# FORM OF ORDER SHEET

Court of				
Case No		1831/2022		

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/12/2022	The appeal of Mr. Mueen Qasmi 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.
		By the order of Chairman
		REGISTRAR
		; ,

The appeal of Mr. Mueen Qasmi son of Muhammad Hanif, 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.

<u>o5-12</u>/2022

REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Muhammad Hassaan Adil Adv. High Court Peshawar.

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

Service Appeal No. <u>1831</u>/2022

Mueen Qasmi	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	,С,	12-21
7.	Departmental Representation dated 17-06-2022	<b>'D'</b>	22
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	Æ,	23
9.	Letter No. 14703/DHO dated 01- 09-2022	· 'F'	24
10.	Reminder application dated 17-10-2022	'G'	25
11.	Wakalatnama	-	· 26

APPELLANT

Through

MUHAMMAD HASSAAN ADIL

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

				•			
Se	rvice Appeal No	/2022	•			•	
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B./	lucan Osami						-
IV.	ueen Qasmi			<b>;</b>	,		
Ç.	on of Muhammad Ha	mif		•			
	esident of Mohalla N		Iouse No. 881	Pakha Gl	ıulam.		
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Τ,	SHUWH						
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	•	•		·		APPELI	LANT
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		•	•			•	
		•	Versus		•		
	Government of Secretariate, Pesha Secretary to Gove Secretary to Rosho	iwar ernment of K					
,	Secretariate, Pesha	awar	•	-			•
•	Dimentan Camanal (	DC) Heelth (	erriaa War	sals Daad	Dochawar		
э.	Director General (	DG), neam s	service, wai	Sak Koau,	į CSIIAWAI		
4.	District Health Of	ficer (DHO), (	Grand Trunl	k Road, Te	hsil and Di	strict Pes	hawar
					$(-1)^{-1} = (-1)^{-1}$		
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					I	RESPONE	DENTS
	2				•		
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		•					
	APPEAL U/S 4 O	F THE KHY	RER PAKH	THNKHY	A SERVI	CE TRIB	UNAL
	ALLEAD OIG 4 G	A THE MALL			71 DEJAC 1 A		
	ACT, 1974 FOR I						

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, Mueen Qasmi Son of Muhammad Hanif, Resident of Mohalla Noor Garden, House No. 881, Pakha Ghulam, 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

•	VS Government of KP and Oth
A - Parking Communication	
·	straining the respondents from taking any nst the appellant till the final disposal of the
espectfully Sheweth:	
hat the above titled appeal	is being filed before this hon'ble Tribunal along wit
pplication.	

#### PRAYER:

2)

3)

4)

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.

That if the relief as prayed for in the heading of this application is not granted, the very

That balance of convenience also leans in favour of appellant.

purpose of titled appeal will become infructuous.





Through

BARRISTER
MUHAMMAD HASSAAN ADIL

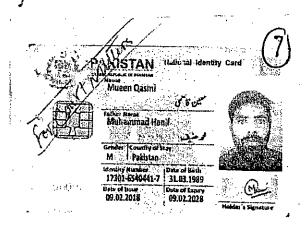
Advocate High Court

#### **AFFIDAVIT**

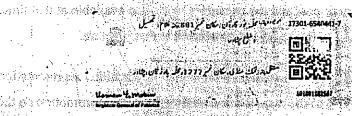
I, Mueen Qasmi Son of Muhammad Hanif, Resident of Mohalla Noor Garden, House No. 881, Pakha Ghulam, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

DEPONENT

DEPONENT



THE RESERVE OF THE PROPERTY OF



كشده كاراط يرزع ليوبكن شن وال دين



# OFFICE OF THE DISTRICT HEALTH OFFICER, PESHAWAR.

Phone No.091 9225387 Fax No. 091 9225467

1225467 Annex "A"

#### <u>OFFICE ORDER</u>

On the recommendation of Departmental Selection Committee in its meeting beld on 20/10/2020 at 10:00 am under the cholmanship of the undersigned. Mr. Macen Quant sto Muhammad Haulf (Mst. Sajida Tauheed Ex- LHW Deceased) resident of House No. 881 Mohallah Noor Garden Pakhaghulam, 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.
- 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.
- 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.
- Ilc/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.

