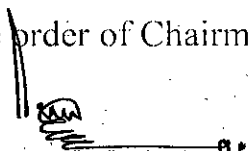


# FORM OF ORDER SHEET

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

Case No. - 1830/2022

| 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. Muhammad Tayyab resubmitted today by Mr. Muhammad Hassaan Adil Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellatant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p><br/>REGISTRAR</p> |


The appeal of Mr. Muhammad Tayyab son of Masood Ahmad 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. 3472 /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. 1830/2022

**Muhammad Tayyab**

**VS**

**Government of KP and Others**

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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            |
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| 7.            | Departmental Representation dated 17-06-2022         | 'D'              | 19           |
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Through

APPELLANT

*Hassan*

**BARRISTER**

**MUHAMMAD HASSAAN ADIL**

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

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

**Muhammad Tayyab**

Son of Masood Ahmad  
Resident of Hussain Chowk, Sethi Town, Haji Camp, Mohalla Khattak Street,  
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 Ward Attendant (BPS-04) 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;

**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 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.

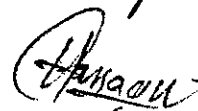
**PRAYER:**

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



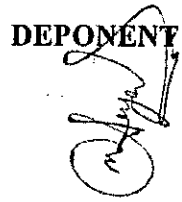
**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, Muhammad Tayyab Son of Masood Ahmad, Resident of Hussain Chowk, Sethi Town, Haji Camp, Mohalla Khattak Street, 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  


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

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

**Muhammad Tayyab**

**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.



*[Handwritten signature]* (6)  
APPELLANT

Through

*[Handwritten signature]*

**BARRISTER**

**MUHAMMAD HASSAAN ADIL**

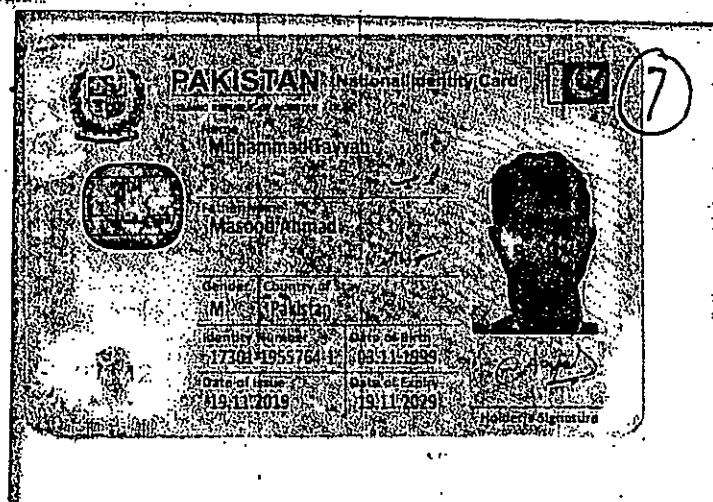
Advocate High Court

**AFFIDAVIT**

I, Muhammad Tayyab Son of Masood Ahmad, Resident of Hussain Chowk, Sethi Town, Haji Camp, Mohalla Khattak Street, 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.

*[Handwritten signature]*  
**DEPONENT**





(8)

Annex "A"



OFFICE OF THE DISTRICT HEALTH OFFICER,  
PESHAWAR.

Phone No.091 9225387  
Fax No. 091 9225467

**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. Muhammad Tayyab s/o Masood Ahmad (Mst. Sarwat Kauser MB) resident of Hussain Chowk City Town Haji Camp Mohallah Khattak Street, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Ward Attendant BPS -04 in Basic Pay Scale (9900-440-23100) 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 16969-67/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.

