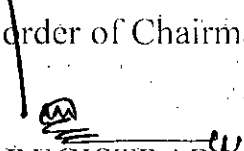


FORM OF ORDER SHEET

Court of _____

Case No. - 1834/2022

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. Tahir Shah 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. Tahir, Shah son of Ameer Zada 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. 3497 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.
High Court Peshawar.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

(*) All the objections have been removed.



BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1834/2022

Tahir Shah

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'	12-15
7.	Departmental Representation dated 17-06-2022	'D'	16
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	17
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	18
10.	Reminder application dated 17-10-2022	'G'	19
11.	Wakalatnama		20

Through

Jalil
APPELLANT

Hassan
BARRISTER
MUHAMMAD HASSAN ADIL

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

Service Appeal No. _____/2022

Tahir Shah

Son of Ameer Zada
Resident of Shpano Garhi, Urmar Mayana,
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 02.01.1992 (**Annex "A"**) in prescribed manner as Chowkidar (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than thirty 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;

G R O U N D S:

- 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 1994 is required to be placed senior to the fresh candidates appointed or promoted after 1994 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

4

F. That appellant reserve his right to urge additional grounds with leave of the Tribunal, after the stance of the respondents becomes known to him.

PRAYER:

It is, therefore, most respectfully prayed that on acceptance of the instant appeal, the Hon'ble Tribunal may graciously be pleased to direct the respondents to promote the appellant to the post of Junior Clerk along with the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred. Furthermore, the respondents may also be directed to place the appellant senior to the fresh candidates appointed or promoted after his entitlement as Junior Clerk.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.

T. Shah
APPELLANT

Through

Hassan

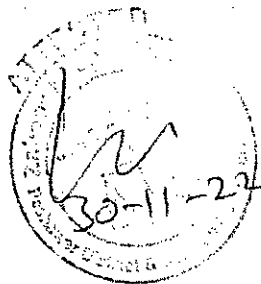
**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, Tahir Shah Son of Ameer Zada, Resident of Shapsano Garhi, Urmur Mayan, 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.

T. Shah
DEPONENT



5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Tahir Shah

VS

Government of KP and Others

Application for restraining the respondents from taking any adverse action against the appellant till the final disposal of the instant appeal.

Respectfully Sheweth:

- 1) That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about its success.
- 4) That balance of convenience also leans in favour of appellant.
- 5) That if the relief as prayed for in the heading of this application is not granted, the very purpose of titled appeal will become infructuous.

PRAYER:

It is, therefore, prayed that on acceptance of this application, the respondents may graciously be restrained from taking any adverse action against the appellant till the final disposal of the instant appeal.

6
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAAN ADIL


Advocate High Court

AFFIDAVIT


I, Tahir Shah Son of Ameer Zada, Resident of Shapsano Garhi, Urmar Mayan, 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



PAKISTAN National Identity Card
 FEDERAL REPUBLIC OF PAKISTAN

Name: Tahir Shah
 Father's Name: Amir Zada
 Gender: M Country of Stay: Pakistan
 Identity Number: 17301-8905148-5 Date of Birth: 04.01.1970
 Date of Issue: 02.11.2021 Date of Expiry: 02.12.2031


 Holder's Signature

(7)

گورنمنٹ آف پاکستان
 گورنمنٹ آف سندھ
 گورنمنٹ آف بلوچستان
 گورنمنٹ آف خیبر پختونخوا
 گورنمنٹ آف آزاد کشمیر

17301-8905148-5

 528191030065
 117-10-750983

گورنمنٹ آف پاکستان
 Director General of Printing

گورنمنٹ آف پاکستان
 گورنمنٹ آف سندھ
 گورنمنٹ آف بلوچستان
 گورنمنٹ آف خیبر پختونخوا
 گورنمنٹ آف آزاد کشمیر

OFFICE OF THE DISTRICT HEALTH OFFICER, PESHAWAR.

OFFICE ORDER.

