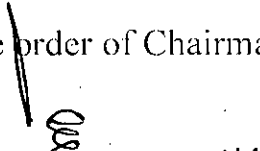


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 1820/2022

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. Muhammad Suliman 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. Muhammad Suliman son of Qabil Khan, received today i.e. on 02.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal be got signed by the appeal.
- 2- Copy of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.

No. 3478 /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.

Hassaan

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

Service Appeal No. \_\_\_\_\_/2022

**Muhammad Suliman**

**VS**

**Government of KP and Others**

-----  
**INDEX**  
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<b>Sr. No</b>	<b>Description of Documents</b>	<b>Annexures</b>	<b>Pages</b>
1.	Service appeal		1-4
2.	Application for Temporary Injunction		5-6
3.	Appointment Order	'A'	7-8
4.	Seniority List	'B'	9-10
5.	Educational Documents	'C'	11-16
6.	Departmental Representation dated 17-06-2022	'D'	17
7.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	18
8.	Letter No. 14703/DHO dated 01-09-2022	'F'	19
9.	Reminder application dated 17-10-2022	'G'	20
10.	Wakalatnama		21

APPELLANT

Through

**BARRISTER**  
**MUHAMMAD HASSAAN ADIL**

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

Service Appeal No. 1820/2022

**Muhammad Suliman**

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

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

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

**GROUNDS:**

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

4

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

**PRAYER:**

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

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

*[Handwritten signature]*

APPELLANT

Through

*[Handwritten signature]*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, Muhammad Suliman Son of Qabil Khan, Resident of Hazrat Umar Colony GT Road, Chughal Pura, 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.

*[Handwritten signature]*  
30-11-22  
Peshawar Court

DEPONENT

*[Handwritten signature]*

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

Service Appeal No. \_\_\_\_\_/2022

**Muhammad Suliman 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 honorable 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

*Handwritten signature*

APPELLANT

Through

*Handwritten signature: Hassaan*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Muhammad Suliman Son of Qabil Khan, Resident of Hazrat Umar Colony GT Road, Chughal Pura, 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

*Handwritten signature of deponent*

*Handwritten signature*  
30-11-22  
Hon Court

Annex 'A'

7

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, Mohammad Suliman S/O Qabil Khan R/O Hazrat Umar Colony GT Road Chughal Pura District Peshawar is hereby appointed as Ward Orderly BPS-04 (8280-370-19380) in District Health Officer, Peshawar plus other allowances as admissible to him under the Rules.

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

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

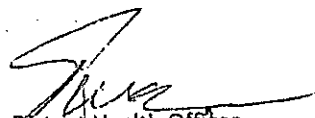
If the above terms and conditions are acceptable to him, he should report to District Health Officer, Peshawar within 14 days after the receipt of this order.

Sd/-  
District Health Officer,  
Peshawar

No. 6536-41 /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 of this office
4. DHIS Section of this office.
5. Mohammad Suliman S/O Qabil Khan R/O Hazrat Umar Colony GT Road Chughal Pura District Peshawar
6. Account Section of this office  
For information and necessary action

  
District Health Officer,  
Peshawar  
3/8/16

8

# 1 Peshawar Dist.

Pers #: 00783561 Buckle:  
Name: MUHAMMAD SULIMAN  
WARD ORDERLY  
CNIC No. 1730184498503  
GPF Interest Applied  
04 Active Permanent

P Sec: 004 Month: May 2022  
PW6580 - EXECUTIVE DISTRICT OFFICER II  
EXECUTIVE DISTRICT OFFICER  
NTN:  
GPF #:   
Old #:

PAYS AND ALLOWANCES:		PW6580	-
0001-Basic Pay			
1004-House Rent Allow 45% KP21		12,540.00	
1210-Convey Allowance 2005		3,576.00	
1300-Medical Allowance		1,785.00	
2148-15% Adhoc Relief All-2013		1,500.00	
2211-Adhoc Relief All 2016 10%		260.00	
2224-Adhoc Relief All 2017 10%		865.00	
2247-Adhoc Relief All 2018 10%		1,254.00	
2264-Adhoc Relief All 2019 10%		1,254.00	
Gross Pay and Allowances		1,254.00	
DEDUCTIONS:		30,023.00	

GPF Balance	70,337.00		
3501-Benevolent Fund		Subrc:	830.00
4004-R. Benefits & Death Comp:			600.00
			300.00
Total Deductions			1,730.00
			28,293.00

