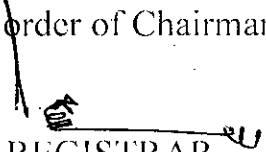


FORM OF ORDER SHEET

Court of _____

Case No. - 1821/2022

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. Sahibzada Amir 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. Sahibzada Amir son of Mukhtar Ahmad received today i.e. on 02.12.2022 is incomplete on the following score which is returned to the counsel for the appellants 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 appellants is not attached with the appeal which may be placed on it.

No. 3469 /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. 1824 /2022

Sahibzada Amir

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'	12-17
7.	Departmental Representation dated 17-06-2022	'D'	18
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	19
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	20
10.	Reminder application dated 17-10-2022	'G'	21
11.	Wakalatnama		22

Through


APPELLANT


BARRISTER

MUHAMMAD HASSAAN ADIL

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Sahibzada Amir

Son of Mukhtiar Ahmad
Resident of Jala Bela, P.O Nahaqi,
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 11.08.2006 (**Annex "A"**) in prescribed manner as Ward Orderly (BPS-02) in the respondent no. 04's department. The appellant has rendered services for more than sixteen 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 2008 is required to be placed senior to the fresh candidates appointed or promoted after 2008 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.

Muhammad
APPELLANT

Through

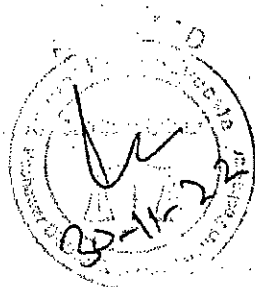
Hassan
BARRISTER
MUHAMMAD HASSAN ADIL

Advocate High Court

AFFIDAVIT

I, **Sahibzada Amir** Son of **Mukhtiar Ahmad**, Resident of **Jala Bela, P.O Nahaqi, 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.

Sahibzada Amir
DEPONENT



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

Service Appeal No. _____/2022

Sahibzada Amir

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.

Amir Ahmad (6)
APPELLANT

Through

Hassaan
BARRISTER
MUHAMMAD HASSAAN ADIL

Advocate High Court

AFFIDAVIT

I, **Sahibzada Amir Son of Mukhtiar Ahmad, Resident of Jala Bela, P.O Nahaqi, 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.

Amir Ahmad
DEPONENT



(7)

حکومت پاکستان
قومی شناختی کارڈ

17301-0508248-9

نام: صاحبزادہ عار
 جنس: مرد
 والد کا نام: صاحبزادہ
 شناختی حوت: کوئی نہیں
 تاریخ پیدائش: 15/12/1985

عثمان ایف بی
 سٹوڈنٹ ایڈمنسٹریٹر

پشاور

S6Q5PB 17301-0508248-9

قومی شناختی کارڈ

پیدائش: 29/04/2016
 منقضی: 29/04/2026

پشاور

Annex "A"

8

OFFICE OF THE EXECUTIVE DISTRICT OFFICER HEALTH CITY DISTRICT PESHAWAR

OFFICE ORDER

Consequent upon the approval of the Departmental Selection Committee held on 07/08/2006 at 10.00 AM in the office of the undersigned, Mr. Amir Ahmed S/O Mukhtiar Ahmed (Deceased) Residence of Village Jala Bela P/O Nahaqi District Peshawar is hereby appointed under the deceased Govt: Servants Son's quota as Ward Orderly in BPS-02(2200-75-4450) Plus usual allowances as admissible under the rules.

His appointment in the Health Department Govt: of NWFP, will be subject to the following terms and conditions:

1. His appointment will be subject to Medical fitness and verification of character.
2. He will be domiciled in NWFP Peshawar.
3. He will not be entitled to any TA/DA for Medical examination and joining first appointment.
4. He will be governed by such rules and orders as may be issued by the Govt: for the category of Govt: Servant to which he belongs.
5. He will be served any where in NWFP.
6. His appointment will be on purely temporarily basis and not be entitled to Pension or gratuity as laid down by the Govt: of NWFP E & AD Notification No. E&A (1-3) 2005 dated 10/8/2005.
7. If he wishes to resign from Govt: Service, he will have to submit resignation in writing one month in advance or deposite one month salary in the Govt: treasury. However he will continue to serve the Govt: till his resignation is accepted by the competent authority.

If the above terms and conditions are accepted to him, he should report to the office of the undersigned for further posting in any Health facility within 14 days of the receipt of this order.