*Attested*  
*[Signature]*  
District Health Officer,  
Peshawar.  
12020  
INCHARGE  
RHO REG  
District Peshawar

9

| 00965375 HOODMAN TAYLOR |                       | CHICG 1730119557640 |  | DEPT: 041 |  | 002718197 |  | BUCKLE ROE |  | CREDITED/NOT CREDITED |  |
|-------------------------|-----------------------|---------------------|--|-----------|--|-----------|--|------------|--|-----------------------|--|
| 0001                    | MAINT FRY             | 15,350.00           |  |           |  |           |  |            |  |                       |  |
| 1004                    | HOUSE REAR ALLOW      | 8,878.00            |  |           |  |           |  |            |  |                       |  |
| 1210                    | OSAGE ALLOWANCE       | 1,735.00            |  |           |  |           |  |            |  |                       |  |
| 1508                    | INDUCT ALLOWANCE      | 1,509.00            |  |           |  |           |  |            |  |                       |  |
| 2011                    | DEER ALLOWANCE - 20   | 1,009.00            |  |           |  |           |  |            |  |                       |  |
| 2112                    | BURDING ALLOWANCE 20  | 1,009.00            |  |           |  |           |  |            |  |                       |  |
| 2312                    | TRUCKING ALLOWANCE    | 809.00              |  |           |  |           |  |            |  |                       |  |
| 2311                    | TRUCK. REAR ATT 154.2 | 1,551.00            |  |           |  |           |  |            |  |                       |  |
| 4004                    | R. BOWLES & DENTON C  | 500.00              |  |           |  |           |  |            |  |                       |  |
| 3001                    | GEN. EXPENSE          | 770.00              |  |           |  |           |  |            |  |                       |  |
| 3501                    | RECOGNIZ. FUND        | 600.00              |  |           |  |           |  |            |  |                       |  |
| 4004                    | R. BOWLES & DENTON C  | 500.00              |  |           |  |           |  |            |  |                       |  |
| 0000                    | TOTAL                 | 19,165.00           |  |           |  |           |  |            |  |                       |  |

10/24

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        | 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        | Aza 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

Saad Ullah s/o  
Salim Zada

District Health Officer  
Peshawar

|    |                     |                  |                  |            |              |                        |
|----|---------------------|------------------|------------------|------------|--------------|------------------------|
| 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       | 17101-1892366-1  | 30/10/2018 | Ward Orderly | FA                     |
| 46 | Rahim Shah          | Sardar Khan      | 17301-8692584-1  | 27/10/2020 | Chowkidar    | FA+Electric Diploma    |
| 47 | Shehryar Khan       | Faqir Hussain    | 17301-2332817-7  | 27/10/2020 | Ward Orderly | DAE+ DIT               |
| 48 | Jehan Ullah         | Ihsan Ullah      | 17301-1797449-1  | 27/10/2020 | Ward Orderly | MA+DIT Diploma         |
| 49 | Amir Khan           | Zaka Ullah       | 17301-0416153-5  | 27/10/2020 | Ward Orderly | FA                     |
| 50 | Muhammad Nouman     | Noor Muhammad    | 17301-3280446-5  | 27/10/2020 | Ward Orderly | FSc                    |
| 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 | BA                     |
| 53 | Imran Khan          | Abdul Sattar     | 17301-6952992-5  | 27/10/2020 | Ward Orderly | MBA                    |
| 54 | Shahid Ahmad        | Habib ur Rehman  | 17301-6701436-9  | 27/10/2020 | Chowkidar    | Matric                 |
| 55 | Haroon Ur Rashid    | Muhammad Dawood  | 17301-8767271-3  | 27/10/2020 | Ward Orderly | FA                     |
| 56 | Aqib Zahoor         | Zahoor Ud Din    | 17301-5569170-9  | 27-10-2020 | Chowkidar    | BA                     |
| 57 | Tahir Hafeez        | Abdul Hafeez     | 17301-5242528-1  | 27-10-2020 | Chowkidar    | Matric                 |
| 58 | Hamza Shah          | Jalal Shah       | 17301-6527188-7  | 27-10-2020 | Ward Orderly | B.COM                  |
| 59 | Muhammad Tayyab     | Masood Ahmad     | 17301-1955764-1  | 27-10-2020 | Ward Orderly | FA                     |
| 60 | Shehryar Hussain    | Nighah Hussain   | 17301-6255930-7  | 27-10-2020 | Ward Orderly | FSc+Health Diploma     |
| 61 | Momin Khan          | Johar Ali        | 17301-7058253-5  | 27-10-2020 | Ward Orderly | BSC Computer Science   |
| 62 | Imran Shah          | Sabir Shah       | 17301-3206617-7  | 8/12/2020  | Ward Orderly | SSC                    |
| 63 | Anwar ul Haq        | Zia Ul Haq       | 17301-5541278-7  | 2/3/2021   | Ward Orderly | FSC                    |
| 64 | Salman Khan         | Dilawar Khan     | 17301-3443294-5  |            | Behishti     | FA                     |
|    |                     |                  |                  |            | Ward Orderly | Matric (Died)          |
|    |                     |                  |                  |            |              |                        |
|    |                     |                  |                  |            |              |                        |
|    |                     |                  |                  |            |              |                        |
|    |                     |                  |                  |            |              |                        |

