FORM OF ORDER SHEET

Court of	
Case No	1833/2022

	Cas	e No
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. Sohail Ashiq resubmitted today by
		Mr. Muhammad Hassaan Adil Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawa
		on Notices be issued to appellant and his counse
		for the date fixed.
		By the order of Chairman
		REGISTRAR ^L U,
		NEXOTO TRAIN
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		,
		·

The appeal of Mr. Sohail Ashiq son of Muhammad Ashiq 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. 3492 /S.T,

Dt. 05-12 /2022

REGISTRAR.

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Hassaan Adil Adv. High Court Peshawar.

(A) A4 The

objections

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. <u>1833</u>/2022

Sohail Ashiq	VS	Government of KP and Others
•		1
\		
	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	·Α,	: 8-9
5.	Seniority List	'B'	10-11
6.	Educational Documents	'С'	12-17
7.	Departmental Representation dated 17-06-2022	'D'	18
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	19
9.	Letter No. 14703/DHO dated 01- 09-2022	' F'	20
10.	Reminder application dated 17-10-2022	,G,	21
11.	Wakalatnama	- /	22

APPELLANT

Through

BARRISTER

MUHAMMAD HASSAAN ADIL

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

· •				•	•	
Service Appeal No	/2022					
			•			
	. •					,
Sohail Ashiq	,					
Son of Muhammad Ash Resident of P.O Samar	-	gh,	•		•	
Peshawar		:		•	÷.	
. •	•					
	-				APPELL	ANT
					•	
		Versus				,
		_				
. Government of K Secretariate, Peshaw	•	ınkhwa thr	ough C	hief Secr	etary,	Civil
. Secretary to Govern Secretariate, Peshaw		er Pakhtunk	hwa, He	alth Depa	rtment,	Civil
					•	:
3. Director General (D	G), Health Serv	ice, Warsak l	Road, Pe	shawar		1
3. Director General (D		·	,		rict Pesh:	/ awar
		·	,		rict Pesh:	awar
		·	,	l and Disti	rict Pesh:	
		·	,	l and Disti		
	er (DHO), Gran	nd Trunk Ros	kHWA	and Distr	SPONDE	NTS

APPELLANT DATED 17-06-2022 HAS NOT BEEN RESPONDED BY THE

RESPONDENTS.

Respectfully Sheweth,

- 1. That the appellant was appointed on 09.01.2009 (Annex "A") in prescribed manner as Beheshti (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than thirteen years in one and the same scale.
- 2. That the seniority list (Annex "B") of the appellant-Class-IV is maintained separately in the office of respondent no. 04, whereas the seniority list of the employees-Class-IV of the respondent no. 3's office is maintained separately in their office. The services of the employee in the respondent no. 4's office is regulated by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hereinafter referred to as the Rules.
 - 3. That the next post in the hierarchy to which the appellant can be promoted is that of Junior Clerk (BPS-11), and 33% quota is reserved by the Rules for the promotions amongst the Daftaries (BPS-04), Naib Qasids (BPS-03), Bailiff (BS-04), etc with 02 years' service experience as such, and who have passed Secondary School Certificate Examination.
- 4. That, numerous posts of the Junior clerk were advertised by the respondent No. 3 & 4 department. However, the same were filled by the respondent No. 3 by promoting the employees of his office only as well as through initial recruitment since long, but the respondents were taking no steps to fill the same by affording a chance of promotion to the appellant despite of the availability and allocation of post to the office of the respondent no. 04.
- 5. That though the appellant was having the required qualification (Annex "C") at the time of advertisement of junior clerk post and the vacancies were also available at that time, but he was deprived, illegally, of the benefit of promotion at that juncture.
- 6. That the appellant along with other colleagues submitted an application / representation dated 17-06-2022 (Annex "D") to the respondent-department for their promotion on the quota reserved for them. In response to application dated 17-06-2022, a letter was issued by respondent No. 03 vide letter no. 1776-856/Promotion cell, dated 18-08-2022 (Annex "E"), wherein the respondent No. 03 asked the respondent no. 04 to furnish the details of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33% quota. Following this, the respondent no. 04 vide letter No. 14703/DHO dated 01-09-2022 (Annex "F") sent an answer to the respondent

