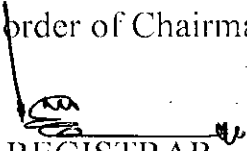


FORM OF ORDER SHEET

Court of _____

Case No.:- 1846/2022

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. Asfandiyar 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. Asfandyar Khan son of Musharaf 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 is illegible which may be replaced by legible/better one.

No. 3493 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.
High Court Peshawar.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

(*) All the objections have been removed.



BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1846/2022

Asfandyar Khan

VS

Government of KP and Others

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		1-4
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4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
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7.	Departmental Representation dated 17-06-2022	'D'	17
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	18
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10.	Reminder application dated 17-10-2022	'G'	20
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APPELLANT

Through



BARRISTER

MUHAMMAD HASSAAN ADIL

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Asfandyar Khan

Son of Musharaf Khan
Resident of Sherdil Khan, P.O Qilla, Mathra,
Peshawar

....APPELLANT

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariate, Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Health Department, Civil Secretariate, Peshawar
3. Director General (DG), Health Service, Warsak Road, Peshawar
4. District Health Officer (DHO), Grand Trunk Road, Tehsil and District Peshawar

....RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR PROMOTION OF THE APPELLANT AGAINST THE POST OF JUNIOR CLERK, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT DATED 17-06-2022 HAS NOT BEEN RESPONDED BY THE RESPONDENTS.

Respectfully Sheweth,

1. That the appellant was appointed on 03.10.2014 (**Annex "A"**) in prescribed manner as Ward Attendant (BPS-02) in the respondent no. 04's department. The appellant has rendered services for more than eight 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 2016 is required to be placed senior to the fresh candidates appointed or promoted after 2016 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

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

PRAYER:

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

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

APPELLANT

Through



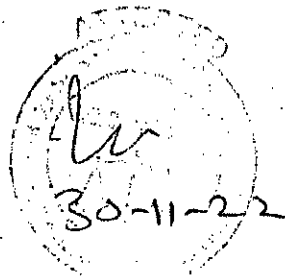
**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Asfandiyar Khan** Son of **Musharaf Khan**, Resident of **Sherdil Khan, P.O Qilla, Mathra, Peshawar**, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.


DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____ /2022

Asfandyar 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.

6

APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Asfandyar Khan** Son of **Musharaf Khan**, Resident of **Sherdil Khan, P.O Qilla, Mathra, 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

[Signature]
30-11-22

7

PAKISTAN National Identity Card

Ministry of Interior

Name: **Asfandiyar Khan**

Province: **Multan**


Gender: **M** Country of Birth: **Pakistan**

Identity No: **17301-69962407** Date of Birth: **03/08/1900**

Date of Issue: **29/01/2021** Date of Expiry: **29/01/2031**

Holder's Signature

17301-69962407



Ministry of Interior

کشدہ کارڈ ملے برقریبی ایمریکس میں دلان دیں

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

OFFICE ORDER

Consequent upon approval accorded by the Departmental Selection Committee meeting held in the office of the District Health Officer Peshawar on 16/1/2014, Mr. Asfandyar S/O Mr. Musharraf Khan resident of Sher Dil Khan Qilla P/O Mathra Peshawar is hereby appointed as Ward Attendant HPN 02/1990. The appointment shall be made in accordance with the government servant rules, subject to the following terms and conditions:

1. He will be on probation initially for a period of one year extendable for a further period of one year.
2. His appointment will be subject to medical fitness.
3. He will not be entitled to any LAFY or Medical examination and posting for first appointment.
4. He will be governed by such rules and regulations as may be applicable to him in the category of government servant of which he belongs.
5. If he wishes to resign from service, he will be required to submit his resignation in writing one month in advance OR deposit one month's pay in the government treasury. However, he will continue to serve the government until his resignation accepted by the competent authority.

At the above terms and conditions attached to him, he should comply with the District Health Officer Peshawar's 20/1/14 copy of the copy of this order.

