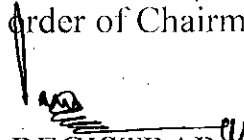


FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1856/2022

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. Tahir Hafeez 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. Tahir Hafeez son of Abdul Hafeez 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. 3465 /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. 1856 /2022

Tahir Hafeez

VS

Government of KP and Others

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1.	Service appeal		1-4
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3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
6.	Educational Documents	'C'	12-20
7.	Departmental Representation dated 17-06-2022	'D'	21
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	22
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	23
10.	Reminder application dated 17-10-2022	'G'	24
11.	Wakalatnama		25

E.H.C.
APPELLANT

Through

Hassan
BARRISTER
MUHAMMAD HASSAN ADIL

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

Service Appeal No. _____/2022

Tahir Hafeez

Son of Abdul Hafeez
Resident of House No. 2117, Mohalla Mehar Buddu, Jhanda Bazar,
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 Ward Attendant (BPS-04) 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.

Tahir
APPELLANT

Through

Hassaan
BARRISTER
MUHAMMAD HASSAAN ADIL

Advocate High Court

AFFIDAVIT

I, Tahir Hafeez Son of Abdul Hafeez, Resident of House No. 2117, Mohalla Mehar Buddu, Jhanda Bazar, 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.

Tahir
DEPONENT



5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Tahir Hafeez

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

Tahir
APPELLANT

Through

Hassan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

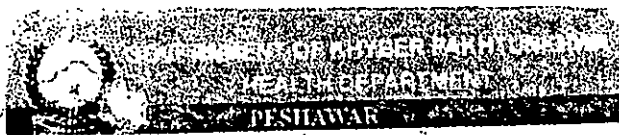
AFFIDAVIT

I, **Tahir Hafeez Son of Abdul Hafeez, Resident of House No. 2117, Mohalla Mehar Buddu, Jhanda Bazar, 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.

Tahir

DEPONENT





FESHAWAR

Tahir Hafeez
Ward Attendant



7

OFFICE:

DISTRICT HEALTH OFFICER
FESHAWAR

Issuing Authority

Father / Husband Name: **Abdul Hafeez**

CNC No: **17301-5512528-1** Date of Birth: **25-12-1995**

Mark of Identification: **NIB** Blood Group: **A+ve**

Emergency Contact No: **0342-9105502** BPS: **04**

Present Address: **M-2011, Mahalshah, Near Bedda Jhanda Bazar**

Mobile No: **0991-0910910910**

OFFICE OF THE DISTRICT HEALTH OFFICER,
PESHAWAR.

Phone No.091 9225387
Fax No. 091 9225467

8

Annex - "A"

OFFICE ORDER

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. Tahir Hafeez S/o Abdul Hafeez (Mst. Salma Hafeez Ex - Dai deceased) resident of Janda Bazaar House No. 2117 Mohallah Momer Bhuddho, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Ward Attendant BPS -04 in Basic Pay Scale (9900-440-23100) 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 16926-31 /DHO/E-19
Copy forwarded to the:-

Dated Peshawar the 27/10 /2020

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.

27/10/2020

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

9



Personal Information of Mr TAHIR HAFEEZ d/w/s of ABDUL HAFEEZ

Personnel Number: 00963394 CNIC: 1730152425281 NTN:
 Date of Birth: 25.12.1995 Entry into Govt. Service: 27.10.2020 Length of Service: 02 Years 00 Months 006 Days

Employment Category: Active Temporary

Designation: WARD ATTENDANT 81186488-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8863-District Support Manager PPHI 1522 2 NBP Haba PESHAWAR
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 22,327.00 (provisional)
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 04 Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	15,350.00	1004	House Rent Allow 45% KP21	3,576.00
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	1,551.00
2347	Adhoc Rel Al 15% 22(PS17)	1,551.00			0.00

Deductions - General

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

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

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

Gross Pay (Rs.): 27,913.00 Deductions: (Rs.): -1,670.00 Net Pay: (Rs.): 26,243.00