As recommended by Mr. Iftikhar Ahmad Khan Jungra, Minister for Agriculture, NWFP, Peshawar.

Mr. Tehli Shah S/O Ambar Zada

is hereby appointed temporarily as Chowkidar BPS (1) (20-1310) against a vacant post of Chowkidar in Civil Supply BHU, Peshawar subject to the following term and conditions:-

- 1/-
- 2/-
- 3/-
- 4/-
- 5/-
- 6/-
- 7/-

- 1. He is domiciled in NWFP.
- 2. He is declared medically fit for Govt. Services.
- 3. He will be Governed by such rules and orders as may be issued by the Govt. for the category of Govt. Servants.
- 4. He is liable to serve any where in NWFP.
- 5. If he wishes to resign at any time, he will resign in writing by giving a prior notice of one month and will continue to serve the Govt. till the acceptance of his resignation by the competent authority.
- 6. He will be on probation period of one year.
- 7. If he accept the offer on above conditions, he should report for duty to this office within 7 days after the receipt of this communications.

DISTRICT HEALTH OFFICER, PESHAWAR.

No. 23-27 /E- dated Peshawar the, 2/1/1992.

A copy is forwarded to the:-

- 1/- Mr. Iftikhar Ahmad Khan Jungra, Minister for Agriculture, Peshawar.
- 2/- District Health Officer, Peshawar.
- 3/- Mr. Iftikhar Ahmad Khan Jungra, Minister for Agriculture, Peshawar.
- 4/- Mr. Iftikhar Ahmad Khan Jungra, Minister for Agriculture, Peshawar.
- 5/- Mr. Iftikhar Ahmad Khan Jungra, Minister for Agriculture, Peshawar.

Abdul Aziz

S#:1 Peshawar Dist.

Pers #: 00040479 Buckle: 0
 Name: TAHIR SHAH
 CHOWKIDAR
 CNIC No. 13888359855
 GPF Interest Applied
 04 Active Temporary

PAYS AND ALLOWANCES:

0001-Basic Pay	20,460.00
1210-Convey Allowance 2005	1,785.00
1300-Medical Allowance	1,500.00
2148-15% Adhoc Relief All-2013	423.00
2199-Adhoc Relief Allow 210%	285.00
2211-Adhoc Relief All 2016 10%	1,531.00
2224-Adhoc Relief All 2017 10%	2,046.00
2247-Adhoc Relief All 2018 10%	2,046.00
2264-Adhoc Relief All 2019 10%	2,046.00
Gross Pay and Allowances	36,768.00

DEDUCTIONS:

GPF Balance 286,995.00	Subscr:	830.00
6505-GPF Loan Principal Instal Bal: 6,200.00		5,133.00
3501-Benevolent Fund		600.00
4004-R. Benefits & Death Comp:		300.00

Total Deductions 6,863.00
 29,905.00

D.O.B 08.01.1970
 30 Years 01 Months 022 Days

LFP Quota:
 NATIONAL BANK OF MUNICIPAL CORPORATIO
 3086119621

طاهر شاہ

Peshawar Dist.

S#:2

Pers #: 00040479 Buckle: 0
 Name: TAHIR SHAH
 CHOWKIDAR
 CNIC No. 13888359855
 GPF Interest Applied
 04 Active Temporary

PAYS AND ALLOWANCES:

2309-Adhoc Relief All 2021 10%	2,046.00
2311-Dress Allowance - 2021	1,000.00
2312-Washing Allowance 2021	1,000.00
2313-Integrated Allowance 2021	600.00

Gross Pay and Allowances 36,768.00

DEDUCTIONS:

GPF Balance 286,995.00

Subscr:

Total Deductions 6,863.00
 29,905.00

D.O.B 08.01.1970
 30 Years 01 Months 022 Days

LFP Quota:
 NATIONAL BANK OF MUNICIPAL CORPORATIO
 3086119621

(D)

