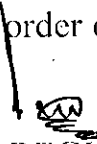


FORM OF ORDER SHEET

Court of _____

Case No. - 1819/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/12/2022	<p>The appeal of Mr. Haroon-ur-Rasheed resubmitted today by Mr. Muhammad Hassaan Adil Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>


The appeal of Mr. Haroon ur Rasheed son of Muhammad Dawood received today i.e. on 02.12.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be got signed by the appeal.
- 2- Copy of departmental appeal in respect of appellatant is not attached with the appeal which may be placed on it.

No. 3462 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.
High Court Peshawar.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

(*) All the objections have been removed.

Hassaan

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1819 /2022

Haroon-ur-Rasheed

VS

Government of KP and Others

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		1-4
2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
6.	Educational Documents	'C'	12-18
7.	Departmental Representation dated 17-06-2022	'D'	19
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	20
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10.	Reminder application dated 17-10-2022	'G'	22
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APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Haroon-ur-Rasheed

Son of Muhammad Dawood
Resident of Al-Noor Colony, P.O Khazana,
Peshawar

....APPELLANT

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariate, Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Health Department, Civil Secretariate, Peshawar
3. Director General (DG), Health Service, Warsak Road, Peshawar
4. District Health Officer (DHO), Grand Trunk Road, Tehsil and District Peshawar

....RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR PROMOTION OF THE APPELLANT AGAINST THE POST OF JUNIOR CLERK, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 17-06-2022 HAS NOT BEEN RESPONDED BY THE RESPONDENTS.

Respectfully Sheweth,

1. That the appellant was appointed on 27.10.2020 (**Annex "A"**) in prescribed manner as Chowkidar (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than two years in one and the same scale.
2. That the seniority list (**Annex "B"**) of the appellant-Class-IV is maintained separately in the office of respondent no. 04, whereas the seniority list of the employees-Class-IV of the respondent no. 3's office is maintained separately in their office. The services of the employee in the respondent no. 4's office is regulated by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hereinafter referred to as the Rules.
3. That the next post in the hierarchy to which the appellant can be promoted is that of Junior Clerk (BPS-11), and 33% quota is reserved by the Rules for the promotions amongst the Daftaries (BPS-04), Naib Qasids (BPS-03), Bailiff (BS-04), etc with 02 years' service experience as such, and who have passed Secondary School Certificate Examination.
4. That, numerous posts of the Junior clerk were advertised by the respondent No. 3 & 4 department. However, the same were filled by the respondent No. 3 by promoting the employees of his office only as well as through initial recruitment since long, but the respondents were taking no steps to fill the same by affording a chance of promotion to the appellant despite of the availability and allocation of post to the office of the respondent no. 04.
5. That though the appellant was having the required qualification (**Annex "C"**) at the time of advertisement of junior clerk post and the vacancies were also available at that time, but he was deprived, illegally, of the benefit of promotion at that juncture.
6. That the appellant along with other colleagues submitted an application / representation dated 17-06-2022 (**Annex "D"**) to the respondent-department for their promotion on the quota reserved for them. In response to application dated 17-06-2022, a letter was issued by respondent No. 03 vide letter no. 1776-856/Promotion cell, dated 18-08-2022 (**Annex "E"**), wherein the respondent No. 03 asked the respondent no. 04 to furnish the details of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33% quota. Following this, the respondent no. 04 vide letter No. 14703/DHO dated 01-09-2022 (**Annex "F"**) sent an answer to the respondent

No. 03 wherein the details provided were shown to be NIL, because all the posts, either made available / created in the office of respondent no. 04 or become available / vacant due to retirement etc, were used to be filled by the respondent no. 04 from the employees of his office and illegally ignoring the Class-IVs including the appellant from the office of the respondent no. 04. Needless to mention here that a reminder application dated 17-10-2022 (**Annex "G"**) was also submitted to the department by the appellant along with other colleagues but the respondent's department didn't consider it necessary to even take up the file of the appellant into consideration.

