FORM OF ORDER SHEET

Court of	·
Case No	1844/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/12/2022	The appeal of Mr. Fareedullah Safi 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.
		By the order of Chairman
		REGISTRAR
	·	

The appeal of Mr. Fareed Ullah Safi son of Afridi Khan Safi 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. 3461 /S.T.

Dt. 05 - 12 /2022

REGISTRAR

SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA

PESHAWAR.

Muhammad Hassaan Adil Adv. High Court Peshawar.

(*) All the objections have been removed

Harragu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1844/2022

Fareedullah Safi

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,	12-23
7.	Departmental Representation dated 17-06-2022	'D'	24
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'Е '	25
9.	Letter No. 14703/DHO dated 01- 09-2022	٠Ł,	26
10.	Reminder application dated 17-10-2022	'G'	27
11.	Wakalatnama		28

Through

BARRISTER MUHAMMAD HASSAAN ADIL



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Son of A	ullah Safi Afridi Khan t of Mohalla							
Son of A	Afridi Khan t of Mohall					·		
Son of A	Afridi Khan t of Mohall							
Residen	t of Mohall					•		1
		•	Town,				•	
					-			
	•			,			APPEI	LANT
•		•			,	·		
-				**				
				Versus				
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	nment of tariate, Pes	-	r Pakhtu	inkhwa	through	Chief	Secretary,	Civil
	tary to Go tariate, Pes		of Khyb	er Pakh	tunkhwa,	Health	Departmen	t, Civil
. Direc	tor Genera	l (DG), H	ealth Serv	ice, War	sak Road	, Peshaw	ar	
. Distri	ct Health (Officer (D	HO), Grai	ıd Trunl	k Road, T	ehsil and	District Pe	shawar
				,				
	-			-		,	RESPON	DENTS
			•			•		DEIVIO
	 			<u> </u>		 	 	<u> </u>

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 03.08.2016 (Annex "A") in prescribed manner as Naib Qasid (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than six 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 2018 is required to be placed senior to the fresh candidates appointed or promoted after 2018 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.

APPELLANT

Through

BARRISTER MUHAMMAD HASSAAN ADIL

Advocate High Court

AFFIDAVIT

I, Fareedullah Safi Son of Afridi Khan Safi, Resident of Mohalla Shahbaz Town, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

DEPONENT

(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

hat the grounds of main appeal may kindly also be considered as part and pplication.			
espectfully Sheweth: nat the above titled appeal is being filed before this hon'ble Tribunal along plication. nat the grounds of main appeal may kindly also be considered as part and plication.		•	-
hat the above titled appeal is being filed before this hon'ble Tribunal along oplication. that the grounds of main appeal may kindly also be considered as part and oplication.	instant appeal.		
pplication		s being filed before th	nis hon'ble Tribunal along
That appellant has a good view of the state	•	eal may kindly also b	be considered as part and
hat appellant has a good prima-facie case in his favour and is also sanguuccess.			
hat balance of convenience also leans in favour of appellant.	pplication	ima-facie case in his	favour and is also sangu

PRAYER:

2)

3)

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

APPELLANT

Through

BARRISTER MUHAMMAD HASSAAN ADIL

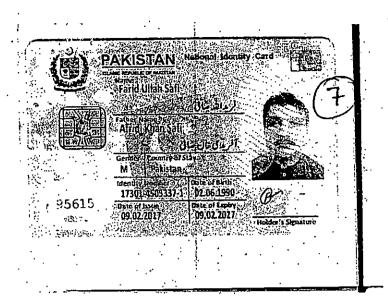
Advocate High Court

AFFIDAVIT

I, Fareedullah Safi Son of Afridi Khan Safi, Resident of Mohalla Shahbaz Town, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

DEPONENT





AND THE STATE OF T

OFFICE OF THE DISTRICT HEALTH OFFICER, PESHAWAR OFFICE ORDER

As recommended by the Departmental Selection Committee during the meeting held on 02/08/2016 at 10:00 AM in the office of District Health Officer, Peshawar, Mr. Fareed Ullah Safi S/O Afridi Khan Safi, Safi House Wazir Bagh Road O/S Kohati Gate Moh: Shahbaz Town District Peshawar is hereby appointed as Naib Qasid (BPS-03 (8040-325-17790) in District Health Officer, Peshawar plus other allowances as admissible to him under the Rules.