District Health Officer  
Peshawar

Annex "C"

(12)

S.No.PB 12557635

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No 145529  
Group SCIENCE

## PESHAWAR



### PROVISIONAL AND DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION ANNUAL 2016

Muhammad Tayyab Son/Daughter of Masood Ahmed  
of HUDAIBIA MODEL SCHOOL GUL BAHAR PESHAWAR  
has secured the marks shown against each subject, in the Secondary School Certificate Examination  
held in the month of March 2016 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   | 45             | --                | 60             | --                | 105   | One Hundred Five     |
| 2. Urdu             | 150   | 54             | --                | 54             | --                | 108   | One Hundred Eight    |
| 3. Islamiyat (Comp) | 100   | 41             | --                | 39             | --                | 80    | Eighty Only          |
| 4. Pakistan Studies | 100   | 35             | --                | 38             | --                | 73    | Seventy-Three        |
| 5. Maths            | 150   | 51             | --                | 64             | --                | 115   | One Hundred Fifteen  |
| 6. Physics          | 150   | 44             | 8                 | 54             | 7                 | 113   | One Hundred Thirteen |
| 7. Chemistry        | 150   | 48             | 8                 | 49             | 8                 | 113   | One Hundred Thirteen |
| 8. Biology          | 150   | 45             | 9                 | 49             | 8                 | 111   | One Hundred Eleven   |

Total 1100

818-A Eight Hundred Eighteen Only

Remarks

Date of Birth: 03rd November, 1999

Enrolment No: 010-B/HMGBP-2014

Checked by:

Issue Date: 21-06-2016

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

Approved  
In-charge  
Board of Examinations  
District Peshawar

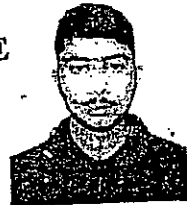
13

S.No. 12373697

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
PESHAWAR**



**KHYBER PAKHTUNKHWA (PAKISTAN)  
PROVISIONAL & DETAILED MARKS CERTIFICATE  
Higher Secondary School Certificate Examination**



Roll No: 89022

INTERMEDIATE (ANNUAL) EXAMINATION, 2018  
PRE-MEDICAL (Part-II)