№ <u>16872 –77</u>/DHOÆ-19

Dated Peshawar the 271 /0 /2020

Copy forwarded to the: -

- 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.

Ashici Health Officer

eshawh.



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



#### Personal Information of Mr MUEEN QASMI daw/s of MUHAMMAD HANEEF

Personnel Number: 00963378

CNIC: 1730165404417

Date of Birth: 31.03.1989

Entry into Govt. Service: 27.10.2020

Length of Service: 01 Years 11 Months 005 Days

**Employment Category: Active Temporary** 

Designation: X-RAY ATTENDANT DDO Code: PR8854-District Health Officer RHC Peshawar 81186185-GOVERNMENT OF KHYBER PAKH

Payroll Section: 009

**GPF Section: 001** 

Cash Center:

20,374.00 (provisional)

GPF A/C No:

**GPF** Interest applied

GPF Balance:

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 04

, Pay Stage: 1

<u> </u>	Wage type	Amount Wage type		Amount	
	Basic Pay	15,350,00	1004	House Rent Allow 45% KP21	3,576,00
1210	Convey Allowance 2005	1,785.00		Medical Allowance	1,500.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	1,551,00
2347	Adhoc Rel Al 15% 22(PS17)	1,551.00			0.00

#### Deductions - General

	Wage type	Wage type Amount		Wage type	Amount
İ	3003 GPF Subscription	-770,00	3501	Benevolent Fund	-600.00
l	4004 R. Benefits & Death Comp:	-300,00	6173	CM Flood Relief Fund01-16	-1.750.00

#### Deductions - Loans and Advances

*************					S.
Loan		Description	Principal amount	Deduction	Balance
Deductions -	Income Ton				
Payable:	0.00	Recovered till SEP-2022:	0.00 Exempted:	0.00 Recoverab	le: 0.00

Gross Pay (Rs.):

27,913.00

Deductions: (Rs.):

24,493,60

Payee Name: MUEEN QASMI \*

Account Number: 0865493201001338

Bank Details: MCB BANK LIMITED, 241686 Truck Stand Br.Peshawar Truck Stand Br.Peshawar, PESHAWAR

Leaves:

Opening Balance:

Availed:

Earned:

Net Pay: (Rs.):

Permanent Address:

City: PESHAWAR

Domicile: -

Housing Status: No Official

Temp. Address: City:

· Email: mucenqasmi@gntail.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/30.09.2022/19:21:32)



