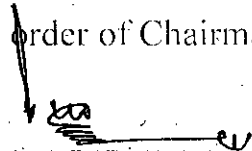


FORM OF ORDER SHEET

Court of _____

Case No. - 1827/2022

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. Fazal-e-Rabbi 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. Fazale Rabbilison of Sahar Gul received today i.e. on 02.12.2022 is incomplete on the following score, which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 3500 /S.T.

Dt. 05-12/2022

Muhammad Hassan Adil Adv.
High Court Peshawar.

(*) All the objections have been removed. *(Abusouf)*

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1827/2022

Fazal-e-Rabbi

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'	12-13
7.	Departmental Representation dated 17-06-2022	'D'	14
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	15
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Fazal-e-Rabbi
APPELLANT

Through

M. Hassan
BARRISTER
MUHAMMAD HASSAN ADIL

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____ /2022

Fazal-e-Rabbi

Son of Sahar Gul
Resident of Flat No. 840, Mohalla Kochi Khan, Sard Chah Gate
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 11.08.2006 (**Annex "A"**) in prescribed manner as Ward Orderly (BPS-02) in the respondent no. 04's department. The appellant has rendered services for more than sixteen 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;

GROUNDS:

- 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 2008 is required to be placed senior to the fresh candidates appointed or promoted after 2008 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.

Fazal-e-Rabi
APPELLANT

Through

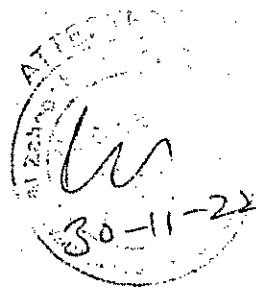
Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Fazal-e-Rabbi** Son of **Sahar Gul**, Resident of **Flat No. 840, Mohalla Kochi Khan, Sard Chah Gate, 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.



Fazal-e-Rabi
DEPONENT

5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Fazal-e-Rabbi

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.

6

Fazal-e-Rabbi
APPELLANT

Through

Muhammad

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Fazal-e-Rabbi** Son of **Sahar Gul**, Resident of Flat No. 840, Mohalla Kochi Khan, Sard Chah Gate, 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.

Fazal-e-Rabbi
DEPONENT

30-11-22

7



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN
Fazal E Rabbi



Father Name
Sahar Gul

فصل ربی



Gender | Country of Stay
M | Pakistan

Identity Number
17301-9516-1143

Date of Birth
06.01.1980


Date of Issue
01.07.2017

Date of Expiry
01.07.2027

Holder's Signature

کشفہ کارڈ ملے پر قریبی لیبو بکس میں ڈال دیں

17301-9516-1143



18104124342
157-80-53182

Ministry of Information
Government of Pakistan



Annex - "A"

8

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH CITY DISTRICT PESHAWAR

OFFICE ORDER

Consequent upon the approval of the Departmental Selection Committee held on 07/08/2006 at 10.00 AM in the office of the undersigned, Mr. Fazal Rabi S/O Sahar Gul (Old age) Residence of H.No.9, Khyber Bazar Moh: Railway Road No.2 Peshawar city is hereby appointed under the Old age Govt: Servants Son's quota as Ward Orderly in BPS-02 (2200-75-4450) Plus usual allowances as admissible under the rules.

His appointment in the Health Department Govt: of NWFP, will be subject to the following terms and conditions:

1. His appointment will be subject to Medical fitness and verification of character.
2. He will be domiciled in NWFP Peshawar.
3. He will not be entitled to any TA/DA for Medical examination and joining first appointment.
4. He will be governed by such rules and orders as may be issued by the Govt: for the category of Govt: Servant to which he belongs.
5. He will be served any where in NWFP.
6. His appointment will be on purely temporarily basis and not be entitled to Pension or gratuity as laid down by the Govt: of NWFP E & AD Notification No. E&A (1-3) 2005 dated 10/8/2005.
7. If he wishes to resign from Govt: Service, he will have to submit resignation in writing one month in advance or deposite one month salary in the Govt: treasury. However he will continue to serve the Govt: till his resignation is accepted by the competent authority.

If the above terms and conditions are accepted to him, he should report to the office of the undersigned for further posting in any Health facility within 14 days of the receipt of this order.


Sd/xxxxxxx
Executive District Officer
Health District Peshawar

No. 2493-97 /EDOH/

Dated Peshawar the 11 / 08 /2006

A copy is forwarded to the:-

- i. PA to District Coordination Officer City District Govt: Peshawar.
 - ii. District Accounts Officer Peshawar.
 - iii. Official Concerned.
 - iv. Accounts Section of this office.
- For information and necessary action.


DR. MOSEM KHAN
Executive District Officer
Health District Peshawar

RRVAV/ACHPAR/FRIDI/DOC/DATA/ARIPAR/FOLDER/APPOINTMENT/ORDERS

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

9



Personal Information of Mr FAZAL RABBI d/w/s of SHAR GUL

Personnel Number: 00319849 CNIC: 1730195864547
 Date of Birth: 06.01.1980 Entry into Govt. Service: 11.08.2006

NTN:
 Length of Service: 16 Years 01 Months 021 Days

Employment Category: Active Temporary

Designation: WARD ORDERLI 81186488-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8863-District Support Manager PPHI 1522 2 NBP Haba PESHAWAR

Payroll Section: 009 GPF Section: 010 Cash Center:

GPF A/C No: 319849 GPF Interest applied GPF Balance: 63,209.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 05 Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	25,730.00	1004	House Rent Allow 45% KP21	3,610.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	352.00	2199	Adhoc Relief Allow @10%	243.00
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	2,589.00
2347	Adhoc Rel Al 15% 22(P517)	2,589.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-1,200.00
4004	R. Benefits & Death Comp:	-450.00	6173	CM Flood Relief Fund01-16	-2,248.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	160,000.00	-5,000.00	155,000.00