7. That the appellant, realizing the violation of his rights, approaches this Hon'ble Court through instant appeal, *inter alia*, on the following grounds amongst others;

GROUND S:

- A. That the appellant was equipped with all the requisite qualification for promotion to the posts of Junior Clerk (BPS-11) long ago and also the vacancies were available but for no valid reason and illegally, the promotion was withheld and the posts were filled in through promoting the employee from the office of the respondent no. 03 as well as through initial recruitment by the respondent No. 03's office, unlawfully curtailing the right of promotion of the appellant; hence, as per the settled principal of law, the appellant is entitled to the back benefits from the date of his entitlement and the vacancies had occurred.
- B. That the appellant has a right and entitlement to the promotion as well as to the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred.
- C. That the appellant being eligible to promotion in the year 2022 is required to be placed senior to the fresh candidates appointed or promoted after 2022 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution; 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

F. That appellant reserve his right to urge additional grounds with leave of the Tribunal, after the stance of the respondents becomes known to him.

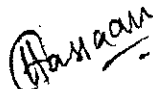
PRAYER:

It is, therefore, most respectfully prayed that on acceptance of the instant appeal, the Hon'ble Tribunal may graciously be pleased to direct the respondents to promote the appellant to the post of Junior Clerk along with the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred. Furthermore, the respondents may also be directed to place the appellant senior to the fresh candidates appointed or promoted after his entitlement as Junior Clerk.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.


APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL
Advocate High Court

AFFIDAVIT

I, **Haroon-ur-Rasheed** Son of **Muhammad Dawood**, Resident of **Al-Noor Colony, P.O Khazana Payan, Peshawar**, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.




DEPONENT

5

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

Service Appeal No. _____/2022

Haroon-ur-Rasheed

VS

Government of KP and Others

Application for restraining the respondents from taking any adverse action against the appellant till the final disposal of the instant appeal.

Respectfully Sheweth:

- 1) That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.
- 2) That, the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about its success.
- 4) That balance of convenience also leans in favour of appellant.
- 5) That if the relief as prayed for in the heading of this application is not granted, the very purpose of titled appeal will become infructuous.

PRAYER:

It is, therefore, prayed that on acceptance of this application, the respondents may graciously be restrained from taking any adverse action against the appellant till the final disposal of the instant appeal.



APPELLANT

Through



BARRISTER

MUHAMMAD HASSAAN ADIL

Advocate High Court

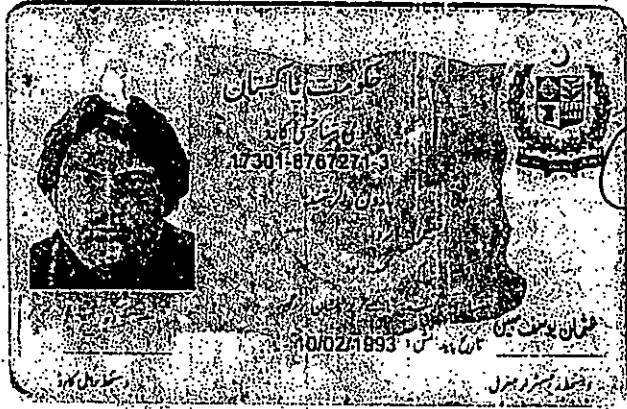
AFFIDAVIT

I, **Haroon-ur-Rasheed** Son of **Muhammad Dawood**, Resident of **Al-Noor Colony, P.O Khazana Payan, Peshawar**, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.





DEPONENT





OFFICE OF THE DISTRICT HEALTH OFFICER,
PESHAWAR.