5.NO		Father Name	NIC Number	Date of Entry in	Designation	
	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Maih Ossid	
	Tahir Shah	!- Amir Zada	17301-8905148-5	2/1/1992	Naib Qasid	Matric
	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Chowkidar	Matric
	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	Matric
	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Ward Orderly	BA
	Ahmad Jan	Ghazi Khan	17301-1274726-3		Chowkidar	Matric
	Salman Shah	Fazle Qadar	17301-7456183-7	30/04/1999	Naib Qasid 🔛	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	9/1/2003	Ward Orderly	FA :
. 9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	11/8/2006	Ward Orderly	Matric
10	Muhammad Ishfaq	Mir Akbar		12/8/2006	Ward Orderly	BA. Health Diploma
11	Sohail Ashiq	Muhammad Ashig	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DII
12	Ghulam Mujtaba	Ghulam Mustafa	17301-4002508-5	12/1/2009	Sanitary Petrol	BA
	ljaz Ahmad	Taza Gul	17301-7148125-9	26/12/2009	Ward Orderly	BA I
14	Munir Hussain	Fagir hussain	17301-5419523-7	31-12-2009	Chowkidar	FA
. 15	Naveed Khan	Muhammad Nawaz Kham	17301-1311673-1 17301-6584400-1	23/02/2010	Naib Qasid 👉 🔒	Matric
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9			ВА
17	Muhammad Sulaiman	Musafar				SSC
18	Sajjad Ahmad	Llagat Ali Khan	17301-6117689-7		Behishti	BA
19	Torgat Auzal	Javid Akhtar	17301-8599458-3 16101-7487588-9	1		FA .
20 5	yed Kifayat Shah	Naurooz Shah			Chowkidar	FÁ
	Abdul Shahab	Abdul Jabbar	17301-1458161-3		X-ray Attendent	MA+ Health Diploma
22 N	Muhammad Imran	Qaleem Ullah	17301-7776929-5			MSC Economics
	sif Naveed	Naveed Ahmad	17301-3090264-1			MA
	ก็บทัลmmad Altaf	Subhan ullah	17301-5904442-3	31/12/2012	K-ray Attendent	FA
	hahid Islam	Fagir Gul	17301-5887445-5		Behishti (	DAE
	sfandyar Khan	Musharaf Khan	17301-3550466-9	4/2/2014 V	Nard Orderly	SC+ Surgical Diploma
	nams Ul Athhar		17301-6996238-7	4/2/2014 V		BA (
	a-ul-islam	Shams Ul Qamar	17301-8058948-7			SSC
	lman Misbah	Muhammad Qayum	17301-5067106-3	30/03/2015 V		MA+ Health Diploma
	ahid Islam	Misbah Ud din	17101-4426272-5			A .
		Fagir Gul				urgical Diploma
	Jhan mad Sulaiman		17301-8449980-3			SC SC
3211/10	irshid Ali	Gohar Khan				Sc

Surday ACI \$/5 Mir Aslam

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District Health Officer Peshawar

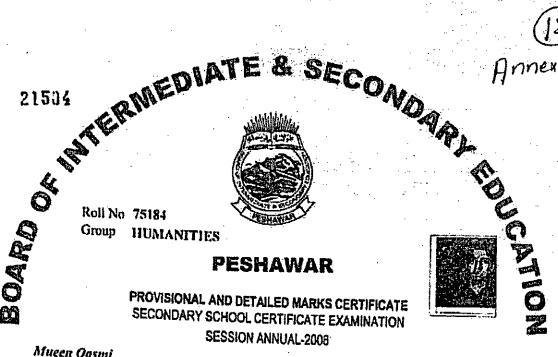
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		adeem Khan	Sher Zaman	17301-8762303-1	12/0/2016	- <i>)</i> {	
بايغ	-	Fareed Ullah	Afridi Khan Safi	17301-4505337-1	12/8/2016	Behishti	FA .
\$ <b>3</b> 0		Umair Khan	Pervaiz Khan	17301-8066889-5	3/8/2016	Naib Qasid	BA,
-		Sabir Shah	Zaiban Shah	17201-6576098-3	29/05/2017	Naib Qasid	FA
-		Wagar Younis	Shafaras Khan	17301-9197840-5	19/01/2018	Chowkidar	Matric+ Health Diploma
-	38	Syed Ghous Ali Shah	Syed Abid Shah	17301-3197840-3	19/01/2018	Ward Orderly	FSC
1		Muhammad Arif	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	MA '
}-		Muhammad Ihtisham	DilShad Khan	17301-2621626-3	19/01/2018	Ward Orderly	BSc
_		Zeeshan Ahmad	Fareed Khan	17301-5237207-1	19/01/2018	Ward Orderly .	м.сом
.		Faisal Ahmad	Habib ur Rehman	17301-5237207-1	20/02/2018	Ward Orderly	BA
1	43	Muhammad Saboor	Manzoor Khan	17301-9784416-5	3/10/2018	Chowkidar	FA
L	44	Faroog Haidar	Khan Bahadur	11/301-9/84416-5	3/10/2018	Chowkidar'	FA+ Health Diploma
L	45	lmran Khan	Izzat Khan	17171 1777	3/10/2018	Ward Orderly	FA
	46	Rahim Shah	Sardar Khan	17101-1892365-1	30/10/2018	Chowkidar	FA+Electric Diploma
	47	Shehryar Khan	Fagir hussain	17301-8692584-1	27/10/2020	Ward Orderly	DAE+ DIT
. Г		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
		Muhammad Nouman	Noor Muhammad	17301-0416153-5	27/10/2020	Ward Orderly	FSc
, –		Muhammad Arif	Usman Khan	17301-3280446-5	27/10/2020	Ward Orderly	ВА
1		Mueen Qasmi	Muhammad Hanif	17301-86494820-9	27/10/2020	Ward Orderly	ВА
┢		Imran Khan	Abdul Sattar	. 17301-6540441-7	27/10/2020	Ward Orderly	MBA
-		Shahid Ahmad	Habib ur Rehman	17301-6952992-5	27/10/2020	Chowkidar	Matric
-		Haroon Ur Rashid	Muhammad Dawood	17301-6701436-9	27/10/2020	Ward Orderly	FA
_		Agib Zahoor	Zahoor Ud Din	17301-8767271-3	27/10/2020	Chowkidar	ВА
1		Tahir Hafeez	Abdul Hafeez	17301-5569170-9	27-10-2020	Chowkidar	Matric
		Hamza Shah	Jalal Shah	17301-5242528-1	27-10-2020	Ward Orderly •	в.сом
		Muhammad Tayyab	Masood Ahmad	17301-6527188-7	27-10-2020	Ward Orderly	FA
$\vdash$		Shehryar Hussain		17301-1955764-1	27-10-2020	Ward Orderly	FSc+Health Diploma
-		Momin Khan	Nighah hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
+		Imran Shah	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
$\vdash$		Anwar ul Hag	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
-		Salman Khan	Zia Ul Haq .	17301-5541278-7	2/3/2021	Behishti	FA
-	04	Saiman Knan .	Dilawar Khan	17301-3443294-5	<b>2年1月27日 1月2日</b>	Ward Orderly	Matric Died
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District Health Officer Peshawar



