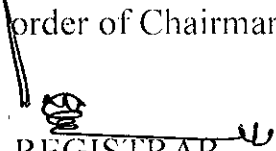


FORM OF ORDER SHEET

Court of _____

Case No. - 1847/2022

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. Aqib Zahoor 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. Aqib Zahoor son of Zahoor ud Din 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. 3482 /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. 1847/2022

Aqib Zahoor

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'	12-13
7.	Departmental Representation dated 17-06-2022	'D'	14
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	15
9.	Letter No: 14703/DHO dated 01-09-2022	'F'	16
10.	Reminder application dated 17-10-2022	'G'	17
11.	Wakalatnama		18


APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL

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

Service Appeal No. _____/2022

Aqib Zahoor

Son of Zahoor-ud-Din
Resident of Kohat Road, House No. 08, Street No. 04, Mohalla Gulgasht Colony,
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 27.10.2020 (**Annex "A"**) in prescribed manner as Chowkidar (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than two 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 2022 is required to be placed senior to the fresh candidates appointed or promoted after 2022 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.

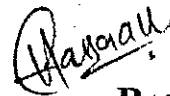
PRAYER:

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

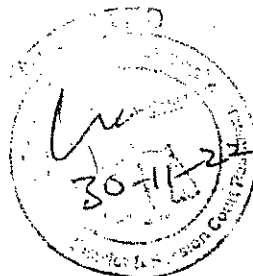


**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Aqib Zahoor Son of Zahoor-ud-Din, Resident of Kohat Road, House No. 08, Street No. 04, Mohalla Gulgasht Colony, 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.**

Service Appeal No. _____/2022

Aqib Zahoor

VS

Government of KP and Others

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

Respectfully Sheweth:

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

PRAYER:

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

6
APPELLANT

Through

Hassan

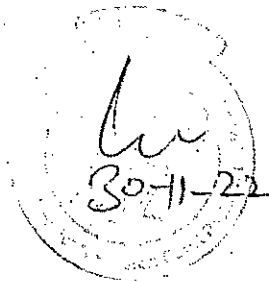
**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