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid ✓	Matric
	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid ✓	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DIT
11	Sohail Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar	FA
14	Munir Hussain	Faqir hussain	17301-1311673-1	23/02/2010	Naib Qasid ✓	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid ✓	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torgat Auzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray 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

(10)

Annex - "B"

BHU Terai |

Sardar Ali s/o
Mir Aslam

Sardar Ullah s/o
Sulib Zada

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	Shehan 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 (Fied)

11

District Health Officer
Peshawar

GG. No. 201741

Annex - "C"

12

**Board of Intermediate & Secondary Education
PESHAWAR**

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

Name Talwar Shoh

Father's Name Aamir Zada Roll No. 10490

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figures	In Words
1. English	150	49	/
2. Urdu	150	49	
3. Islamiyat Comp:	75	52	
4. Pakistan Studies	75	30	
5. Gen: Mathematics	100	50	
6. General Science	100	34	
7. <u>g.s</u>	100	36	
8. <u>Pa</u>	100	43	
Total	850	343=D	Three hundred + Forty Three

This certificate is issued errors and omission excepted.

Prepared by CU

Checked by _____

Date 20/12/1996



Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

S. No. PBP- 915506

Roll No 10490

13

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Peshawar N.W.F.P. Pakistan
 Secondary School Certificate Examination
 SESSION 1996 (SUPPLEMENTARY)
 (HUMANITIES GROUP)

THIS IS TO CERTIFY THAT Tahit Shah
 Son/Daughter of Amir Mada
 and a resident of Peshawar District

has passed the Secondary School Certificate Examination
 of the Board of Intermediate and Secondary Education, Peshawar held in October 1996
 as a F grade candidate. He/She obtained 340 Marks out of 850
 and has been placed in Grade II Representing Fair

- The Candidate passed in the following subjects.
- | | | | | | | | |
|---------|--------------|------------|---------------------|------------------|----------------------|-----------------|-----------|
| 1. Urdu | 2. Islamiyat | 3. English | 4. Pakistan Studies | 5. Genl. Science | 6. Genl. Mathematics | 7. Isl. Studies | 8. Pashto |
|---------|--------------|------------|---------------------|------------------|----------------------|-----------------|-----------|

Date of birth recorded in admission form is 1970
 one thousand nine hundred and seventy (1970)

[Signature]
 Secy Secretary
 December, 1996

[Signature]
 Secretary

This certificate is issued without alteration or erasure.

42134

14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



PESHAWAR

DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION, 2003
HUMANITIES (Part-II)

Name : TAHIR SHAH
 Father's Name : AMEERZADA

Roll No: 11581

Subjects	Marks	Marks Obtained				Total	Marks In Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	42	--	33	--	75	Seventy Five
Urdu	200	35	--	38	--	73	Seventy Three
Islamic Education	50	28	--	--	--	28	Twenty Eight
Pakistan Studies	50	--	--	19	--	19	Nineteen
Islamic History	200	35	--	40	--	75	Seventy Five
Islamic Studies	200	51	--	55	--	106	One Hundred Six
Arabic	200	50	--	44	--	94	Ninety Four
Total : 1100						470-D	Four Hundred Seventy Only
Remarks :							

Checked By : _____

Date : 03-September, 2003

Note: Error / Omissions excepted

Khaksar and BRAINS Software Enterprise (KBSoft)

