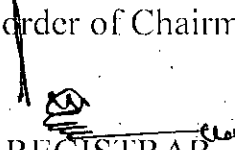


FORM OF ORDER SHEET

Court of _____

Case No. - _____ 1832/2022

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 Arif 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. Muhammad Arif son of Usman Khan 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. 3467 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.
High Court Peshawar.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

(*) All the objections have been removed.

Hassaan

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1837/2022

Muhammad Arif

VS

Government of KP and Others

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		1-4
2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
6.	Educational Documents	'C'	12-18
7.	Departmental Representation dated 17-06-2022	'D'	19
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	20
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	21
10.	Reminder application dated 17-10-2022	'G'	22
11.	Wakalatnama		23

Arif
APPELLANT

Through

Hassaan
BARRISTER
MUHAMMAD HASSAAN ADIL

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

Service Appeal No. _____/2022

Muhammad Arif

Son of Usman Khan
Resident of Mohalla Bilal Masjid, Choli Bala, Pajaggi,
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 Orderly (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.

Adil

APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

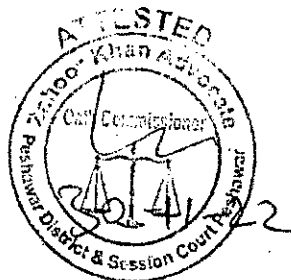
Advocate High Court

AFFIDAVIT

I, Muhammad Arif Son of Usman Khan, Resident of Mohalla Bilal Masjid, Choli Bala, Pajaggi, 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.

Arif

DEPONENT



5

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

Service Appeal No. _____/2022

Muhammad Arif

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.

Adj. 6
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAAN ADIL

Advocate High Court

AFFIDAVIT

I, Muhammad Arif Son of Usman Khan, Resident of Mohalla Bilal Masjid, Choli Bala, Pajaggi, 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.

Arif
DEPONENT





**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 Arif s-o Usman Khan (MB) resident of Mohallah Bilal Masjid Choli Bala Pajaggi, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Ward Orderly EPS - 04 in Basic Pay Scale (9900-440-23100) plus all other allowances as admissible to him as per Government rules.*

Annex - "A"

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.

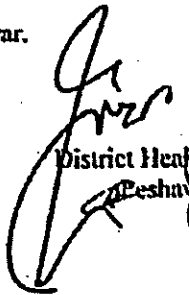
If the above mentioned terms and conditions are acceptable to him/her, He/she should report to District Health Office, Peshawar within 14 days after the receipt of this appointment order.

Sd/_____
District Health Officer,
Peshawar.

No 16854-59 /DHO/E-19
Copy forwarded to the:-

Dated Peshawar the 27/10/2020

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


District Health Officer,
Peshawar.
27/10/2020

Dist. Govt. KP-Provincial
District Accounts Office Peshawar Dist.
Monthly Salary Statement (June-2022)



Personal Information of Mr MUHAMMAD ARIF d/w/s of USMAN KHAN

Personnel Number: 00965824 CNIC: 1730186494829 NTN:
Date of Birth: 03.01.1995 Entry into Govt. Service: 27.10.2020 Length of Service: 01 Years 08 Months 005 Days

Employment Category: Active Permanent

Designation: BEHISHTI/SWEEPER ---80814379-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6579-DistSuprMngrPPHI-1522-2 NBP HABA PESHAWA

Payroll Section: 004 GPF Section: 001 Cash Center:

GPF A/C No: GPF Interest applied GPF Balance: 15,722.00 (provisional)

Vendor Number: - Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 04 Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	10,340.00	1004	House Rent Allow 45% KP21	3,576.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2211	Adhoc Relief All 2016 10%	828.00	2224	Adhoc Relief All 2017 10%	1,034.00
2247	Adhoc Relief All 2018 10%	1,034.00	2264	Adhoc Relief All 2019 10%	1,034.00
2309	Adhoc Relief All 2021 10%	1,034.00	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			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			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 26,316.00 Deductions: (Rs.): -1,670.00 Net Pay: (Rs.): 24,646.00

Payee Name: MUHAMMAD ARIF

Account Number: 0043205490015

Bank Details: ALLIED BANK LIMITED, 250600 Charsadda Road Eid Gah Peshawar Charsadda Road Eid Gah Peshawa, Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESHAWAR

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: marif012017@gmail.com

System generated document in accordance with APPM 4.6.12.9(87333/19.06.2022/v3.0)
* All amounts are in Pak Rupees
* Errors & omissions excepted (SERVICES/01.07.2022/15.06.43)

Seniority List Of Class IV Employees Working Under DHO Peshawar

(10)

Annex - "B"

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid ✓	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid ✓	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diplcma
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	Llaqat 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 |