SESSION ANNUAL-2008



Mueen Qasmi of PESHAWAR DISTRICT	Son/Daughter of Muhammad Hancef
has secured the marks shown again months of <u>March / April 2006</u>	st each subject, in the Secondary School Examination held in the as <b>Private Student</b>

		MARKS OBTAINED								
Subject	Marks		Th		Th		1.			
		Theory	Pract	Theory	Pract	Total	In Words			
1. English	150	36	-	27		63	Sixty-Three			
2. Urdu	150	- 34		46						
3. Islamiyat (Comp)				*0		· 80	Eighty Only			
	75	29	_	-		29	Twenty-Nine			
4. Pakistan Studies	75	•••		38		36	Thirty-Six			
5. Maths	150	26	_	38	<u> </u>	<b></b>				
S. Connect Cultural				30	_	54	Sixty-Four			
6. General Science	150	27	-	48	-	75	Seventy-Five			
7. Islamic Studies	150	41		54	·		<u> </u>			
0 A-4 P 64-3-3 P	┦			34		95	Ningly-Five			
B. Art & Model Drawing	150	25	22	33	27	107	One Hundred Seven			

Total 1050

549-C Five Hundred Forty-Hine Only

Remarks

S:ART:

Date of Birth: 31st March, 1989

Issue Date: 30-06-2008

Controller of Examinations

Note: Error / Ommission excepted. Any mistake in above particulars must be intimated within 30 days after receiving the above certificate.