Sd/xxxxxx
District Health Officer
Peshawar

Dated Peshawar the 31/1/2014

No 670-93/DHO/P

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mr. Asfandyar S/O Musharraf Khan resident of Sher Dil Khan Qilla P/O Mathra Peshawar
3. Personal file.
4. Accounts Section
For information and attention

District Health Officer
Peshawar

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR**OFFICE ORDER**

Consequent upon approval accorded by the Departmental Selection Committee meeting held in the office of the District Health Office Peshawar on 16.01.2014, Mr. Asfandyar S/o Musharaf Khan resident of Sher Dil Khan Qilla P/O Mathra Peshawar is hereby appointed as ward attendant BPS-02 (1900____) plus all allowances as admissible under the government servant rules, subject to the following term and conditions:

1. He will be on probation initially for a period of one year extendable for a further period of one year.
2. His appointment will be subject to the medical fitness.
3. He will not be entitled to any LADA for Medical examination and jointly be first appointment.
4. He will be governed by such order as may be issued for the pavement of the category of government servant in which he
5. If he wishes to resign from services he will have to submit resignation in writing within one month in advance OR deposited one month per month in the government history. However he will continue to service the government till his resignation is accepted by the complete authority.

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

Sd/xxxxxx

**District Health Officer
Peshawar**

No. 690-93/DHO/PP

Dated Peshawar the 03/10/2014

A Copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mr. Asfandyar S/o Musharaf Khan R/o Sher Dil Khan Qilla P.O Mathra Peshawar.
3. Personal file.
4. Accounts Section
5. For Information and action.

**District Health Officer
Peshawar**

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



Personal Information of Mr ASFANDYAR KHAN d/w/s of MUSHRAF KHAN

Personnel Number: 00714631 CNIC: 1730169962387 NTN:
 Date of Birth: 03.08.1990 Entry into Govt. Service: 04.02.2014 Length of Service: 08 Years 07 Months 028 Days

Employment Category: Active Temporary

Designation: WARD ORDERLI 81186483-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8857-DISTRICT HEALTH OFFICER PESHAWAR
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 95,841.00 (provisional)
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 04 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	19,970.00	1004	House Rent Allow 45% KP21	3,576.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	253.00	2199	Adhoc Relief Allow @10%	169.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	2,013.00
2347	Adhoc Rel AI 15% 22(PS17)	2,013.00			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	6173	CM Flood Relief Fund01-16	-2,074.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	39,000.00	-1,101.00	2,667.00

Deductions - Income Tax

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

Gross Pay (Rs.): 33,879.00 Deductions: (Rs.): -4,845.00 Net Pay: (Rs.): 29,034.00

Payee Name: ASFANDYAR KHAN
 Account Number: 03247900050503
 Bank Details: HABIB BANK LIMITED, 220324 MATHRA, PESHAWAR, MATHRA, PESHAWAR., PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: PESH. Domicile: - Housing Status: No Official
 Temp. Address: City: Email: asfandiyarpti@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
	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	Qafeem 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

Saad Ullah s/o
Sahib Zada

District Health Officer
Peshawar

	adeem 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
	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	17301-8592584-1	27/10/2020	Ward Orderly	DAA+ DIT
47	Shehryar Khan	Faqir hussain	17301-2332817-7	27/10/2020	Ward Orderly	MA+DIT Diploma
48	Jehan 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	Jafar 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)

11

District Health Officer
Peshawar

90618

(12)

Annex "C"

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No 31352
Group HUMANITIES



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

Asfandiyar Khan Son/Daughter of Musharraf Khan
of GOVT. HIGH SCHOOL GARHI SHER DAD PESHAWAR

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

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Pract	Theory	Pract		
1. English	150	25	--	26	--	51	Fifty-One
2. Urdu	150	22	--	38	--	60	Sixty Only
3. Islamiyat (Comp)	75	29	--	--	--	29	Twenty-Nine
4. Pakistan Studies	75	--	--	38	--	38	Thirty-Eight
5. Maths	150	48	--	25	--	73	Seventy-Three
6. General Science	150	28	--	39	--	67	Sixty-Seven
7. Islamic Studies	150	32	--	41	--	73	Seventy-Three
8. Pashlo	150	27	--	47	--	74	Seventy-Four