Sweidar Ali s/o Mir Aslam

Saad Ullah s/o Sahib Qadar

District Health Officer
Peshawar

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

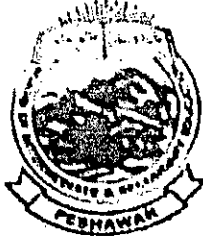
11

District Health Officer
Peshawar

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Annex - "c"

12



Roll No 103519
Group SCIENCE

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION ANNUAL-2011

Muhammad Arif Son/Daughter of Usman Khan
of HIRA PUBLIC SCHOOL SHAH ALAM PUL PESHAWAR
has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of MARCH 2011 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	27	--	39	--	66	Sixty-Six
2. Urdu	150	48	--	51	--	99	Ninety-Nine
3. Islamiyat (Comp)	75	40	--	--	--	40	Forty Only
4. Pakistani Studies	75	--	--	51	--	51	Fifty-One
5. Maths	150	26	--	50	--	76	Seventy-Six
6. Physics	150	29	8	31	8	76	Seventy-Six
7. Chemistry	150	26	9	28	9	70	Seventy Only
8. Biology	150	47	9	47	9	112	One Hundred Twelve

Total 1050

590-C Five Hundred Ninety Only

Remarks

Date of Birth: 03rd January, 1995

Checked by: _____

Issue Date: 15-06-2011

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

[Signature]
Controller of Examinations

S No. 66722

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 403519



Board of Intermediate & Secondary Education Peshawar

PHOTO NO.



Khyber Pakhtunkhwa (Pakistan)

Secondary School Certificate Examination

SESSION 2011- ANNUAL

(Science Group)

This is to Certify that Muhammad Arif Son of Usman Khan
and a student of Hira Public School Shah Alam Pul Peshawar has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Peshawar held in March, 2011 as a Regular candidate. He obtained 590 Marks out of 1050 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|------------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. Maths | 6. Physics | 7. Chemistry | 8. Biology |

Date of birth according to admission form 03 January, 1995

J. Ullah
Passit Secretary
Few

[Signature]
Secretary

This Certificate is Issued without alteration or erasure.

13

729648 14

KHYBER PAKHTUNKHWA TECHNICAL EDUCATION



PESHAWAR

**DETAIL MARKS CERTIFICATE
DIPLOMA OF ASSOCIATE ENGINEER
3RD YEAR
CIVIL TECHNOLOGY**

Name of Candidate MUHAMMAD ARIF
 Father's Name USMAN KAHN
 Roll.No. 1083953 Session SUPPLY 2014
 Reg.No. PIT/PT/11-29606
 Institute/College PESHAWAR INSTITUTE OF TECHNOLOGY PESHAWAR



Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
2nd Year Marks	2200			1,568	
1 GEN-311 Islamiyat/Pak. Studies	50	31	-	31	Thirty-one
2 CT-312 Project Management	100	51	-	51	Fifty-one
3 CT-322 Quantity Surveying-II	100	-	84	84	Eighty-four
4 CT-333 Public Health Engg-II	100 / 50	52	42	94	Ninety-four
5 CT-344 Hydraulics & Irrigation	150 / 50	71	42	113	One hundred thirteen
6 CT-353 Railway, Docks, Har & Bridges	100 / 50	58	42	100	One hundred
7 CT-364 Concrete Tech: RCC Design	150 / 50	84	32	116	One hundred sixteen
8 CT-373 Soil Mechanics, Highways, & Airports	100 / 50	47	42	89	Eighty-nine
9 CT-381 Civil Engineering Project	50	-	33	33	Thirty-three

3350

2279 Two thousand two hundred seventy-nine

Prepared by Nasir Feroz

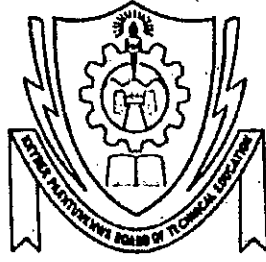
Checked by _____

Theory Passing Marks=40% Practical Passing Marks=50%

Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issue of this certificate.