(Computer Call BISE, Postawar)

	<sub>S.No.</sub> 461462	Ę	<b>新</b>		
	Roll No. 75184				
	Poard	of Intermediate		y Education	
	•	JI e	shawar		
		<b>—</b> — — — — — — — — — — — — — — — — — —	押. Įakistan	:	
	TO THE STATE OF TH	Secondary School	Certificate Examin	ation	
	(wy)		006-ANNUAL		
			Group)		
	This is to Certify that	Mucen Qasmi	Son of	Muhammad Hancef	
	and a resident of	Peshawar Distric	<del></del>	assed the Secondary Scho	10 A 17 F 22
		Intermediate and Secondary E	-		(2) (E) (E)
	candidate. He obtained The Candidate passed in the	549 Marks out of 1050 an	d has been placed in Grade	C_ Represerung	Good
	English	2. Urdu	3. Islamiyat (Comp)	4. Pakistan Studies	
1	5. General Science	, 6. Art & Model Drawing	7. Meths	8. Islamic Studies	
	Date of birth ascording to ad	mission form March 31,15	<del>)89</del>		
		•		Bul	
	Assit Secretary	This analysis is to a	red without alteration or erasure.	/ Secret	ery .
		THE CHINCOIL IS OUR	THE WILLIAM STREET		
ESCHALL STRUCKS TO	Service Commence of the Commen	Anti-ministration of the second secon		Contract of the second	A CONTRACTOR OF THE PROPERTY O

PESHAWAR

DETAIL MARKS CERTIFICATE



**DETAIL MARKS CERTIFICATE DIPLOMA IN COMMERCE PART-II ACCOUNT GROUP (REVISED 2006)** 

Neme of Candidate MUEEN QASMI

Father's Name

MUHAMMAD HANEEF

Roll.No.

22634

ANNUAL

2008

Rog.No.

MCCHVP/AC/06-6685

Institute/College

THE MUSUIM COLLEGE OF COMMERCE & MANAGEMENT PESHAWAR



	Subject			Obtained Marks			
			Th	Pr	Total	In Words	
	Part-I Marks	600			395		
1	English	100	59	•	59	Fifty-nine	
2	Urdu	100	48	1	48	Forty-eight	
3	Pakistan Studies	5 <b>0</b>	21	٠	21	Twenty-one	
4	Businesa I.T-II	75 / 25	48	24	72	Seventy-two	
5	Principle of Economics	50	25	•	25	Twenty-six	
6	Communication Skills	50	37	•	37	Thirty-seven	
7	Financial Accounting -If	100	75	-	75	Seventy-five	
å	Applied Accounting	50	25	•	26	Twenty-six	

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Prepared by Sher Aman

Checked by Errors & Omissions excepted.

RYPA STALP

CHAIRMAN

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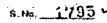
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# PESHAWAR (PAKISTAN) Diploma in Commerce Year 2008

(Annual / Supplementary)

Certified that Mr. /Miss	MUEEN QA	SMI		
Son/Daughter of Mr	DAMMAHUM	HANEEF >	1251	
Registration No.				
	M COLLEGE OF COL			PESHAWAR
has passed the Diploma	in Commerce Examinat	ion held by t	he NWFO	Board of Conf
Education, Peshawar, in t	he month of APRIL	08		Louis by Technical
He / She secured	759 Marks o	ut of 120	0	
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	In recognition	thereof, this		
	Diploma in (			
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is awarded to him / he	er at Peshawar on the		day of JUL	Y no
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OF IT & EMERGING SCIENCES PESHAWAR, PAKISTAN

## Academic Transcript

Programme: Bachelor of Commerce (with Specialization in IT)

CollegeMostlitute: CECOS Frontier College of Business Education

Faiher's Nac Registration i	MUHEN OASMI V  NO. MUHAMMAD HANEEF V  NO. CUP/H.Com.IT-00388-2009 V  ISSIGN 2009-2011 V	Marks Obtained/Total Appropate Marks 16 Gumulative Grade Point Total Credit Hours	Average		75.257	000
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CU-301 CU-302 CU-303 CU-304 CU-305	Semester-I  Husiness Statistics Principles of Accounting Functional English Micro Economics Computer Application to Business		3 3 3	75 78 07 07 87 74	8 8 0 1	10.20 10.74 08.76 12.00
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23-09-2011 Date of Issue

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# CECOS Unibersity

of IT & Emerging Sciences

Peshawar, Pakistan

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CEGOS UNIVERSITY OF IT

& Emerging Sciences Peshawa

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The University in accordance with the authority vested in it hereby confers upon