No. 03 wherein the details provided were shown to be NIL, because all the posts, either made available / created in the office of respondent no. 04 or become available / vacant due to retirement etc, were used to be filled by the respondent no. 04 from the employees of his office and illegally ignoring the Class-IVs including the appellant from the office of the respondent no. 04. Needless to mention here that a reminder application dated 17-10-2022 (Annex "G") was also submitted to the department by the appellant along with other colleagues but the respondent's department didn't consider it necessary to even take up the file of the appellant into consideration.

7. That the appellant, realizing the violation of his rights, approaches this Hon'ble Court through instant appeal, *inter alia*, on the following grounds amongst others;

GROUNDS:

- A. That the appellant was equipped with all the requisite qualification for promotion to the posts of Junior Clerk (BPS-11) long ago and also the vacancies were available but for no valid reason and illegally, the promotion was withheld and the posts were filled in through promoting the employee from the office of the respondent no. 03 as well as through initial recruitment by the respondent No. 03's office, unlawfully curtailing the right of promotion of the appellant; hence, as per the settled principal of law, the appellant is entitled to the back benefits from the date of his entitlement and the vacancies had occurred.
- B. That the appellant has a right and entitlement to the promotion as well as to the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred.
- C. That the appellant being eligible to promotion in the year 2011 is required to be placed senior to the fresh candidates appointed or promoted after 2011 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

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, Sohail Ashiq Son of Muhammad Ashiq, Resident of P.O Samar Bagh, Samar Bagh, 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.

Sohail Ashiq	VS	Government of KP and Otl	her
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		espondents from taking any	
•	nst the appellan	at till the final disposal of the	-
instant appeal.	•		
		· · · · · · · · · · · · · · · · · · ·	
	,	÷ •	
Respectfully Sheweth:			
hat the above titled appeal	is heing filed hef	ore this hon'ble Tribunal along wit	h ir
pplication.	is some mod cor	ore and non-ore rendental thong with	11 11.
,			
That the grounds of main app	peal may kindly a	also be considered as part and parc	el o
pplication.			
Th-4 11 1		/	
• •	rima-facie case ii	n his favour and is also sanguine	abo
uccess.			. •
•	also leans in four	our of annellant	
That balance of convenience	aisu icans in iavi		

PRAYER:

1)

2).

3)

4)

5)

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.

APPELLANT

Through

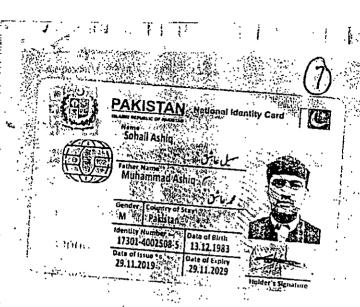
BARRISTER MUHAMMAD HASSAAN ADIL

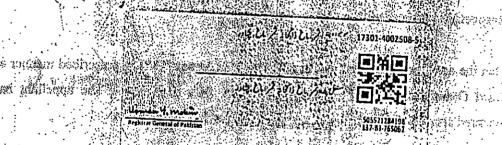
Advocate High Court

AFFIDAVIT

I, Sohail Ashiq Son of Muhammad Ashiq, Resident of P.O Samar Bagh, Samar Bagh, 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





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Annex



OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH PESHAWAR

OFFICE ORDER

Consequent upon accorded by the Departmental Selection Committee Sohail Ashiq S/O Mohammad Ashiq Muslim Abad Peshawar is hereby appointed as Behishti BPS-01 (2970-90-5670) plus usual allowances as admissible under the rules.