CONTROLLER OF EXAMS

Khyber Pakhtunkhwa Board of Technical Education



15

PESHAWAR (PAKISTAN)

DIPLOMA OF ASSOCIATE ENGINEER

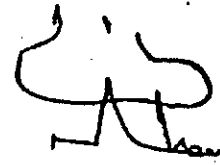
Civil Technology

Session Supplementary 2014

Certified that Mr./Miss MUHAMMAD ARIF
Son/Daughter of USMAN KAHN
Registration No. PIT/P/CT/11-29808
of PESHAWAR INSTITUTE OF TECHNOLOGY PESHAWAR
has passed the Diploma of Associate Engineer CIVIL TECHNOLOGY
Examination held by the Khyber Pakhtunkhwa Board of Technical Education, Peshawar in the month
of November 2014
He/She secured 2279 Marks out of 3350 and has been placed in
Grade B

*In recognition thereof, this
Diploma of Associate Engineer*

is awarded to him/her at Peshawar on the 27th day of July 2016


ASSISTANT SECRETARY


SECRETARY

This Diploma is issued without any alteration or eraser



University of Peshawar Pakistan

16

Detailed Marks Certificate

Bachelor of Arts
Part-II
Supplementary Examination 2018
Govt: College, Peshawar City



Regular

Name: MUHAMMAD ARIF

Gender: Male

Roll No: 17210

Father's Name: USMAN KHAN

Registration No: 2016-GP-10546

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	40	Forty Only
Political Science	75	30	Thirty Only
Law	75	45	Forty Five
Pakistan Studies	40	16	Sixteen
Part-I 7432:Annual-2018	285	166	One Hundred and Sixty Six
Part-II	550	297	Two Hundred and Ninety Seven

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken in Parts

Examination held From 19-Dec-2018 to 21-Jan-2019

Result Declared on Thursday, March 21, 2019

Issue Date: 22-Mar-2019

4:35 pm

(Dr. S. Fazl-i-Hadi)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR



University of Peshawar Pakistan

This certifies that

Muhammad Arif son of Usman Khan

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Arts

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 21st day of March, 2019.

Roll No: 17210

Session: Supplementary 2018

Reg. No: 2016-GP-10546



179065


Registrar


Vice Chancellor

17

GOVT. COLLEGE PESHAWAR

KHYBER PAKHTUNKHWA

18



Character Certificate

Name MUHAMMAD ARIF

Father's Name USMAN KHAN

Class 4th - YEAR Group ARTS C.No. 77

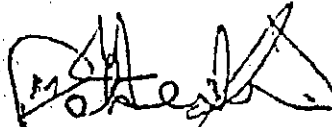
Board/University Registration No. 2016-GP-10546

Board/University Roll No. 17210

Period of Study 2016 - 2018



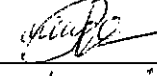
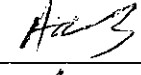
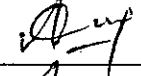
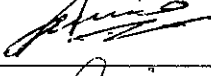
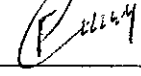
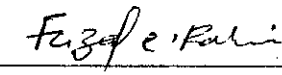
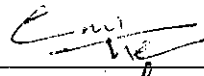
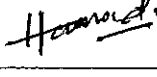

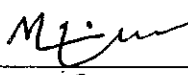



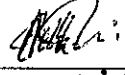
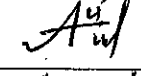
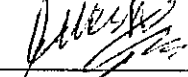
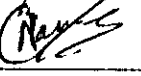
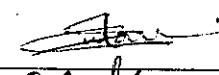
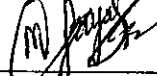
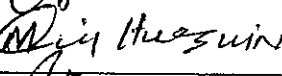
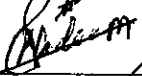
Conduct/Remarks GOOD


Date 29/03/2019


Principal
Govt. College Peshawar
PESHAWAR
Khyber Pakhtunkhwa

Ali Ali Ali Tahir
Jasman Amir Ali Ali
Fazal e Razi Muhammad Ali Ali
Nasim Ali Ali Ali
Said I 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.	<u>Muhammad Arif</u>	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	


ATTACHED

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

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. 091-9225887

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

To,

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar.

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

Sir,

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

The requisite information is hereby submitted as mentioned below:

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

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

Proforma for Junior Clerks initially recruited.

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

District Health Officer
Peshawar

SOFT REMINDER

ANNEX - 4

1755

17/10/2022

22

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

HEALTH

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

Sir,

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

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

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




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

We would be obliged, please.

Date: 13.10.2022


Yours Sincerely,
All Qualified Class-IV Staff

*Chilla
Mjla*
[Signature]
[Signature]

50	129862			
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

بجالات جناب:

Appellant	مخائب:	Sr. Appeal	دعویٰ:
			
			مکتبہ نمبر:
			مورخہ:
			جرم:
			تھانہ:

بابت تحریر آنکہ

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

آن مقام لٹنٹنر کے لیے لٹنٹنر محمد حسان علیا کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے پر جواب دہی و دعویٰ اقبال و دعویٰ اور درخواست از ہر قسم کی تصدیق و جرم پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو ایسے ہر امور سے مستثنیٰ تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی عملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساتھ و دستخط 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

Hassan

26/11/22

المقوم:

العواہ

مقام لٹنٹنر کے لیے منظور ہے۔