Sd/xxxxxxx
Executive District Officer
Health District Peshawar

No. 2473-76 /EDOH/

Dated Peshawar the 11 / 08 /2006

- A copy is forwarded to the:-
- i. PA to District Coordination Officer City District Govt: Peshawar.
 - ii. District Accounts Officer Peshawar.
 - iii. Mr. Amir Ahmed S/O late Mukhtiar Ahmed Resident of Jala Bela Peshawar: Accounts Section of this office.
 - iv. For information and necessary action.

DR. MOSEM KHAN
Executive District Officer
Health District Peshawar

Dist. Govt. KP-Provincial
District Accounts Office Peshawar Dist.
Monthly Salary Statement (November-2021)



Personal Information of Mr SAHIBZADA AAMIR d/w/s of MUKHTIAR AHMAD

Personnel Number: 00322740 CNIC: 1730105982459 NTN: -
 Date of Birth: 15.12.1985 Entry into Govt. Service: 12.08.2006 Length of Service: 15 Years 03 Months 020 Days

Employment Category: Active Temporary

Designation: WARD ORDERLI 80814379-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6579-DistSuprtMngrPPHI-1522-2 NBP HAbA PESHAWA

Payroll Section: 004 GPF Section: 010 Cash Center: -

GPF A/C No: 322740 Interest Applied: Yes **GPF Balance: 143,271.00**

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale-Type: Civil BPS: 05 Pay Stage: 13

Wage type		Amount	Wage type		Amount
0001	Basic Pay	16,760.00	1004	House Rent Allow 45% KP21	3,610.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	332.00	2199	Adhoc Relief Allow @10%	243.00
2211	Adhoc Relief All 2016 10%	1,237.00	2224	Adhoc Relief All 2017 10%	1,676.00
2247	Adhoc Relief All 2018 10%	1,676.00	2264	Adhoc Relief All 2019 10%	1,676.00
2309	Adhoc Relief All 2021 10%	1,676.00	2311	Dress Allowance - 2021	1,000.00
2312	Washing Allowance 2021	1,000.00	2313	Integrated Allowance 2021	600.00

Deductions - General

Wage type		Amount	Wage type		Amount
3005	GPF Subscription	-890.00	3501	Benevolent Fund	-1,200.00
4004	R. Benefits & Death Comp:	-450.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	73,600.00	-2,045.00	18,385.00

Deductions - Income Tax

Payable: 0.00 Recovered till NOV-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 34,918.00 Deductions: (Rs.): -4,585.00 Net Pay: (Rs.): 30,333.00

Payee Name: SAHIBZADA AAMIR

Account Number: 0010010575720010

Bank Details: ALLIED BANK LIMITED, 250308 Gur Mandi Peshawar City, Gur Mandi Peshawar City., Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PEAH

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: sahibzadaaamirahmad@gmail.com

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zafar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Nalb 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	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 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	Nalb Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	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	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torgat Awzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Nauroz 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 Aliaf	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	Mustarraf Khan	17301-6596238-7	4/2/2014	Ward Orderly	BA
27	Shams Ul Athar	Shams Ul Qamar	17301-8058948-7	27-03-2015	Behishti	SSC
28	Zia-ul-Islam	Muhammad Qayyum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Salman Mischah	Mischah 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"

(10)

Suzdar Ali s/o
Mir Aslam

Sardullah s/o
Sulaiman

District Health Officer
Peshawar

34	Fareed Ullah	Afridi Khan Saifi	17301-8762303-1	12/8/2016	Behishti	FA
35	Umar Khan	Pervaiz Khan	17301-4505337-1	3/8/2016	Naib Casid	BA
36	Sabir Shah	Zaiban Shah	17301-8066889-5	29/05/2017	Naib Casid	FA
37	Waqar Younis	Shafaras Khan	17201-6576098-3	19/01/2018	Chowkidar	Matrix Health Diploma
38	Syed Ghous Ali Shah	Syed Abid Shah	17301-9197840-5	19/01/2018	Ward Orderly	FSC
39	Muhammad Arif	Faiz Muhammad	17301-1800560-9	19/01/2018	Ward Orderly	MA
40	Muhammad Ihtisham	Dilshad Khan	17301-2618886-7	19/01/2018	Ward Orderly	BSC
41	Zeeshan Ahmad	Fareed Khan	17301-2621626-3	19/01/2018	Ward Orderly	M.COM
42	Faisal Ahmad	Habib ur Rehman	17301-5237207-1	20/02/2018	Ward Orderly	BA
43	Muhammad Saboor	Manzoor Khan	17301-6599340-5	3/10/2018	Chowkidar	FA
44	Farooq Haider	Khan Bahadur	17301-9784416-5	3/10/2018	Chowkidar	FA+ Health Diploma
45	Imran Khan	Izzat Khan	17101-1892366-1	30/10/2018	Ward Orderly	FA
46	Rahim Shah	Sardar Khan	17301-8692584-1	27/10/2020	Chowkidar	FA+Electric Diploma
47	Shehryar Khan	Faqir Hussain	17301-2332817-7	27/10/2020	Ward Orderly	DAE+ DIT
48	Jehan Ullah	Ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	MA+DIT Diploma
49	Amir Khan	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FA
50	Muhammad Nouman	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	FSC
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	BA
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	Saiman Khan	Dilwar Khan	17301-3443294-5		Ward Orderly	MATRIC (Filed)