His appointment in the Health Department City District Govt. of NWFP will be subject to the following terms and conditions:-

- 1 He will be on probation initially for a period of one year.
- 2. His services can be dispensed with during the probation period, if his work and conduct found unsatisfactory.
- 3. His appointment will be subject to medical fitness.
- 4. He will not entitled to any TA DA for medical examination and joining the first appointment.
- 5. 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.
- 6. As laid down vide3 Govt. of NWFP, Establishment and Administration Department Notification No. E&A (1-13)/2005, dated 10/08/2005, he will not be entitle to pension or gratuity however in lieu thereof, he will entitled to to receive such amount contributed by his towards the contributory provident fund along with the contributions made by the Government to his account in the said fund.
- 7. If he wishes to resign from service he will have to submit resignation in writing one month in advance OR deposit one month's pay in the Govt. treasury. However he will continue to serve the government till his resignation accepted by the competent authority.

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

> Sd/xxxxxx Executive District Officer Health District Peshawar

No. 206 - 11 .EDOH/Sohail

Dated Peshawar the // /2009

/A copy is forwarded to the:

- 1. PS to Minister for Health NWF@Peshawar
- 2. PA to Director General Health Services, NWFP Peshawar
- 3. PA to District Coordination Officer Peshawar
- 4. District Accounts Office Peshawar
- 5. Official Concerned
- 6. Account Section

For information and n/action.

Executive District Officer

M Health District Peshawar

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



Personal Information of Mr SOHAIL ASHIQ d/w/s of MURAMMAD ASHIQ

Personnel Number: 00412478 CNIC: 1730140025085

Date of Birtle 13.12.1983

Entry into Govt. Service: 12.01.2009

Length of Service: 13 Years 09 Months 021 Days

Employment Category: Active Temporary

Designation: SANITARY PETROL

81186483-GOVERNMENT OF KHYBER PAKH

DDO Code: PR9857-DISTRICT HEALTH OFFICER PESHAWAR Payroli Section: 009

GPF Section: 001

Cash Center:

OFF A C No. 441478

GPF Interest applied

GPF Balance:

137,302.00 (pravisional)

Pay and Allermances:

Vendor Number: 30316207 - SOHAIL ASHIQ 21693 NBP Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 03

Pay Stage: 12

Wage type	Amount	Wage type	Amoun
0001 Basic Pay	21,720,00	1004 House Rent Allow 45% KP21	3.512.00
1210 Convey Allowance 2005	1.785.00	1300 Medical Allowance	
1521 Fixed T.A.(D.A	30.00	2148 15% Adhec Relief All-2013	1.500.60
199 Adduc Relief Allow € 10%	202.00	2311 Dress Alloyance - 2021	292.(X)
2312 Washing Allowance 2021	1.000.00	2313 Integrated Allowance 2021	1,000,00
2341 Dispr. Red All 15% 2022KP	2,143,00	2347 Adhec Rel Al 15% 22(PS17)	2,143,00

Deductions - General

_ :	Wage type	Atmound.	Wage type	16 mm 1 6	
	3083 GPF Subscription	-770,00	3501 Benevolent Fund	Ameni	
, !	4004 R. Benefits & Death Comp:	-300.00		-6400.000	
٠. '	The state of the s	70.07.043		0.00	Ĺ

Deductions - Loans and Advances

Long	Description	Principal amount	Deduction	Balance
Deductions - Income Tax				

Payable:

0.00

Recovered till DCT-2022-

0.00

Exempted: 0.00

Recoverable:

0.00

Gress Pay (Rs.):

35,457,00

Deductions: (Rs.):

-1,670,00

Net Payr (Rs.):

33,787.00

Payee Name: SOHAIL ASHIQ Account Number: 4320118461

Bank Denils: NATIONAL BANK OF PAKISTAN, 230822 CHOWK YADGAR CHOWK YADGAR.