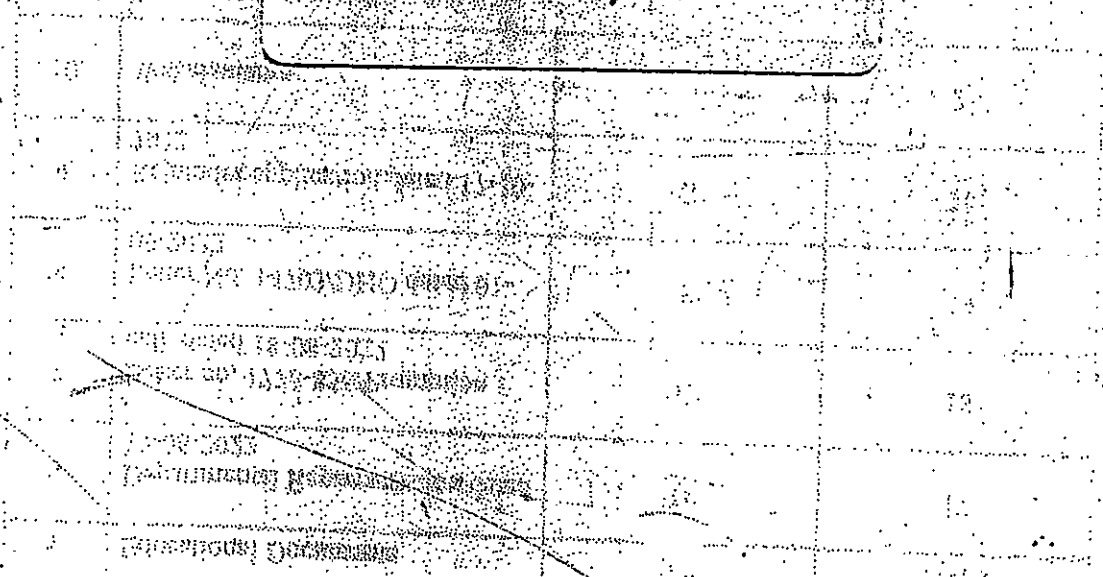
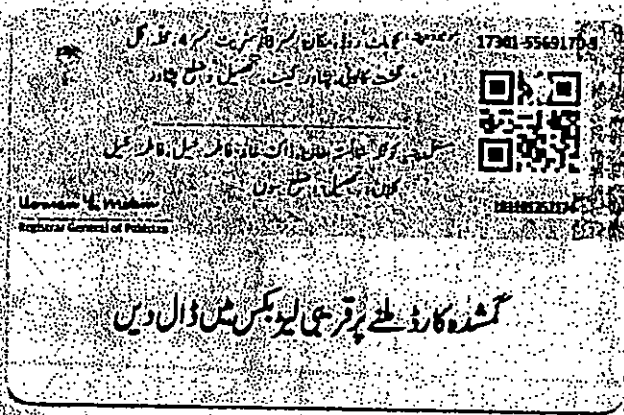
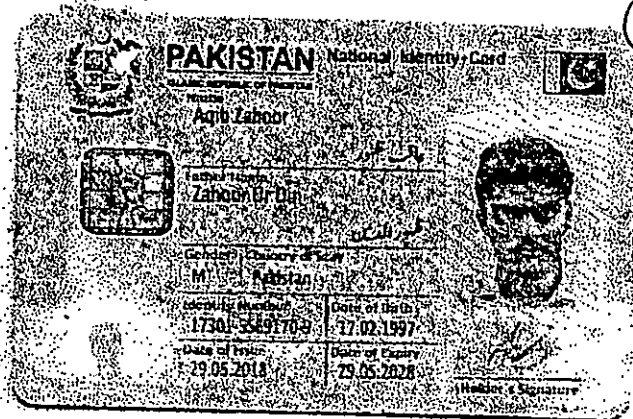
AFFIDAVIT

I, **Aqib Zahoor Son of Zahoor-ud-Din, Resident of Kohat Road, House No. 08, Street No. 04, Mohalla Gulgash Colony, Peshawar,** do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

Aqib
DEPONENT



7





OFFICE OF THE DISTRICT HEALTH OFFICER,
PESHAWAR.

Phone No. 091 9225387
Fax No. 091 9225467

8

OFFICE ORDER

Annex "A"

On the recommendation of Departmental Selection Committee in its meeting held on 20/10/2020 at 10:00 am under the chairmanship of the undersigned, *Mr. Aqib Zahoor v/o Zahoor ud Din (Mst. Tabassum Ex- LHW Deceased) resident of House No. 08, Street No. 4 Gulgasht Colony, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Chowkidar BPS - 03 in Basic Pay Scale (9610-390-21310) plus all other allowances as admissible to him as per Government rules.*

His appointment in Health Department Govt. of Khyber Pakhtunkhwa 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 the 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/she 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 till the acceptance of his resignation by the competent authority.
7. He/She will serve in all health facilities under the control of District Health Office Peshawar.

If the above mentioned terms and conditions are acceptable to him/her, He/she should report to District Health Office, Peshawar within 14 days after the receipt of this appointment order.

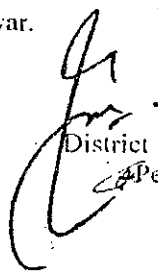
Sd/-----
District Health Officer,
Peshawar.

No 16980-85 /DHO/E-19

Dated Peshawar the 27 / 10 / 2020

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Peshawar.
4. Coordinator DHIS Section DHO office Peshawar.
5. Account Section of this Office.
6. Official Concerned.


District Health Officer,
Peshawar.