District Health Officer
Peshawar

70431

(12)

Annex "C"

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR



PESHAWAR DETAILED MARKS CERTIFICATE Secondary School Certificate Examination Session 2002 (Supply)

Name: Sahib Zada AmirFather's Name: Mukhtiar Ahmed Roll No. 4012

Subject	Marks	MARKS OBTAINED			
		The/P-A	Prac/P-B	Total	In Words
1. English	150	--	--	64	Sixty-Four
2. Urdu	150	--	--	80	Eighty Only
3. Islamiyat (Comp)	75	45	--	45	Forty-Five
4. Pakistan Studies	75	25	--	25	Twenty-Five
5. New Rizazi	100	33	--	33	Thirty-Three
6. Physics	100	--	--	44	Forty-Four
7. Chemistry	100	25	8	33	Thirty-Three
8. Biology	100	--	--	35	Thirty-Five

Total 850

359-D Three Hundred Fitty-Nine Only

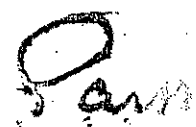
Remarks

Checked By: _____

Date: 16-12-2002

Note: Error / Omission are excepted

Khaksar and BRAINS Software Enterprise (KBSof)


 Controller of Examinations

5609

13

Roll No: 4012



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION PESHAWAR

Peshawar N.W.F.P Pakistan
PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION

SESSION 2002 (*Supply*)

THIS IS TO CERTIFY THAT Sahib Zada Amir

Son of Mukhtiar Ahmed

and resident of District Peshawar

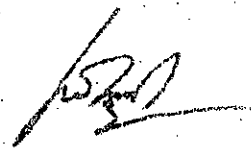
has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Peshawar held in *October, 2002* as a *Private* candidate, securing *359* marks out of *850* marks, (Grade "*D*") in the following subjects:

- | | | | |
|--------------|------------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. New Riazi | 6. Physics | 7. Chemistry | 8. Biology |

Date of birth according to admission form is 15-December-85

Date of Issue **27 December, 2003**

(Certificate) Khaksar and BRAINS Software Enterprise (KBSoft)


Asstt: Secretary

70425

(14)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No: 11063

PESHAWAR



PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (SUPPLY) EXAMINATION, 2006 GENERAL SCIENCE (Part-II)

Amir Ahmad Son of Mukhtiar Ahmad
of Peshawar
has secured the marks shown against each subject in the H S S C Examination held in the month of
November as a Private Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	33	--	41	--	74	Seventy-Four
Urdu	200	62	--	58	--	120	One Hundred Twenty Only
Islamic Education	50	40	--	--	--	40	Forty Only
Pakistan Studies	50	--	--	20	--	20	Twenty Only
Statistics	200	21	12	30	16	79	Seventy-Nine
Mathematics	200	37	--	33	--	70	Seventy Only
Computer Science	200	23	19	41	20	103	One Hundred Three

Total : 1100

506-D Five Hundred Six Only

Remarks :