Leaves:

Opening Balance:

Availed:

Ermed:

Balance

Perinanent Address:

City: P

Domicile: NW - Klyber Pakhimkhwa

Housing Status: No Official

Temp. Address: City;

Email: sohailashiq507@gmail.com

Symem penermed discurrent in occumbatre with APPM 4.0.12 MX2852.56.10.20224-3.01 AB amounts are in Pat.Rupees

Errors & concessions escripted (SERVICES/11/10/2022/19/47-27)

		Ser	iority List Of Class	IV Employees	Working Unde	r DHO Pach		$ \begin{array}{ccc} & (10) \end{array} $
5.1			Father Name	NIC Number	Date of Entry i	n Designation	Qualification	Annex
· -		affar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988			
<u> </u>		ahir Shah	· Amir Zada	17301-8905148-5		Naib Qasid	Matric	
		tuhammad Riaz	. Násar Ullah	17301-1675304-7	2/1/1992	Chowkidar	Matric	
<u> </u>		amad	Shahid Hamid	17301-5090803-1	16/03/1995 6/4/1997	Ward Orderly	Matric	
	5 A	shfaq Ahmad	Sulaiman Khan	17301-1814298-7		Ward Orderly	BA	
	6 AI	hmad Jan	Ghazi Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric	BHU Terai
	7 Sa	alman Shah	Fazle Qadar		30/04/1999	Naib Qasid 🗸	FA	
	8 Fa	zal Rabi	Sahar Gul	17301-7456183-7	9/1/2003	Ward Orderly	FA ·	
"	9 Sa	hibzada Aamir	Mukhtiar Ahmad	17301-9586454-7	11/8/2006 :	Ward Orderly	Matric	
Г		uhammad Ishfaq	Mir Akbar	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diploma	
		hail Ashiq	Muhammad Ashiq	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DIT	
		hulam Mujtaba	Ghulam Mustafa	17301-4002508-5	12/1/2009	Sanitary Petrol	BA	-
		z Ahmad .	Taza Gul	17301-7148125-9	26/12/2009	Ward Orderly	BA	
		unir Hussain	Faqir hussain	17301-5419523-7	31-12-2009	Chowkidar	FA	
		veed Khan	Muhammad Nawaz Kham	17301-1311673-1	23/02/2010	Naib Qasid	Matric	
<u> </u>		uhammad Ibrar	Gul Mast Khan	17301-6584400-1	3/3/2010	Nalb Qasid	BA	$\exists x \in \mathcal{M}(x)$
		uhammad Sulaiman	Musafar	17301-4408732-9	4/3/2010	Behishti	SSC	Sweden ACI \$10 Mir Ash
		jjad Ahmad	Liagat Ali Khan	17301-6117689-7	24-05-2010	Behishti	BA	- Mir Axi
		rgat Auzal	Javid Akhtar	17301-8599458-3	13-06-2011	Behishti	FA	- VO (1) // X
· 		ed Kifayat Shah		16101-7487588-9	19-10-2011	Chowkidar	FA	
		dul Shahab	Naurooz Shah Abdul Jabbar	17301-1458161-3	31/12/2011	X-ray Attendent	MA+ Health Diploma	-
		hammad Imran		17301-7776929-5	27/12/2012	Behishti	MSC Economics	-12- AMMal al
		Naveed	Qaleem Ullah	17301-3090264-1	29/12/2012	Chowkidar	MA	TERRIORIAN 1/2
	-	hammad Altaf	Naveed Ahmad	17301-5904442-3	31/12/2012	 	FA ,	Sad Ollah 5/0 .
		hid Islam	Subhan ullah	17301-5887445-5	29-04-2013		DAE	
			Fagir Gul	17301-3550466-9	4/2/2014		FSC+ Surgical Diploma	1
		andyar Khan	Musharaf Khan	17301-6996238-7			BA BA	=
		ms Ul Athhar	Shams Ul Qamar	17301-8058948-7			SSC	-
		ıl-islam	Muhammad Qayum	17301-5067106-3	0.000			-
		an Misbah	Misbah Ud din	17101-4426272-5	1_1_1		MA+ Health Diploma BA	
		id Islam 🔞	F档ir Gul					District Health Officer
			Qabil Khan				Surgical Diploma · FSC	Peshawar
37	2 Murs	hid Ali			I = 7 - 1		rsc RSc	

