF RADIOGRAPHER BS-16.  
Dear Sir,

I am directed to refer to your letter No. 3400/MS/DHQ (H) dated 18.06.2014, on the subject noted above and to state that the official concerned will be promoted to the next higher scale on his turn as per rules/ policy of the Government.

Assistant Director (P-III)  
Directorate General Health,  
Services KPK, Peshawar.

*[Handwritten signature]*

*[Handwritten signature]*  
16/7/14

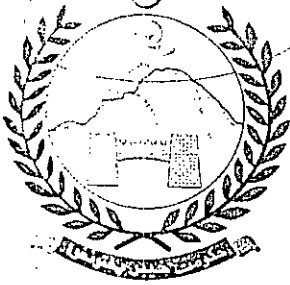
ESM

*Circulate*

*[Handwritten signature]*  
7/8

A. Hestad  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur

CONFIDENTIAL.



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

No. 4919 /AE-VII

Dated 29/04/2015.

Annex I  
34

To

Dr. Mushtaq Ahmad  
District Health Officer,  
Haripur.

SUBJECT: AUTHENTICATION OF APPOINTMENT OFFICE ORDER NO. 2779-84/ETT; DATED 22.05.2006 AND NO.2779-84/ESTT; DATED 02.05.2006.

Dear Sir,

I am directed to refer to the subject noted above and to forward appointment office order No.2779-84/Estt: dated 22.05.2006 and No.2779-84/Estt: dated 02.05.2006 in respect of Mr. Ghulam Akhtar Junior Clinical Technician(Radiology) BPS-09 received from DHO, Abbottabad vide his letter No.3135/Estt:/D/DGHS dated 27/03/2015 for your information and authentication from the original record and submit to this Directorate urgently so as to settle the issue of seniority list of JCT (Radiology) BPS-09 once for all.

ASSISTANT DIRECTOR-(P-III)  
DIRECTORATE GENERAL HEALTH  
SERVICES KPK, PESHAWAR

No. /AE-VII

Copy forwarded to the District Accounts Officer Haripur for information and with the request to intimate that from which date Mr. Ghulam Akhtar JCT Radiology BS-09 has been drawn his salaries i.e. w.e. from 02.05,2006 or 22.05.2006 an attested pay roll may also be sent to this Directorate for further necessary action.

ASSISTANT DIRECTOR (P-III)  
DIRECTORATE GENERAL HEALTH  
SERVICES KPK, PESHAWAR

Mudasir Shah  
for report  
  
4/5/15



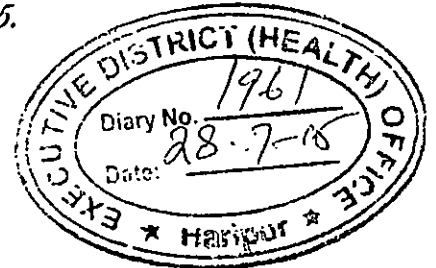
DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR.

No. \_\_\_\_\_ /AE.VII.

Dated \_\_\_\_\_ /2015.

To

The District Accounts Officer  
Haripur.



SUBJECT: - AUTHENTICATION OF APPOINTMENT OFFICE ORDER  
NO. 2779-84/Estt: DATED 22/05/2006 AND NO. 2779-84/Estt:  
DATED 2.05.2006.

Dear Sir,

I am directed to refer to your letter No.4679/ac/Estt:/D/MS date: 11.05.2015 and this Directorate letter No. 4919.AE-VII dated 29.04.2015 on the subjected noted above and to expedite the matter without any further delay so as to settle the issue of seniority list of Junior Clinical Technician (Radiology) BPS-09

*[Signature]*  
ASSISTANT DIRECTOR (P-III)  
DIRECTORATE GENERAL HEALTH  
SERVICES KPK, PESHAWAR.

No. \_\_\_\_\_ /AE-VII

Copy forwarded to the DAO Haripur for information and necessary action w/r to this Directorate endst: No. 4920/AE-VII dated 29/04/2015.

*[Signature]*  
ASSISTANT DIRECTOR (P-III)  
DIRECTORATE GENERAL HEALTH  
SERVICES KPK, PESHAWAR.

*[Handwritten signature]*  
D.A.O. Haripur



**Office Of The District Health Officer, Haripur.**

No. 8272  
Dated Haripur, the

/Estab/D/DGHS-  
06/02/2015.

Annex (10)

36

ANNEXURE J

To,

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

Authentication Of Appointment Officer Order No.2779-84/Estt: dated 22.05.2006 & No.2779-84/Estt: dated 02.05.2006.

Sir,

Please refer to your office letter No.4919/AE.VII dated 29.04.2015 & No.8662/AE.VII dated 06.07.2015, on the above cited subject.