Phone No. 091 9225387
Fax No. 091 9225467

Annex - "A"

OFFICE ORDER

On the recommendation of Departmental Selection Committee in its meeting held on 20/10/2020 at 10:00 am under the chairmanship of the undersigned. *Mr. Haroon-ur-Rasheed S/o Muhammad Dawood (Mst. Sania Dawood Ex - LHW MB) resident of Al-Noor Colony Khazana Payaan, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Chowkidar BPS -03 in Basic Pay Scale (9610-390-21310) plus all other allowances as admissible to him as per Government rules.*

His appointment in Health Department Govt. of Khyber Pakhtunkhwa will be subject to the following terms and conditions:-

1. He will be on probation initially for a period of one year.
2. His services will be subject to medical fitness.
3. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
4. He will be governed by such rules and orders as may be issued by the Government for the category of Government servant to which he belongs.
5. His services can be dismissed without any notice during the probation period, if his work and conduct found unsatisfactory.
6. If he/she wishes to resign from service he will have to submit resignation in writing 30-days in advance or deposit one month salary in the government treasury. However he will continue to serve the Government till the acceptance of his resignation by the competent authority.
7. He/She will serve in all health facilities under the control of District Health Office Peshawar.

If the above mentioned terms and conditions are acceptable to him/her, He/she should report to District Health Office, Peshawar within 14 days after the receipt of this appointment order.

Sd/-----
District Health Officer,
Peshawar.

No 16932-37 /DHO/E-19
Copy forwarded to the: -

Dated Peshawar the 27/10/2020

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Peshawar.
4. Coordinator DHIS Section DHO office Peshawar.
5. Account Section of this Office.
6. Official Concerned.


District Health Officer,
Peshawar.

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (July-2022)



Personal Information of Mr HAROON RASHEED d/w/s of MUHAMMAD DAWOOD

Personnel Number: 00963388 CNIC: 1730157672713 NTN:
 Date of Birth: 10.02.1993 Entry into Govt. Service: 27.10.2020 Length of Service: 01 Years 09 Months 006 Days

Employment Category: Active Temporary

Designation: MALL 81186485-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8854-District Health Officer RHC Peshawar
 Payroll Section: 004 GPF Section: 601 Cash Center:
 GPF A/C No: GPF Interest applied GPF Balance: 16,327.00 (provisional)
 Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 03 Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,840.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	1,500.00
2347	Adhoc Rel At 15% 22(PS17)	1,500.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
2004	R. Benefits & Death Comp:	-300.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till Jul-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 27,267.00 Deductions: (Rs.): -1,670.00 Net Pay: (Rs.): 25,597.00

Payee Name: HAROON RASHEED
 Account Number: 000272694286
 Bank Details: UNITED BANK LIMITED, 2100-3 PESHAWAR CITY PESHAWAR CITY, Peshawar

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
 City: PESHAWAR Domicile: - Housing Status: No Official
 Temp. Address:
 City: P Email: haroonrasheed10021993@gmail.com

Seniority List Of Class IV Employees Working Under DHO Peshawar

(10)

Annex - "B"

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid ✓	Matric
	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar ✓	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly ✓	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly ✓	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar ✓	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid ✓	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly ✓	FA
8	Fazal Rabi	Jahar Gul	17301-9586454-7	11/8/2006	Ward Orderly ✓	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly ✓	BA, Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly ✓	Mphil Microbiology+DIT
11	Sohail Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol ✓	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly ✓	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar ✓	FA
14	Munir Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Naib Qasid ✓	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid ✓	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti ✓	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti ✓	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti ✓	FA
19	Torgat Auzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar ✓	FA
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendent ✓	MA+ Health Diploma
21	Abdul Shahab	Abdul Jabbar	17301-7776929-5	27/12/2012	Behishti ✓	MSC Economics
22	Muhammad Imran	Qaleem Ullah	17301-3090264-1	29/12/2012	Chowkidar ✓	MA
23	Asif Naveed	Naveed Ahmad	17301-5904442-3	31/12/2012	X-ray Attendent ✓	FA
24	Muhammad Altaf	Subhan Ullah	17301-5887445-5	29-04-2013	Behishti ✓	DAE
25	Shahid Islam	Faqir Gul	17301-3550466-9	4/2/2014	Ward Orderly ✓	FSC+ Surgical Diploma
26	Asfandyar Khan	Musharaf Khan	17301-6996238-7	4/2/2014	Ward Orderly ✓	BA
27	Shams Ul Athhar	Shams Ul Qamar	17301-8058948-7	27-03-2015	Behishti ✓	SSC
28	Zia-ul-Islam	Muhammad Qayum	17301-5067106-3	30/03/2015	Ward Orderly ✓	MA+ Health Diploma
29	Salman Misbah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti ✓	BA
30	Shahid Islam	Faqir Gul		16-1-2016	Ward Orderly ✓	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-8449980-3	3/8/2016	Ward Orderly ✓	FSC
32	Murshid Ali	Gohar Khan	17301-4164590-9	3/8/2016	Naib Qasid ✓	BSc