9

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



Personal Information of Mr AQIB ZAHOOR d/w/s of ZAHOOR UD DIN

Personnel Number: 00963381 CNIC: 1730155691709 NTN:
 Date of Birth: 17.02.1997 Entry into Govt. Service: 27.10.2020 Length of Service: 01 Years 11 Months 005 Days

Employment Category: Active Temporary

Designation: CHOWKIDAR 81186481-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8865-DISTRICT Health OFFICER PESHAWAR
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 19,271.00 (provisional)
 Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 03 Pay Stage: I

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,840.00	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. Red All 15% 2022KP	1,500.00
2347	Adhoc Rel At 15% 22(PS17)	1,500.00			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	-1,706.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 27,267.00 Deductions: (Rs.): -3,376.00 Net Pay: (Rs.): 23,891.00

Payee Name: AQIB ZAHOOR
 Account Number: 00110077265240014
 Bank Details: ALLIED BANK LIMITED, 250305 Saddar Rd.Peshawar Cantt. Saddar Rd.Peshawar Cantt., Peshawar

Leaves: Opening Balance: Availed: Earned: Balance:

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 Muftaba	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-Ilam	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

Sard Ullah s/o
Sahib Zada

District Health Officer
Peshawar

	Wadeem 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	Falz 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
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)

11

District Health Officer
Peshawar

Serial No. 0956280

Annex - "C"

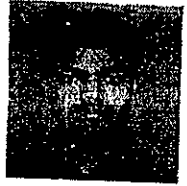
12

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



PROVISIONAL RESULT CARD

DMC No. 000034750-1721
Name AQIB ZAHOR
Father's Name ZAHOR U DIN
Address GUL GASHT COLONY ST NO. 4 H. PESHAWAR KPK PESHAWAR
Registration No. 18NBU00079
Enrollment Semester SPR-2018
Final Semester SPR-2021
Date of Birth Feb 17, 1997



Tehsil PESHAWAR
District PESHAWAR

has successfully completed
with Group/Major/Specialization

SECONDARY SCHOOL CERTIFICATE
GENERAL

The detail of passed courses is as under:

Semester	Course Code	Credits	Title of Courses	Marks	
				Maximum	Obtained
SPR-2018	0201	6	ISLAMIAT	100	58
SPR-2018	0202	6	PAKISTAN STUDIES	100	58
AUT-2018	0247	3	MATHEMATICS-I	100	57
SPR-2019	0248	3	MATHEMATICS-II	100	57
AUT-2019	0203	6	GENERAL SCIENCE	100	87
AUT-2019	0204	6	URDU FOR DAILY USE	100	89
AUT-2019	0207	3	COMPULSORY ENGLISH-I	100	85
AUT-2019	0215	6	EDUCATION	100	83
AUT-2019	0217	3	FOOD AND NUTRITION	100	90
AUT-2019	0221	3	COMPULSORY ENGLISH-II	100	95
SPR-2021	0260	3	INFORMATION TECHNOLOGY BASICS	100	54

Total Credits 48

Result Declared on Nov 12, 2021

Date of Issue Dec 3, 2021

Total Marks/Obtained 1100 / 813

Percentage/Grade 74 / A

Raufi

Controller of Examinations

Disclaimer:

This result card/transcript is issued provisionally, errors and omissions excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma which will be issued under the rules/regulations on the basis of the original record of the university/institution.

Serial No.BS 007546

Allama Iqbal Open University Islamabad

13



Certified that Mr./Ms. AQIB ZAHOR

Son./ Daughter of ZAHOR U DIN

Registration No. 18NBU00079

Roll No. BQ264105

Semester SPRING 2021 Whose date of birth as per A.O.U admission's record

is 17-02-1997 (In words 17TH FEBRUARY, NINETEEN, NINETY SEVEN)

having met all the requirements under the semester system is this day awarded the

Secondary School Certificate GROUP-GENERAL

He/She has secured 74 % marks

and has been placed in A grade



Result declared on: November 12, 2021

Date of Issue: February 24, 2022

CONTROLLER OF EXAMINATIONS

B X

Note: This Certificate is issued without alteration/versura.
The detail of courses is overleaf.

