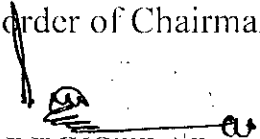


# FORM OF ORDER SHEET

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

Case No. - 1828/2022

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. Muneer Hussain 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. Muneer Hussain son of Faqeer Hussain 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 appeal.
- 2- Copy of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.

No. 3476 /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.



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

Service Appeal No. 1828 /2022

**Muneer Hussain**

**VS**

**Government of KP and Others**

-----  
**INDEX**  
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<b>Sr. No</b>	<b>Description of Documents</b>	<b>Annexures</b>	<b>Pages</b>
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2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
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8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	16
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*Muneer Hussain*  
APPELLANT

Through

*Hassan*  
BARRISTER  
MUHAMMAD HASSAN ADIL

1

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

Service Appeal No. \_\_\_\_\_/2022

**Muneer Hussain**

Son of Faqeer Hussain  
Resident of House No. 2856, Mohalla Garhi Saidan,  
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 23.02.2010 (**Annex "A"**) in prescribed manner as Naib Qasid (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than twelve 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 2011 is required to be placed senior to the fresh candidates appointed or promoted after 2011 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.

(4)

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.

*Munee Hussain*  
APPELLANT

Through

*Muhammad Hassaan Adil*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Munee Hussain**, Son of **Faqeer Hussain**, Resident of **House No. 2856, Mohalla Garhi Saidan, 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.



*Munee Hussain*  
DEPONENT

5

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

Service Appeal No. \_\_\_\_\_/2022

**Muncer Hussain**

**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

*Muneeb Hussain*  
APPELLANT

Through

*M Hassan Adil*

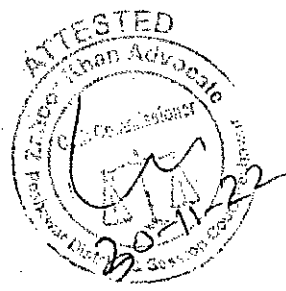
**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Muneeb Hussain**, Son of **Faqeer Hussain**, Resident of House No. 2856, Mohalla Garhi Saidan, 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.

*Muneeb Hussain*  
**DEPONENT**





محمد حسین

دستخط مال کارڈ

حکومت پاکستان  
قومی شناختی کارڈ  
17301-1311673-1



نام: منیر حسین  
جنس: مرد  
والد کا نام: فقیر حسین  
شناختی حالت: کوئی نہیں  
تاریخ پیدائش: 1979

عثمان یوسف مبین  
سنٹرل رجسٹریشن



شناختی نمبر: 17301-1311673-1  
ٹائٹل نمبر: T4P1QQ  
موجودہ پتہ: مکان نمبر 2858، گڑھی سیدان، پشاور

مسکون پتہ: مکان نمبر 2858، گڑھی سیدان، ڈاکخانہ کھنڈ، پشاور

تاریخ اجراء: 15/11/2019  
تاریخ منسوخ: 15/11/2029  
گمشدہ کارڈ سے برائے کسی کپیٹل میں ڈال دیں

13679487079  
شناختی نمبر



8

Annex - "A"

**OFFICE ORDER**

Consequent upon the approval of the Departmental Selection Committee held on 13/1/2010 at 10.00 AM in the office of the undersigned, Mr. Munir Hussain S/O Faqir Hussain Moh: Ghari Saidan Hashtnagri Peshawar is hereby appointed under the retired Govt: Servants Son's quota as Naib Qasid in BPS-01 (2970-90-5670) Plus usual allowances as admissible under the rules.

His appointment in the District Health Department Peshawar 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 can be dispensed with during the probation period, if his work and conduct found satisfactory.
3. His appointment will be subject to medical fitness.
4. He will not entitle to any TA/DA for medical examination and joining his first appointment.
5. He will be governed by such rules and orders as may be issued by the government for the category of government servants to which he belongs.
6. As laid down vide 3 government of NWFP E & AD notification No. E&A (1-13)2005 dated 10/8/2005, he will not be entitle to pension or gratuity. However in lieu thereof, he will entitle to receive such amount contributed by his towards the contributory provident fund along with the contributions made by the government to his account in the said fund.
7. If he wishes to resign from service, he will have to submit resignation in writing one month in advance OR deposit one month's pay in the government treasury. However he will continue to serve the government till his resignation accepted by the competent authority.

If the above terms and conditions are acceptable to him, he should report to the Executive District Officer Health Peshawar within 14 days of the receipt of this order.