Checked By : _____

Issue Date: January 20 2007

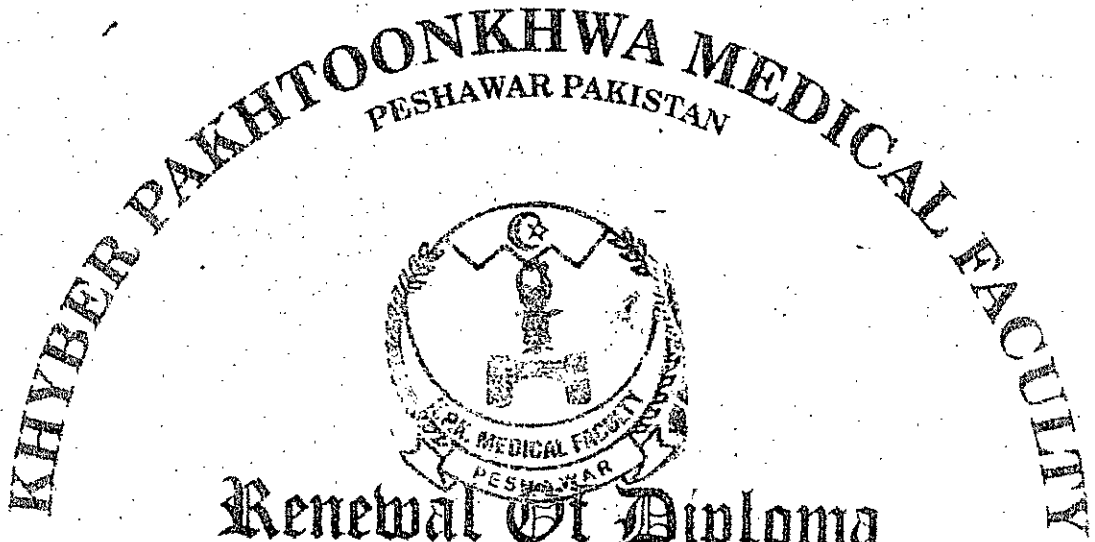
Controller of Examinations

NOTE: Error/Omission excepted. Any mistake in above particulars must be intimated within 30 days of the receiving this certificate.

(Computer Cell BISE Peshawar)

(15)

Serial No 2185 Roll No 242
Batch No _____ Examination Session 01/2012
Technology Health



Renewal Of Diploma
REGISTRATION/ ENROLMENT
Valid for Five years


The Diploma registration of Mr. Miss. Mrs. Sahib Zada Amir Son Daughter of
Mukhtiar Ahmed hearing Registration No. MF/341/RIMS Enrolment Provisional
Diploma Serial No. 1454 Dated 21-05-2012 is hereby renewed for the period of five
years with effect from 05/2017 to 05/2022

SECRETARY
Khyber Pakhtoonkhwa
Medical Faculty Peshawar

Prepared by: [Signature]
Checked by: [Signature]
Verified by: [Signature]

Serial No. 1454

Roll No. 242



KHYBER PAKHTOONKHWA MEDICAL FACULTY

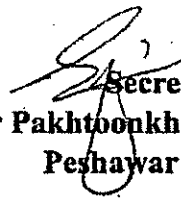
Diploma in Medical Technology

Health Technology

SESSION 01-2012

This is to certify that Mr. Miss. Mrs. SABIB ZADA AMIR Son/Daughter of
 Mr. MUKHTIAR AHMED Of 13th Batch bearing Registration No
MF/355/RIMS/H.T Has passed the examination of diploma in Medical Technology
 In the year 01-2012 He / She obtained 742 Marks out of 1400
 He / She has been Placed in C Grade.

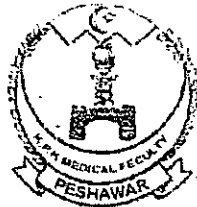



 Secretary,
 Khyber Pakhtoonkhwa Medical Faculty
 Peshawar Pakistan

773

KHAYER PAKHTOONKHA MEDICAL FACULTY
PESHAWAR - PAKISTAN

(17)



(RIMS)

Name: Sahib Zada AmirFather Name: Mr. Mukhtiar AhmedHealth Technology1st SEMESTER SESSION. 01/2012 (ROLL.NO 242)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Anatomy	100	54	50	Passed
Pathology	100	52	50	Passed
Pharmacology	100	50	50	Passed
Physiology/ Biochemistry	100	57	50	Passed
Result	400	213		

2nd SEMESTER SESSION. 01/2012 (ROLL.NO 242)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Paper A	100	51	50	Passed
Paper B	100	54	50	Passed
English	100	53	50	Passed
Islamiat	50	27	25	Passed
Result	350	185		

3rd SEMESTER SESSION. 01/2012 (ROLL.NO 242)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Paper A	100	55	50	Passed
Paper B	100	52	50	Passed
Public Health	100	50	50	Passed
Result	300	157		

4th SEMESTER SESSION. 01/2012 (ROLL.NO 242)

Subject/paper	Total Marks	Obtained Marks	Passing Marks	Result
Paper A	100	56	50	Passed
Paper B	100	50	50	Passed
English	100	52	50	Passed
Pak Study	50	29	25	Passed
Result	350	187		
Grand Total	1400	742		

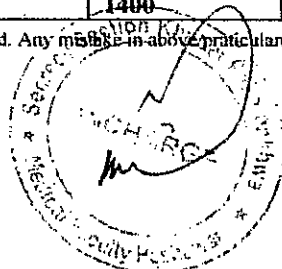
Errors(s) Omission(s) excepted. Any mistake in above particulars must be intimated within 10 days of the issuance of this certificate