D.O.B 18.03.1994 LFP Quota:  
05 Years 09 Months 029 Days Peshawar Dist. HABIB BANK LIMITED Gulbahar Colony2, PE  
22427901089603

# 2

Pers #: 00783561 Buckle:  
Name: MUHAMMAD SULIMAN  
WARD ORDERLY  
CNIC No. 1730184498503  
GPF Interest Applied  
04 Active Permanent

P Sec: 004 Month: May 2022  
PW6580 - EXECUTIVE DISTRICT OFFICER II  
EXECUTIVE DISTRICT OFFICER  
NTN:  
GPF #:   
Old #:

PAYS AND ALLOWANCES:		PW6580	-
2309-Adhoc Relief All 2021 10%		1,254.00	
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		1,881.00	
Gross Pay and Allowances		30,023.00	

DEDUCTIONS:			
GPF Balance	70,337.00	Subrc:	
Total Deductions			1,730.00
			28,293.00

D.O.B 18.03.1994 LFP Quota:  
05 Years 09 Months 029 Days Peshawar Dist. HABIB BANK LIMITED Gulbahar Colony2, PE  
22427901089603

## Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Job	Date of Entry in	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Nalb 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	Nalb 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 Amir	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+DT	
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	Nalb Qasid	Matric	
15	Naveed Khan	Muhammad Nawaz Khan	17301-6584400-1	3/3/2010	Nalb 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	Lagat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA	
19	Torgat Auzaal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA	
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	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 Attendant	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	Musharat 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	Nalb Qasid	BSC	

Annex - "B"

(9)

BHU Terai

Sudhar Ali s/o  
Mir Aslam

Saad Ullah s/o  
Sulaiman Raza

District Health Officer  
Peshawar

33	Nadeem Khan	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
34	Fareed Ullah	Afridi Khan Sali	17301-4505337-1	3/8/2016	Naib Qasid	BA
35	Umar Khan	Pervaz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
36	Sabir Shah	Zaiban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matrix+ Health Diploma
37	Waqar Younis	Shafaraz 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 Aarif	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 Haider	Khan Bahadur	17101-1892366-1	30/10/2018	Ward Orderly	FA
45	Imran Khan	Izzat Khan	17301-8692584-1	27/10/2020	Chowkidar	FA+Electric Diploma
46	Rahim Shah	Sardar Khan	17301-2332817-7	27/10/2020	Ward Orderly	MA+DT Diploma
47	Shehryar Khan	Faqir Hussain	17301-1797449-1	27/10/2020	Ward Orderly	FA
48	Ishan Ullah	Ihsan Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FSC
49	Amir Khan	Zaka Ullah	17301-3280446-5	27/10/2020	Ward Orderly	BA
50	Muhammad Nouman	Noor Muhammad	17301-86494820-9	27/10/2020	Ward Orderly	BA
51	Muhammad Aarif	Usman Khan	17301-6540441-7	27/10/2020	Ward Orderly	MBA
52	Mueen Qasmi	Muhammad Hanif	17301-6952992-5	27/10/2020	Chowkidar	Matric
53	Imran Khan	Abdul Sattar	17301-8767271-3	27/10/2020	Ward Orderly	FA
54	Shahid Ahmad	Habib ur Rehman	17301-5569170-9	27/10/2020	Chowkidar	BA
55	Haroon Ur Rashid	Muhammad Dawood	17301-5242528-1	27-10-2020	Ward Orderly	Matric
56	Aqib Zahoor	Zahoor Ud Din	17301-555930-7	27-10-2020	Ward Orderly	B.COM
57	Tahir Hafeez	Abdul Hafeez	17301-1955764-1	27-10-2020	Ward Orderly	FA
58	Hamza Shah	Jalal Shah	17301-7058253-5	27-10-2020	Ward Orderly	FSC+Health Diploma
59	Muhammad Tayab	Masood Ahmad	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
60	Shehryar Hussain	Nighah Hussain	17301-3206617-7	8/12/2020	Ward Orderly	SSC
61	Momin Khan	Johar Ali	17301-5541278-7	2/3/2021	Behishti	FA
62	Imran Shah	Sabir Shah	17301-3443294-5		Ward Orderly	Matric (Diploma)
63	Anwar ul Haq	Zia Ul Haq				
64	Saiman Khan	Dilawar Khan				

District Health Officer  
Peshawar

10

Annex "C"