Total 1050

465-D

Four Hundred Sixty-Five Only

Remarks

IS:PA:

Date of Birth: 03rd August, 1990

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)

S.No. 456478

Roll No. 31352



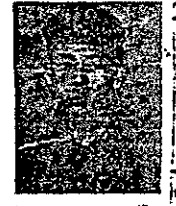
Board of Intermediate and Secondary Education Peshawar

N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 2006- ANNUAL

(Arts Group)



This is to Certify that Asfandiyar Khan Son of Musharraf Khan
and a student of Govt. High School Garhi Sher Dad Peshawar has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March, 2006 as a Regular
candidate. He obtained 465 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 |

Date of birth according to admission form August 3, 1990

Asstt Secretary



Secretary

This certificate is issued without alteration or erasure.

S.No. PB 044624
(13)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 70853

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE

INTERMEDIATE (ANNUAL) EXAMINATION, 2008

HUMANITIES (Part-II)

Asfandiyar Khan Son / Daughter of Musharraf Khan
of Gort Degree College Mathra, Peshawar
has secured the marks shown against each subject in the H S S C Examination held in the month of
May 2008 as a Regular Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Prac	Theory	Prac		
English	200	39	--	42	--	81	Eighty One
Urdu	200	45	--	54	--	100	One Hundred Nine
Islamic Education	20	31	--	--	--	31	Thirty One
Pakistan Studies	50	--	--	20	--	20	Twenty Only
Crises	200	47	--	47	--	94	Ninety Four
Islamic Studies	200	60	--	61	--	121	One Hundred Twenty One
Health & Physical Education	200	39	5	43	12	99	Ninety Nine
Total: 1100						555-C	Five Hundred Fifty Five Only
Remarks :							

Checked By : [Signature]

[Signature]
Controller of Examinations

Date of Issue: 10-05-08

Note: Error/Commission(s) excepted. Any mistake in above particulars must be intimated within 10 days of the issuance of this certificate.

S. No. 013050
Roll No. 70852
Group. Humanities

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



**Board of Intermediate and Secondary Education
Peshawar**

P. W. F. P Pakistan

INTERMEDIATE EXAMINATION

SESSION 2008- ANNUAL



This is to Certify that Asfandiyar Khan Son of Musharraf Khan
and a student of Govt Degree College Mathra Peshawar Registered No. 241-B/GMP-2006
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2008 as a Regular candidate. He obtained 555 Marks out of 1100 and
has been placed in grade C Representing Good. The examination was taken as a whole.


Asstt Secretary

This certificate is issued without alteration or erasure.


Secretary

(11)



University of Peshawar Pakistan

15

Detailed Marks Certificate

Bachelor of Arts

Part-I

Annual Examination 2020

District Peshawar



Private

Name: ASFANDI YAR KHAN

Gender: Male

Roll No: 16427

Father's Name: MUSHARRAF KHAN

Registration No: 2008-MP-861

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English(Compulsory)	75	33	Thirty Three
Islamic Studies	75	54	Fifty Four
Arabic	75	37	Thirty Seven
Islamiyat (Compulsory)	60	50	Fifty Only
	285	174	One Hundred and Seventy Four

Errors & omissions are subject to subsequent rectification

Chance: 1

The Examination was taken As a Whole

Examination held From 23-Sep-2020 to 24-Oct-2020

Result Declared on Thursday, December 31, 2020

Issue Date: 31-Dec-2020

5:55 pm

Computerized by RTC

Mathra Area

(Dr. S. Fazl-i-Hadi)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR



University of Peshawar Pakistan

Detailed Marks Certificate

Bachelor of Arts
Part-II
Annual Examination 2021
District Peshawar



Private

Name: ASFANDI YAR KHAN

Gender: Male

Roll No: 55317

Father's Name: MUSHARRAF KHAN

Registration No: 2008-MP-861

Division: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	42	Forty Two
Islamic Studies	75	48	Forty Eight
Arabic	75	58	Fifty Eight
Pakistan Studies	40	20	Twenty Only
Part-I 16427:Annual-2020	285	174	One Hundred and Seventy Four
Part-II	550	342	Three Hundred and Forty Two

