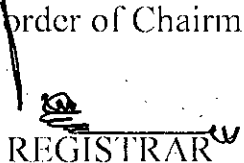


# FORM OF ORDER SHEET

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

Case No. - 1835/2022


| 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. Ahmad Jan 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><br/>REGISTRAR</p> |

The appeal of Mr. Ahmad Jan son of Ghazir 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.
- 3- Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 3473 /S.T,

Dt. 05-12 /2022

  
REGISTRAR <sup>CLW</sup>  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Hasaan Adil Adv.  
High Court Peshawar.

(\*) All the objections have been removed

Hasaan

NOTE:- There is no appointment order. However, the details of appointment have been provided in the pay roll.

Hasaan

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

Service Appeal No. 1835/2022

Ahmad Jan

VS


Government of KP and Others

-----  
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-----

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| 1.     | Service appeal                                       |           | 1-4   |
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| 4.     | Appointment Order                                    | 'A'       | 8-11  |
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| 7.     | Departmental Representation dated 17-06-2022         | 'D'       | 18    |
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| 9.     | Letter No. 14703/DHO dated 01-09-2022                | 'F'       | 20    |
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APPELLANT

Through

  
BARRISTER  
MUHAMMAD HASSAAN ADIL

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

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

**Ahmad Jan**

Son of Ghazi Khan  
Resident of Garhi Baloch Abad, P.O Pakha Ghulam,  
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 (D.H.O), 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 23.04.1999 (**Annex "A"**) in prescribed manner as Naib Qasid (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than twenty-three 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;

**GROUND 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 2001 is required to be placed senior to the fresh candidates appointed or promoted after 2001 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.

*[Signature]*  
APPELLANT

Through

*[Signature: Hassaan]*  
BARRISTER  
MUHAMMAD HASSAAN ADIL

Advocate High Court

**AFFIDAVIT**

I, Ahmad Jan, Son of Ghazi Khan, Resident of Garhi Baloch Abad, P.O Pakha Ghulam, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

*[Signature]*  
DEPONENT



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

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

**Ahmad Jan**

**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

*[Signature]*  
APPELLANT

Through

*[Signature]*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Ahmad Jan**, Son of **Ghazi Khan**, Resident of **Garhi Balocha Abad**, P.O **Pakha Ghulam**, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

*[Signature]*  
DEPONENT



7



The entries in this page should be reviewed or re-checked at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Mr. AHMAD TARI

2. Race: Muslim

3. Residence: Village Ghazi Baloch, P.O. Pakka GILLAN  
Taluk & Distt. Peshawar.

4. Father's name and residence: Mr. GHAZI KHAN

5. Date of birth by Christian era as nearly as can be ascertained: 07-12-1975  
7th December 1975

6. Exact height by measurement: 5-5

7. Personal marks for identification: A wound Scar on right sight of eye.

8. Left hand thumb and Finger impression of (Non-Gazetted) Officer.

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant: [Handwritten Signature]

10. Signature and Designation of the Head of the Office, or other Authorizing Officer.

[Handwritten Signature]  
**District Health Officer  
Peshawar**





Peshawar Dist.

#: 2

P Sec:004 Month:September 2021  
PW657B -EXECUTIVEDISTRICTOFFICER H  
EXECUTIVEDISTRICTOFFICER  
NTN: 0  
GPF #: JM 021513  
Old #: 99991744656

Pers #: 00040955 Buckle: 0

Name: AHMAD JAN  
NAIB QASID

CNIC No.13564448082

GPF Interest Applied

04 Active Temporary

PW6578 -

PAYS AND ALLOWANCES:

|                                |          |
|--------------------------------|----------|
| 2264-Adhoc Relief All 2019 10% | 1,870.00 |
| 2309-Adhoc Relief All 2021 10% | 1,870.00 |
| 2311-Dress Allowance - 2021    | 1,000.00 |
| 2312-Washing Allowance 2021    | 1,000.00 |
| 2313-Integrated Allowance 2021 | 600.00   |

Gross Pay and Allowances

37,740.00

DEDUCTIONS:

GPF Balance 102,456.00

Subrc:

Total Deductions

3,230.00

34,510.00

D.O.B

22.04.1964

LFP Quota:

NATIONAL BANK OF PAKMUNICIPAL CORPORATIO  
3086106920

27 Years 02 Months 001 Days

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    | Galeem 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                    |

(12)  
Annex "B"

BHU Terai |

Sardar Ali s/o  
Mir Aslam

Sard Ullah s/o  
Sahib Zada

District Health Officer  
Peshawar

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

District Health Officer  
Peshawar



8507  
 Board of Intermediate & Secondary Education  
 PESHAWAR

Annex 14

DETAILED MARKS CERTIFICATE  
 Secondary School Certificate Examination  
 (GENERAL GROUP)  
 Session 19 91 (Annual/Supplementary)

Name

Abdul Jan

Father's Name

Chishti

Roll No.