Annex - D

(14)

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 (B&D)
- AS - (REV)
- AS - MTE
- CH - (SR/II)
- CPO
- DS - (B&D)
- DS - (SR/II)
- SO - B-I
- SO - B-II




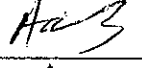
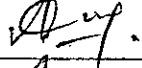
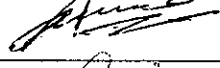
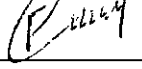
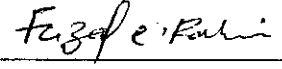
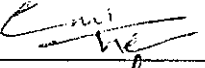
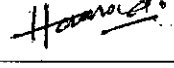
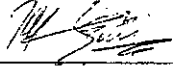
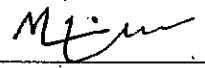
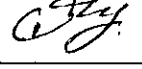


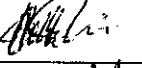
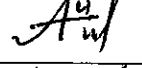
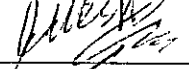
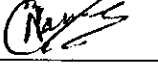




Handwritten signatures and initials of Class-IV staff members, including names like Arsal, Anwar, and others, written in various styles and colors (blue and black ink).

P.T.O

Scanned with CamScanner

Khalid ~~Alam~~ ~~Alay~~ Tahir
 Jassam ~~Alam~~ ~~Alay~~ ~~Alay~~
 Faisal ~~Alam~~ ~~Alay~~ ~~Alay~~
 Naleem ~~Alam~~ ~~Alay~~ ~~Alay~~
 Saad ~~Alam~~ ~~Alay~~ ~~Alay~~
 Hussain ~~Alam~~ ~~Alay~~ ~~Alay~~

Names, Scales and Signatures of Candidates

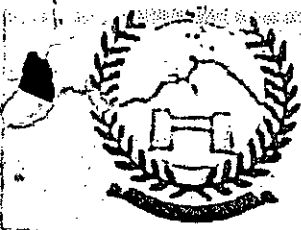
<u>Sr No.</u>	<u>Name of Candidate</u>	<u>Scale</u>	<u>Signature</u>
1.	Abdul Shahab	BPS-01	
2.	Ahmad Jan	BPS-01	
3.	Amir Khan	BPS-04	
4.	Aqib Zahoor	BPS-03	
5.	Asfandyar Khan	BPS-02	
6.	Asif Naveed	BPS-02	
7.	Fareedullah Safi	BPS-03	
8.	Fazal-e-Rabi	BPS-02	
9.	Ghulam Mujtaba	BPS-02	
10.	Hamad	BPS-02	
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

14 "B"

24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir Khan
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

①
ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

15

1. All District Health Officers in Khyber Pakhtunkhwa
2. All Medical Superintendents of Hospitals in Khyber Pakhtunkhwa.

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



Annex - "F"

16

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

No. 14703 /DHO dated Pesh: 11/09/2022

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

MINIA-9
1755
17/10/2022
Health Services
SOFT REMINDER

17

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

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

Sir,

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

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




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

We would be obliged, please.


Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

Chahida
Miyta
[Handwritten signatures and initials]

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Barrister M. Hassan Adil ایڈووکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
RC-116028 بار کونسل ایسوسی ایشن نمبر:		
03078773453 رابطہ نمبر:		

Service Tribunal Peshawar بدرالت جناب:

Appellant عاقبت ظہور صاحب  اور محنتی ایف بی وغیرہ	Sr. Appeal دعویٰ: علت نمبر: فوریت: جرم: تھانہ:
باعت تحریر آگے	

عاقبت ظہور صاحب
 ظہور الدین کنڈ کوپٹ روڈ پشاور
 Adil

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

آن مقام پشاور بیسٹریٹر محمد حسان عاچل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موعوف کو مقدمات کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و 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 تاخیر یا دوسری طرف یا اپیل کی سرکاری 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 کوائف سے ہر اوٹا یا غلطی سے نمٹانے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی عملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ دراختیار منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخی پیشکش یا مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابندی نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 26-11-2022
 PESHAWAR BAR ASSOCIATION
 ATTORNEYS & SOLICITORS
 PESHAWAR

مقام پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فزیکل کاپی تاحال قبول ہوگی۔