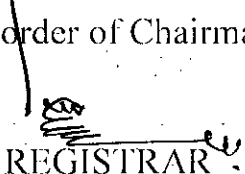


FORM OF ORDER SHEET

Court of _____

Case No. - 1836/2022

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. Imran Khan 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. Imran Khan son of Izzat Khan received today i.e. on 02.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be got signed by the appeal.
- 2- Copy of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.

No. 3499 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.
High Court Peshawar.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

(*) All The objections have been removed.

Hassaan

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1836/2022

Imran Khan

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'	12-16
7.	Departmental Representation dated 17-06-2022	'D'	17
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	18
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	19
10.	Reminder application dated 17-10-2022	'G'	20
11.	Wakalatnama		21

Mir
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAAN ADIL

①

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

Service Appeal No. _____/2022

Imran Khan

Son of Izzat Khan
Resident of Alian Korona,
Charsadda

....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 03.10.2018 (**Annex "A"**) in prescribed manner as Chowkidar (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than four 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 2020 is required to be placed senior to the fresh candidates appointed or promoted after 2020 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.

Mujib
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAN ADIL
Advocate High Court

AFFIDAVIT

I, **Imran Khan** Son of **Izzat Khan**, Resident of **Alian Korona, Charsadda**, 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.

Imran
DEPONENT



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

Service Appeal No. _____/2022

Imran Khan

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.

Mir (6)
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAAN ADIL

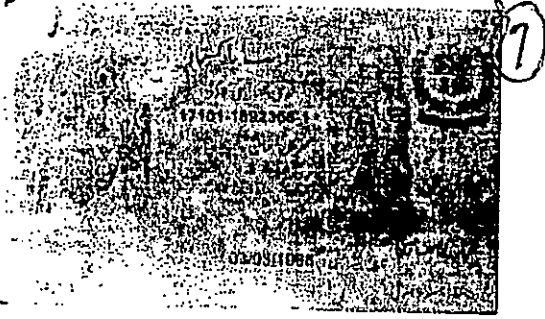
Advocate High Court

AFFIDAVIT

I, **Imran Khan** Son of **Izzat Khan**, Resident of **Alian Korona, Charsadda**, 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.



Mir
DEPONENT



Annex "A"

OFFICE ORDER

As recommended by the District Department of Selection Committee during the meeting held on 14 September, 2018 at 10:00 AM in the presence of the undersigned, **Muhammad Khan S/O Izzat Khan (Ex-Porter, Incapacitated)** has been appointed as **Chowkidar** (RDC No. 9610-390-21310) in the office of the District Health Officer, Peshawar, on the basis of his candidature in the category of the staff belonging to the Government of Khyber Pakhtunkhwa.

The appointment of the above mentioned staff in the Government of Khyber Pakhtunkhwa Department will be subject to the following terms and conditions:

1. He will be on probation initially for a period of one year which may be extended for another one year.
2. He will be offered minimum of the pay scale.
3. His services will be subject to Medical fitness certificate.
4. He will not be entitled to any TADA for medical examination and joining the post of 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. He will perform duty where and when the undersigned/his administrative officer post or transfer him in District Peshawar.
7. His services can be dismissed without any notice during the probation period, if his work and conduct found unsatisfactory.
8. If he wishes to resign from service he will have to submit resignation in written form in advance or deposit one month salary in the government treasury. However he will continue to serve the government service till the acceptance of his resignation by the competent authority.
9. If the above terms and conditions are acceptable to him, he should report to District Health Officer, Peshawar and signed this offer within 14 days of the receipt of this order.
10. If he failed to comply with Para-8, the order will automatically be considered as withdrawn and cancelled.

Sd/-xxxxxx
District Health Officer,
Peshawar.