BHU Terai |

Sawdar Ali s/o
Mir Aslam

Said Ullah s/o
Subhan Zada

District Health Officer
Peshawar

	adeem Khan	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
34	Fareed Ullah	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
35	Umair Khan	Pervaiz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
36	Sabir Shah	Zaiban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matric+ Health Diploma
37	Waqar Younis	Shafaras Khan	17301-9197840-5	19/01/2018	Ward Orderly	FSC
38	Syed Ghous Ali Shah	Syed Abid Shah	17301-1800560-9	19/01/2018	Ward Orderly	MA
39	Muhammad Arif	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	BSc
40	Muhammad Ihtisham	Dilshad Khan	17301-2621626-3	19/01/2018	Ward Orderly	M.COM
41	Zeeshan Ahmad	Fareed Khan	17301-5237207-1	20/02/2018	Ward Orderly	BA
42	Faisal Ahmad	Habib ur Rehman	17301-6599340-5	3/10/2018	Chowkidar	FA
43	Muhammad Saboor	Manzoor Khan	17301-9784416-5	3/10/2018	Chowkidar	FA+ Health Diploma
44	Farooq Haider	Khan Bahadur		3/10/2018	Ward Orderly	FA
45	Imran Khan	Izzat Khan	17101-1892366-1	30/10/2018	Chowkidar	FA+Electric Diploma
46	Rahim Shah	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	DAE+ DIT
47	Shehryar Khan	Faqir hussain	17301-2332817-7	27/10/2020	Ward Orderly	MA+DIT Diploma
48	Behan Ullah	Ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	FA
49	Amir Khan	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FSc
50	Muhammad Nouman	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	BA
51	Muhammad Arif	Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
52	Mueen Qasmi	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	MBA
53	Imran Khan	Abdul Sattar	17301-6952992-5	27/10/2020	Chowkidar	Matric
54	Shahid Ahmad	Habib ur Rehman	17301-6701436-9	27/10/2020	Ward Orderly	FA
55	Haroon Ur Rashid	Muhammad Dawood	17301-8767271-3	27/10/2020	Chowkidar	BA
56	Aqib Zahoor	Zahoor Ud Din	17301-5569170-9	27-10-2020	Chowkidar	Matric
57	Tahir Hafeez	Abdul Hafeez	17301-5242528-1	27-10-2020	Ward Orderly	B.COM
58	Hamza Shah	Jalal Shah	17301-6527188-7	27-10-2020	Ward Orderly	FA
59	Muhammad Tayyab	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FSc+Health Diploma
60	Shehryar Hussain	Nighah hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
61	Momin Khan	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
62	Imran Shah	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
63	Anwar ul Haq	Zia Ul Haq	17301-5541278-7	2/3/2021	Behishti	FA
64	Saiman Khan	Dilawar Khan	17301-3443294-5		Ward Orderly	Matric (Died)

11

District Health Officer
Peshawar

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

S.No. PB

895686

12



Annex - "C"

Roll No: 54150

Group: Arts

PESHAWAR



DETAILED MARKS CERTIFICATE Secondary School Certificate Examination Annual 2009 (9th Class)