Payee Name: TAHIR HAFEEZ

Account Number: 2007524172

Bank Details: THE BANK OF KHYBER, 080025 ASHRAF ROAD PESHAWAR CITY, ASHRAF ROAD PESHAWAR CITY., Peshawar

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: PESHAWAR

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: tahirhafceez6607@gmail.com

Seniority List Of Class IV Employees Working Under DHO Peshawar

(10)

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	Muni Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Naib Qasid ✓	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid ✓	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torgat Auzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendent	MA+ Health Diploma
21	Abdul Shahab	Abdul Jabbar	17301-7776929-5	27/12/2012	Behishti	MSC Economics
22	Muhammad Imran	Qaleem Ullah	17301-3090264-1	29/12/2012	Chowkidar	MA
23	Asif Naveed	Naveed Ahmad	17301-5904442-3	31/12/2012	X-ray Attendent	FA
24	Muhammad Altaf	Subhan ullah	17301-5887445-5	29-04-2013	Behishti	DAE
25	Shahid Islam	Faqir Gul	17301-3550466-9	4/2/2014	Ward Orderly	FSC+ Surgical Diploma
26	Asfandyar Khan	Musharaf Khan	17301-6996238-7	4/2/2014	Ward Orderly	BA
27	Shams Ul Athhar	Shams Ul Qamar	17301-8058948-7	27-03-2015	Behishti	SSC
28	Zia-ul-islam	Muhammad Qayum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Salman Misbah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti	BA
30	Shahid Islam	Faqir Gul		16-1-2016	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-8449980-3	3/8/2016	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan	17301-4164590-9	3/8/2016	Naib Qasid	BSc

BHU Terai |

Sardar Ali s/o
Mir Aslam

Sard Ollah s/o
Sachib Zada

District Health Officer
Peshawar

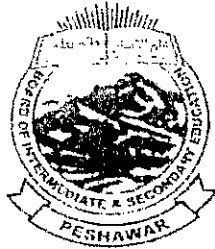
	Wadeem Khan	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
34	Fareed Ullah	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
35	Umair Khan	Pervaiz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
36	Sabir Shah	Zaiban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matric+ Health Diploma
37	Waqar Younis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

11

District Health Officer
Reshwar

(12)

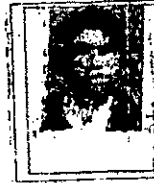
BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Annex-"c"

Roll No 118512
Group SCIENCE

PESHAWAR



PROVISIONAL AND DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION ANNUAL-2012

Tabir Hafeez

Son/Daughter of Abdul Hafeez

of AL-MUSLIM CAMBRIDGE SCHOOL GULBAHAR PESHAWAR CITY

has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of March 2012 as Regular Student

Subjects	Marks	MARKS OBTAINED				Total	In Words
		9Th		10Th			
		Theory Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	38	--	39	--	77	Seventy Seven
2. Urdu	150	37	--	31	--	68	Sixty Eight
3. Islamiyat (Comp)	75	45	--	--	--	45	Forty Five
4. Pakistan Studies	75	--	--	44	--	44	Forty Four
5. Maths	150	26	--	43	--	69	Sixty Nine
6. Physics	150	22	7	27	7	63	Sixty Three
7. Chemistry	150	22	7	38	7	76	Seventy Six
8. Biology	150	26	7	31	6	70	Seventy Only

Total 1050

511-D Five Hundred Eleven Only

Remarks

Date of Exam: 24th March 2012

Enrollment No: 001-B/AMCH/2011

Checked by: _____

Issue Date: 14-08-2012

Controller of Examinations

Note: Entries/Comments/Alterations made in above particulars must be journalized within 90 days of the issuance of this certificate

S No. 126240

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 118512

Board of Intermediate & Secondary Education

Peshawar

Khyber Pakhtunkhwa (Pakistan)

Secondary School Certificate Examination



SESSION 2012- ANNUAL

(Science Group)

This is to Certify that Tahir Hafeez Son of Abdul Hafeez
and a student of Al-Muslim Cambridge School Gulbahar Peshawar City has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Peshawar held in March 2012 as a Regular candidate. He obtained 511 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. Maths | 6. Physics | 7. Chemistry | 8. Biology |

Date of birth according to admission form 25 December, 1995

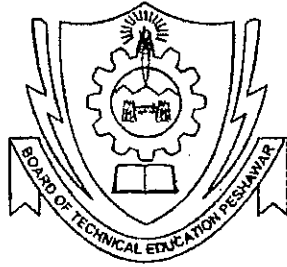

Asstt Secretary


Secretary

This Certificate is issued without alteration or erasure.