No. 1772/18005/ADSC/1/ceased/2018

Dated Peshawar the 30-7-2018

1. Accountant General Khyber Pakhtunkhwa, Peshawar
 2. Director General Health Services Khyber Pakhtunkhwa Peshawar
 3. District Nazim, City District Government Peshawar.
 4. Registrar, Peshawar High Court Peshawar.
 5. Litigation Officer, DHO Office, Peshawar.
 6. Account Section of this office.
 7. Mr. Izzat Khan S/O Izzat Khan (Ex-Porter Incapacitated) Resident of Mohallah Alyan Near Kot District Peshawar.
 8. Office Record.
- For information and necessary action

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



Personal Information of Mr IMRAN KHAN d/w/s of EZAT KHAN

Personnel Number: 00898642 CNIC: 1710118923661 NTN:
 Date of Birth: 03.03.1988 Entry into Govt. Service: 13.10.2018 Length of Service: 04 Years 00 Months 020 Days

Employment Category: Active Temporary

Designation: CHOWKIDAR 81186488-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8863-District Support Manager PPIII 1522 2 NBP Haba PESHAWAR
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied GPF Balance: 45,118.00 (provisional)
 Vendor Number:
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 03 Pay Stage: 3

Wage type		Amount	Wage type		Amount
0001	Basic Pay	16,000.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Rel All 15% 2022KP	1,617.00
2347	Adhoc Rel AI 15% 22(PS17)	1,617.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
4004	R. Benefits & Death Comp:	-300.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 28,661.00 Deductions: (Rs.): -1,670.00 Net Pay: (Rs.): 26,991.00

Payee Name: IMRAN KHAN

Account Number: 4154349118

Bank Details: NATIONAL BANK OF PAKISTAN, 230517 MUNICIPAL CORPORATION PESHAWAR, MUNICIPAL CORPORATION (GT ROAD, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESHAWAR

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: 0303imrankhan1988@gmail.com

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
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid ✓	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DTT
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
Sulaiman 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	Pervaiz 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 Haider	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 I
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)

(N)

District Health Officer
Peshawar

26168

12

Annex "C"

Roll No. 74946
Group HUMANITIES

PESHAWAR
PROVISIONAL AND DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION ANNUAL-2006

Imran Khan Son/Daughter of Erzat Khan

of CHARSADDA DISTRICT

has secured the marks shown against each subject, in the Secondary School Examination held in the months of March / April 2006 as Private Student

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Pract	Theory	Pract		
1. English	150	30	--	25	--	55	Fifty-Five
2. Urdu	150	26	--	36	--	62	Sixty-Two
3. Islamiyat (Comp)	75	31	--	--	--	31	Thirty-One
4. Pakistan Studies	75	--	--	31	--	31	Thirty-One
5. Maths	150	40	--	17	--	57	Fifty-Seven
6. General Science	150	45	--	42	--	87	Eighty-Seven
7. Islamic Studies	150	43	--	52	--	95	Ninety-Five
8. Pashto	150	38	--	49	--	87	Eighty-Seven

Total: 1050

805:0 Five Hundred Five Only

Remarks

PA.S.

Date of Birth: 03rd March, 1988

Controller of Examinations

Issue Date: 30-06-2006

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

(Computer Cell BISE Peshawar)

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Board of Intermediate and Secondary Education

Peshawar

مجلس التعليم اعدادي و ثانوي

Secondary School Certificate Examination

SESSION 2006- ANNUAL

(Arts Group)

No. 461410

Date 25/9/06

This is to Certify that Imran Khan Son of Ezzat Khan
and a resident of Charsadda District has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March, 2006 as a Private
Candidate. He obtained 505 Marks out of 1050 and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- | | | | |
|---|----------|----------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. General Science | 6. Maths | 7. Islamic Studies | 8. Pashto |
| Name of birth according to admission form | | <u>March 3, 1988</u> | |

Chief Secretary

[Signature]
Secretary

This certificate is issued without alteration or erasure

KHYBER PAKHTUNKHWA TRADE TESTING BOARD

Directorate General Technical Education & Manpower Training
Competency based / Skill recognition



Serial No. 1027

Session 2012-14

Roll No. 2736

Name of Candidate MR. IFRAN KHAN

Category S/D/W.O EZZAT KHAN

Registration No. IMT/ISBI/ELE/14/2736

Institute INSTITUTE OF MODERN TECHNOLOGY ISLAMABAD


appeared and passed the trade proficiency test in accordance with the requirements of the National Occupational Skill standards of TWO YEARS duration prescribed by the National Training Board, Government of Pakistan in the Trade of ELECTRICAL

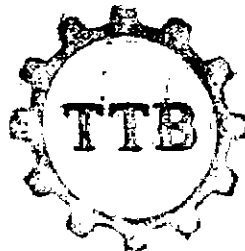
The examination was conducted by the Khyber Pakhtunkhwa Trade Testing Board in the month of January, 2014


His/her proficiency in the trade test is as under:-
1) Theory 560/800 2) Practical 960/1200

The examination was taken as a whole/in parts.

