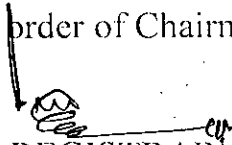


FORM OF ORDER SHEET

Court of _____

Case No. - 1857/2022

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. Nadeem 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. Nadeem Khan son of Sher Zaman 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 mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 3474 /S.T.

Dt. 05-12 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Hassaan Adil Adv.
High Court Peshawar.

(*) All the objections have been removed.

Hassaan

NOTE:- Appointment order is attached as
"annexure A"

Hassaan

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1857/2022

Nadeem Khan

VS

Government of KP and Others

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		1-4
2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
6.	Educational Documents	'C'	12-15
7.	Departmental Representation dated 17-06-2022	'D'	16
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	17
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	18
10.	Reminder application dated 17-10-2022	'G'	19
11.	Wakalatnama		20


APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL

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

Service Appeal No. _____/2022

Nadeem Khan

Son of Sher Zaman
Resident of Village Kukar,
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 03.08.2016 (**Annex "A"**) in prescribed manner as Mali (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than six years in one and the same scale.
2. That the seniority list (**Annex "B"**) of the appellant-Class-IV is maintained separately in the office of respondent no. 04, whereas the seniority list of the employees-Class-IV of the respondent no. 3's office is maintained separately in their office. The services of the employee in the respondent no. 4's office is regulated by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hereinafter referred to as the Rules.
3. That the next post in the hierarchy to which the appellant can be promoted is that of Junior Clerk (BPS-11), and 33% quota is reserved by the Rules for the promotions amongst the Daftaries (BPS-04), Naib Qasids (BPS-03), Bailiff (BS-04), etc with 02 years' service experience as such, and who have passed Secondary School Certificate Examination.
4. That, numerous posts of the Junior clerk were advertised by the respondent No. 3 & 4 department. However, the same were filled by the respondent No. 3 by promoting the employees of his office only as well as through initial recruitment since long, but the respondents were taking no steps to fill the same by affording a chance of promotion to the appellant despite of the availability and allocation of post to the office of the respondent no. 04.
5. That though the appellant was having the required qualification (**Annex "C"**) at the time of advertisement of junior clerk post and the vacancies were also available at that time, but he was deprived, illegally, of the benefit of promotion at that juncture.
6. That the appellant along with other colleagues submitted an application / representation dated 17-06-2022 (**Annex "D"**) to the respondent-department for their promotion on the quota reserved for them. In response to application dated 17-06-2022, a letter was issued by respondent No. 03 vide letter no. 1776-856/Promotion cell, dated 18-08-2022 (**Annex "E"**), wherein the respondent No. 03 asked the respondent no. 04 to furnish the details of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33% quota. Following this, the respondent no. 04 vide letter No. 14703/DHO dated 01-09-2022 (**Annex "F"**) sent an answer to the respondent

No. 03 wherein the details provided were shown to be NIL, because all the posts, either made available / created in the office of respondent no. 04 or become available / vacant due to retirement etc, were used to be filled by the respondent no. 04 from the employees of his office and illegally ignoring the Class-IVs including the appellant from the office of the respondent no. 04. Needless to mention here that a reminder application dated 17-10-2022 (Annex "G") was also submitted to the department by the appellant along with other colleagues but the respondent's department didn't consider it necessary to even take up the file of the appellant into consideration.

7. That the appellant, realizing the violation of his rights, approaches this Hon'ble Court through instant appeal, *inter alia*, on the following grounds amongst others;

GROUNDS:

- A. That the appellant was equipped with all the requisite qualification for promotion to the posts of Junior Clerk (BPS-11) long ago and also the vacancies were available but for no valid reason and illegally, the promotion was withheld and the posts were filled in through promoting the employee from the office of the respondent no. 03 as well as through initial recruitment by the respondent No. 03's office, unlawfully curtailing the right of promotion of the appellant; hence, as per the settled principal of law, the appellant is entitled to the back benefits from the date of his entitlement and the vacancies had occurred.
- B. That the appellant has a right and entitlement to the promotion as well as to the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred.
- C. That the appellant being eligible to promotion in the year 2018 is required to be placed senior to the fresh candidates appointed or promoted after 2018 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

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.