Sd/xxxxxxx  
Executive District Officer  
Health District Peshawar

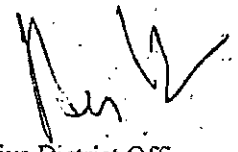
No. 1474-78 /EDOH/Munir

Dated Peshawar the 23/2 /2010

A copy is forwarded to the:-

1. PS to Minister for Health NWFP Peshawar
2. PA to District Coordination Officer District Peshawar.
3. District Accounts Officer Peshawar.
4. Official Concerned.
5. Accounts Section

For information and n/action.

  
Executive District Officer  
Health District Peshawar

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

(9)



**Personal Information of Mr MUNIR HUSSAIN d/w/s of FAQIR HUSSAIN**

Personnel Number: 00500764 CNIC: 1730113116731

Date of Birth: 01.07.1979 Entry into Govt. Service: 03.03.2010

NTN:

Length of Service: 12 Years 06 Months 029 Days

**Employment Category: Active Temporary**

Designation: NAIB QASID

81186480-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8859-DISTRICT HEALTH OFFICER PESHAWAR

Payroll Section: 009

GPF Section: 004

Cash Center:

GPF A/C No: 500764

GPF Interest applied

**GPF Balance:**

85,369.00 (provisional)

Vendor Number: -

**Pay and Allowances:**

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 03

Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	21,220.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	277.00	2199	Adhoc Relief Allow @10%	202.00
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	2,143.00
2347	Adhoc Rel AI 15% 22(PS17)	2,143.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
4004	R. Benefits & Death Comp:	-300.00	6173	CM Flood Relief Fund01-16.	-2,157.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	50,000.00	-1,389.00	31,332.00

**Deductions - Income Tax**

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

**Gross Pay (Rs.): 35,412.00 Deductions: (Rs.): -5,216.00 Net Pay: (Rs.): 30,196.00**

Payee Name: MUNIR HUSSAIN

Account Number: 3096736258

Bank Details: NATIONAL BANK OF PAKISTAN, 231588 ASHRAF ROAD PESH ASHRAF ROAD PESH,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: P

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: munirdho@gmail.com

System generated document in accordance with APPM 4.6.12.9(82882/27.09.2022/v3.0)

\* All amounts are in Pak Rupees

\* Errors & omissions excepted (SERVICES/30.09.2022/16:51:39)

## Seniority List Of Class IV Employees Working Under DHO Peshawar

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	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 Attendant	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 Attendant	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

(10)

Annex - "B"

BHU Terai |

Sardar Ali s/o  
Mir Aslam

Saad Ullah s/o  
Sahib Qadar

District Health Officer  
Peshawar

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

11

District Health Officer  
Peshawar

GG. No. 176663

Annex - "C"

12

**Board of Intermediate & Secondary Education  
PESHAWAR**

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

Name Munir HassanFather's Name Fayiz Hassan Roll No. 6872

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figures	In Words
1. English	150	61	
2. Urdu	150	54	
3. Islamiyat Comp.	75	48	
4. Pakistan Studies	75	36	
5. Gen: Mathematics	100	53	
6. General Science	100	38	
7. <i>15</i>	100	43	
8. <i>100</i>	100	33	<i>three hundred and</i>
<b>Total</b>	<b>850</b>	<b>371</b>	<b>D Sameer</b>

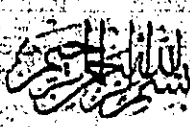
This certificate is issued errors and omission excepted.

Prepared by [Signature]Checked by [Signature]Date 20/11/19

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

13

S. No. PBP- 916626



Roll No. 6872

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**  
SESSION 1998 (SUPPLEMENTARY)  
(HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Munir Hussain  
Son/Daughter of Faqir Hussain  
and a resident of Peshawar District  
has passed the Secondary School Certificate Examination  
of the Board of Intermediate and Secondary Education, Peshawar held in October 1998  
as a *Private candidate*. He/She obtained 371 Marks out of 850  
and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects.

- |            |                |                 |                 |
|------------|----------------|-----------------|-----------------|
| 1. English | 9. Islamiyat   | 5. Gen. Science | 7. Isl. Studies |
| 2. Urdu    | 3. Mathematics | 6. Mathematics  | 8. Pashto       |

Asst. Secy  
24th Decem

Secretary

Sixth January  
Ninth (06-1-1979)



S-A

84117

Roll No. 6872

14

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**

**Peshawar N.W.F.P. Pakistan**  
**PROVISIONAL CERTIFICATE**  
**SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
 Session 19 76 Annual/Supplementary



THIS IS TO CERTIFY THAT Munir Hussain  
 Son/Daughter of Faqir Hussain  
 and a candidate of Pagla District  
 has passed the Secondary School Certificate Examination of the  
 Board of Intermediate and Secondary Education, Peshawar held in oct 19 76  
 as a Regular/Private candidate. He/She obtained 371 Marks out of 850 and has  
 been placed in Grade( D ) Representing Fair

The Candidate passed in the following subjects.