And in recognition thereof this Trade Certificate is issued on the 10th, February, 2014


Secretary




Chairman

Roll No. 112764

Serial No. 032538

Board of Intermediate and Secondary Education
Peshawar
شعبہ اعلیٰ و ثانوی تعلیم پشاور



Higher Secondary School Certificate Examination

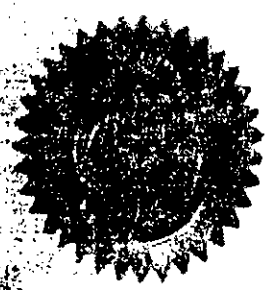
(HUMANITIES GROUP)
SESSION ANNUAL 2015

Certified that Imran Khan
Son of Ezzat Khan
Resident of Charsadda District

Passed the Intermediate Examination of the Board of Intermediate & Secondary Education
Peshawar, held in April, 2015 as a Private candidate. He obtained 542 marks
Out of 1100 and has been placed in Grade D representing Fair

Registered No. 06966-B/P-2014

Asst. Secretary



Secretary

This Certificate is issued without attestation or passport

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: 17-06-2022.

Your Sincerely,

All qualified Class-IV staff

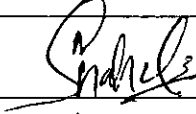

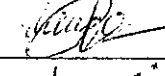

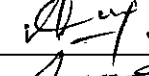
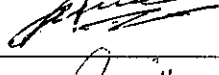
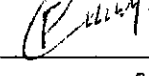
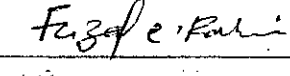
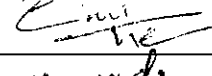
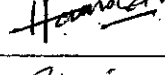
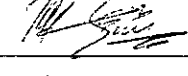
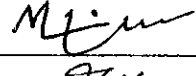
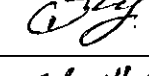


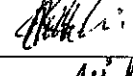
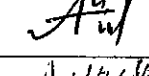
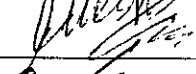
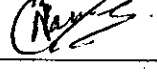

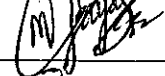
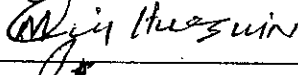
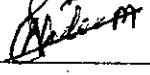
- SSII (BKD)
- AS - (DEV)
- AS - (MTE)
- CH - (HRII)
- CPD
- DS - (RSD)
- DS - (Srgs)
- SO - B-I
- SO - B-II

Handwritten signatures and initials:
- T-Arwal
- Shahab
- Nurwa
- Amir
- ...
- So II

Abdullah Abdullah Abdullah Tahir
Jasman Amir Abdullah Amir
Fizal Abdullah Abdullah Abdullah
Nasir Abdullah Abdullah Abdullah
Abdullah Abdullah Abdullah Abdullah
Abdullah Abdullah Abdullah Abdullah

17 (A)

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	

#

ATTESTED

17(B)

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

(18)

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



19

Annex "F"

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR
PHONE NO. 091-9225987

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

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

1755 (20)
17/10/2022

Annex "G"

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

Sir,

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

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

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




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

We would be obliged, please.

Date: 13.10.2022


Yours Sincerely,
All Qualified Class-IV Staff

Handwritten signatures and initials

50	129856			
Barrister M. Hassan Adil ایڈووکیٹ				
BC-116028 بار کونسل ایسوسی ایشن نمبر:				
03038373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

Service Tribunal Peshawar.

بعدالت جناب:


Appellant	منجانب:	Sr- Appeal	دعویٰ:
	عمران بخش خان	-	علت نمبر:
گواہ محمد علی بی و غیرہ		-	مورخہ:
		-	جرم:
		-	تھانہ:

بامث تحریر آگہ

عمران خان و عمرات خان کنڈ جاگیر

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

آن مقام پشاور ایگے بیرسٹر محمد حسن علی اہل 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 و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برکری 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 کے ہونے پر تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخیت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:  26-10-2022

مقام پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کالی یا قابل قبول ہوگی۔