Haroon Ur Rasheed Son/Daughter of Muhammad Daud
of NEW MODEL PUBLIC SCHOOL BAKHSI PUL PESHAWAR CITY

appeared as Regular Student

Subjects	Marks	MARKS OBTAINED			
		Theory Paper A	Practical Paper B	Total	in Words
1. English	75	(17)	-	--	
2. Urdu	75	43	-	43	Forty-Three
3. Islamiyat (Comp)	75	40	-	40	Forty Only
4. Maths	75	26	-	26	Twenty-Six
5. General Science	75	53	-	53	Fifty-Three
6. Civics	75	36	-	36	Thirty-Six
7. Islamic Studies	75	52	-	52	Fifty-Two
Total		525			
		Remarks		E-I,	

Date of Birth: 10-02-93

Checked by: [Signature]

Issue Date: 16-06-2009

[Signature]
Controller of Examinations

Note: Error(s)/Omission(s) Excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this DMC.

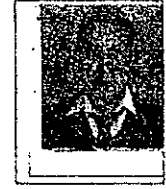
BOARD OF INTERMEDIATE & SECONDARY EDUCATION

S.No. PB 1936717

(13)



Roll No 147454
Group ARTS



PESHAWAR

**PROVISIONAL AND DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION ANNUAL-2010**

Haroon Ur Rasheed Son/Daughter of Muhammad Daud
of NEW MODEL PUBLIC SCHOOL BAKHSI PUL PESHAWAR CITY
has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of March 2010 as Regular Student

Subjects	Marks	MARKS OBTAINED				Total	In Words
		9Th		10Th			
		Theory Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	57	-	50	-	107	One Hundred Seven
2. Urdu	150	43	-	41	-	84	Eighty-Four
3. Islamiyat (Comp)	75	40	-	-	-	40	Forty Only
4. Pakistan Studies	75	-	-	44	-	44	Forty-Four
5. Maths	150	26	-	52	-	78	Seventy-Eight
6. General Science	150	53	-	44	-	97	Ninety-Seven
7. Civics	150	36	-	44	-	80	Eighty Only
8. Islamic Studies	150	52	-	46	-	98	Ninety-Eight

Total 1050

628-C	Six Hundred Twenty-Eight Only
-------	-------------------------------

Remarks IS: CIV: _____

Date of Birth: 10th February, 1993

Checked by: _____

Issue Date: 16-06-2010

Controller of Examinations

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

14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



PESHAWAR

Roll No: 30248



DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2011 HUMANITIES (Part-I)

Haroon Ur Rasheed Son / Daughter of Muhammad Daud

of The City College Of Arts & Science Shahi Bagh Road Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of April 2011 as a Regular Student

Subjects	Marks	Marks Obtained			
		Theory Paper-A	Practical Paper-B	Total	Marks in Words
English	100	61	-	61	Sixty-One
Urdu	100	67	-	67	Sixty-Seven
Islamic Education	50	35	-	35	Thirty-Five
Economics	100	90	-	90	Ninety Only
Civics	100	66	-	66	Sixty-Six
Computer Science	100	63	25	88	Eighty-Eight
Total :		550		487	Four Hundred Seven Only
Remarks :					

Checked By : _____

Date of issue : 21-07-2011

Controller of Examinations

Note: Error(s)/Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this DMC.