- |               |              |              |                     |
|---------------|--------------|--------------|---------------------|
| 1. English    | 2. Urdu      | 3. Islamiyat | 4. Pakistan Studies |
| 5. <u>gym</u> | 6. <u>LS</u> | 7. <u>35</u> | 8. <u>Pshto</u>     |

Internal assessment Grade by the institution concerned is ( )

Date of birth according to admission form is 16th January  
 One thousand nine hundred and seventy nine (06-1-1979)  
 Prepared by \_\_\_\_\_  
 Checked by \_\_\_\_\_  
 Date of Preparation 7/1/77

A. Secretary (Certificate)  
 B. Asstt. Secretary (Certificates)-II  
 C. Deputy Education  
 Peshawar.

Dairy No. 9721  
Date. 17-05-2022

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. 1<sup>st</sup> 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

- SSIT (DAD)
- AS - (DEV)
- AS - (MTE)
- CH - (HRM)
- DPO
- DS - (RED)
- OS - (Eng)
- SO - (SI)
- SO - (BE)

*Handwritten signatures and initials:*

*Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir*

*Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir*

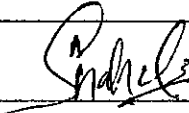


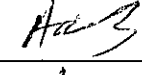
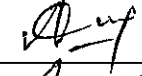
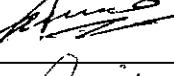
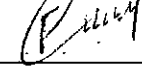
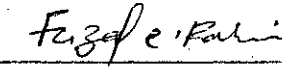
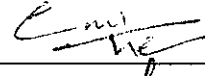
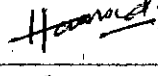
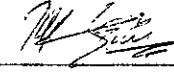
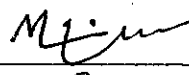
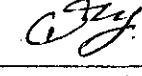
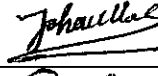
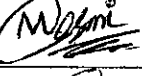
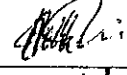
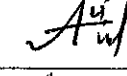
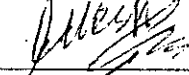
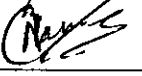
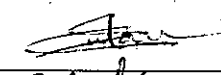
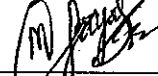
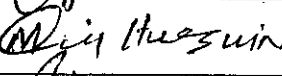

*Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir*

*Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir*

*Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir* *Amir*

Ali Ali Ali Tahir  
Jasman Ali Ali Ali  
Fizal & Pasi Ali Ali Ali  
Nasir Ali Ali Ali  
Said Ali Ali Ali  
Hamid Ali Ali Ali

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.	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	

①  
ATTESTED

15 (B)

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
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Shehryar
32.	Sohail Ashiq	BPS-01	Sohail
33.	Muhammad Suliman	BPS-04	Muhammad
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

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR.

16

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"

17

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

No. 14703 /DIHO dated Pesh: #J/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

To..

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

1755  
17/10/2022  
HEALTH DEPARTMENT

(18)

Annex - "G"

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<sup>st</sup> 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.

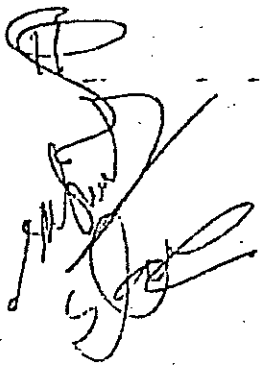
It is pertinent to mentioned that the seniority list of Class-IV Staff have already been prepared at DHO Peshawar against which promotions can be possible.

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  
Miyta*  




فیت = 50	129872			
Barrister M. Hassan Adil ایڈووکیٹ				
BC-116028 بار کونسل ایسوسی ایشن نمبر:				
0303-8373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

Service Tribunal, Peshawar

بعدالت جناب:

Appellant منجانب:	Dr. Appeal دعویٰ:
	—
علت نمبر:	—
موردہ:	—
جرم:	—
تھانہ:	—

بامث تحریر آگے

M. Hassan Adil

منجانب حسین گل و فقیر حسین گل کی طرف سے دعویٰ پشاور

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

آن مقام لٹیا حرمی کے لئے لٹیا محمد حسان محاسب 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 کر کے و تقرر ثالث و فیصلہ بر حلف دینے پر جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا نظر فرہ 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 کا اپنی مرضی سے ہر وقت اپنے منجانب سے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ اپنی داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو چیز چاہے 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 کالت نامہ لکھ دیا تاکہ سند رہے

Hassan

26-11-22

الرقوم:

مقام پشاور کے لیے منظور ہے۔