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Mueen Quemi
Muhamman Maneel

the Degree of

Bachelor of Commerce with specialization in IC (2 years)

with all the rights and privileges appertaining thereto

Given at Peshawar on 64 Metaber, 2011

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Registrar

President

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#### OFFICIAL TRANSCRIPT

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Page 1 of 2



Office of the Registrat: OYS Road, Near Sid Sale, Kohal City, Paliston Tel: +92-922-902211-3, FAC: +92-922-90214

# OFFICIAL TRANSCRIPT

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Specialization: Finance and Accounting Date of Issue: Beptember 06, 2018 Dele of Issue: Beptember 06, 2018 Dele of Registration: March 61, 2013 Dele of Compilifier: March 71,	אַ אַפּויטַסדיי :	Soler of Pinance	Antonia		Paglalizati	on He:	12.313014
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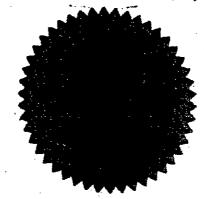
Wasim Javed Qazi Presion University, Islamabad

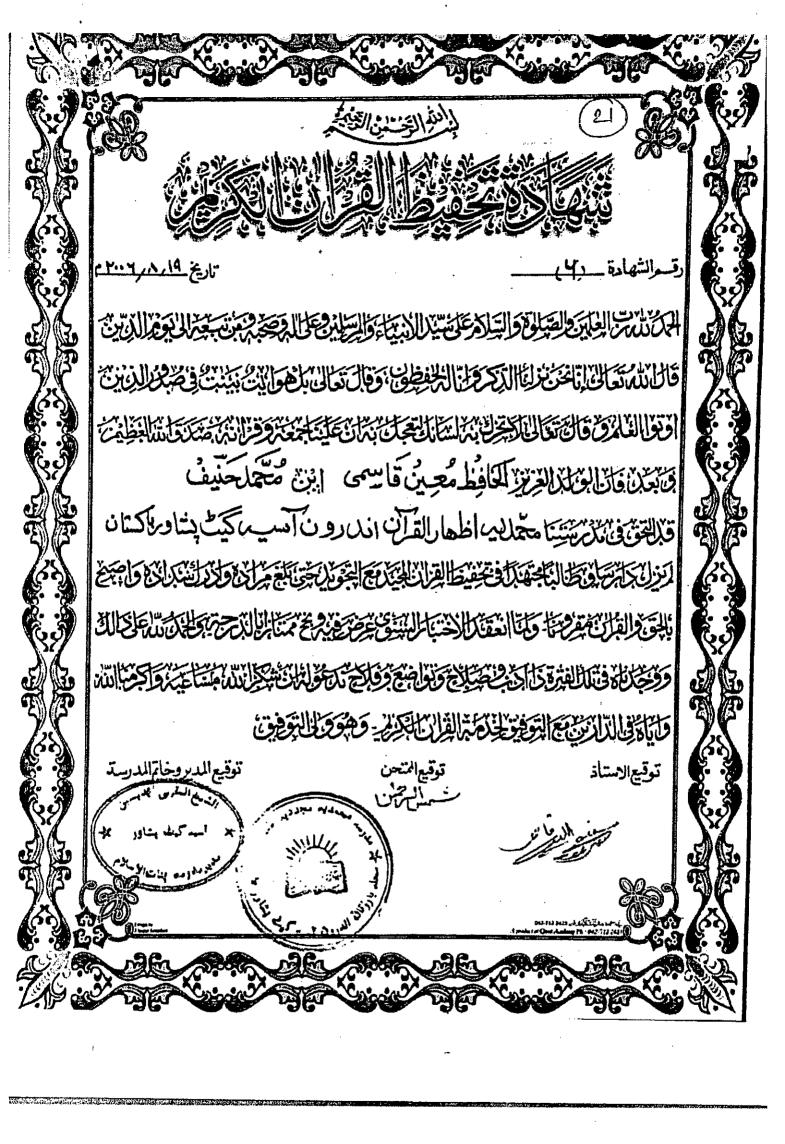
Has satisfactorily and completely fulfilled all requirements for the prescribed studies and the examinations of the University; and has, therefore, been admitted to the Begree of

> Muster of Pusiness Administration in Finance and Accounting

In testimony whereof, this Begree has been issued under authorized signatures and official seal of the Autoersity, on this fifteenth day of September 2016.