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

S. NO. P.B.

2822896

15



Roll No: 78167

PESHAWAR

02 BATCH NO.



PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2012 HUMANITIES (Part-II)

Haroon Ur Rasheed Son / Daughter of Muhammad Daud

of The City College Of Arts & Science Shahi Bagh Road Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of April 2012 as Regular Student

Subjects	Marks	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	61	--	51	--	112	One Hundred Twelve
Urdu	200	67	--	70	--	137	One Hundred Thirty-Seven
Islamic Education	50	35	--	--	--	35	Thirty-Five
Pakistan Studies	50	--	--	22	--	22	Twenty-Two
Economics	200	90	--	54	--	144	One Hundred Forty-Four
Civics	200	66	--	58	--	124	One Hundred Twenty-Four
Computer Science	200	63	25	57	24	169	One Hundred Sixty-Nine
Total : 1100						743-B	Seven Hundred Forty-Three Only
Remarks :							

Reg: No 0064-B/CCASP-2010

Checked By : _____

Date of issue: 25-07-2012

Controller of Examinations

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

Adm. No. _____

The City College of Arts, Science & Commerce



Peshawar City

Character Certificate

This is to certify that Mr. Muhammad Us Rashid
Muhammad Dawud was a bonafide student of this college.
He remained on roll of this college w.e.f. 2016 to 2017

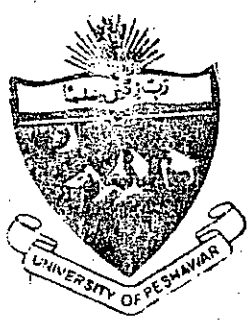
His character and conduct during his stay in this college was good.

I wish him every success in his future life.

(Signature)
Accountant

PRINCIPAL
The City College Shalibagh
Peshawar
Principal
The City College of
Arts, Science & Commerce
Peshawar City.

17



University of Peshawar

Pakistan

Detailed Marks Certificate

Bachelor of Arts.

Part-I

Annual Examination 2014

Govt: College, Peshawar City



Regular

Name: HAROON UR RASHEED

Gender: Male

Roll No: 28382

Father's Name: MUHAMMAD DAUD

Registration No: 2012-GP-8078

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English(Compulsory)	75	31	Thirty One
Political Science	75	35	Thirty Five
Islamic Studies	75	37	Thirty Seven
Islamiyat (Compulsory)	60	40	Forty Only
	285	143	One Hundred and Forty Three

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken In Parts

Examination held From 28-May-2014 to 28-Jun-2014

Result Declared on Monday, September 15, 2014

Issue Date: 17-Sep-2014

4:19 pm

Computerized by RTC

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

18



University of Peshawar

Pakistan

Detailed Marks Certificate

Bachelor of Arts.

Part-II

Annual Examination 2014

Govt: College, Peshawar City



Regular

Name: HAROON UR RASHEED

Gender: Male

Roll No: 52075

Father's Name: MUHAMMAD DAUD

Registration No: 2012-GP-8078

Division: 2nc

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	34	Thirty Four
Political Science	75	32	Thirty Two
Islamic Studies	75	42	Forty Two
Pakistan Studies	40	20	Twenty Only
Part-I 28382:Annual-2014	285	143	One Hundred and Forty Three
Part-II	550	271	Two Hundred and Seventy One

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 28-May-2014 to 28-Jun-2014

Result Declared on Monday, September 15, 2014

Issue Date: 17-Sep-2014

4:27 pm

Computerized by RTC

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Dairy No. 9721
Date. 17-06-2022
Health Department

To

The Secretary Health Government of Khyber Pakhtunkhwa,
Health Department,
Peshawar.

Subject: APPEAL/REQUEST FOR PROMOTION OF CLASS-IV STAFF
WORKING UNDER DHO PESHAWAR

Sir,

With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion since 1988 till date. 1st there was two cadres in the health directorate against which different meetings was scheduled and now it was decided to-merge these cadres into one cadre. But the order is still awaited.

Furthermore, most of our Class-IV staff are well qualified having diploma holders and Master in different subjects. Despite of well deserving and qualified Class-IV staff no promotion was made so far due to the reason that we are sub cadre. The Class-IV staff working in Directorate General Health Services, Khyber Pakhtunkhwa were time and again promoted to the ministerial positions we were ignored.

It is pertinent to mention here that, the seniority of Class-IV staff have already been prepared at DHO Peshawar against which promotion can be possible.