In this regard, it is to inform your good self dispatch No.2779-84/Estt: 22.05.2006 of office order regarding appointment of Mr. Ghulam Akhtar S/o Karam Bakhsh as X-Ray Technician (JCT Radiology BPS-09) at District Headquarter Hospital, Haripur may please be read as No.1996-2001/PF/Estt: dated 02.05.2006 (copy attached) instead of No.2779-84/Estt: dated 22.05.2006 which has wrongly been recorded due to clerical mistake. It is further submitted that the official concerned has reported his arrival on the forenoon of 03.05.2006 (copy attached).

Encs; as above.

  
District Health Officer,  
Haripur

District Health Officer, Haripur  
Phone & Fax # 0995-610997  
[dhoharipur@yahoo.com](mailto:dhoharipur@yahoo.com)

Medical Superintendent  
D.H.O. Teaching Hospital  
Haripur

To

The Director General,  
Health Services Khyber Pakhtunkhwa,  
Peshawar.

Annex  
37

Through: Proper Channel

Subject: DEPARTMENTAL APPEAL FOR GRANT OF PROMOTION  
TO THE POST OF CHIEF RADIOLOGY TECHNICIAN BS-16

Respected Sir,

With due respect it is submitted that in consequence of my departmental appeal I have been granted the due right of seniority vide your goodself letter No. 7565-650/AE/VII dated 07.11.2013 (copy enclosed for ready reference). On basis of the rectified seniority list quoted above, the worthy Secretary Health Government of Khyber Pakhtunkhwa has already referred my case to your good office for grant of promotion as Chief Radiology Technician (BS-16) and to avoid issues of litigation for the department vide letter No. SOH-III/8-89/2014/Mr. Ghulam Akhtar dated 14.04.2015 (copy enclosed for ready reference).

In view of the above, it is humbly prayed that I may kindly be granted promotion to the post of Chief Radiology Technician (BS-16) and I may also be placed in the seniority list of Chief Radiology Technicians duly circulated vide your office letter No. 7828-913/AE-VII dated 07.11.2013 (copy enclosed for ready reference) after the name of Mr. Khursheed stands at S.No.6 of the said list because the other chief radiology technicians were promoted during the dispute of my seniority and they were junior to me.

Thanking you, sir.

Yours obediently

*Ghulam Akhtar* 8-9-15  
Ghulam Akhtar  
JCT Radio:

*Attested*

*[Signature]*  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur

*Recommended to D.D.S.  
Health Services KPK  
for favorable consideration  
Please.*

*[Signature]*  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur



**OFFICE OF THE MEDICAL SUPERINTENDENT**

**D.H.Q. Teaching Hospital Haripur**

Telephone #: 0995-611850 Fax #: 0995- 610069

38

No: 5455

/MS/DHQ/(H)

Dated Haripur the: 08-08-2015

The Director General  
Health Services  
Khyber Pakhtunkhwa Peshawar

Subject: **DEPARTMENTAL APPEAL FOR GRANT OF PROMOTION TO THE POST OF CHIEF CLINICAL TECHNICIAN BPS-16**


Enclosed please find herewith a self explicit application submitted by Mr. Ghulam Akhtar JCT Radiology BPS-9DHQ Hospital Haripur on the subject noted above for favour of further necessary action.


Perusal of the subject departmental appeal appears to be genuine and on merits for consideration.

It is submitted that Government of Khyber Pakhtunkhwa Finance department has created a post of Chief Clinical Technician (Radiology) BPS-16 for DHQ Hospital Haripur for the current financial year: 2015-16, which is lying vacant. Copy of the Budget Book is enclosed herewith please. On the other hand, the appellant (Mr. Ghulam Akhtar) is well experienced, hard work and honest official.

In the light of above facts, it is strongly recommended that appellant may be granted promotion to the post of Chief Clinical Technician (Radiology) BPS-16 in the light of final seniority list, circulated on 07-11-2013 and also as directed by the worthy Secretary to Government of Khyber Pakhtunkhwa Health department Peshawar vide his letter dated 14-04-2015 so as to avoid issue of litigation for the department. It is also requested that his name may please be placed as requested by the appellant as on merit please.

**Encl: As stated.**

  
Medical Superintendent  
DHQ Hospital Haripur

  
Medical Superintendent  
D.H.Q. Teaching Hospital  
Haripur



DIRECTORATE GENERAL HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER:-

Consequent upon approval accorded by the competent authority in its meeting held on 01.07.2013, the following Clinical Tech: (Radiology) BS-12 and Jt. Clinical Tech: (Radiology) BS-09 have been upgraded to the post of Chief Clinical Tech: (Radiology) BS-16 in the light of Govt of Khyber Pakhtunkhwa, Health Department Notification No. SOH-III/8-60/2005(Paramedics) dated 09.05.2012.