BSc

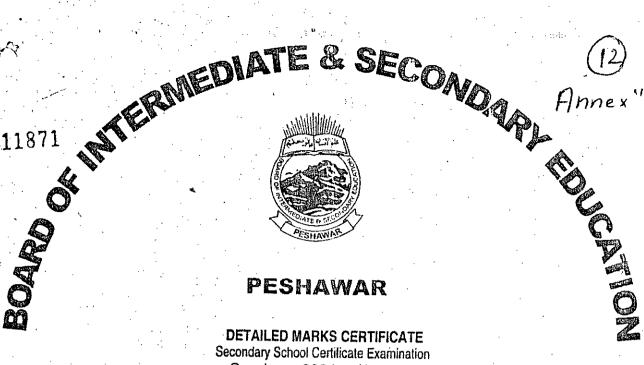
Naib Qasld

		adeem Khan	Cha- 7	······································			
	34	Faread Ullah	Sher Zaman	17301-8762303-1	12/8/2016	- 1 t	l .
· i	35	Uma/Athan	Afridi Khan Safi	17301-4505337-1	3/8/2016	Behishti	FA
j		Sabir Shah	Pervaiz Khan	17301-8066889-5		Naib Qasid	BA'
. -		Wagar Younis	Zaiban Shah	, 17201-6576098-3	29/05/2017	Naib Qasid	FA
ļ		Avariat tonuiz	Shafaras Khan	17301-9197840-5	19/01/2018	Chowkidas	Matric+ Health Diploma
-	30	Syed Ghous Ali Shah Muhammad Arif	Syed Abid Shah	17301-1800560-9		Ward Orderly	FS¢
- (-	73	Muhammad Arif	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	MA
1		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
1		Faisal Ahmad	Habib ur Rehman	17301-6599340-5	20/02/2018	Ward Orderly	BA
\vdash		Muhammad Saboor	Manzoor Khan	17301-9784416-5	3/10/2018	Chowkidar 🕛	FA
-		Faroog Haidar	Khan Bahadur	17301-3784416-5	3/10/2018	Chowkidar'	FA+ Health Diploma
-		lmran Khan	Izzat Khan	17101 3003355	3/10/2018	Ward Orderly?	FA
. _		Rahim Shah 🔞 🦠		17101-1892366-1	30/10/2018	Chowkidar .	FA+Electric Diploma
		Shehryar Khan	Fagir hussain	17301-8692584-1	27/10/2020	Ward Orderly	DAE+ DIT
	48		lhsan Ullah	17301-2332817-7	27/10/2020	Ward Orderly	MA+DIT Diploma
	49		Zaka Ullah	17301-1797449-1	27/10/2020	Ward Orderly	FA
u L	50		Noor Muhammad	17301-0416153-5	27/10/2020	Ward Orderly	FSc
Ų.		NA	Usman Khan	17301-3280446-5	27/10/2020	Ward Orderly	ВА
			Muhammad Hanif	17301-86494820-9	27/10/2020	Ward Orderly	BA
			Abdul Sattar	17301-6540441-7	27/10/2020	Ward Orderly	MBA
			Habib ur Rehman	17301-6952992-5	27/10/2020	Chowkidar	Matric
			Muhammad Dawood	17301-6701436-9	27/10/2020	Ward Orderly	FA
.			Zahoor Ud Din	17301-8767271-3	27/10/2020	Chowkidar	BA
			Abdul Hafeez	17301-5569170-9	27-10-2020	Chowkidar	Matric
-			alal Shah	17301-5242528-1	27-10-2020	Ward Orderly	B.COM
-				17301-6527188-7	27-10-2020	Ward Orderly	FA ·
1				17301-1955764-1	27-10-2020	Ward Orderly	FSc+Health Diploma
\vdash				17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
				17301-7058253-5	27-10-2020	Ward Orderly	SSC
-	*****			17301-3206617-7	8/12/2020	Ward Orderly	FSC :
-				17301-5541278-7	2/3/2021	Behishti	FA
┝	0413	rainian Khan	ilawar Khan	17301-3443294-5	建设加强加强的企业的 和	Ward Orderly	
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District Health Officer Peshawar