Deductions - Income Tax

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

Gross Pay (Rs.): 41,145.00 Deductions: (Rs.): -9,668.00 Net Pay: (Rs.): 31,477.00

Payee Name: FAZAL RABBI

Account Number: 2007684347

Bank Details: THE BANK OF KHYBER, 080015 SECRETARIAT BR. PESHAWAR, SECRETARIAT BR. PESHAWAR, Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESH

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: fazalrabi61980@gmail.com

System generated document in accordance with APPM 4.6.12.9(82882/27.09.2022A3.0)

* All amounts are in Pak Rupees

* Errors & omissions excepted (SERVICES/30.09.2022/15.53.49)

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
2	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	Sahar 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 |

Sardar Ali s/o
Mir Aslam

Sardar Ullah s/o
Sahibzada

District Health Officer
Peshawar

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

11

District Health Officer
Peshawar

Annex- "C"

12

GG. No. 137717

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)
Session 19 96 (Annual/Supplementary)

Name

Fazal Rabi

Father's Name

Sahar Gul

Roll No.

21872

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figures	In Words
1. English	150	56	/
2. Urdu	150	71	
3. Islamiyat Comp:	75	45	
4. Pakistan Studies	75	33	
5. Gen: Mathematics	100	52	
6. General Science	100	33	
7. Art	100	51	
8. Is	100	53	
Total	850	394-D	Three Ninety Four

This certificate is issued errors and omission excepted.

Prepared by my

Checked by _____

Date _____ 19 _____

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

S. No. PBR- 065283



Roll No. 21872

13

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION 1996 (ANNUAL)
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Fazal Rabbi

Son/Daughter of Sahar Gul

and a student of Govt. High School Dabgari Gate Peshawar City

has passed the Secondary School Certificate Examination

of the Board of Intermediate and Secondary Education, Peshawar held in April 1996

as a *Regular candidate*. He/She obtained 394 Marks out of 850

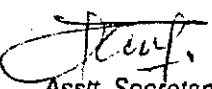
and has been placed in Grade Representing Fair

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|---------------------|-----------------|
| 1. English | 3. Islamiyat | 5. Gen: Science | 7. Isl: Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Mathematics | 8. Art |

He/She has been awarded Grade on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Sixth January,
one thousand nine hundred and Eighty Only (06-01-1980)

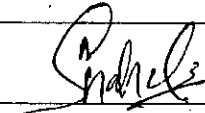

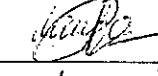
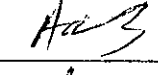
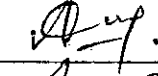
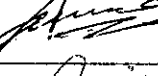
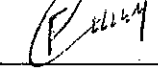
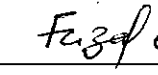
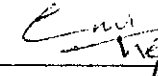
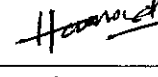
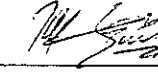
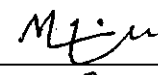
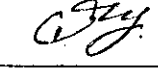

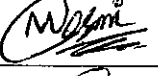
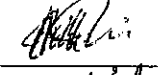
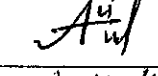


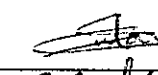
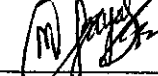
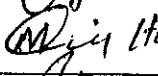


Asstt. Secretary
28th July, 1996

This certificate is issued without alteration or erasure.


Secretary

Kadir ~~Adnan~~ Mulya Tahir*
 Jernam ~~Adnan~~ ~~Adnan~~ ~~Adnan~~
 Fuzul e Ratu ~~Adnan~~ ~~Adnan~~ ~~Adnan~~
 Nuzul ~~Adnan~~ ~~Adnan~~ ~~Adnan~~
 Saiful ~~Adnan~~ ~~Adnan~~ ~~Adnan~~
 Hamid ~~Adnan~~ ~~Adnan~~ ~~Adnan~~

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.	<u>Fazal-e-Rabi</u>	BPS-02	
9.	Ghulam Mujtaba	BPS-02	
10.	Hamad	BPS-02	
11.	Haroon-ur-Rasheed	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

24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir
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)
ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

15

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

Annex - E

No. 1776-856 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 - 4 F

16

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
PHONE NO. 091-9225987

No. 14703 /DHO dated Pesh: 01/09/2022

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

SOFT REMINDER

Annex - 6

1755

17/10/2022

17

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

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. 1" 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

Handwritten signature
Handwritten signature

50	129840			
Barrister M. Hassan <i>Holli</i>				
بارکوس ایسوسی ایشن نمبر: PC-116028				
رابطہ نمبر: 03038373453		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

Service Tribunal Peshawar

بعدالت جناب:

Appellant	متجانب:	Sr. Appeal	دعوی:
	مفضل بلین بنام گورنمنٹ آف پشاور	-	غلت نمبر:
		-	موزہ:
		-	جرم:
		-	تھانہ:

بابت تحریر آگے

فیصل ری 19 ستمبر 2019

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

آن مقام پشاور کے لیے ایئر سٹریٹجی حد حسن و احسن کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے اور تفرز ثالث و فیصلہ بر حلقہ 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 لانا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر دستخط منظور و قبول ہوگا دوران مقدمہ میں جو چیز ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ کسی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں بلکہ اس وقت نامہ لکھ دیا تاکہ سند رہے

M. Hassan

26-11-20

المرقوم:

مقام پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونڈنگ کا نام قابل قبول ہوگی۔