His appointment in the Government of Khyber Pakhtoonkhwa, Peshawar Health Department will be subject to the following terms and conditions: -

- 1. He will be on probation initially for a period of one year.
- 2. His services will be subject to Medical fitness.
- 3. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
- 4. He will be governed by such Rules and Orders as may be issued by to Government for the category of Government servant to which he belongs.
- 5. His services can be dismissed without any notice during the probation period, if his work and conduct found unsatisfactory.
- 6. If he wishes to resign from service he will have to submit resignation in writing 30-days in advance or deposit one month salary in the government treasury. However he will continue to serve the government service till the acceptance of his resignation by the competent authority.

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

> Sd/-District Health Officer, Peshawar

No. 6542-47 JDHO/E-19 Dated Peshawar The 13/8 /2016 Copy forwarded to the: -

- 1. Accountant General Khyber Pakhtoonkhwa, Peshawar
- 2. PA to Director General Health Services Khyber Pakhtoonkhwa Peshawar.
- 3. Litigation officer of this office
- DHIS Section of this office.
- 5. Mr. Fareed Ullah Safi S/O Afridi Khan Safi Safi House Wazir Bagh Road O/S Kohati Gate Moh: Shahbaz Town District Peshawar
- 6. Account Section of this office For information and necessary action

District Health Officer

Peshawar



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





Personal Information of Mr FARIDULLAH SAFI d/w/s of AFRIDI KHAN SAFR

Personnel Number: 00739653

CNIC: 1730145053371

Date of Birth: 02.06.1990

Entry into Govt. Service: 03.08.2016

Length of Service: 06 Years 01 Months 029 Days

Employment Category: Active Temporary

Designation: NAIB QASID

81186479-GOVERNMENT OF KHYBER PAKH

Payroll Section: 009

DDO Code: PR8852-District Health Officer MCH Peshawar

Cash Center:

GPF A/C No:

GPF Section: 001 GPF Interest applied

GPF Balance:

75,085.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 03

Pay Stage: 6

	Wage type	Amount		Wage type	Amount
0001	Basic Pay	17,740.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00		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		Dispr. Red All 15% 2022KP	1.792.00
2347	Adhoc Rel Al 15% 22(PS17)	1,792.00			0.00

Deductions - General

Wage type		Amount .		Wage type	Amount
3003 GPF St	ubscription	-770.00	3501	Benevolent Fund	-600.00
4004 R. Ben	efits & Death Comp:	-300.00	6173	CM Flood Relief Fund01-16	-1,939.00

Deductions - Loans and Advances

Loan	Donnintin	1 5		
Luaii .	Description	Principal amount	Deduction 1	Balance
			Deduction	Durance

Deductions - Income Tax

Payable:

0.00

Recovered till SEP-2022:

0.00

Exempted: 0.00

Récoverable:

0.00

Gross Pay (Rs.):

30,751.00

Deductions: (Rs.):

-3,609.00

Net Pay: (Rs.):

27,142.00

Payee Name: FARIDULLAH SAFI

Account Number: 232747946

Bank Details: UNITED BANK LIMITED, 210053 PESHAWAR CITY PESHAWAR CITY, Peshawar

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address:

City:

Domicile: NW - Khyber Pakhtunkhwa

Housing Statús: UNKNOWN

Temp. Address: City:

Email: faridullahsafi2003@gmail.com

5.NO		Father Name	NIC Number	Date of Entry in	Designation	Qualification ,
1	Zoffas Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	No.	
	Tähir Shah	Amir Zada	17301-8905148-5	2/1/1992	Naib Qasid	Matric
	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Chowkidar	Matric
	Hannad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	Matric
	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Ward Orderly	BA
	Ahmad Jan	Ghazi Khan	17301-1274726-3		Chowkidar	Matric
	Salman Shah	Fazie Qadar	17301-7456183-7	30/04/1999	Naib Qasid 🗸 🕟	FA
	Fazal Rabi	Sahar Gul	17301-9586454-7	9/1/2003	Ward Orderly '	FA
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	11/8/2006	Ward Orderly	Matric
10	Muhammad Ishfaq	Mir Akbar		12/8/2006	Ward Orderly	BA. Health Diploma
11	Sohail Ashlq	Muhammad Ashig	17301-9823680-1 17301-4002508-5	28-11-2006	Ward Orderly	Mphil Microbiology+DIT
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	12/1/2009	Sanitary Petrol	BA
13	ijaz Ahmad	Taza Gul		26/12/2009	Ward Orderly	BA
14	Munir Hussain	Fagir hussain	17301-5419523-7 17301-1311673-1	31-12-2009	Chowkidar	FA
. 15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	23/02/2010	Naib Qasid 👵	Matric.
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	3/3/2010	Nalb Qasid 🧳	BA
1.7	Muhammad Sulaiman	Musafar	17301-6117689-7	4/3/2010	Behishti	SSC .
	Sajjad Ahmad	Liagat Ali Khan	17301-8599458-3		Behlshti	8A
19	Torgat Auzal	Javid Akhtar	16101-7487588-9			FA
20 5	yed Kifayat Shah	Naurooz Shah	17301-1458161-3	24 (42 (22)		FA .
	Abdul Shahab	Abdul Jabbar	17301-7776929-5		X-ray Attendent	MA+ Health Diploma
22 N	Muhammad Imran	Qaleem Ullah	17301-7776929-5		Behishti	MSC Economics
	sif Naveed	Naveed Ahmad	17301-5904442-3			MA
24 N	Juhammad Altaf	Subhan ullah				FA
	hahid Islam	Fagir Gul	17301-5887445-5		3ehishti	DAE
	sfandyar Khan	Musharaf Khan	17301-3550466-9	4/2/2014	Nard Orderly	SC+ Surgical Diploma
	ams Ul Athhar	Shams UI Qamar .	17301-6996238-7	4/2/2014		BA
	a-ul-islam		17301-8058948-7		Behishti S	SSC ·
	lman Misbah	Muhammad Qayum	17301-5067106-3		Vard Orderly	MA+ Health Diploma
	ahid Islam	Misbah Ud din	17101-4426272-5	7/4/2015 B		JA .
		Fagir Gul			Vard Orderly S	urgical Diploma
		Qabil Khan	17301-8449980-3	3/8/2016 V		SC
21.41	namu Ali	Gohar Khan	17301-4164590-9	3/8/2016 N		Sc

11

Annex-"B"

BHU Terai

Suizlar Ali fo Mir Aslan

and Ollah 5/6 Su hib Fata

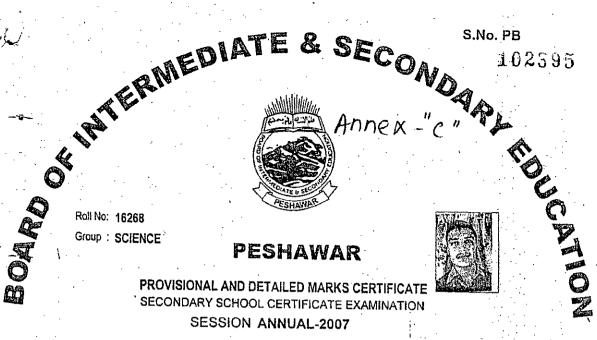
District Health Officer Peshawar

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		-adeem Khan	Sher Zaman	17704		11	
.63	3	4 Fareed Ullah	Afridi Khan Safi	17301-8762303-1	12/8/2016	Behishti	FA
	₹ 3 <u>!</u>	Umair Khan	Pervaiz Khan	17301-4505337-1	3/8/2016	Naib Qasid	BA
-		Sabir Shah	Zaiban Shah	17301-8066889-5	29/05/2017	Naib Qasid •	FA
<u> </u>	37	Waqar Younis .	Shafaras Khan	17201-6576098-3	19/01/2018	Chowkidas	
	38	Syed Ghous Ali Shah	Syed Abid Shah	17301-9197840-5	19/01/2018	Ward Orderly	Matric+ Health Diploma
<u>}</u>	39	Muhammad Arif	Faiz Muhammad	17301-1800560-9	19/01/2018	Ward Orderly	MA
· .	_40	Muhammad Ihtisham	DilShad Khan	17301-2618886-7	19/01/2018	Ward Orderly	BSc
	1	Zeeshan Ahmad	Fareed Khan	17301-2621626-3	19/01/2018	Ward Orderly	м.сом
	42	Faisal Ahmad	Habib ur Rehman	17301-5237207-1	20/02/2018	Ward Orderly	BA BA
	43	Muhammad Saboor	Manzoor Khan	17301-6599340-5	3/10/2018	Chowkidar	FA FA
		Faroog Haidar	Khan Bahadur	17301-9784416-5	3/10/2018	Chowkidar	FA+ Health Diploma
		lmran Khan	Izzat Khan		3/10/2018	Ward Orderly	FA FA
	46	Rahim Shah		17101-1892366-1	30/10/2018	Chowkidar	
		Shehryar Khan	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	FA+Electric Diploma DAE+ DIT
		Jehan Ullah	Fagir hussain	17301-2332817-7	27/10/2020	Ward Orderly	
		Amir Khan	ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	MA+DIT Diploma
		Muhammad Nouman	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FA
`		Muhammad Arif	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	FSc
-			Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
<u> </u>	52	Muĝen Qasmi	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly Ward Orderly	BA
-		Imran Khan	Abdul Sattar	17301-6952992-5	27/10/2020	Chowkidar	МВА
		Shahid Ahmad	Habib ur Rehman	17301-6701436-9	27/10/2020		Matric
-		Haroon Ur Rashid	Muhammad Dawood	17301-8767271-3	27/10/2020	Ward Orderly Chowkidar	FA
·}		Agib Zahoor	Zahoor Ud Din	17301-5569170-9	27-10-2020		8A
		Tahir Hafeez	Abdul Hafeez	17301-5242528-1	27-10-2020	Chowkidar	Matric
-		Hamza Shah	Jalal Shah	17301-6527188-7	27-10-2020	Ward Orderly	в.сом
-	59	Muhammad Tayyab	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FA
		Shehryar Hussain	Nighah hussain	17301-6255930-7	27-10-2020	Ward Orderly	FSc+Health Diploma
		Momin Khan	Johar Ali	17301-7058253-5		Ward Orderly	BSC Computer Science
		mran Shah	Sabir Shah			Ward Orderly	SSC
		Anwar ul Haq	Zia Ul Haq	17301-5541278-7		Ward Orderly	FSC
<u> </u>	64 5	Salman Khan	Dilawar Khan	17301-3443294-5		Behishti	FA ,
<u></u>					A STATE OF THE PARTY OF THE PAR	Mara Orderly	Matric (Died)
 							