Muhammad Tayyab Son / Daughter of Masood Ahmed  
of Peshawar Model Degree College Dalazak Road Peshawar  
has secured the marks shown against each subject in the HSSC Examination held in the month of  
April, 2018 as Regular Student

| Subjects            | Marks | Marks Obtained |       |         |       |     | Total                    | Marks in Words                 |
|---------------------|-------|----------------|-------|---------|-------|-----|--------------------------|--------------------------------|
|                     |       | Part-I         |       | Part-II |       |     |                          |                                |
|                     |       | Theory         | Pract | Theory  | Pract |     |                          |                                |
| English             | 200   | 56             | --    | 64      | --    | 120 | One Hundred Twenty Only  |                                |
| Urdu                | 200   | 74             | --    | 64      | --    | 138 | One Hundred Thirty-Eight |                                |
| Islamic Education   | 50    | 38             | --    | --      | --    | 38  | Thirty-Eight             |                                |
| Pakistan Studies    | 50    | --             | --    | 29      | --    | 29  | Twenty-Nine              |                                |
| Physics             | 200   | 44             | 14    | 59      | 12    | 129 | One Hundred Twenty-Nine  |                                |
| Chemistry           | 200   | 36             | 13    | 60      | 10    | 119 | One Hundred Nineteen     |                                |
| Biology             | 200   | 62             | 8     | 52      | 14    | 136 | One Hundred Thirty-Six   |                                |
| <b>Total : 1100</b> |       |                |       |         |       |     | <b>709-B</b>             | <b>Seven Hundred Nine Only</b> |

Remarks :

Reg: No 0011-B/PMDC-2016

Checked By : \_\_\_\_\_

Issue Date: 28-08-2018

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

*Attested*  
*28/08/18*  
**IN CHARGE**  
**RHC REGI**  
**District Peshawar**

Controller of Examinations



S. No. 016434

Faculty of Paramedical and Allied Health Sciences  
Khyber Pakhtunkhwa-Pakistan

Roll No. 88563  
Session 2016-2017

This is to certify that MUHAMMAD TAYYAB Son/ Daughter of MASOOD AHMED  
and a student of JINNAH INSTITUTE OF MEDICAL SCIENCES PESHAWAR bearing Registered. No. 2016/MF/JIMS/PEW/HT/FS/4  
having passed the prescribed examination held in AUGUST,2021 is this day admitted by the Faculty  
of Paramedical and Allied Health Sciences Khyber Pakhtunkhwa to the Diploma HEALTH

Technology in C Grade.

Checked By [Signature]

Verified By [Signature]

Result Declaration Date 09-Nov-2021 Print Date and Time 26-Jan-2022 11:00:39 AM

[Signature]  
Chief Executive Officer



(14)

Note:- Error(s) & omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this Diploma



# JINNAH Institute of Medical Sciences

Near Motorway Toll Plaza Peshawar

Regd. with Govt. of KPK Medical Faculty  
(Reg. No. 01MF)

## Course Completion Certificate

Ref No. 744/JIMS

Date. 18/09/2020

*This is to certify that*

Mr./Miss Muhammad Tayyab

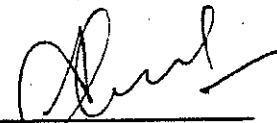
S/o, D/o Masood Ahmed

Academic Record No. 03 Session 2016-2018

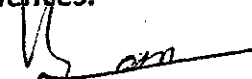
*has completed his training of*

Health Technology

course duration Two Years from *Jinnah Institute of Medical Sciences.*

  
Chairman, JIMS

**CHAIRMAN**  
Jinnah Institute  
of Medical Sciences  
Peshawar.

  
**PRINCIPAL**  
Jinnah Institute of  
Medical Sciences  
Near Motorway Toll Plaza Peshawar  
Principal, JIMS

(5)

16

**Govt Naseerullah Khan Babar Memorial Hospital Kohat Road Peshawar**

No. 3959 /GNBMH/ Training .File- 22

Dated 21 / 6 /2022

**TRAINING CERTIFICATE**

It is to certify that **Muhammad Tayyab S/o Masood Ahmed** student of Jinnah Institute of Medical Sciences, Peshawar (**Health Technology**) has completed his training in Govt. Naseerullah Khan Babar Memorial Hospital Kohat Road Peshawar for **03 Months** vide this office order No. 5920-22/GNKBMH 19/09/2020.