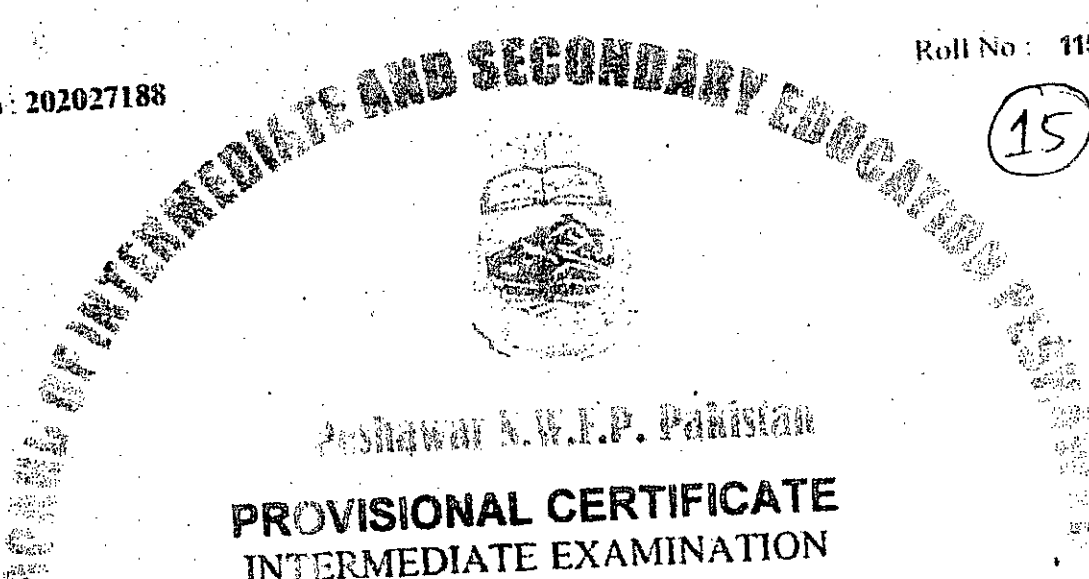
Parv

 Controller of Examinations

SNo: 202027188

Roll No: 11581

15



Peshawar N.W.F.P. Pakistan

**PROVISIONAL CERTIFICATE
INTERMEDIATE EXAMINATION
SESSION 2003 Annual**

Humanities Group

THIS IS TO CERTIFY THAT Tahir Shah

Son of

Ameerzada

student of

Peshawar District

Registration No: _____ has passed the *Intermediate (Annual)*

Examination of the Board of Intermediate & Secondary Education, Peshawar held in
May, 2003 as a *Private* candidate. He obtained 470 marks out of 1100 and has been
 placed in Grade "D"

Checked by _____

Date of Issue: September 3, 2003

Khakhar and BRAINS Software Enterprise (KBSoft)

Asst. Secretary (Certificate)
 Board of Intermediate & Secondary Education
 Peshawar

Dairy No. 9721
Date. 17-06-2022
Health Department

To

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

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

Sir,

With due 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 cadre. But the order is still awaited.

Furthermore, most of our Class-IV staff are well qualified having diploma holders and Master in different subjects. Despite of well deserving and qualified Class-IV staff no promotion was made so far due to the reason that we are sub cadre. The Class-IV staff working in Directorate General Health Services, Khyber Pakhtunkhwa were time and again promoted to the ministerial positions we were ignored.

It is pertinent to mention here that, the seniority of Class-IV staff have already been prepared at DHO Peshawar against which promotion can be possible.

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

I would be obliged, please.

Dated: 17-05-2022.

Your Sincerely,

All qualified Class-IV staff

- SSII (B&D)
- AS - (DEV)
- AS - (MT)
- CH - (SRM)
- CHO
- DS - (SSD)
- DS - (OS)
- SO - B-I
- SO - B-II

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So IV

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Handwritten signature T-Angal

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Handwritten signature Amir...

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Handwritten signature Bahadur

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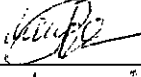
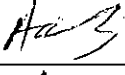
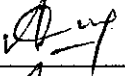
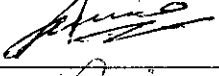
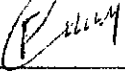
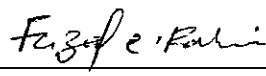
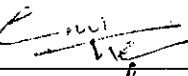
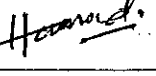
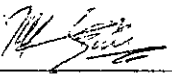
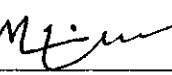
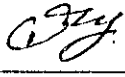


