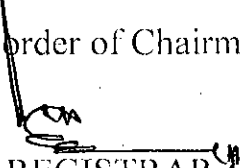


# FORM OF ORDER SHEET

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

Case No. - 1822/2022

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. Izzat Ullah 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. Izzatullah son Riyat 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. 3501 /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. 1822/2022

**Izzat Ullah**

**VS**

**Government of KP and Others**

**INDEX**

<b>Sr. No</b>	<b>Description of Documents</b>	<b>Annexures</b>	<b>Pages</b>
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2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
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APPELLANT

Through

  
BARRISTER  
**MUHAMMAD HASSAAN ADIL**

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

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

**Izzat Ullah**

Son of Riayat Khan  
Resident of Mohalla Mama Khel Payan, P.O Badabher,  
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.**

---

1. That the appellant was appointed on 31.01.2014 (Annex "A") in prescribed manner as Chowkidar (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than eight 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

Respectfully Sheweth,

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 "C") 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;

**GROUND S:**

- 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 2016 is required to be placed senior to the fresh candidates appointed or promoted after 2016 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.

*[Signature]*  
APPELLANT

Through

*[Signature]*

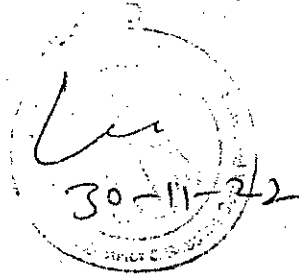
**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Izzat Ullah** Son of **Riayat Khan** Resident of **Mohalla Mama Khel Payan, P.O Badabher, 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.

*[Signature]*  
DEPONENT



5

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

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

**Izzat Ullah**

**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

*[Signature]*  
APPELLANT

Through

*[Signature]*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Izzat Ullah** Son of **Riayat Khan** Resident of **Mohalla Mama Khel Payan, P.O Badabher, 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.

*[Signature]*  
30-11-22  
PESHAWAR

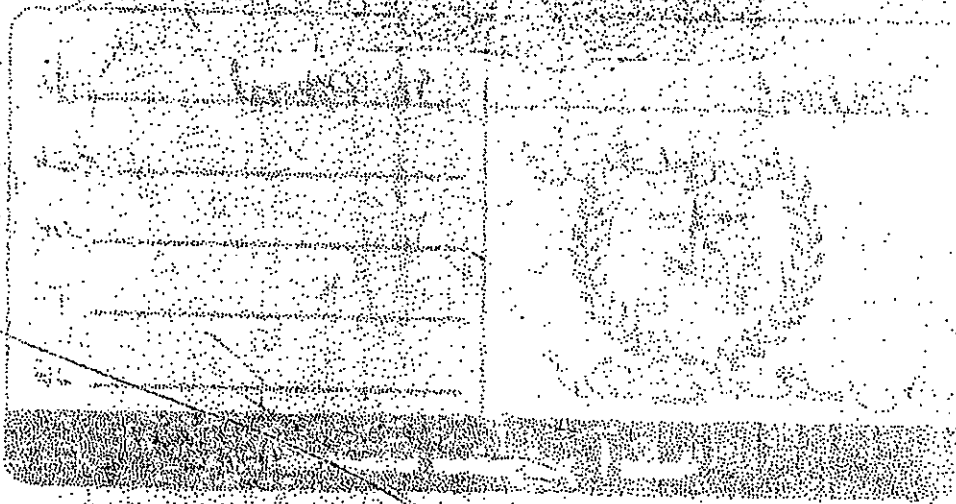
*[Signature]*  
DEPONENT



19



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Annex - "A"

8



**OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR**

**OFFICE ORDER**

Consequent upon approval accorded by the Departmental Selection Committee meeting held in the office of the District Health Officer Peshawar on 16/1/2014, Mr. Izzat Khan S/O Riyat Khan resident of Hurizni Badaber Peshawar is hereby appointed as Chowkidar BPS-01 (4800-150-9300) plus usual allowances as admissible under the government servant rules, subject to the following terms and conditions:

1. He will be on probation initially for a period of one year extendable for a further period of one year.
2. His appointment will be subject to medical fitness.
3. He will not be entitled to any TADA for Medical examination and joining his first appointment.
4. He will be governed by such rules and orders as may be issued by the government for the category of government servants to which he belongs.
5. If he wishes to resign from service, he will have to submit resignation in writing one month in advance OR deposit one month's pay in the government treasury. However he will continue to serve the government till his resignation accepted by the competent authority.

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

*Sd/*  
District Health Officer  
Peshawar

No. 730-23 /DH/O/PF

Dated Peshawar the 21/01/2014

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mr. Izzat Khan S/O Riyat Khan resident of Hurizni Badaber Peshawar.
3. Personal file. *with*.
4. Accounts Section  
For information and n/action.