Errors & omissions are subject to subsequent
rectification

Chance: 1

The Examination was taken As a Whole

Examination held From 15-Sep-2021 to 16-Oct-2021

Result Declared on Monday, January 17, 2022

Issue Date: 17-Jan-2022

12:10 pm

(Dr. S. Fazi-i-Hadi)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

MEDICAL CERTIFICATE

16

Name of official A. S. Pandian Manalor

Caste or race Afghan

Father's name Mustafiz Khan

Residence Shardil Khan P.O. Matra
Panchayat

Date of birth 22-2-1971

Exempted by ...

Personal mark of identification ...

Signature of the official [Signature]

Signature of head of office ...

Seal of office ...

I do hereby certify that I have examined A. S. Pandian a candidate
for employment in the office of the ...
and I do not discover that he had any disqualification or other constitutional infirmity or bodily
infirmity except ...

I do not consider this candidate fit for employment in the office of the ...
His age according to his own statement ... years and by appearance ...
years ...

MEDICAL SUPERINTENDENT,
CIVIL HOSPITAL

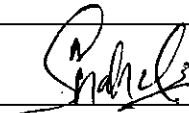

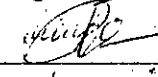
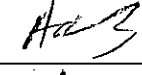

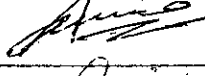
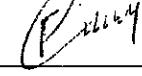
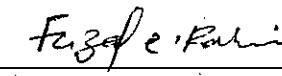
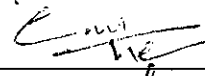
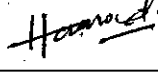

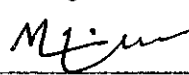





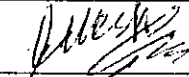
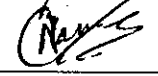
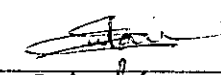
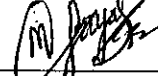
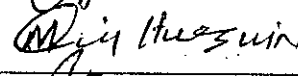

LEFT HAND THUMB AND FINGER IMPRESSIONS



1

Nazki Arif Muhammad Tahir
Jasman Amir Muhammad Amir
Fazal e Rahe Muhammad Arif Arif
Nasim Fahim Muhammad Arif
Sahib I Muhammad Arif
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.	<u>Asfandyar Khan/</u>	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

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 Islam
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Shehryar
32.	Sohail Ashiq	BPS-01	Sohail
33.	Muhammad Suliman	BPS-04	Muhammad Suliman
34.	Syed Zaffar Ali	BPS-04	Syed Zaffar Ali
35.	Tahir Hafeez	BPS-04	Tahir Hafeez
36.	Tahir Shah	BPS-01	Tahir Shah
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair Khan
39.	Waqas Ahmad	BPS-02	Waqas Ahmad
40.	Waqas Ghulam	BPS-01	Waqas Ghulam
41.	Zeeshan Ahmad	BPS-04	Zeeshan Ahmad
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

(18)

Annex "E"

No. 776-856 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



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

(19)

Annex "F"

No. 14703 /DHO dated Pesh.: 10/09/2022

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

To:

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

1755
17/11/2022
Health
HEALTH

(20)

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 promotion's 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

Chaudhry
Mujib



129851			
Barister M. Hassan Adil ایڈووکیٹ	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 رابطہ نمبر:	03038373453		

Service Tribunal Peshawar بعدالت جناب:

Appellant	مخائب:	Jr - Appeal	دعوی:
	اسفندیار بنام گورنمنٹ آف سٹیٹس اینڈ مینیجمنٹ		علت نمبر:
			مورثہ:
			جرم:
			تھانہ:

باعت تحریر آگہ

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

آن مقام پشاور کیلئے بیرسٹر محمد حسن عاقل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے اور تقریر ثالث و 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 ڈگری ٹیک طرف 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 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ 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



26-11-22

المقوم:

العواہف العواہف

مقام پشاور کے لیے منظور ہے۔

اسفندیار خان وکیل صنف خان کلبہ محکمہ پشاور