S. No	Name/Father's Name	Place of Present Posting
1.	Mohiuddin	DHQH Karak
2.	Khurshid	KAT Hospital Mansehra
3.	Muhammad Arshad	LRH Peshawar
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQH Mardan
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad
8.	Zard Ali Khan	LRH Peshawar
9.	Mubasherin	EDO Charsadda
10.	Asfar Khan	HMC Peshawar
11.	Faheem Ullah S/O Habibullah Khan	DHQH Bannu
12.	Rizwan Ullah s/o Mehr Gul Khan.	KGNTH Bannu

On their up-gradation to the post of Chief Clinical Tech: (Radiology) BS-16, the following posting/transfer adjustment are hereby ordered in the interest of public service with immediate effect:-

S. No	Name/Father's Name	From	To	Domicile	Remarks
1.	Mohiuddin	DHQH Karak	DHQ (H) Karak	Karak	Against the vacant post
2.	Khurshid	KAT Hospital Mansehra	DHQH Kohat	Mansehra	-do-
3.	Muhammad Arshad	LRH Peshawar	LRH Peshawar	Peshawar	-do-
4.	Ijaz Mahmood Qureshi S/O Ghulam Miskeen	ATH Abbottabad	ATH Abbottabad	Abbottabad	-do-
5.	M. Riaz Akhtar S/O Muhammad Rafiq	BBSH Abbottabad	ATH Abbottabad	Abbottabad	-do-
6.	Mutahir Shah S/O Syed Muhammad Karim Shah	DHQ H Mardan	SH Swat	Mardan	-do-
7.	Abdul Aziz S/O Haji Fazal Ahmad	BBSH Abbottabad	DHQ H Dir Lower	Abbottabad	-do-
8.	Zard Ali Khan	LRH Peshawar	KTH Peshawar	Peshawar	-do-
9.	Mubasherin	EDO Charsadda	AHQ (H) Ghallanai	Charsadda	-do-
10.	Asfar Khan	HMC Peshawar	NBM Hosp: Peshawar	Peshawar	-do-
11.	Faheem Ullah S/O Habibullah Khan	DHQH Bannu	DHQ Teaching Bannu	Bannu	-do-
12.	Rizwan Ullah s/o Mehr Gul Khan.	KGNTH Bannu	KGNT Teaching Hosp: Bannu	Bannu	-do-

Sd/xxxxxxxxx  
Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

No. 10104-254 /AE-VII

Dated Peshawar the 24/7/2013


Copy forwarded to the:-

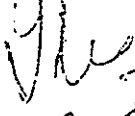
- The Secretary to Govt of Khyber Pakhtunkhwa, Health Department Peshawar.
- The DHS FATA, Khyber Pakhtunkhwa, Peshawar.
- The Director Provincial Health Services Academy, Khyber Pakhtunkhwa, Peshawar.
- Medical Superintendents, KTH, LRH, HMC Peshawar.
- Director IKD, HMC Peshawar
- The All Principals of Medical Colleges in Khyber Pakhtunkhwa
- Medical Superintendent, Maulvi Ameer Shah Memorial Hospital Peshawar.
- All District Health Officer in Khyber Pakhtunkhwa, Province.
- Medical Superintendents, DHQ Hospitals in Khyber Pakhtunkhwa.
- Medical Superintendent, City Hospital Kohat Road, Peshawar.
- Medical Superintendent, Police Services Hospital Peshawar.



- 40
12. Accountant General, Khyber Pakhtunkhwa, Peshawar.
  13. All District Accounts Officers in Khyber Pakhtunkhwa, Province.
  14. All Agency Surgeons in FATA/FRs Khyber Pakhtunkhwa.
  15. The all Agency Accounts Officers in FATA/FRs Khyber Pakhtunkhwa.
  16. I/C Gynaecologist, Govt. Maternity Hospital Peshawar.
  17. President Paramedics Health Deptt: KPK Peshawar.
  18. Incharge, Paramedics Promotion Cell DGHS Office Peshawar.
  19. Officials concerned.
  20. Personal Files.
  21. P.A to DGHS, Khyber Pakhtunkhwa, Peshawar.
  22. P.A to Director (Administration) DGHS Office Peshawar.
  23. P.A to Deputy Director (Personnel) DGHS Office Peshawar.

For information and necessary action.