  
MEDICAL SUPERINTENDENT

S.No. 013867

Session AUGUST, 2021

17

Faculty of Paramedical and Allied Health Sciences



Khyber Pakhtunkhwa-Pakistan  
CERTIFICATE OF REGISTRATION

Registration No. 2016/MF/JIMS/PEW/HT/FS/4  
Name MUHAMMAD TAYYAB  
Father's Name MASOOD AHMED  
Roll Number 88563  
Diploma Serial No. 16434  
Name of Institute JINNAH INSTITUTE OF MEDICAL SCIENCES PESHAWAR  
Technology HEALTH  
Date 27-Jan-2022 Retained upto 26-Jan-2027

Prepared by: [Signature]

Checked by: [Signature]

Verified by: [Signature]

[Signature]

Chief Executive Officer

Note: Errors) & omissions) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate



# Faculty of Paramedical and Allied Health Sciences (FPMA) Khyber Pakhtunkhwa

## DETAILED MARKS CERTIFICATE

10526990



Registration No. 2016/MF/JIMS/PEWHT/FS/4

StudentName MUHAMMAD TAYYAB

Son/Daughter of MASOOD AHMED

Institute JINNAH INSTITUTE OF MEDICAL SCIENCES PESHAWAR

Course DIPLOMA NEW COURSE Technology HEALTH

| Subject Name  | Total Marks | Passing Marks | Theory | Viva | Total Obtained | Result |
|---|-------------|---------------|--------|------|----------------|--------|
| Semester: 1      Session: AUGUST 2021      Roll No: 24975 |             |               |        |      |                |        |
| Anatomy   | 100         | 50            | 38     | 12   | 50             | Pass   |
| Physiology  | 100         | 50            | 50     | 3    | 53             | Pass   |
| BioChemistry  | 100         | 50            | 45     | 5    | 50             | Pass   |
| Computer Skill  | 50          | 25            | 27     | 8    | 35             | Pass   |
| Sub-Total   | 350         |               |        |      | 188            |        |
| Semester: 2      Session: AUGUST 2021      Roll No: 41650 |             |               |        |      |                |        |
| Pathology   | 100         | 50            | 40     | 10   | 50             | Pass   |
| Pharmacology  | 100         | 50            | 37     | 13   | 50             | Pass   |
| English   | 100         | 50            | 62     | --   | 62             | Pass   |
| Islamiat  | 50          | 25            | 34     | --   | 34             | Pass   |
| Public Health   | 100         | 50            | 48     | 2    | 50             | Pass   |
| First Aid & Patient Safety                                | 50          | 25            | 30     | 5    | 35             | Pass   |
| Sub-Total   | 500         |               |        |      | 281            |        |
| Semester: 3      Session: AUGUST 2021      Roll No: 69904 |             |               |        |      |                |        |
| I-Medicine-I & CP   | 100         | 50            | 43     | 14   | 57             | Pass   |
| II-Medicine-II & CP                                       | 100         | 50            | 43     | 12   | 55             | Pass   |
| Medical Ethics  | 50          | 25            | 33     | --   | 33             | Pass   |
| Sub-Total   | 250         |               |        |      | 145            |        |
| Semester: 4      Session: AUGUST 2021      Roll No: 88563 |             |               |        |      |                |        |
| English   | 100         | 50            | 50     | --   | 50             | Pass   |
| Pak-Study   | 50          | 25            | 25     | --   | 25             | Pass   |
| I-EYE, ENT & SURGICAL DISEASE & CP                        | 100         | 50            | 40     | 13   | 53             | Pass   |
| II-ORTHOPEDIC AND PAEDIATRIC DISORDERS & CP               | 100         | 50            | 44     | 11   | 55             | Pass   |
| Sub-Total   | 350         |               |        |      | 183            |        |
| Grand Total   | 1450        |               | 689    | 108  | 797            | 54.97% |