14127

| SUBJECT             | Total Number of Marks Allowed | MARKS OBTAINED |                           |
|---------------------|-------------------------------|----------------|---------------------------|
|                     |                               | In Figures     | In Words                  |
| 1. English          | 150                           | 98             | Four hundred Eighty Seven |
| 2. Urdu             | 150                           | 69             |                           |
| 3. Islamiyat Comp.  | 75                            | 51             |                           |
| 4. Pakistan Studies | 75                            | 42             |                           |
| 5. Gen. Mathematics | 100                           | 64             |                           |
| 6. General Science  | 100                           | 33             |                           |
| 7. <i>Art</i>       | 100                           | 67             |                           |
| 8. <i>IS.</i>       | 100                           | 63             |                           |
| <b>Total</b>        | <b>850</b>                    | <b>487</b>     | <b>e</b>                  |

This certificate is based on marks and omissions excepted.

Prepared by

*[Signature]*

Checked by

Date

14

Controller of Examinations  
 Board of Intermediate & Secondary Education  
 PESHAWAR

15

Sr. No. **PBR-0010451**

Roll No. 14127



**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**Secondary School Certificate Examination**

**SESSION 1991 (ANNUAL)**  
**(HUMANITIES GROUP)**

THIS IS TO CERTIFY THAT Ahmad Jan  
Ghani

Son/Daughter of \_\_\_\_\_  
and a student of Govt: High School Pakha Ghulam

has passed the *Secondary School Certificate Examination*  
of the Board of Intermediate and Secondary Education, Peshawar held in March 1991  
as a *Regular candidate*. He/She obtained 427 Marks out of 850  
and has been placed in *Grade*  Representing Good

The Candidate passed in the following subjects:

- |            |                     |                     |                 |
|------------|---------------------|---------------------|-----------------|
| 1. English | 3. Islamiyat        | 5. Gen: Science     | 7. Isl: Studies |
| 2. Urdu    | 4. Pakistan Studies | 6. Gen: Mathematics | 8. Art          |

He/She has been awarded *Grade*  on the basis of internal  
assessment by the Institution concerned:

Date of birth according to admission form is Seventh December,  
one thousand nine hundred and Seventy Five (07-12-1975)

Asstt. Secretary

10th July, 1991.

*This certificate is issued without alteration or erasure.*

Secretary

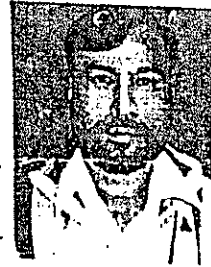
# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No: 12521

## PESHAWAR

DUPLICATE



PROVISIONAL AND DETAILED MARKS CERTIFICATE  
INTERMEDIATE (SUPPLY) EXAMINATION, 2014  
HUMANITIES ( Part-II )

Ahmad Jan Son / Daughter of Ghazi Khan

of Peshawar

has secured the marks shown against each subject in the HSSC Examination held in the month of October 2014 as Private Student

| Subjects          | Marks | Marks Obtained |       |         |       |       | Marks in Words               |
|-------------------|-------|----------------|-------|---------|-------|-------|------------------------------|
|                   |       | Part-I         |       | Part-II |       | Total |                              |
|                   |       | Theory         | Pract | Theory  | Pract |       |                              |
| English           | 200   | 33             | --    | 33      | --    | 66    | Sixty-Six                    |
| Urdu              | 200   | 33             | --    | 42      | --    | 75    | Seventy-Five                 |
| Islamic Education | 50    | 41             | --    | --      | --    | 41    | Forty-One                    |
| Pakistan Studies  | 50    | --             | --    | 21      | --    | 21    | Twenty-One                   |
| Islamic History   | 200   | 50             | --    | 42      | --    | 92    | Ninety-Two                   |
| Philosophy        | 200   | 58             | --    | 56      | --    | 114   | One Hundred Fourteen         |
| Islamic Studies   | 200   | 64             | --    | 72      | --    | 136   | One Hundred Thirty-Six       |
| Total : 1100      |       |                |       |         |       | 545-D | Five Hundred Forty-Five Only |
| Remarks :         |       |                |       |         |       |       |                              |

Reg: No 70717-B/PVT-2010

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

Issue Date: 12-01-2015

Controller of Examinations

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

Roll No. 12521

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Sr No. 91995

**Board of Intermediate and Secondary Education**  
Peshawar Khyber Pakhtunkhwa  
Pakistan



**Intermediate Examination**

(Humanities Group)

**SESSION SUPPLEMENTARY 2014**

This is to Certify that

Ahmad Jan

Son of

Ghazi Khan

Private student of

Peshawar District

passed the Intermediate Examination of the Board of Intermediate & Secondary Education  
Peshawar, hold in October, 2014 He obtained 545 marks out of 1100 and placed in  
grade D representing Fair. The examination was taken in parts.