Nadeem
APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Nadeem Khan** Son of **Sher Zaman**, Resident of **Village Kukar**, 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.

Nadeem

DEPONENT

30-11-22

5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Nadeem 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
Nadeem
APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

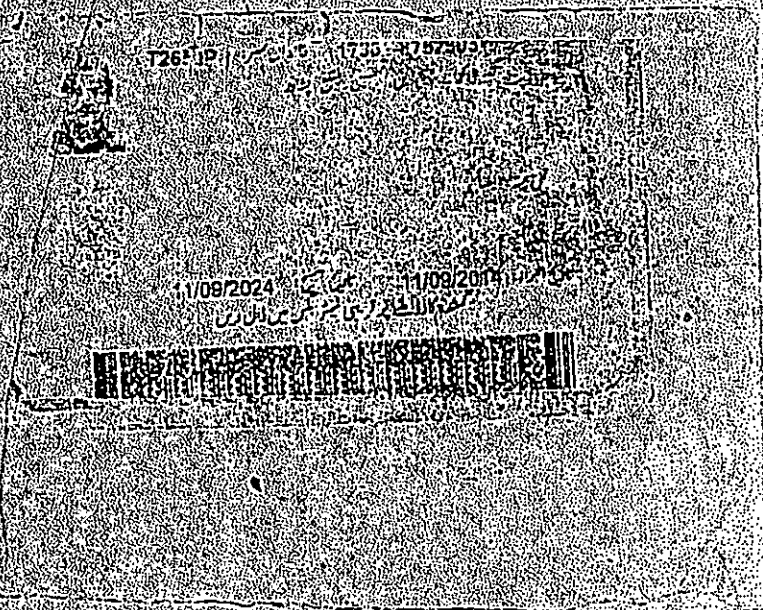
Advocate High Court

AFFIDAVIT

I, **Nadeem Khan** Son of **Sher Zaman**, Resident of **Village Kukar, 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.

Nadeem
DEPONENT

Lu
30-11-22



Annex - "A"

8

OFFICE OF THE DISTRICT HEALTH OFFICER, PESHAWAR
OFFICE ORDER.

As recommended by the Departmental Selection Committee during the meeting held on 02/08/2016 at 10:00 AM in the office of District Health Officer, Peshawar, Mr. Nadeem Khan S/O Sher Zaman R/O Village Kukar District Peshawar is hereby appointed as Mali BPS-03 (8040-325-17790) in District Health Officer, Peshawar plus other allowances as admissible to him under retired son's quota.

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

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

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

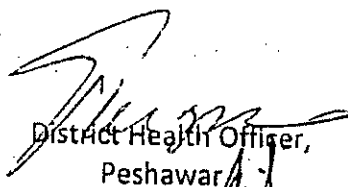
Sd/-
District Health Officer,
Peshawar

No. 6548-53 /DHO/E-19 Dated Peshawar The 03/08 /2016

Copy forwarded to the: -

1. Accountant General Khyber Pakhtoonkhwa, Peshawar
2. PA to Director General Health Services Khyber Pakhtoonkhwa Peshawar.
3. Litigation officer & DHIS Section.
4. DHIS Section of this office.
5. Mr. Nadeem Khan S/O Sher Zaman R/O Village Kukar District Peshawar
6. Account Section of this office

For information and necessary action.


District Health Officer,
Peshawar

03/8/16

00809897 NADEEM KHAN		CNIC: 1730187623031	Desig: BENISHTI/SWEEPER (80500466)	Grade: 03 NTN:	Buckle No.:	Gazetted/Non-Gazetted: N.	
PAYMENTS		AMOUNT	DEDUCTIONS	AMOUNT	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	11,950.00	4004 R. Benefits & Death C	300.00-				
1004 House Rent Allow 454	3,542.00						
1210 Convey Allowance 20	1,785.00						
1300 Medical Allowance	1,500.00						
2148 15% Adhoc Relief All	253.00						
2199 Adhoc Relief Allow 8	126.00						
2211 Adhoc Relief All 201	836.00						
2224 Adhoc Relief All 201	1,195.00						
2247 Adhoc Relief All 201	1,195.00						
2264 Adhoc Relief All 201	1,195.00						
2309 Adhoc Relief All 202	1,195.00						
2311 Dress Allowance - 20	1,000.00						
2312 Washing Allowance 20	1,000.00						
2313 Integrated Allowance	600.00						
2341 Dispr. Red All 15% 2	1,792.00						
5155 Adj. Disp. Red All 2	1,792.00	3003 GPF Subscription	770.00-				
5353 Adj. Weather Allowan	3,250.00	3501 Benevolent Fund	500.00-				
					GPF#:		58,798.00
PAYMENTS	34,206.00	DEDUCTIONS	1,670.00-		NET PAY	32,536.00	01.04.2022 30.04.2022
Branch Code:250309	Gur Mandi Peshawar City.	ALLIED BANK LIMITED	Gur Mandi Peshawar City.		Peshawar	Accnt.No: 0010036156510016	