S.No. PB

4223289

11

BOARD OF INTERMEDIATE & SECONDARY EDUCATION  
PESHAWAR



Roll No 118851  
Group SCIENCE

PESHAWAR

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

Muhammad Suliman Son/Daughter of Qabil Khan  
of SAAD BIN MAAZ INTERNATIONAL SCHOOL 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					
		9Th		10Th		Total	In Words
		Theory Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	36	--	33	--	69	Sixty-Nine
2. Urdu	150	53	--	42	--	95	Ninety-Five
3. Islamiyat (Comp)	75	25	--	--	--	25	Twenty-Five
4. Pakistan Studies	75	--	--	37	--	37	Thirty-Seven
5. Maths	150	28	--	32	--	60	Fifty-Two
6. Physics	150	30	7	28	6	71	Seventy-One
7. Chemistry	150	25	6	26	6	63	Sixty-Three
8. Biology	150	28	6	36	6	76	Seventy-Six

Total 1050

493-D Four Hundred Ninety-Three Only

Date of Birth: 18th March, 1994

Enrolment No: 005-B/SBMP-2010

Checked by: \_\_\_\_\_

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

Remarks

Remarks box containing the number 493-D and the text 'Four Hundred Ninety-Three Only'.

Controller of Examinations

(12)

S No. 126533

Roll No. 118851

پشاور

# Board of Intermediate & Secondary Education

## Peshawar

### پشاور پابھرتنکھما (پاکستان)

#### Secondary School Certificate Examination



SESSION 2012- ANNUAL  
(Science Group)

This is to Certify that

Muhammad Sulman

Son of

Qabil Khan

and a student of

Saad Bin Maaz International School 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 493 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 18 March, 1994

Assit Secretary

This Certificate is issued without alteration or erasure.

Secretary

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 68555



## PESHAWAR



### PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2014 PRE-MEDICAL (Part-II)

Muhammad Suliman Son / Daughter of Qabil Khan

of Peshawar Science College Shahi Bagh Peshawar City

has secured the marks shown against each subject in the HSSC Examination held in the month of April 2014 as Regular Student

Subjects	Marks	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	40	--	33	--	73	Seventy-Three
Urdu	200	53	--	42	--	95	Ninety-Five
Islamic Education	50	29	--	--	--	29	Twenty-Nine
Pakistan Studies	50	--	--	22	--	22	Twenty-Two
Physics	200	49	12	35	8	104	One Hundred Four
Chemistry	200	29	13	39	10	91	Ninety-One
Biology	200	43	12	50	10	115	One Hundred Fifteen
<b>Total : 1100</b>						<b>520-0</b>	<b>Five Hundred Twenty-Nine Only</b>
Remarks :							

Reg: No 0286 B/PSCP-2012

Checked By : \_\_\_\_\_

Issue Date: 24-07-2014

Controller of Examinations

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



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

14

Roll No. 68555

Sr No. 57165

**Board of Intermediate and Secondary Education**  
**Peshawar Khyber Pakhtunkhwa**  
**Pakistan**



**Intermediate Examination**

**(Pre-Medical Group)**

**SESSION ANNUAL 2014**

This is to Certify that

Muhammad Suliman

Son of

Qabil Khan

a student of

Peshawar Science College Shahi Bagh Peshawar City

passed the Intermediate Examination of the Board of Intermediate and Secondary Education  
Peshawar, held in April, 2014 as a Regular candidate. He obtained 529 marks  
out of 1100 and placed in grade D representing Fair

The examination was taken as a whole.

Registered No. 0289-BIPSCP-2012

  
Asstt. Secretary

  
Secretary

This certificate is issued without alteration or erasure.



# Certificate



# APTECH

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

**INSTITUTE OF INFORMATION TECHNOLOGY**

Affiliated with: K.P.K BTE, TTB, SDC, Govt. of Pakistan

Reg No. AP/CER/10625

S. No. 10625

## Certificate

This Is To Certify That

Mr/Ms

MUHAMMAD SULJMAN

Son/Daughter of

QABIL KHAN

Successfully Completed

Certificate in Information Technology (CIT)

He/She secured ..... 80% ..... Marks and placed in grade ..... A

From ..... 24/08/2015 ..... To ..... 23/02/2016 .....

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

On ..... 21st ..... Day of ..... March-2016 .....

Principal

PRINCIPAL  
APTECH INSTITUTE OF IT  
Affiliated with: NWFP B.T.E  
F.3., S.D.C Govt of Pakistan

Controller of Exam.