Annex" C"

11871



Secondary School Certificate Examination Session 2004 (Annual)

Name: Sohail Ashiq		
Father's Name: <u>Muhammad Ashiq</u>	Ball No	147016

Subject	Marks	MARKS OBTAINED			
		The:/P-A	Prac/P-B	Total	In Words
1. English	150	-		69	Sixty-Nine
2. Urdu	150			61	Sixly-One
3. Islamiyat (Comp)	75	49		49	Forty-Nine
4. Pakislan Sludies	75	29	. **	29	Twenty-Nine
5. New Riazi	100	45		45	Forty-Five
6. G. Science	100	35		35	Thirty-Five
7. A.M. Drawing	100			. 45	Forty-Five
8. Islamic Studies	100	53		53	Fifty-Three

Total 850

386-D Three Hundred Eighty-Six Only

Remarks

IS,ART.

Prepared by: Checked By:_

Date: 19-06-2004

Note: Error / Ommission accepted

Computer Cell BISE, Peshawar,

Controller of Examinations

S.No. 312057

Roll No. <u>147016</u>



Board of Intermediate and Secondary Education Peshawar N.W.J.P. Pakistan

Secondary School Certificate Examination

SESSION 2004 - ANNUAL

(Humanities Group)

This is to Certify that	Sohail Ashiq	Son / Daughter of	Muhammad Ashiq
ਤnd a resident of	Peshawar District	<u> </u>	as passed the Secondary School Certificate
amination of the Board of	Intermediate and Secondary Educa		
	i <u>386</u> Marks out of 850 and t		
The Candidate passed in the 1. English 3.		5. Mathematics6. General Science	7. Islamic Studies
Date of birth according to adr	mission form February 13.	1983	
Asstt Socretary			secretary.

This certificate is issued without alteration or erasure



1371975

Roll No: 11292

PESHAWAR

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE

HUMANITIES (Part-II)

Son / Daughter of Muhammad Ashiq	
of PESHAWAR	
has secured the marks shown against each subject in the H S S C Examination held in the month of October 2010 as Private Student	

Subjects	. ,	Marks Obtained					
Subjects	Marks	Par		Рал		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	33		36		69	Sixty-Nine
Urdu	200	40		47		87	Eighty-Seven
Islamic Education	50	19				19	Nineteen
Pakistan Studies	50			19		19	Nineteen
Islamic History	1 300	77					Hancetteri .
	200	37		.33		70	Seventy Only
Civies	200	50		44		94	Ninety-Four
Archaeology	200	33		33			Sixty-Six

Remarks:

424-E | Four Hundred Twenty-Four Only

Checked By:

Date of issue: 28-12-2010

Controller of Examinations

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

بتالمالتخالجيل S NO. 31099 Roll No. 11292 **Group Humanities** Board Of Intermediate & Secondary Education Rhyber Pakhtunkhwa (pakistan) INTERMEDIATE EXAMINATION **SESSION 2010-SUPPLEMENTARY** Sohail Ashiq This is to Certify that_____ Son of ____ Muhammad Ashiq and a resident of Peshawar District _____ Registered No. 480-B/P-2009 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Deshawar held in Oct, 2010 as a Private candidate. He obtained 424 Marks out of 1100 and has been placed in grade __ E _ Cepresenting _ Satisfactory . The examination was taken in parts. This Certificate is issued without alteration or erasure.