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District Health Officer Peshawar





Fareedullah Saafi

Son / Daughter of Afridi Khan Saafi

of ITIFAQ MODEL SCHOOL SURZAI BALA PESHAWAR

has secured the marks shown against each subject, in he Secondary School Certificate Examination held in the month of May 2007 as Regular Student

Subject	Marks	MARKS OBTAINED			
		Theory Paper A	Practical Paper B	Total	In Words
1. English	150	_		75	Seventy-Five
2. Úrdu	150		-	111	One Hundred Eleven
3. Islamiyat (Comp)	75	61		61	Sixty-One
4. Pakistan Studies	75	55	-	55	Fifty-Five
5. Maths	150	, _	-	57	Fifty-Seven
6. Physics	100	30	12	42	Forty-Two
7. Chemistry	100	28	13	41	Forty-One
8. Biology	100	40	14	54	Fifty-Four

496-C Four Hundred Ninety-Six Only

Remarks

Date of Birth: 02nd June,1990

Issue Date: 16-07-2007

ler of Examinations

Note: Errors/Ommission accepted. Any mistake in above particulars must be infirmated within 30 days of the issuance of this certificate Computer Cell BISE, Peshawar.

S. No. 797687

Roll No. 16268



Board of Intermediate and Secondary Education Peshawar N-M-F-P-Pakistan



Secondary School Certificate Examination

SESSION 2007-ANNUAL

(Science Group)

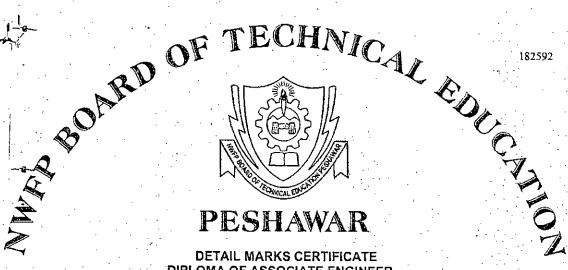
This is to Certify that	Farcedullah Saafi	Son of	Afridi Khan Saafi
and a student of	Itifaq Model School Surzai Ba	ila Peshawar has	s passed the Secondary School Certificate
Examination of the Board of	f Intermediate and Secondary Ed	lucation, Peshawar held in	April, 2007as aRegular
candidate. He obtained	496 Marks out of 900 and	has been placed in Grade	C Representing Good
The Candidate passed in the	e following subjects:		
1. English	2. Urdu	3. Islamiyat (Comp)	Pakistan Studies
5. Maths	6. Physics	7. Chemistry	8. Biology
Date of birth according to a	dmission form June 2,199	<u>) </u>	
		·	<i>Of</i> '
Assit. Secretary	This certificate is is:	sued without alleration or erasure.	Secretary

W.