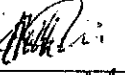
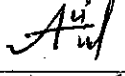
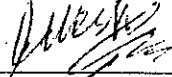
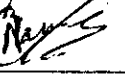


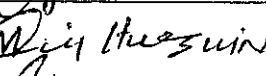
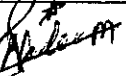
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Handwritten signature Nurva

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Naqvi Umar Majeed Tahir
Jasim Amir Abdullah Umar
Fazal e Rahe Muhammad Abdul Qadir
Nawaz Fahim Safdar Arif
Sahib I. Iqbal M. Iqbal Mir
Hussain

Names, Scales and Signatures of Candidates

<u>Sr No.</u>	<u>Name of Candidate</u>	<u>Scale</u>	<u>Signature</u>
1.	Abdul Shahab	BPS-01	
2.	Ahmad Jan	BPS-01	
3.	Amir Khan	BPS-04	
4.	Aqib Zahoor	BPS-03	
5.	Asfandyar Khan	BPS-02	
6.	Asif Naveed	BPS-02	
7.	Fareedullah Safi	BPS-03	
8.	Fazal-e-Rabi	BPS-02	
9.	Ghulam Mujtaba	BPS-02	
10.	Hamad	BPS-02	
11.	Haroon-ur-Rasheed	BPS-03	
12.	Imran Khan	BPS-03	
13.	Izzat Ullah	BPS-01	
14.	Jahanullah Khan	BPS-01	
15.	Mueen Qasmi	BPS-04	
16.	Muhammad Altaf	BPS-03	
17.	Muhammad Arif	BPS-04	
18.	Muhammad Ihtisham	BPS-04	
19.	Muhammad Nouman	BPS-04	
20.	Muhammad Sulaiman	BPS-03	
21.	Muhammad Tayyab	BPS-04	
22.	Muneer Hussain	BPS-01	
23.	Nadeem Khan	BPS-03	

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ATTESTED

24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir
27.	Sardar Ali	BPS-01	Sardar Ali
28.	Shahid Ahmad	BPS-04	Shahid
29.	Shahid Islam	BPS-02	Shahid
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

Memorandum of Understanding between the Government of Khyber Pakhtunkhwa and the Government of Punjab

Annex - "E"

No. 776-856 Promotion Cell Dated Peshawar the 18/08/2022

17

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"

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
PHONE NO. 091-9225887

18

No. 14703 /DHIO dated Pesh: 09/09/2022

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

ATTORNEY - 9
1755
17/10/2022
Health
SOFT REMINDER

To:

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

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

19

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.

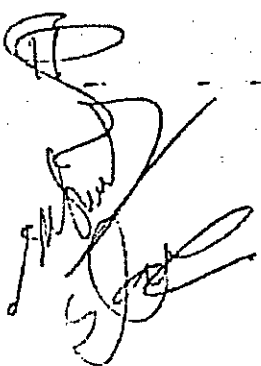
It is pertinent to mentioned that the seniority list of Class-IV Staff have already been prepared at DHO Peshawar against which promotions can be possible.

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

Chahida
Miyta


تہ 50

129846



Barrister M. Hassoan Adil ایڈووکیٹ

بار کونسل ایسوسی ایشن نمبر: PC-116028

رابطہ نمبر: 03038373453

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

Service Tribunal Peshawar

بعدالت جناب:

مخائب: Appellant	دعوی: Sr. Appeal
طالب شاہ بنام گورنمنٹ آف پشاور	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

بابت تحریر آئکہ

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

آن مقام پشاور کے ایڈووکیٹ محمد حسن عادل 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 تقریر ثالث و فیصلہ بر حلف دینے و جواب دعویٰ اقبال و دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی ہر آئینگی 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 اپنے ہمتاؤں سے اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی عملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پورا ساختہ 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 پابندی ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Adil

26-11-22

الرقوم:

بعدالت جناب

مقام پشاور کے لیے منظور ہے۔