Registered No. \_\_\_\_\_

*[Signature]*

Asstt. Secretary

*[Signature]*

*[Signature]*  
Secretary

This certificate is issued without alteration or erasure.

Annex — "D"

Dairy No. 9721  
Date. 17-05-2022  
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. 1<sup>st</sup> there was two cadres in the health directorate against which different meetings was scheduled and now it was decided to merge these cadres into one cadre. But the order is still awaited.

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

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

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

I would be obliged, please.

Dated: 17-05-2022.

Your Sincerely,

All qualified Class-IV staff

- SS1 (B&D)
- AS - (REV)
- AS - MFI
- CH - HSRU
- CPO
- DS - (R&D)
- DS - (R&G)
- SO - B1
- SO - B2

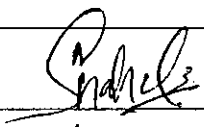

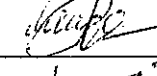

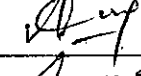
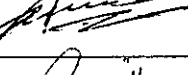
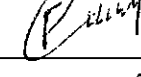
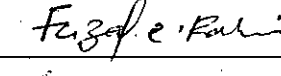
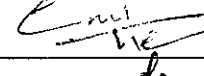
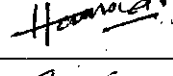
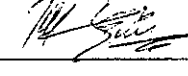
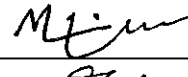
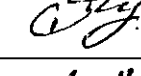

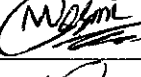
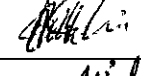
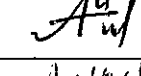
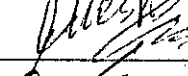
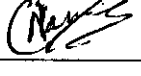

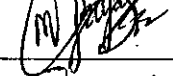
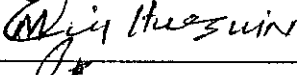
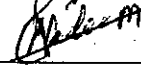
*[Handwritten signatures and initials]*

*[Handwritten names: T-Arwal, Shahab, Nurva, etc.]*

*[Handwritten initials: A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z]*

Abdul Ullah Majeed Tahir  
Jasimuddin Amir Abdullah Qureshi  
Fazal e Rahe Muhammad Abdullah Qureshi  
Nawaz Fahim Safdar Qureshi  
Sahibuddin I Qureshi Mir  
Hamid

Names, Scales and Signatures of Candidates

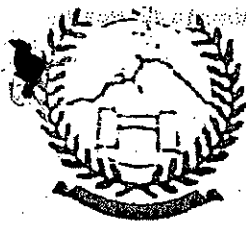
| <u>Sr No.</u> | <u>Name of Candidate</u> | <u>Scale</u> | <u>Signature</u>  |
|---------------|--------------------------|--------------|---|
| 1.            | Abdul Shahab             | BPS-01       |    |
| 2.            | Ahmad Jan                | BPS-01       |    |
| 3.            | Amir Khan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

  
**ATTENDED**

|     |                  |        |                |
|-----|------------------|--------|----------------|
| 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   |

(A)  
ATTESTED





DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR

(19)

1. Max. Salary for J/C in Govt. Service as per the scale of pay for J/C in Govt. Service. 01/01/2019

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



20

Annex "F"

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

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

1755 (21)

17/10/2022  
HEALTH SERVICES KHYBER PAKHTUNKHWA  
Annex "G"

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

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

Sir,

With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion since 1988 till date. 1" 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  
Mujta*  
*[Signature]*  
*[Signature]*  
*[Signature]*

|  |        |  |
|--|--------|--|
| 50                                       | 129857 |    |
| Barrister M. Harsan Adil<br>ایڈووکیٹ:    |        |  |
| BC-116028<br>بار کونسل ایسوسی ایشن نمبر: |        | <p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p> <p>Service Tribunal Peshawar. بعدالت جناب:</p>  |
| 0303-8373453<br>رابطہ نمبر:              |        |  |

|   |                     |
|---|---------------------|
| Appellant: منجانب:  | Sr - Appeal. دعویٰ: |
|  <p>پشاور بار ایسوسی ایشن</p> | علت نمبر:           |
|   | موردہ:              |
|   | جرم:                |
|   | تھانہ:              |

**باعت تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجواب دہی کاروائی متعلقہ

آن مقام پشاور کے لئے مسٹر محمد حسام عادل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے اور رٹس، فیصلہ بر حلف دینے، جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈکری یا کسی 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمزاد ملانے کی اجازت ہے۔ تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی عملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ دراختیار منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر خانہ 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

Parvaan

26/11/22

المقوم:

مقام پشاور کے لیے منظور ہے۔

احمد جاوید خان بلوچ آباد ٹرینی پشاور