16

# University of Peshawar

## Pakistan

This certifies that

**Muhammad Suliman son of Qabil Khan**

having fulfilled all the requirements is hereby admitted to the degree of

**Bachelor of Arts**

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 17th day of January, 2022.



Roll No: 46000

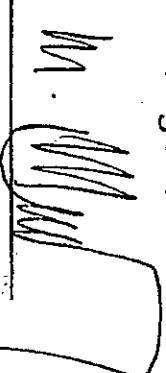
Session: Annual 2021

Reg. No: 2017-QDDCP-1194



19731

  
Registrar

  
Vice Chancellor

Annex - <sup>4</sup>D<sup>4</sup>

17

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. 1<sup>st</sup> 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 (S&D)
- AS - (DEV)
- AS - (MT)
- CH - (HSRI)
- DHO
- DS - (S&D)
- DS - (C&S)
- SO - B-I
- SO - B-II

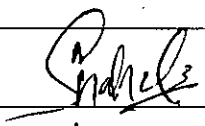

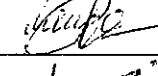
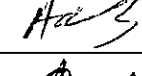
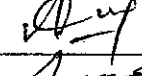
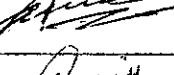
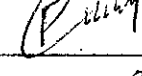
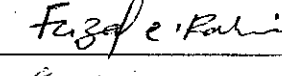
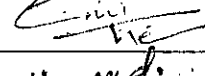
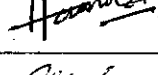

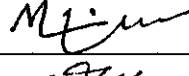
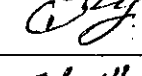
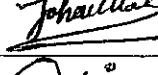
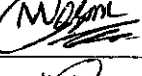
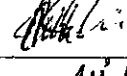
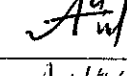
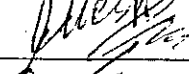
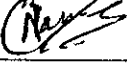

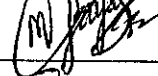
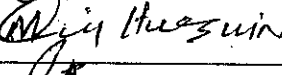
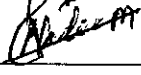
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*So IV* *Qureshi* *Shah*  
*Aziz* *Zahid* *Shah*  
*Namir* *Masood* *Shah*  
*Shah* *Shah* *Shah*  
*Shahab* *Nisra*


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P.T.O

Adhikari Adhikari Adhikari Tahir  
Jeyamurthy Amal Adhikari Adhikari  
Fizal & Partner Adhikari Adhikari Adhikari  
Nawaz Adhikari Adhikari Adhikari  
Sankar Adhikari Adhikari Adhikari  
Adhikari Adhikari Adhikari Adhikari

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	

  
 ATTENDED

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.	<u>Muhammad Suliman</u>	BPS-04	Muhammad Suliman
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

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR

18

Annex "E"

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

To

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

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

Memo:


Reference to the subject noted above, please furnish the detail of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33 % quota on the following format:-

Proforma for Junior Clerks from Class-IV on 33% Quota.

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

Proforma for Junior Clerks initially recruited.

S No.	Name / Father Name	Date of Entry into Govt: Service.	Qualification	Date of Initial Recruitment as Junior Clerk.
01.				
02.				

  
Additional Director General (HR)  
Directorate General Health Services  
Khyber Pakhtunkhwa, Peshawar





Annex "F"

(19)

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

No. 14703 /DHO dated Pesh: 01/09/2022

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

Annex - 9

20

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

1755  
17/10/2022

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

Sir,

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

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

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




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

We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,  
All Qualified Class-IV Staff

*Handwritten signatures and initials*

50	129853			
Barrister M. Hassan Adil: ایڈوکیٹ				
BC-116028 بار کونسل ایسوسی ایشن نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
03038373453 رابطہ نمبر:				

Service Tribunal Peshawar

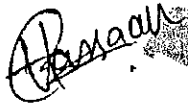
بعدالت جناب:

مخانب:	دعوی:
Appellant	Sr. Appeal
محمد شعیب ایمان	علت نمبر:
بنام	مورثہ:
گواہ محمد آرتھو پیس وغیرہ	جرم:
	تھانہ:

### بابت تحریر آگہ

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

آن مقام پشاور کے لیے ایڈووکیٹ محمد حسن اعظمی کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف 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 یا طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرائی 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 ہمسامعہ یا اپنے سببائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے بلکہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



26-11-22

المرقوم:

العبد العبد  
پشاور مقام کے لیے منظور ہے۔

محمد شعیب ایمان 99 فیل خان کنڈہ چغل پورہ پشاور