Dairy No. 9721 Date. 17-06-2.012 Health Department

The Speretary Health Government of Khyber Pakhtunkhwa. Health Department, Poshawar.

Subject

APPEALIREQUEST FOR PROMOTION OF CLASS-NY 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" 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 cudre. But the order is still

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 for due to the reason that we are sub-cadre. The Class-IV stoff working in Directorate General Health Services, Khyber Pakhtunkhwa were time and again promuted 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 OHO Poshawar 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.

l would be obliged, pleaso.

Dated: 17-05-2022.

8811(28D): AS - (DEV) AS - MTE CH - HSRU CHD DS - (25D) os - Onga 50, 24 50 - B-il

Your Sincerely,

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### Names, Scales and Signatures of Candidates

Sr No.	Name of Candidate	Scale	Signature
1	) 		
I <sup>R</sup>	Abdul Shahab	BPS-01	Indula !
2.	Ahmad Jan	BPS-01	Ac
3.	Amir Khan	BPS-04	info-
4.	Aqib Zahoor	BPS-03	An Z
5.	Asfandyar Khan	BPS-02	Aug.
6.	Asif Naveed	BPS-02	Aug
7.	Fåreedullah Safi	BPS-03	Rung
8.	Fazal-e-Rabi	BPS-02	Frzale, Runi
9.	Ghulam Mujtaba	BPS-02	Carlo
10.	Hamad	BPS-02	Hoursed.
: 1.1.	Haroon-ur-Rasheed	BPS-03	W Sail
2.	Imran Khan	BPS-03	Mjim
13.	Izzat Ullah	BPS-01	Fy.
14.	Jahanullah Khan	BPS-01	Johaillas
15.	Mueen Qasmi	BPS-04	Mount
16.	Muhammad Altaf	BPS-03	With Ci.
17.	Muhammad Arif	BPS-04	Au
18.	Muhammad Ihtisham	BPS-04	Merk
19.	Muhammad Nouman	BPS-04	Charles
20.	Muhammad Sulaiman	BPS-03	
21.	Muhammad Tayyab	BPS-04	M Joyet
22.	Muneer Hussain	BPS-01	Wing theozuins
23.	Nadeem Khan	BPS-03	Mig there wins

H. H.

24.	Saadullah Khan	BPS-01	Soudulful Khii
25.	Sabir Shah	BPS-03	Swis _
<u>2</u> 6.	Sahibzada Amir	BPS-02	Annil Hand
27.	Sardar Ali	BPS-01	De dille
28.	Shahid Ahmad	BPS-04	Q4.
29.	Shahid Islam	BPS-02	filie
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	hannyar
32.	Sohail Ashiq	BPS-01	S. S
33.	Muhammad Suliman	BPS-04	- Blink!
34.	Syed Zaffar Ali	BPS-04	Sinte
35.	Tahir Hafeez	BPS-04	Janis
36.	Tahir Shah	BPS-01	fabios_
37.	Turkat Auzal	BPS-03	T Avail
38.	Umair Khan	BPS-03	URIL
39.	Waqas Ahmad	BPS-02	il de la company
40.	Waqas Ghulam	BPS-01	suffer.
41.	Zeeshan Ahmad	BPS-04	ines
42.	Zia-ul-Islam	BPS-02	ZiHilislam
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# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA, PESHAWAR

No. 1776-854 Promotion Cell

Dated Peshawar the 18/08/2022

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 int Service.	o Govti	-	Date of Promotion to J/C in 33% Quota.
01.		•	· · · · · · · · · · · · · · · · · · ·	, · · · · ·	
02.		<u>.</u>			

Proforma for Junior Clerks initially recruited.