University of Peshawar

Session:	Supplementary 201	2 partsian		
<u> </u>	SOHAIL ASHIQ	son of	MUHAMMAD ASH	iQ and
Prībate Ca	ndidate of	District Peshawar		_ habīng Passed :
•				, ~ ,
prescribed :	examination held inD	ecember 2012 is this day a	dmitted by the Univer	rsity Of Peshawar
the Begree :	of	Bachelor of Arts.	in	3rd Division
The examin	ation was taken <u>In F</u>	arts_		
Registration No.	2011-PE-34192	تحنيق الم		3 M C
Rell No.	36129	2.40a		Registrar
8.N.I. & M.	17301-4002508-5	Constant of the second of the	•	m. Nasuewa

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Result Declared on

March 26, 2014

Wee Chancellor





University of Peshawar

Pakistan

Detailed Marks Certificate

Bachelor of Arts.

Part-II
Supplementary Examination 2012

District Peshawar

Private

Name: SOHAIL ASHIO

Father's Name: MUHAMMAD ASHIQ

Gender.Male

Roll No: 36129

Registration No: 2011-PE-34192

Division:3rd

Papers	Max Marks		Marks Obtained
		In Figures	In Words
English (Compulsory)	75	24	Twenty Four
Urdu	75	25	Twenty Five
Islamic Studies	75	34	Thirty Four
Pakistan Studies	40	15	Fifteen
	!		
	·		
Part-l 4571:Supplementary-2013	285	111	One Hundred and El
Part-II	550	209	One Hundred and Eleven Two Hundred and Nine

Errors & omissions are subject to subsequent rectification

The Examination was taken in Parts

Examination held From 19-Dec-2012 to 28-Jan-2013 Result Declared on Wednesday, March 26, 2014 Issue Date: 31-Mar-2014

11:10 am

Chances Availed: 2

Robbit Khan

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Computenced by RTC

City Area

To

Dairy No. 9721 Date. 17-06-2012 Health Department

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

Subject

APPEALIREQUEST 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. 1st 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 cudro. 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 for 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 promuted to the ministerial positions we were ignored.

It is pertinent to montion here that, the seniority of Class-IV staff have already been prepared at DHO 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.

i would be obliged, pleaso.

Dated: 17-05-2022.

AS - (DEV) AS - MI ्ष - सक्षरात ps - (28D) ggr Crept 50 9.1 50 · B-8

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Your Sincerely,

Jeromannen Am Haller Catrir A.
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Names, Scales and Signatures of Candidates

Sr No.	Name of Candidate	Scale	Signature
1.	Abdul Shahab	BPS-01	Conducts
2.	Ahmad Jan	BPS-01	A
3.	Amir Khan	BPS-04	heafe
4.	Aqib Zahoor	BPS-03	An ?
5.	Asfandyar Khan	BPS-02	Aug.
6.	Asif Naveed	BPS-02	phine.
7.	Fareedullah Safi	BPS-03	Pring
8.	Fazal-e-Rabi	BPS-02	Frizafe, Fali
9.	Ghulam Mujtaba	BPS-02	Chi.
10.	Hamad	BPS-02	Harried.
11.	Haroon-ur-Rasheed	BPS-03	W Sair
12.	Imran Khan	BPS-03	Mju
13.	Izzat Ullah	BPS-01	Fy.
14.	Jahanullah Khan	BPS-01	Johacellas
15.	Mueen Qasmi	BPS-04	Mount
16.	Muhammad Altaf	BPS-03	Milh Cri
17.		BPS-04	Au
18.	Muhammad Ihtisham	BPS-04	Mesky
	Muhammad Nouman	BPS-04	Charles
	Muhammad Sulaiman	BPS-03	
	Muhammad Tayyab	BPS-04	m Jayes
22.	Muneer Hussain	BPS-01	My theoring
- 23.	Nadeem Khan	BPS-03	National States