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION

(14) 750787



PESHAWAR

**DETAIL MARKS CERTIFICATE
DIPLOMA IN COMMERCE
PART-II
ACCOUNT GROUP (REVISED 2006)**

Name of Candidate TAHIR HAFEEZ
 Father's Name ABDUL HAFEEZ
 Roll.No. 83618 Session ANNUAL 2015
 Reg.No. PCIP/PIAC/13-4819
 Institute/College PESHAWAR CITY INSTITUTE OF MODERN SCIENCES PESHAWAR



Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Part-I Marks	600			303	
1 English	100	34	-	34	Thirty-four (Pass by GM)
2 Urdu	100	45	-	45	Forty-five
3 Pakistan Studies	50	28	-	28	Twenty-eight
4 Business I.T-II	75 / 25	40	16	56	Fifty-six
5 Principle of Economics	50	25	-	25	Twenty-five
6 Communication Skills	50	34	-	34	Thirty-four
7 Financial Accounting -II	100	64	-	64	Sixty-four
3 Applied Accounting	50	30	-	30	Thirty

1200

619 Six hundred nineteen

Prepared by Nasir Feroz

Checked by _____

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

23/08/2015

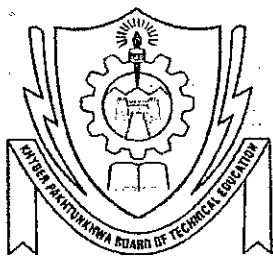
Serial No. 17727

Roll No 83618

15



Khyber Pakhtunkhwa Board of Technical Education



PESHAWAR (PAKISTAN)

Diploma in Commerce

Session Annual 2015

Certified that Mr./Miss. TAHIR HAFEEZ

Son/Daughter of Mr. ABDUL HAFEEZ

Registration No. PCIP/PIAC/13-4819

of PESHAWAR CITY INSTITUTE OF MODERN SCIENCES PESHAWAR

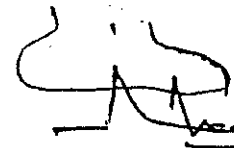
has passed the Diploma in Commerce Examination held by the Khyber Pakhtunkhwa Board of Technical Education, peshawar in the month of April 2015

He/She secured 619 Marks out of 1200 and has been placed in Grade C

*In recognition thereof, this
Diploma In Commerce*

ACCOUNT GROUP (Revised 2006)

is awarded to him/her at peshawar on the 23Th day of August 2016


ASSISTANT SECRETARY


SECRETARY

This Diploma is issued without any alteration or eraser

Sr. No: 032

Roll. No: 83618

PIMS

PESHAWARCITY INSTITUTE OF MODERN SCIENCES



PROVISIONAL CERTIFICATE

Certified that Mr./Miss: TAHIR HAFEEZ

D/S/o ABDUL HAFEEZ a student of this college appeared

in the Examination of **DIPLOMA IN COMMERCE** with Specialization


in ACCOUNTS under Registration No: PCIP/P/AC/13-48A, conducted under

the Technical Board. According to the Board Result Gazette,

he / she passed the said examination in 2ND Division by

Obtaining 619 Marks out of 200.

During his / her stay at this college, his / her character was satisfactory.