Therefore, it is humbly requested that, we the Class-IV staff may kindly be promoted and promotion quota may kindly be specified since 1988, so as to get the benefit and the two cadres may kindly be merged.

I would be obliged, please.

Dated: 17-05-2022.

Your Sincerely,

All qualified Class-IV staff

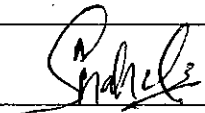

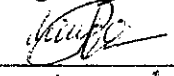
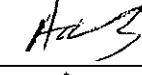
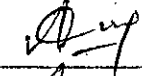
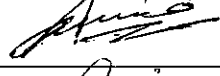
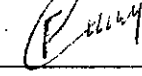
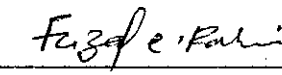
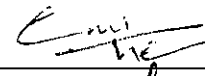
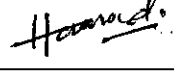
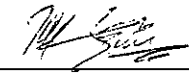
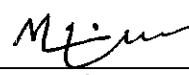




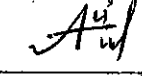
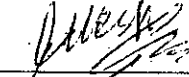


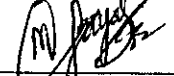
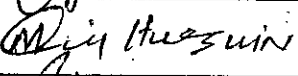

- SSII (B&D)
- AS - (DEV)
- AS - MTE
- CH - HSRU
- CPO
- DS - (R&D)
- DS - (Engg)
- SO - B-I
- SO - B-II

Handwritten signatures and initials:
 - Top left: A large signature, possibly "A. H. Khan".
 - Middle left: "So IV" written vertically.
 - Middle: "Amir", "Qasim", "Zaid", "Mansoor", "Fahad", "Shahab", "Nurwan".
 - Right side: "T-Arwal", "Abdul", "Shahab", "Nurwan".
 - Bottom right: "P.T.O." written vertically.

Adhikari Arif Arif Tahir
Fazal e Raza Muhammad Muhammad Muhammad
Nawaz Fahim Muhammad Muhammad
Sahibzada I Muhammad Muhammad
Hamid

19(A)

Names, Scales and Signatures of Candidates

<u>Sr No.</u>	<u>Name of Candidate</u>	<u>Scale</u>	<u>Signature</u>
1.	Abdul Shahab	BPS-01	
2.	Ahmad Jan	BPS-01	
3.	Amir Khan	BPS-04	
4.	Aqib Zahoor	BPS-03	
5.	Asfandyar Khan	BPS-02	
6.	Asif Naveed	BPS-02	
7.	Fareedullah Safi	BPS-03	
8.	Fazal-e-Rabi	BPS-02	
9.	Ghulam Mujtaba	BPS-02	
10.	Hamad	BPS-02	
11.	<u>Haroon-ur-Rasheed</u>	BPS-03	
12.	Imran Khan	BPS-03	
13.	Izzat Ullah	BPS-01	
14.	Jahanullah Khan	BPS-01	
15.	Mueen Qasmi	BPS-04	
16.	Muhammad Altaf	BPS-03	
17.	Muhammad Arif	BPS-04	
18.	Muhammad Ihtisham	BPS-04	
19.	Muhammad Nouman	BPS-04	
20.	Muhammad Sulaiman	BPS-03	
21.	Muhammad Tayyab	BPS-04	
22.	Muneer Hussain	BPS-01	
23.	Nadeem Khan	BPS-03	


ATTESTED

19(B)

24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir Khan
27.	Sardar Ali	BPS-01	Sardar Ali
28.	Shahid Ahmad	BPS-04	Shahid
29.	Shahid Islam	BPS-02	Shahid Islam
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Shehryar
32.	Sohail Ashiq	BPS-01	Sohail
33.	Muhammad Suliman	BPS-04	Muhammad Suliman
34.	Syed Zaffar Ali	BPS-04	Syed Zaffar
35.	Tahir Hafeez	BPS-04	Tahir
36.	Tahir Shah	BPS-01	Tahir
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair
39.	Waqas Ahmad	BPS-02	Waqas
40.	Waqas Ghulam	BPS-01	Waqas
41.	Zeeshan Ahmad	BPS-04	Zeeshan
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