S No.	Name Father Name	Date of Entry int Service.	o Govt:	Qualification	Date of Initial Recruitment as Junior Clerk.
01.			<u> </u>		
02.					

Additional Director General (HR) Directorate General Health Service Khyber Pakhtunkhwa, Peshawa



Annex "F"

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

No. 14703 /DHO dated Pesh: 1/09/2022

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.

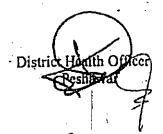
The requisite information is hereby submitted as mentioned below:

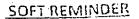
Proforma for Junior Clerks from Class-IV on 33% Quota.

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

Proforms for Junior Clerks initially recruited.

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





The Secretary Health Government of Khyber Pakhtunkhwa, Health Department, Peshawar, Hamil Annex G

Subject:

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

PESHAWAR

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With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion singe 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.

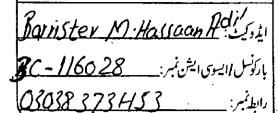
We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

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129841

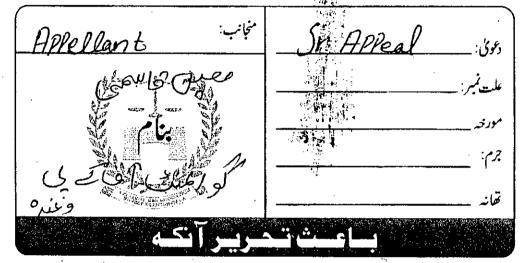






بیثاور بارایسوی ایش، خیبر پختونخواه

Service Tribunal Responsar



مقدمه مندرجة عنوان بالاش الي طرف سه واسط يروى وجواب دى كاروائي متعلقه

آن مقام مِنْ الور الما جاتا ہے کہ مسلمہ محے برحساس کے حل کا الفقاد ہوگا ، نیز و کیل صاحب کو راضی نامہ کرنے اقرار کا جاتا ہے کہ معادب موضوف کو مقدۃ کی کل کاروائی کا کال افقیاد ہوگا ، نیز و کیل صاحب کو راضی نامہ کرنے اقتر ( قالت و فیصلہ بر طف دیے بھواب دوئی اقبال دوئی اور در قرائش از برتم کی تعدین زریں پر د شخط الرنے کا افتیار ہوگا ، نیز بھورت عدم ہوری یا ڈکری کی کھرفہ یا ایل کی برآ مذکی اور منسونی ، نیز دائر کرنے ایس گرائی و نظر عانی و بیروی کرنے کا مخار ہوگا اور بصورت بغرورت مقدہ فذکھ کے کی یا جروی کا دار کے دائر کرنے ایس گرائی و نظر عانی و بیروی کرنے کا مخار ہوگا اور بصاحب کاروائی کے واسطے اور وکیل یا مخار تا تولی کو اور صاحب مقرر شدہ کو وہ بی جمل فیکورہ با افتیارات ماصل ہوں کے افاد آئی کا ساختہ بی داختہ منظور و قبول ہوگا دروان مقدمہ میں جو ترجہ بر جانہ افتیارات مقدہ کے سب سے ہوگا ۔ کوئی تا دی گرائی مقدم میں جو ترجہ بر جانہ افتیارات مقدہ کے سب سے ہوگا ۔ کوئی تا دی گرائی مقدم دیا تا کہ سند رہ باہر ہو تو وکیل صاحب بیابر اور کا ساحت بیابر ہوتو وکیل صاحب بیابر ہوتو وکیل میابر ہوتو وکیل میابر کیابر ہوتو وکیل میابر کی کوئی تا کی کوئی تا کوئی تا کر کوئی تا کوئی تا کوئی تا کر کوئ

Marsaan 96-11-22 1.50

قام <u>مست اور</u> <u>کے لیے منظور</u>ے