Examination Incharge 

PRINCIPAL
Peshawar City Institute of
Modern Sciences
Principal

Date of Issue 15-07-15

16

AL-MUSLIM CAMBRIDGE SCHOOL
GUL BAHAR PESHAWAR

17

88



CHARACTER CERTIFICATE

This is to Certify that Mr. TAMIR HAFEEZ

Son / Daughter of Mr. ABDUL HAFEEZ has been

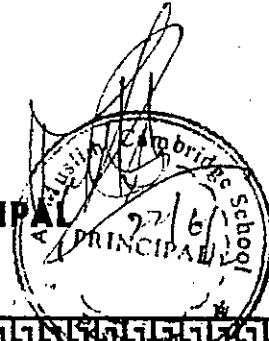
a regular student of this school during

session 2011-2012

During his stay in this school his conduct

and character was V - Good

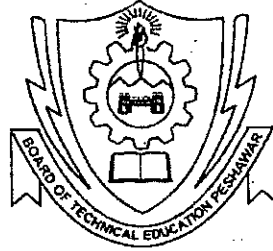
PRINCIPAL



KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION

1226432

18



193385

PESHAWAR

**DETAIL MARKS CERTIFICATE
COMPUTER COURSE
PART-II
DIPLOMA IN INFORMATION TECHNOLOGY 2011**

Name of Candidate TAHIR HAFEEZ
 Father's Name ABDUL HAFEEZ
 Roll No. 90642 Session 2ND TERM 2018
 Reg.No. GCMSIP/DITR/IST-17/3381
 Institute/College GOVERNMENT COLLEGE OF MANAGEMENT SCIENCES PESHAWAR



Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Part-I Marks	700			589	
1 Introduction to DataBase	100 / 50	54	47	101	One hundred one
2 MS Access	50 / 100	46	97	143	One hundred forty-three
3 E-Commerce & Web Technology	100 / 50	72	47	119	One hundred nineteen
4 Graphic Design	100 / 50	76	47	123	One hundred twenty-three
5 Project	100	-	97	97	Ninety-seven

1400

1172 One thousand one hundred seventy-two

Prepared by Hafeez

Checked by _____

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

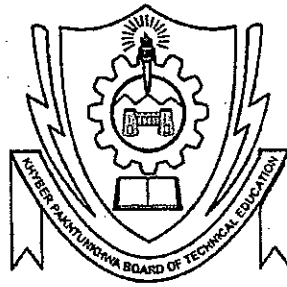
Serial No. 023597

(19)

Roll No 90642

Khyber Pakhtunkhwa Board of

Technical Education



PESHAWAR (PAKISTAN)

DIPLOMA IN INFORMATION TECHNOLOGY

Session 2nd Term 2018

This is to certify that


Mr./Miss. TAHIR HAFEEZ
Son/Daughter of ABDUL HAFEEZ
Registration No. GCMS/P/DITR/IST-17/338
of GOVERNMENT COLLEGE OF MANAGEMENT SCIENCES PESHAWAR

has satisfactorily completed the one year duration Information Technology course titled " Diploma in Information Technology" and passed the Examination held by the Khyber Pakhtunkhwa Board of Technical Education, peshawar, in the month of August 2018

He/She secured 1172 Marks out of 1400 and has been placed in Grade A+

In recognition thereof, this Diploma In Information Technology is awarded to him/her at Peshawar.

on the 17th day of January 2019


ASSISTANT SECRETARY


SECRETARY

This Diploma is issued without any alteration or eraser

20



University of Peshawar Pakistan

Detailed Marks Certificate

Bachelor of Commerce
Part-II
Supplementary Examination 2019
Peshawar City Institute of Modern Sciences, Peshawar



Regular

Name: **TAHIR HAFEEZ**

Gender: *Male*

Roll No: **472**

Father's Name: **ABDUL HAFEEZ**

Registration No: **2015-PIMS-421**

Division: *2nd*

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Accounting Information Systems(Th)-I	100	60	Sixty Only
Auditing-II	100	65	Sixty Five
Business Communication-III	100	40	Forty Only
Cost Accounting-IV	100	63	Sixty Three
Financial Accounting-V	100	46	Forty Six
Income Tax Law-VI	100	45	Forty Five
Statistics-VII	100	68	Sixty Eight
Part-I 276:Supplementary-2018	700	382	Three Hundred and Eighty Two
Part-II	1400	769	Seven Hundred and Sixty Nine