*LIC*  
District Health Officer  
Peshawar

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



Personal Information of Mr **IZZAT ULLAH** d/o/s of **RIYAT KHAN**

Personnel Number: 00714701 CNIC: 1780138503811 NTN:  
 Date of Birth: 25.03.1992 Entry into Govt. Service: 10.02.2014 Length of Service: 08 Years 08 Months 021 Days

Employment Category: Active Temporary

Designation: CHOWKIDAR 8118681-GOVERNMENT OF KHYBER PAKHT  
 DDO Code: PRK57-DISTRICT JILALI OFFICER PESHAWAR  
 Payroll Section: 009 GPF Section: 001 Cash Center:  
 GPF A/C No: GPF Interest applied (GPF Balance) 21,723.00 (gross amount)  
 Vendor Number: -  
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 01 Pay Stage: 9

Wage type	Amount	Wage type	Amount
0001 Basic Pay	19,400.00	1024 House Rent Allow 45% KP2	8,820.00
1210 Convey Allowance 2018	1,785.00	1000 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2011	257.00	2199 Adhoc Relief Allow @ 10%	165.00
2311 Dress Allowance - 2021	1,000.00	2312 Washing Allowance 2021	1,000.00
2313 Integritist Allowance 2021	600.00	2321 Thre. Rel All 15% 2022KP	1,900.00
2327 Adhoc Rel All 15% 2022KP	1,068.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
0011 GPF Subscription	-770.00	3501 Retirement Fund	-600.00
0001 R. Benefits & Death Comp	-300.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
AS05	GPF Loan Principal Total	56,000.00	-2,330.00	53,670.00

Deductions - Income Tax

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

Gross Pay (Rs.): 33,255.00 Deductions: (Rs.): -4,603.00 Net Pay: (Rs.): 28,652.00

Payer Name: IZZAT ULLAH  
 Account Number: 7901238803  
 Bank Details: HABIB BANK LIMITED, 220696 KHYBER BAZAR, PESHAWAR, KHYBER BAZAR, PESHAWAR, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: PESH Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official  
 Temp. Address: City: Email: izzatullah10013@gmail.com

System generated document in accordance with APPM 4.0 12/02/2022 v.1.0  
 \* All amounts are in Pak Rupees  
 \* Errors & omissions excepted (SERVICES/11.10.2022/2148.05)

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid	Matric
	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasir Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Haraid	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	Ghazal 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	Musafer	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Lagat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torgat Anzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Nauroz 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	Galeem 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 ulah	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 Qayyum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Salmar, Misbah	Misbah Ud din	17301-4426272-5	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

Annex - "B"

(16)

BHU Terai

Suzdar Ali s/o  
Mir Aslam

Syed Ullah s/o  
Sulaiman

District Health Officer  
Peshawar

34	Fareed Ullah	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
35	Umar Khan	Arifdi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Pervaiz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
37	Waqar Younis	Zabban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matric+ Health Diploma
38	Syed Ghous Ali Shah	Shafiqas Khan	17301-9197840-5	19/01/2018	Ward Orderly	FSC
39	Muhammad Arif	Syed Abid Shah	17301-1800560-9	19/01/2018	Ward Orderly	MA
40	Muhammad Ihtisham	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	BSc
41	Zaeshan Ahmad	Dilshad Khan	17301-2621626-3	19/01/2018	Ward Orderly	M.COM
42	Faisal Ahmad	Fareed Khan	17301-5237207-1	20/02/2018	Ward Orderly	BA
43	Muhammad Saboor	Habib ur Rehman	17301-6599340-5	3/10/2018	Chowkidar	FA
44	Farooq Haider	Manzoor Khan	17301-9784416-5	3/10/2018	Chowkidar	FA+ Health Diploma
45	Imran Khan	Khan Bahadur		3/10/2018	Ward Orderly	FA
46	Rahim Shah	Izzat Khan	17101-1892366-1	30/10/2018	Chowkidar	FA+Electric Diploma
47	Shehryar Khan	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	DAE+ DIT
48	Jehan Ullah	Faqir Hussain	17301-2337817-7	27/10/2020	Ward Orderly	MA+DIT Diploma
49	Amir Khan	Ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	FA
50	Muhammad Nouman	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FSC
51	Muhammad Arif	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	BA
52	Mueen Qasmi	Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
53	Imran Khan	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	MBA
54	Shahid Ahmad	Abdul Sattar	17301-6992992-5	27/10/2020	Chowkidar	Matric
55	Haroon Ur Rashid	Habib ur Rehman	17301-6701436-9	27/10/2020	Ward Orderly	FA
56	Aqil Zahoor	Muhammad Dawood	17301-8767271-3	27/10/2020	Chowkidar	BA
57	Tahir Hafeez	Zahoor Ud Din	17301-5569170-9	27-10-2020	Chowkidar	Matric
58	Hamza Shah	Abdul Hafeez	17301-5242528-1	27-10-2020	Ward Orderly	B.COM
59	Muhammad Tayyab	Jalal Shah	17301-6527188-7	27-10-2020	Ward Orderly	FA
60	Shehryar Hussain	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FSC+Health Diploma
61	Momin Khan	Mughah Hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
62	Imran Shah	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
63	Anwar ul Haq	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
64	Salman Khan	Zia Ul Haq	17301-5541278-7	2/3/2021	Behishti	FA
		Dilwar Khan	17301-3443294-5		Ward Orderly	Matric (Pied)