9

Seniority List Of Class IV Employees Working Under DHO Peshawar

(10)

Annex - "B"

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid ✓	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid ✓	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+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	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 Ullah s/o
Sachib Zada

District Health Officer
Peshawar

	Fareed Khan	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
34	Fareed Ullah	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
35	Umar 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
Peshawar

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR

4240239

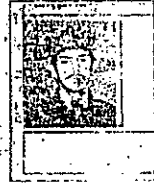


Annex - "C"

12

Roll No: 138746

Group: ARTS



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

Nadeem Khan Son/Daughter of Sher Zaman

of GOVT. HIGH SCHOOL PAKHA GHULAM PESHAWAR

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			
		Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	28	--	40	--	68	Sixty-Eight
2. Urdu	150	47	--	45	--	92	Ninety-Two
3. Islamiyat (Comp)	75	32	--	--	--	32	Thirty-Two
4. Pakistan Studies	75	--	--	38	--	38	Thirty-Eight
5. Maths	150	32	--	35	--	67	Sixty-Seven
6. General Science	150	48	--	45	--	93	Ninety-Three
7. Islamic Studies	150	39	--	51	--	90	Ninety Only
8. Art & Model Drawing	150	27	25	26	22	100	One Hundred Only

Total 1050

580-C Five Hundred Eighty Only

Date of Birth: 10th April, 1996

Remarks: IS:ART:

Enrolment No: 110-B/PGP-2010

Checked by: _____

Controller of Examinations

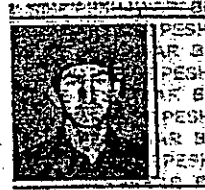
Issue Date: 14-06-2012

Note: Error(s) / Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

S No. 141396

Roll No. 138746

Board of Intermediate & Secondary Education
Peshawar



Khyber Pakhtunkhwa (Pakistan)

Secondary School Certificate Examination

SESSION 2012- ANNUAL

(Arts Group)

This is to Certify that Nadeem Khan Son of Sher Zaman
and a student of Govt. High School Pakha Ghulam Peshawar 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 580 Marks out of 1050 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|--------------------|------------------------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. General Science | 6. Art & Model Drawing | 7. Maths | 8. Islamic Studies |

Date of birth according to admission form 10 April, 1996


Asstt Secretary


Secretary

(13)

This Certificate is issued without alteration or erasure.

The best of you are those who possess the best of manners.

GOVT. HIGHER SECONDARY SCHOOL NO. 3



PESHAWAR CITY.

CHARACTER CERTIFICATE

Admission. No. R.No. 93633 S. No. 3

Certified that Mr. NADEEM KHAN

S/o SHER ZAMAN


has been a regular student of Government Higher Secondary School

No #3 Peshawar City during the Session 2013-14.

During his stay at school, he showed good moral character.

Prepared by 

Date 21/8/14


PRINCIPAL
G.H.S.S. No: 3
Govt. Higher Secondary School
Peshawar City.