24.	Saadullah Khan	BPS-01	Sombulliel Whiis
25.	Sabir Shah	BPS-03	(abis)
26.	Sahibzada Amir	BPS-02	Jamy Hand
27.	Sardar Ali	BPS-01	O dille
28.	Shahid Ahmad	BPS-04	Py.
29.	Shahid Islam	BPS-02	Gilie
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	transyar.
32.	Sohail Ashiq	BPS-01	
33.	Muhammad Suliman	BPS-04	- tilme
34.	Syed Zaffar Ali	BPS-04	Sinte
35.	Tahir Hafeez	BPS-04	Ganit
36.	Tahir Shah	BPS-01	farios
37.	Turkat Auzal	BPS-03	T-Aveil
38.	Umair Khan	BPS-03	UZ JE
39.	Waqas Ahmad	BPS-02	all the same of th
40.	Waqas Ghulam	BPS-01	July
41.	Zeeshan Ahmad	BPS-04	ing
42.	Zia-ul-Islam	BPS-02	ZiH fislam



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA, PESHAWAR Annex

No. 1776-854 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.

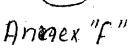
S No.	Name / Father Name	Date of Entry into Govt: Service.	Promotion to J/C in 33% Quota.
 01.			•
02.		-	· .

Proforma for Junior Clerks initially recruited.

S No.	Name / Father Name	Date of Entry into Govt: Service.	ł	Recruitment as Junior Clerk.
01.				
02.			• ,	

Additional Director General (IIR) Directorate General Health Services Khyber Pakhtunkhwa, Peshawar





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.

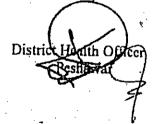
The requisite information is hereby submitted as mentioned below:

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

S.No		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

 Name/Father Name	Date of Entry into Govt: Service	Qualification	Date of initial Recruitment as
Nil	Nil	Nil	Junior Clerk. Nil



SOFT REMINDER

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

1755 (21)
17 (1/2/20) Annex "G".

Subject:

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

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Sic.

With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion since 1988 till date. 1" there was two cadres in health Directorate against which different meetings was scheduled and now it was deciral 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

my to

129858

Barrisler M. Hassaan Adil

باركونسل اايوى ايش نبر: BC-116028 رالطنبر: . . 6243788-6080







يشاور بارايسوسي ايشن،خيېر پختونخواه

Service Tribunal, Peshawer : بدالت بنات

Appellant :- ija	Sr. Appeal :55,	
of girty Ary	علت نمبر:	L
المرابع المراب	مور خد	
() Let R-well	: _{7.2}	V
وينه	تقانه	
ويرآنكه	باعث	

مقدمه مندرج عنوان بالاطس الى طرف سے واسطے پيروى وجواب دہى كارواكى متعلقه

آن مقام میشا ور کیا مقرر کی مقرر کی مقرر کی مقرر کی مقرر کی افزار کیا جاتا ہے کہ صاحب کو کیل مقرر کی اقرار کیا جاتا ہے کہ صاحب موسوف کو مقد کی کل کاروائی کا کائل افتیار ہوگا ، نیز وکیل صاحب کو راضی نامه کریے والر روالت و فیمله بر طف دینے جواب دعوی اقبال دعوی اور درخواست از برقتم کی تقیدیق زریں پر دی خطار نے کا اختیار ہوگا ، ٹیز بھورت عدم میروی یا وگری میطرفہ یا ایل کی برا مال اورمنسوفی ، نیز دائر کرنے ایک گرائی ونظر تانی و بیروی کرنے کا مخار ہوگا اور بھورت ضرورت مقدو مدور کے کل یا جزوی كارواكى كي واسط اور وكيل ما محار قانوني كواسي مراويا النه يجائ تقر ركا اختيار موكا اور صاحب مقرر شده کوری جملہ فرکورہ بازافتیارات حاصل ہو ل کے اور اس کا ساختہ بڑ داختہ منظور و تبول ہو گا دوران مقدمہ میں جو جرجہ ار طاف التوائے مقدہ کے سب سے ہوگا رکوئی تاریخ بیشی مقام دورہ یا حد سے باہر ہوتو وکیل صاحب یابند نے ہول کے کہ پیروی مذکورہ کریں ، لیدا وکات تامہ لکھ دیا تاکہ سند رہے

26/11/2022