11

District Health Officer  
Peshawar

Annex - "C"

12

S.No. PB

1118533

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 170491

Group: ARTS



## PESHAWAR

### PROVISIONAL AND DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION Annual 2009 (Composite)

Izzat Ullah

Son / Daughter of Rimyat Khan

of PESHAWAR DISTRICT

has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of March, 2009 as Private Student

Subjects	Marks	MARKS OBTAINED			
		Theory Paper A	Theory Paper B OR PRACTICE	Total	In Words
1. English	150	-	-	66	Sixty-Six
2. Urdu	150	-	-	59	Fifty-Nine
3. Islamiyat (Comp)	75	31	-	31	Thirty-One
4. Pakistan Studies	75	28	-	28	Twenty-Eight
5. Maths	150	-	-	68	Sixty-Eight
6. General Science	100	53	-	53	Fifty-Three
7. Islamic Studies	100	38	-	38	Thirty-Eight
8. Pashto	100	37	-	37	Thirty-Seven
<b>Total</b> 900				<b>380-D</b>	<b>Three Hundred Eighty Only</b>
Remarks:				P.A.S,	

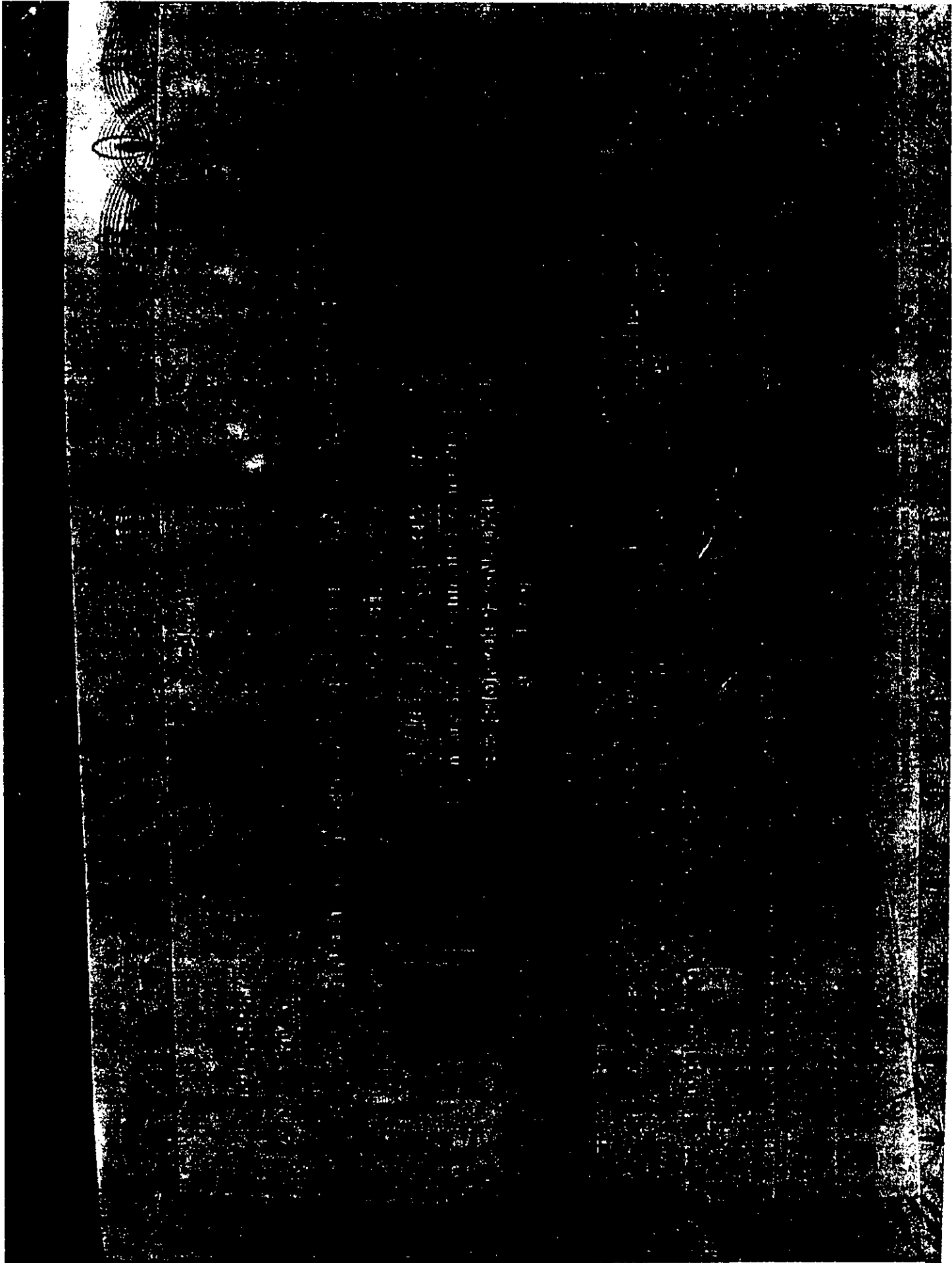
Date of Birth: 25th March, 1992

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

Issue Date: 18-08-2009

Controller of Examinations

Note: Errors/omissions excepted. Any mistake in above particulars may be intimated within 30 days of the issuance of the certificate.





Annex - "D" (14)

Dairy No. 9721  
Date. 17-06-2022  
Health Department

To

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

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

Sir,

With due respect it is stated that we all the Class-IV qualified staff are deprived from promotion since 1988 till date. 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: 17-05-2022.

Your Sincerely,

All qualified Class-IV Staff



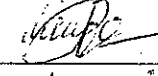
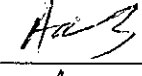
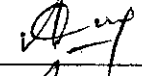
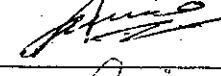
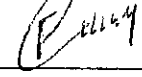
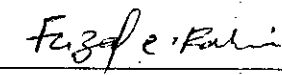
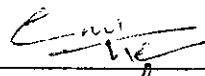
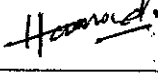
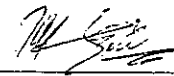
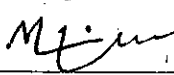

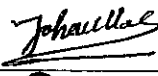

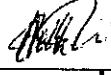