ITTEFAQ ABAD SURIZAI BALA PESHAWAR

Provisional Certificate

This is to certify that Mr/Miss FAREEDULLAH SAAFI
To DIO Mr AFRIDI KHAN SAAFI Board Registration No 095-B/17FP-05
Who appeared in the B.I. S. E. Peshawar S. S. C. Annual Examination held in MAY 2007
Under Roll No 16218 From this school. According to the result gazette he/she has been declared passed
And obtained 496 Marks and was placed in 2 Division. According to the school record his/her
Date of birth is . In figure 02-06-90 In words. 2nd JUNE, N/H & NINETY
The candidate passed the following subjects.
(1) English (2) Urdu (8) Islamiyat (4) Pak. Studies (5) Mathematics (6) Physics (7) Chemotry (8) Biology
His conduct as a student here was GOOD
Prepared by Dev
Checked by
Dated 16-07-07
Melac Model Cala



DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER IST YEAR MECHANICAL

GOVERNMENT COLLEGE OF TECHNOLOGY PESHAWAR (B-TECH)

Name of Candidate FARID ULLAH SAFI Father's Name AFRIDI KHAN SAFI Roll.No. 168771 Session ANNUAL 2009 Reg. No. GCTB/P/M/II-S/07-3029

Obtained Marks Subject Total Marks Th P٢ In Words Total

1	GEN-111 Islamyat/Pak, Study	50	27		27	Twenty-seven
2	GEN-112 English	100	42	-	42	Forty-two
3	MATH-113 Applied Mathematics-I	150	87	-	87	Eighty-seven
4	MT-131 Safety Practice & Procedure	50	20		20	Twenty
5_,	PHY-122 Applied Physics	50 / 50	20	39	59	Fifty-nine
6	CH-112 Applied Chemistry	50 / 50	20	30	50	Fifty
7	COMP-122 Computer Applications	50 / 50	25	33.	58	Fifty-eight
8	MT-143 Basic Engineering Drawing & CAD-I	50 / 100	20	50	70	Seventy .
9	MT-116 Workshop Practice-I	-,100	64	1.	64	Sixty-four
10	i) Metal Work	50	-	34	34	Thirty-four
11	ii) Wood Work	50	-	32	32	Thirty-two
12-1	iii) Welding & Forging	50	j	30	30	Thirty
13	iv) Foundry	50	-	41	41	Forty-one

1100 Six hundred fourteen.

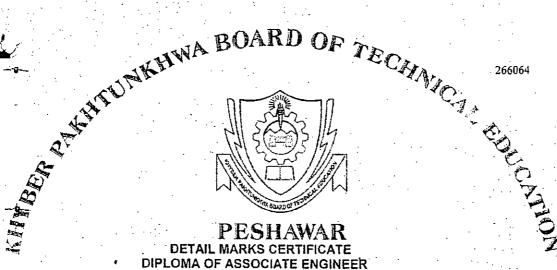
Prepared by Hafeez Checked by

Institute/College

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

Error(s) & Omission(s) excepted. Any mistake in above particulars must be intir

CONTROLLER OF EXAMS



ANNUAL

2010

DIPLOMA OF ASSOCIATE ENGINEER **2ND YEAR MECHANICAL**

FARID ULLAH SAFI Name of Candidate

Father's Name

AFRIDI KHAN SAFI

Roll.No. Reg.No.

GCTB/P/IWII-S/07-3029

Institute/College

GOVERNMENT COLLEGE OF TECHNOLOGY PESHAWAR (B-TECH)

Session



Subject		Total	- -			lained Marks
•	<u> </u>	Marks	Th	Pr	Total	In Words
	─¥ Ist year Marks	1100			614	
1	GEN-211 Islamyat/Pak. Studies	50	23	-	23 .	Twenty-three
2	MATH-212 Applied Mathematics-II	100	44	-	44	Forty-four
3	MGM-211 Business Communication	50	22		22	Twenty-two
4	MGM-221 Business Management & Industrial Economics	50	25	-	25	Twenty-five
5 .	MT-242 Metallurgy	100	40 -	-	40	Forty
6	PHY-212 Applied Physics	50 / 50	20	39	59	Fifty-nine
7	ET-202 Applied Electricity & Electronics	50 / 50	23	38	61	Sixty-one
48	MT-212 Metrology	50 / 50	22	27	49	Forty-nine
9	MT-223 Enginnering Drawing-II A) Machine Drawing B) CAD-II	50 / 100	20	64	84	Eighly-four
į	MT-236 WorkShop Practice-II	100	40		40	Forty
þ1	i) Machine Shop	100		66	66	Sixty-slx
12	íi) Pattern Making	50	-	33	33	Thirty-three
13.	iii) Advance Welding	50	١.	32	32	Thirty-two