Prepared By: [Signature]

Checked By: [Signature]

Verified By: [Signature]

[Signature]  
Chief Executive Officer  
Faculty of Paramedical & Allied Health Sciences  
Khyber Pakhtunkhwa

Result Declaration DateTime: Tuesday, November 09, 2021      Printed by:- Anwar Zeb      Issue DateTime: Wednesday, January 26, 2022 11:55:14 AM  
 Note: Error/Omission excepted Any mistake in above particulars must be intimated within 15 days of the receiving of the certificate  
 CP Means Clinical Practice

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 to 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

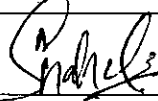


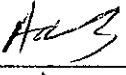
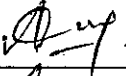
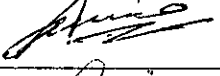
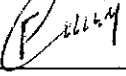
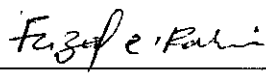
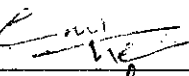
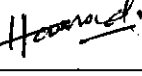
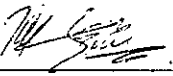
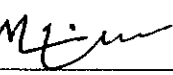
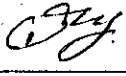


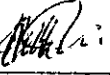
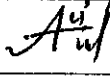
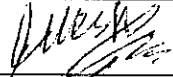

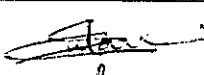
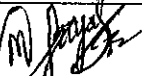
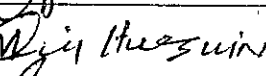
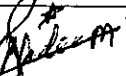
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SSII (B&D)  
 AS - (DEV)  
 AS - HTI  
 CH - HSR/II  
 CPO  
 DS - (B&D)  
 DS - (C&G)  
 SO - B-I  
 SO - B-II

T-Ahsan  
 Anwar  
 Shahab  
 Nurwa  
 P.T.O

Naqvi ~~\_\_\_\_\_~~ Arif Tahir  
Jasim Amir \_\_\_\_\_ \_\_\_\_\_  
Fazal e Razi Umesh \_\_\_\_\_ \_\_\_\_\_  
Nasim \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_  
Sandhu I \_\_\_\_\_ \_\_\_\_\_  
Hamid \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_

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       |  |

  
**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 Ali  |
| 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

20

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 "F" (21)

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

No. 14703 /DHO dated Pesh: 21/09/2022

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

1755 (22)

17/10/2022

Health Department

Annex "G"

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<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

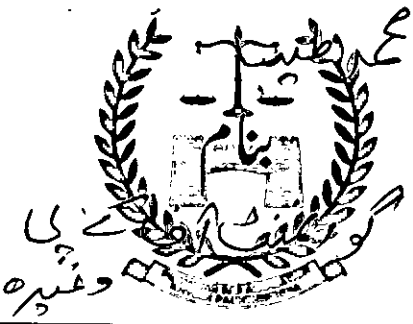
Chilla  
Myta

Signature

|  |        |   |  |   |
|--|--------|---|--|---|
| 50                                     | 120871 |  |  |  |
| Barrister M. Harsaan Adil<br>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: | 61. Appeal | دعویٰ:    |
|  |         |            | علت نمبر: |
|  |         |            | مورخہ:    |
|  |         |            | جرم:      |
|  |         |            | تھانہ:    |

**بابت تحریر آگے**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
آن مقام پشاور محمد حسان علی کے نام سے درخواست کی گئی ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو  
راضی نامہ کرنے و تقریر ثالث و فیصلہ بر خلاف 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 ہزاردگی اور منسوخی، نیز  
وائر 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 باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جانب 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

Harsaan

26/11/22

المرقوم:

مقام پشاور کے لیے منظور ہے۔

محمد طیب ولد مسعود احمد کلن حاجی کیمپ پشاور