15

S.No: 10247800

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION
PESHAWAR**

**KHYBER PAKHTUNKHWA (PAKISTAN)
PROVISIONAL & DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination**



Roll No: 149911

INTERMEDIATE (ANNUAL) EXAMINATION, 2017
HUMANITIES (Part-II)

Nadeem Khan Son / Daughter of Sher Zaman
of GOVT HIGHER SECONDARY SCHOOL NO.3 PESHAWAR CITY
has secured the marks shown against each subject in the HSSC Examination held in the month of
April, 2017 as Ex-Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	33	--	43	--	76	Seventy-Six
Urdu	200	48	--	60	--	108	One Hundred Eight
Islamic Education	50	25	--	--	--	25	Twenty-Five
Pakistan Studies	50	--	--	24	--	24	Twenty-Four
Islamic History	200	39	--	55	--	94	Ninety-Four
Civics	200	40	--	43	--	83	Eighty-Three
Islamic Studies	200	65	--	61	--	126	One Hundred Twenty-Six
Total : 1100						536-D	Five Hundred Thirty-Six Only

Remarks :

Reg: No 0091-B/CITY3-2012
Checked By : _____
Issue Date: 06-08-2017

Controller of Examinations

Note: Except in case of (s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate.

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: 17-05-2022.

Your Sincerely,

All qualified Class-IV Staff



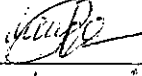
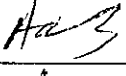
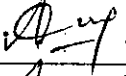
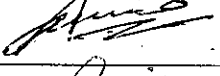
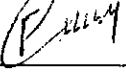
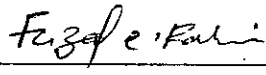
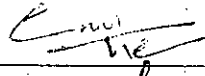
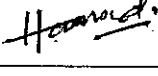
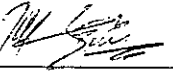

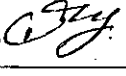


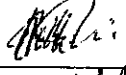
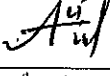
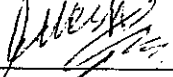
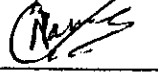

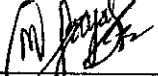
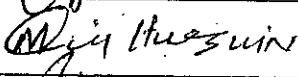
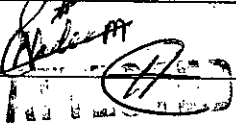
- SSM (SAD)
- AS - (DEV)
- AS - MTE
- CH - HSRU
- CPD
- DS - (S&D)
- DS - (Prog)
- SO - B-I
- SO - B-II

[Handwritten signatures and initials]

[Signatures: T-Arshad, Shabab, Nurva, etc.]

Naqvi Ali Ali Tahir
Jasim Ali Ali Ali
Fuzal e Pathan Ali Ali Ali
Nasim Ali Ali Ali
Sandhu Ali Ali Ali
Hamid Ali Ali Ali

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	

16 (B)

24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir
27.	Sardar Ali	BPS-01	Sardar Ali
28.	Shahid Ahmad	BPS-04	Shahid
29.	Shahid Islam	BPS-02	Shahid 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
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

ATTACHED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

17

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"

18

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

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

SOFT REMINDER

HP/HRX-6

(19)

1755

17/10/2022

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. 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

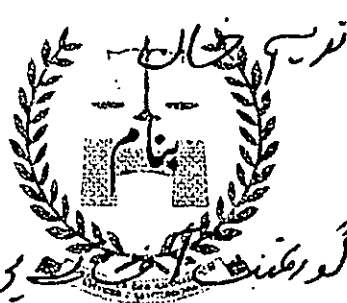
Yours Sincerely,
All Qualified Class-IV Staff

*Chahida
Miyta*

[Handwritten signature]

50	129870			
Barrister M. Hassan. Ad. ل.		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		رابطہ نمبر: 0303-8373453		
Service Tribunal - Peshawar				

بعدالت جناب:

Appellant	مخائب:	Sr. Appeal	دعویٰ:
	مدرسہ خیال بنام گورنمنٹ کالج بی وغنڈہ	—	علت نمبر:
		—	مورخہ:
		—	جرم:
		—	تھانہ:
باعتبار آنکہ			

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

آن مقام پشاور کے لئے مدرسہ محمد حسان عادل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کر کے دفتر ثالث و فیصلہ بر طرف دینے طلب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت ضرورت پیروی یا ڈگری یا طرفہ یا اپیل کی برائگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے اختیار حاصل ہے، بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی عملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا ساختہ و ساختہ منظور و قبول ہوگا دوران مقدمہ میں ہر چیز پر خانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاخیر کوئی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں بلکہ ذکاوت نامہ لکھ دیا تاکہ سند رہے



26.1.22

المقوم:

مقام پشاور کے لیے منظور ہے۔

مدرسہ محمد حسان عادل کلمہ پشاور