A
ATTENDED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

20

Annex - "E"

No. 776-856 Promotion Cell Dated Peshawar the 18/08/2022

To

1. All District Health Officers in Khyber Pakhtunkhwa
2. All Medical Superintendents of Hospitals in Khyber Pakhtunkhwa.

Subject: APPEAL / REQUEST FOR PROMOTION OF CLASS-IV STAFF

Memo:


Reference to the subject noted above, please furnish the detail of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33 % quota on the following format:-

Proforma for Junior Clerks from Class-IV on 33% Quota.

S No.	Name / Father Name	Date of Entry into Govt: Service.	Qualification	Date of Promotion to J/C in 33% Quota.
01.				
02.				

Proforma for Junior Clerks initially recruited.

S No.	Name / Father Name	Date of Entry into Govt: Service.	Qualification	Date of Initial Recruitment as Junior Clerk.
01.				
02.				


Additional Director General (HR)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar



Annex - "F"

21

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
PHONE NO. 091-9225387

No. 14703 /DHIO dated Pesh: #/09/2022

To,

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: APPEAL/REQUEST FOR PROMOTION OF CLASS-IV STAFF

Sir,

Reference your letter No. 11776-856/Promotion Cell dated: 18.08.2022.

The requisite information is hereby submitted as mentioned below:

Proforma for Junior Clerks from Class-IV on 33% Quota.

S.No	Name/Father Name	Date of Entry into Govt: Service	Qualification	Date of Promotion to J/C in 33% Quota
	Nil	Nil	Nil	Nil

Proforma for Junior Clerks initially recruited.

S.No	Name/Father Name	Date of Entry into Govt: Service	Qualification	Date of initial Recruitment as Junior Clerk.
	Nil	Nil.	Nil	Nil

District Health Officer
Peshawar

HT/111/18X-4
SOFT REMINDER

The Secretary Health Government of Khyber Pakhtunkhwa,
Health Department,
Peshawar.

1755
17/10/2022
HEALTH DEPARTMENT

22

Subject: APPEAL/REQUEST FOR PROMOTIONS OF CLASS-IV STAFF WORKING UNDER DHO PESHAWAR

Sir,

With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion since 1988 till date. 1st there was two cadres in health Directorate against which different meetings was scheduled and now it was decided to merge these cadres into one cadre. But the order is still awaited.

Furthermore, most of our Class-IV staff are well qualified having Diploma holders and Master in different subjects. Despite of well deserving and qualified Class-IV staff no Promotion was made so far due to the reason that we are sub cadre. The Class-IV staff working in Directorate General Health Services Khyber Pakhtunkhwa were timely promoted to Ministerial Positions but we were ignored.

It is pertinent to mentioned that the seniority list of Class-IV Staff have already been prepared at DHO Peshawar against which promotions can be possible.




Therefore, it is humbly requested that, we the Class-IV staff may kindly be promoted and promotion quota may kindly be specified since 1988, so as to get the benefits and the two cadre may kindly be merged.

We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

*Chahida
Mujib*
[Signature]

50	129835			
Barrister M. Hassaan Adil ایڈووکیٹ		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		بعدالت جناب: Service Tribunal Peshawar		
03038373453 رابطہ نمبر:				

Appellant مخائب:	Sr. Appeal دعویٰ:
یارون سرسید بنام گورنمنٹ آف پی سی وکٹریہ	— علت نمبر:
	— موردہ:
	— جرم:
	— تھانہ:

باعث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام پشاور کیلئے بیسٹرن مجنہ حسان محکامل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 26-11-2025
مقام پشاور

مقام پشاور کے لیے منظور ہے۔

یارون سرسید و محمد داؤد کنگہ خزانہ ڈاکٹی نہ پشاور