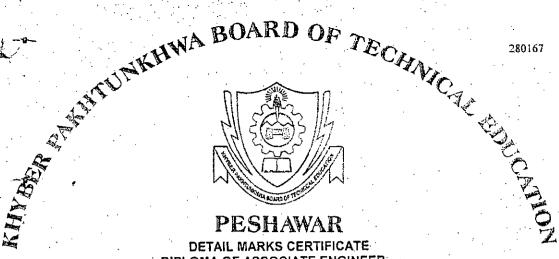
1192

One thousand one hundred ninety-two

Prepared by Hafeez

Checked by
Theory Russing Marks=40% Practical Passing Marks=50%
Error(s) & Omission(s) excepted Any mistake in above particle

CONTROLLER OF EXAMS



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

Name of Candidate

FARID ULLAH SAFI

Father's Name

AFRIDI KHAN SAFI

Roll.No. Reg.No.

2010

GCTB/P/M/II-S/07-3029

Institute/College 1

GOVERNMENT COLLEGE OF TECHNOLOGY PESHAWAR (B-TECH)

Subject		Total			ained Marks	
		Marks	Th	Pr	Total	in Words
		2200			1,192	
1	GEN-311 Islamyat/Pak. Studles	50	30	•	30	Thirty
2	MGM-311 Industrial Management & Human Relation	50	24	-	24	Twenty-four
3	MT-312 Hydraulics & Hydraulic Machines	50 / 50	23	26	49	Forty-nine
4	MT-323 App. Thermody: & Energy Conservation	100 / 50	47	27	74	Seventy-four
5 .	MT-332 ind: Eng(Ind. Planning & Production methods)	50 / 50	23	35	59	Fifty-nine .
6	MT-343 Machine Design	100 / 50	40	30	70	Seventy
7	MT-353 Tool Design & Making	100 / 50	49	27	76	Seventy-six
8	MT-362 Material Testing & Heat Treatment	50 / 50	38	38	76	Seventy-six
9	MT-374 Workshop Practice-II(adv. Mach: Shop & Project)	100 / 100	52	80	132	One hundred thirty-two
10	MT-382 Computer Integrated Manuf:	50/50	20	30	50	Fifty

3350

One thousand eight hundred thirty-two

Prepared by Fazal Ghaffar

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

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

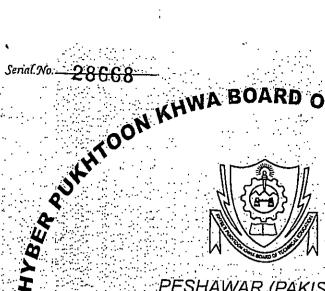
CONTROLLER OF EXAMS

08/03/2011



Rot. C





PESHAWAR (PAKISTAN)

Diploma of Associate Engineer 2010

(Annual / Supplementary)

	The second of the second of the second
Certified that Mr. /Miss. FARID ULLAH SAFI	ere () je ere opere britani i trek na bra betake. Projektiva (j. 1888) projekt Dominion se bra domen.
The control of the second seco	The state of the s
Son/Daughter of Mr. AFRIDI KHAN SAFI	BANDER PROPERTY OF THE PROPERT
Registration No. GCT/P/M/II-S/07-3029	
of GOVT. COLLEGE OF TECHNOLOGY,	PESHAWAR
	20 20 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
has passed the Diploma of Associate Engineer Mecha	nical Technolog
Examination held by the Khyber Pukhtoon Khwa Board of Technic	A CONTRACTOR OF THE CONTRACTOR
and toom with the second of the second	at Laucation, Peshawar, in th
month of Nov. 2010.	િલ્લા કર્યા હતું. આ વિધા સાથે કરેલા છેલા કરવાનો છે છે છે. જ માર્ચિક અને કર્યા છે છે છે કર્યો હતા જો જો પ્રસ્તાન તે જો પ્રાપ્ય
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He/She secured 1832 Marks out of 3350	The state of the s
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Diploma of Associate Engin	2016年1月20日 日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日
is awarded to him / her at Peshawar on the 30th	And Andrew Marc. 32011
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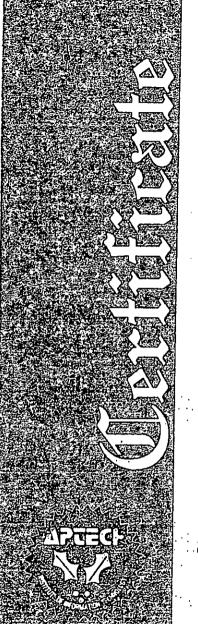
DIPLOMA OF ASSOCIATE ENGINEER ISSUED BY THE BOARD OF TECHNICAL EDUCATION IS HELD EQUIVALENT TO F. A./FSc. (PRE-ENGINEERING) OF THE BOARD OF INTERMEDIATE AND SECONDARY EDUCATION IN PAKISTAN VIDE A BOOK OF EQUIVALENCE OF EDUCATIONAL CERTIFICATES IN PAKISTAN PUBLISHED BY THE GOVERNMENT OF PAKISTAN MINISTRY OF EDUCATION, INTER BOARD COMMITTEE OF CHAIRMEN, ISLAMABAD.