Errors & omissions are subject to subsequent rectification

Chance: . 3

The Examination was taken In Parts

Examination held From 20-Dec-2019 to 07-Jan-2020

Result Declared on Friday, June 5, 2020


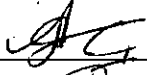

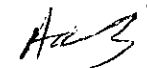
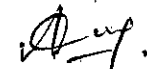
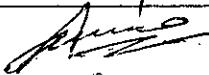
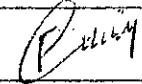
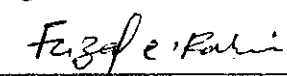
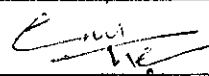

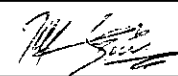
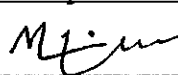
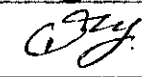
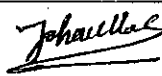

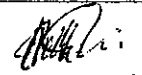
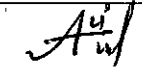
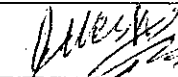
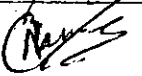
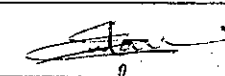

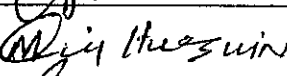
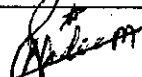
Issue Date: 24-Aug-2020

2 23 pm

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

Khalid Ali Muhammad Tahir
Ferran Amir Abdullah Umar
Fazal Muhammad Ali Abbas
Nawaz Fahim Safar Ali
Sahib I. Ali Umar Ali
Hamid

Names, Scales and Signatures of Candidates

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


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
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.	<u>Tahir Hafeez</u>	BPS-04	Tahir
36.	Tahir Shah	BPS-01	Tahir
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair
39.	Waqas Ahmad	BPS-02	Waqas
40.	Waqas Ghulam	BPS-01	Waqas
41.	Zeeshan Ahmad	BPS-04	Zeeshan
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

22

U.S. GOVERNMENT PRINTING OFFICE: 1963 O 351101

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.



Annex - "F"

23

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

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

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

AMRKA - 6

1755

17/10/2022

24

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

Health Department

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

Sir,

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

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

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

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



We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

*Chaudhry
Mujib*


[Handwritten signature]

129852			
<i>Adv. Barrister M. Hassan</i>			
BC-116028			
03038373453			

25

Service Tribunal Peshawar

بعدالت جناب:

مخائب: <i>Appellant</i>	دعوی: <i>Sr. Appeal</i>
طالب: 	علت نمبر: _____
گورنمنٹ آف ججس و منسٹرز	مورخہ: _____
	جرم: _____
	تھانہ: _____

بابت تحریر آگہ

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




آن مقام پشاور ایڈووکیٹ *ایڈووکیٹ محمد حسن عادل* کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موضوع کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے پر جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا دگرسی یا گھبرائے یا اہیل کا برائے اور منسوخی، نیز دائر کرنے اہل 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 اپنے متعلقہ تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی مقدمہ مذکورہ یا امتیازات حاصل ہوں گے اور اس کا ساختہ و اختتام منظور و قبول ہوگا دوران مقدمہ میں جو چیز چاہے ہر جانے التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخی خوشی 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

المقوم: *M. Hassan* 26-11-2022


مقام پشاور کے لیے منظور ہے۔

طالب حفیظ وکیل عبد حفیظ کلنہ جسدہ ابارا پشاور

نوٹ: اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔

50	129852			
Barrister M. Hassan Adil ایڈووکیٹ		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		بعدالت جناب:		
03038373453 رابطہ نمبر:		Service Tribunal Peshawar		

25

Appellant	مخائب:	Sr. Appeal	دعوی:
	طالب		علت نمبر:
گو و عدالت ان کی پیشی و عدلیہ			مورخہ:
			جرم:
			تھانہ:
بابت تحریر آگے			

طالب صفیہ و اول عبدالحفیظ کلہ جہتہ ابار پشاور

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

آن مقام پشاور کیلئے بیسٹریٹ محمد حسن ان محامل 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 و تقرر ثالث و فیصلہ بر خلف دینے (جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ 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 لیا جائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخنتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 26-11-2022

مقام صیت اور

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