  
Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

  
22/13



45

**DIRECTORATE GENERAL HEALTH SERVICE, KHYBER PAKHTUNKHWA, PESHAWAR**

**OFFICE ORDER**

Consequent upon approval accorded by the competent authority the following Jr. Clinical Technician (Radiology) BS-09 have been upgraded to the post of Chief Clinical Technician (Radiology) BS-16 w.e.f. 24.07.2013 (without arrears) in the light of Govt. Khyber Pakhtunkhwa, Health Department Notification No. SOH-III/8-60/2005 (Paramedics) dated 09.05.2012:-

S. No	Name/Father's Name	Place of Present Posting
1.	Wahidullah	DHQ Hosp: DI Khan
2.	Munir Hussain	AS Kurram at Parachinar.
3.	Iqbal Hussain	AS Kurram at Parachinar
4.	Rashid Muhammad	DHO Lakki Marwat

On their upgradation to the post of Chief Clinical Technician (Radiology) BS-16, the following posting/ transfer/ adjustment are hereby ordered against the vacant post in the interest of public service with immediate effect:-

S. No	Name/Father's Name	From	To	Domicile	Remarks
1.	Wahidullah	DHQ Hosp: DI Khan	DHQ Hosp: DI Khan	DI Khan	Against the vacant post
2.	Munir Hussain	AS Kurram at Parachinar	South Waziristan Agency Wana	Kurram Agency	-do-
3.	Iqbal Hussain	AS Kurram at Parachinar	AS Bajaur	Kurram Agency	-do-
4.	Rashid Muhammad	DHO Lakki Marwat	KTH Peshawar	Lakki Marwat	-do-

Sd/xxxxxxxx  
Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar

Dated Peshawar the 25/11/2013

No. 33173-92/AE-VII  
Copy forwarded to the:-

- The Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
- The Director Health Service, FATA Peshawar.
- The Medical Superintendent, KTH Peshawar.
- The Medical Superintendent, DHQ Hosp: DI Khan.
- The District Health Officer, Lakki Marwat.
- The Agency Surgeon, Kurram at Parachinar, Bajaur, South Waziristan Agency Wana.
- The Agency Surgeon, South Waziristan Agency Wana.
- Incharge, Paramedics Promotion Cell, DGHS Office Peshawar.
- President, Provincial Paramedical Association, Govt. LHM Peshawar.
- Officials concerned.
- Personal Files.
- P.A to DGHS, Khyber Pakhtunkhwa, Peshawar.

For information and necessary action.

Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

208  
01/11/2013

“B”

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

No.

TB

Appeal No. 66 of 20 16

Ghulam Akhtar Appellant/Petitioner

Versus

Through Secy: Health Dept. Pesh: Respondent

Respondent No. 7

Notice to: —

Mohammad Riaz S/o M. Rafiq  
Chief Clinical Technician BBSH  
Akbat آباد

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 16/11/2021 at 8.00 A.M. If you wish to urge anything against the appellants/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 3rd

Day of Sep: 20 21

at Camp Court A. Road

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

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

**"B"**

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

No.

T/B

Appeal No. 66 of 20 16

Ghulam A. Khan Appellant/Petitioner

Versus

Through Secy. Health Dept. Pesh. Respondent

Respondent No. 9

Notice to: -

Abedul Aziz S/o Haji Fazal Ahmed  
Chief Clinical Technician Lady Reading  
Hospital 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 16/11/2021 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 30 .....

Day of Sept ..... 2021

at Camp Court A. Road

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

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

"A"

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

No. *Reg*

*TB A/A*

APPEAL No. *66* of 20 *22*

*Shulam Akhtar*

Appellant/Petitioner

Versus

*through Secy: Health*

RESPONDENT(S)

Notice to Appellant/Petitioner *counsel Syed Haseeb Haider*  
*(Advocate)*

*High Court at Haveli Pur*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *13-6-22* at *2:00 AM*.

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

*At Camp Cody*  
*At Abad-*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

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

No. *Req*

*TB A/A*  
*22*

APPEAL No. *66* of 20

*Ghulam Akhtar*

Appellant/Petitioner

Versus

*Through Secy: Health*

RESPONDENT(S)

Notice to Appellant/Petitioner

*Consent*

*Syed Haseeb Halder*  
*(Advocate)*

*High Court at Hanoi Pur*

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

on *13-6-22* at *8:00 AM.*

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

*At cmr PCDY*  
*At Abad.*

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

"A"

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

Regg  
No.

TB A/A

APPEAL No. 66 of 2016

Ghulam Akhtar

Appellant/Petitioner

Versus

Muzib Saq: Health Resh

RESPONDENT(S)

Notice to Appellant/Petitioner

Ghulam Akhtar S/O  
Karam Baksh X-Ray technician  
D.HQ Hospital Dhenda  
Teh & Distt Haripur

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/6/22 at 2:00 PM

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

at camp court  
A/Abad.

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *Resg*

*TB A/A*

APPEAL No. *66* of 20 *16*

*Ghulam AKhtar*

Appellant/Petitioner

Versus

*Through Say: Health Resh*

RESPONDENT(S)

Notice to Appellant/Petitioner *Ghulam AKhtar S/O*

*Kayam Bakhsh X-Ray technician  
DHO Hospital Dhenda  
teh & Distt Haripur*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *13/6/22* at *2:00 PM*

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

*at court  
A/Abad.*

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