. Typed/Prepared by

Checked by

Dealt 6/k)2-11

Ase't Telislay
NWFP, ETE, Poshawar



PLE

It's more than an education it's a career.

INSTITUTE OF INFORMATION TECHNOLOGY

Affiliated with: NWFP BTE, TTB, SDC. Govt. of Pakistan

Certificate This Is To Certify That

Mr/Ms Farid Ullah Safi Son/Daughter of Afridi Khan Safi Successfully Completed Course of

Mechanical AUTO CAD

He/She secured ______Marks and placed in grade ____A___

In recognition thereof, this certificate is awarded to him/her

On 20th Day of January-2011

Controller of Exam.

S. No.....8073



Principa





University Of Peshawar

Pakiston

Betailed Marks Certificate

Bachelor of Arts Part-I

Annual Examination 2013

District Peshawar



Name: FARID ULLAH SAFI

Father's Name. AFRIDI KHAN SAFI

Gender.Male

Roll No: 16178

Registration No: 2012-PE-45050

Papers	Max Marks		Marks Obtained				
		In Figures	In Words				
English(Compulsory)	75	30	Thirty Only				
Urdu	75	57	Fifty Seven				
Islamic Studies	75	30	Thirty Only				
Islamiyat (Compulsory)	60	33	Thirty Three				
		· · <u>:</u>					
		. <u></u>					
Errors & omissions are subject to subsequent	285	150 (One Hundred and Fifty				

Errors & omissions are subject to subsequent

Chances Availed: 2

The Examination was taken in Parts Examination held From 05-Jun-2013 to 08-Jul-2013 Result Declared on Thursday, September 12, 2013 Issue Date: 13-Sep-2013

10:54 am

City Area

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





Name: FARID ULLAH SAFI

Father's Name: AFRIDI KHAN SAFI

University Ol Peshawar

Betailed Marks Certificate

Bachelor of Arts Part-!! Annual Examination 2013

District Peshawar

Gender:Male Roll No: 65530

Registration No: 2012-PE-45050



Division.2nd

Papers	Max Marks		Marks Obtained		
·	 	In Figures	In Words		
English (Compulsory)	76	24	Twenty Four		
Urdu	75	- 30	Thirty Only		
Islamic Studies	75	43	Forty Three		
Pakistan Studies	40	13	Thirteen		
Part-I 16178:Annual-2013	285	150	One Hundred and Fifty		
Part-u-	550	260	Two Hundred and Sixty		

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 05-Jun-2013 to 08-Jul-2013 Result Declared on Thursday, September 26, 2013 Issue Date: 02-Oct-2013

~ 3:08 pm

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

Campularized by RTC

City Area



University of Peshawar

Session:	Annual 2013			
· .	•			
<u>FAR</u>	ID ULLAH SAFI	son of	AFRIDI KHAN SA	<u> </u>
Private Candida	te of	District Peshawar		_ having Passed the
prescribed exami	nation held in	June 2013 is this day a	idmitted by the Unibers	ity Of Peshawar to
the Begree of		Bachelor of Arts	in	2nd Division
The examination	was taken <u>as a</u>	Whole		
Registration No. 2012	?-PE-45050	المنافقة الم		DRegistrar
<i>Gu No.</i> 655	39			GRégistrar
C.Y.J.C.M. 1730	1-4505337-1	Ginessin of February		m Rasnedan
Result Declared on Seq	ptember 26, 2013	064913	,	Vice Chancellor





Government of Pakistan, Pakistan Locomotive Factory, Risalpur. Ph. # (0937) 880123-30. Fax # (0937) 880149



Comotive Factors



ISO 9001 : 2000 ISO 14001: 2004 CERTIFIED



Mr.	It is to a	-			n Safi	has
comple	eted Internship Jol	l Tra	ining	in	the	fiela
of	MECHANICAL	_for th	e perio	rd of	(83)	months
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Remai	ned <u>Salis Inctory</u>	• •	1			

Dated: 13. 16. 3.16.