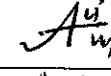
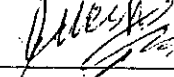
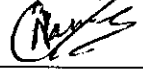

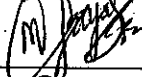
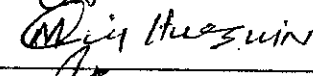

- SS1 (B&D)
- AS - (DEV)
- AO - MTL
- CH - HSRU
- CPO
- DS - (B&D)
- DS - (B&S)
- SO - B-I
- SO - B-II


*[Handwritten signatures and initials]*

*[Handwritten notes: "So IV", "T-Arzu", "Shahab", "Nurva"]*

Alfi Alfi Alfi Tahir  
Jessamiah Amir Alfi Alfi  
Fuzale Patu Alfi Alfi Alfi  
Nawaz Alfi Alfi Alfi  
Sambal Alfi Alfi Alfi  
Alfi Alfi Alfi Alfi

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**

H(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

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR

15

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"

16

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

No. 14703 /DHO 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

ANNEX - 9  
SOFT REMINDER

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

1755  
17/10/2022  
Health Department

17

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<sup>st</sup> 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  
Miyta

[Handwritten signature]

50	129854			
Barrister M. Hasaan Adil ایڈووکیٹ		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		رابطہ نمبر: 03038373453		

Service Tribunal Peshawar

بعدالت جناب:

Appellant	منجانب:	Sr. Appeal	دعویٰ:
			علت نمبر:
			مورخہ:
			جرم:
			تھانہ:
<b>باعت تحریر آئکہ</b>			

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

آن مقام میں 19/11/22 کیلئے ایس ایس آر محمد حسان عادل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موضوع کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے بجاوب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زیر پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا دگری یا دگری یا دگری یا اہیل کی برآمدگی اور منسوخی، نیز دائر کرنے اہیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پر دائرہ 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 کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



26/11/22

المقوم:

العبد **محمد حسان عادل** العبد

مقام **پشاور** کے لیے منظور ہے۔

کڑت اللہ 98 رعایت خان کنڈ طاہرین بیان بدو سیر پشاور