Date: 21/05/2012

Presented by:

Checked by:

Verified by:



Khayer Pakhtoonkha Medical Faculty

Peshawar

Dairy No. 9721
Date. 17-06-2022

Health Department

To

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

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

Sir,

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

Furthermore, most of our Class-IV staff are well qualified having diploma holders and Master in different subjects. Despite of well deserving and qualified Class-IV staff no promotion was made so far due to the reason that we are sub cadre. The Class-IV staff working in Directorate General Health Services, Khyber Pakhtunkhwa were time and again promoted to the ministerial positions we were ignored.

It is pertinent to mention here that, the seniority of Class-IV staff have already been prepared at DHO Peshawar against which promotion can be possible.

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

I would be obliged, please.

Dated: 17-06-2022.

Your Sincerely,

All qualified Class-IV Staff

- SS1 (3&D)
- AS - (DEV)
- AS - (MT)
- CH - (SR)
- CHO
- DS - (SSD)
- DS - (CS)
- SO - B-1
- SO - B-2

[Handwritten signatures and initials]

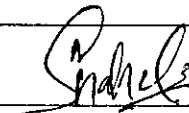

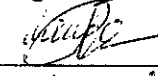
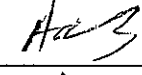

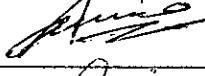
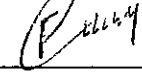
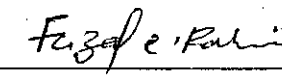
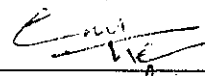
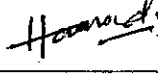

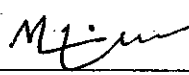




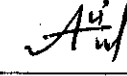
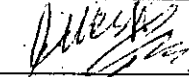

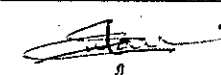
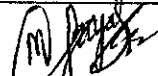
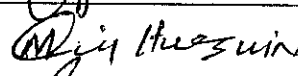
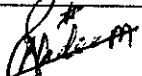
[Handwritten names: T-Arwal, Shahab, Amir, etc.]

[Handwritten notes: So IV, etc.]

P.T.O

Ali Ali Majid Tahir
Jasman Amir Muhammad Amir
Fizal & Rizki Muhammad Ali Abis
Nasir Felix Safar Ali Ali
Sahid I Ali 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 Ahmad
27.	Sardar Ali	BPS-01	Sardar Ali
28.	Shahid Ahmad	BPS-04	Shahid
29.	Shahid Islam	BPS-02	Shahid
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Shehryar
32.	Sohail Ashiq	BPS-01	Sohail
33.	Muhammad Suliman	BPS-04	Muhammad
34.	Syed Zaffar Ali	BPS-04	Syed Zaffar
35.	Tahir Hafeez	BPS-04	Tahir
36.	Tahir Shah	BPS-01	Tahir
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair
39.	Waqas Ahmad	BPS-02	Waqas
40.	Waqas Ghulam	BPS-01	Waqas
41.	Zeeshan Ahmad	BPS-04	Zeeshan
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Annex "E"

19

No. 1776-856 Promotion Cell Dated Peshawar the 18/08/2022

To

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

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

Memo:

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

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

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

Proforma for Junior Clerks initially recruited.

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

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



20

Annex "F"

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

No. 14703 /DHIO dated Pesh: 21/09/2022

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

(21)

1755

17/10/2022

1438

Annex "G"

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

Chilla
Mujta
[Signature]
[Signature]
[Signature]

50	129830			
Barrister M. Hassan Adil ایڈووکیٹ: <i>Adil</i>				
RC-116028 بار کونسل ایسوسی ایشن نمبر:				
03028373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
Service Tribunal Peshawar. بعدالت جناب:				

منجانب: <i>Appellant</i>	دعویٰ: <i>Sr. Appeal</i>
	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____
باعت تحریر آگہ	

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

آن مقام میں 19/11/2022ء کے لیے *بیر سٹریٹجک احسان عیادال* کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا ٹریفک 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 کاروائی کے واسطے اور وکیل یا مختار قانونی نمونہ اپنے نمونہ کے بجائے تقرر کا اختیار ہوگا، اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب اتوائے 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

Hassan

26-11-2022

المرقوم:

مقام پشاور کے لیے منظور ہے۔

صاحبزادہ عامر و مولانا مختیار احمد کلیم جلال بیل، محفی پشاور