(Muhammad Ghufran Khan) Senior Mechanical Engineer/G Pakistan Locomotive Factory, Risalpur

To

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

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

Subject:

APPEALIREQUEST FOR PROMOTION OF CLASS-IV STAFF
YORKING UNDER DHO PESHAWAR

Sir,

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

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

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Names, Scales and Signatures of Candidates

<u>Sr</u>	Name of Candidate	Scale	Signature
No.			
! 1.	Abdul Shahab	- BPS-01-	Endrels
2.	Ahmad Jan	BPS-01	AC
3.	Amir Khan	BPS-04	ininfo
4.	Aqib Zahoor	BPS-03	An 3
5.	Asfandyar Khan	BPS-02	Aug.
6.	Asif Naveed	BPS-02	Aus
7.	Fareedullah Safi	BPS-03	(Fully
8.	Fazal-e-Rabi	BPS-02	Frizafe, Fali
9.	Ghulam Mujtaba	BPS-02	C mi
10.	Hamad	BPS-02	Housed.
11.	Haroon-ur-Rasheed	BPS-03	W Side
12.	Imran Khan	BPS-03	Mjim
13.	Izzat Ullah	BPS-01	By
14.	Jahanullah Khan	BPS-01	Johallas
15.	Mueen Qasmi	BPS-04	Walni
16.	Muhammad Altaf	BPS-03	Milh Cr.
17.	Muhammad Arif	BPS-04	Au
18.	Muhammad Ihtisham	BPS-04	Meskin
19.		BPS-04	Charles
	Muhammad Sulaiman	BPS-03	atomic .
21.		BPS-04	m Jayes
22.		BPS-01	Mying theorem
23.	Nadeem Khan	BPS-03	William To The Town
•			(Heat)

24.	Saadullah Khan	BPS-01	Soubelle Khii
25.	Sabir Shah	BPS-03	(avis
26.	Sahibzada Amir	BPS-02	Jany Han
27.	Sardar Ali	BPS-01	@ fille
28.	Shahid Ahmad	BPS-04	24.
29.	Shahid Islam	BPS-02	Ceilie
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Hannyan
32.	Sohail Ashiq	BPS-01	
33.	Muhammad Suliman	BPS-04	1 Almei
34.	Syed Zaffar Ali	BPS-04	State
35.	Tahir Hafeez	BPS-04	Ganis
36.	Tahir Shah	BPS-01	fabios_
37.	Turkat Auzal	BPS-03	1 7020
38.	Umair Khan	BPS-03	URAL
39.	Waqas Ahmad	BPS-02	up.
40.	Waqas Ghulam	BPS-01	My
41.	Zeeshan Ahmad	BPS-04	in short
42.	Zia-ul-Islam	BPS-02	ZiHylislam

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUNKHWA, PESHAWAR

Annex-"E

No. 1/776-856 Promotion Cell Dated Peshawar the 18/08/2022

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.

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

ma for Junior Clerks initially recruited.

S No.	Name /	Date of Entry into Govt: Service.		Recruitment as Junior Clerk.
	Name		·	
01.				
02.			L	1

Additional Director General (HR) Directorate General Health Service Khyber Pakhtunkhwa, Feshawar



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

No. 14703 /DHO dated Pesh: 1/09/2022

Τo,

The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.

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

Sir,

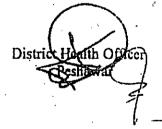
Reference your letter No. 11776-856/Promotion Cell dated: 18.08.2022.

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	Qualification	Date of
		Govt: Service		Promotion to
ļ ·				J/C in 33%
·				Quota
	Nii	Nil	Nil	Nil

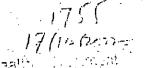
S.No	Name/Father Name	Date of Entry into Govt: Service	Qualification	Date of initial Recruitment as Junior Clerk.
	Nil	Nil	Nil	Nil



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SOFT REMINDER

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

my to

129848

BarrisTer M. Harsaan Ad U

باركونسل اليسوى ايش نمبر <u>Bc - 116038</u>

رابط نمبر: 3373453 - 0303







بيثاور بارايسوى ايشن،خيبر يختونخواه

Service Tribunal, Peshawar :

Appellant :	er-Appeal.
فريد المتعادي في	علت نمبر
	مورن. 2 م
0.59	\(\frac{\gamma}{\cdot \cdot \c
انک	ناو ث

مقدمه مندرج عنوان بالاميس الي طرف سدواسط بيروى وجواب دبي كارواكي متعلقه

آن مقام المهنا علی المنظامی المین ا



نام <u>کیشا کا</u>

نوك: اى دكالت ناسد كونوكا إنا قائل تبول موك