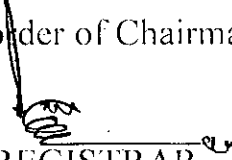


# FORM OF ORDER SHEET

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

Case No.- 1824/2022

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. Syed Zaffar Ali 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. Syed Zaffar Ali son of Najaf Ali Shah 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.

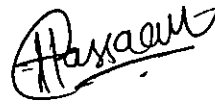
No. 3480 /S.T,

Dt. 05-12 /2022

Muhammad Hassaan Adil Adv.  
High Court Peshawar.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

(\*) All the objections have been removed.



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

Service Appeal No 1824 /2022

Syed Zaffar Ali

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'	12-13
7.	Departmental Representation dated 17-06-2022	'D'	14
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	15
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	16
10.	Reminder application dated 17-10-2022	'G'	17
11.	Wakalatnama		18

  
APPELLANT

Through

  
BARRISTER  
MUHAMMAD HASSAAN ADIL

①

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

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

**Syed Zaffar Ali**

Son of Najaf Ali Shah,  
Resident of Village Hindo Kasi, P.O Mathra,  
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 07.05.1988 (**Annex "A"**) in prescribed manner as Naib Qasid (BPS-04) in the Divisional Director Health Services and later on transferred to the respondent no. 04's department. The appellant has rendered services for more than thirty-four 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 "R") 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 1990 is required to be placed senior to the fresh candidates appointed or promoted after 1990 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.

  
APPELLANT

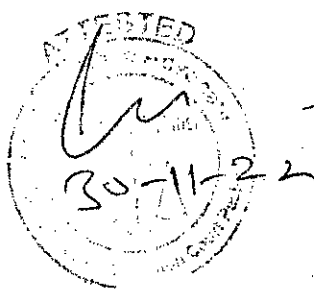
Through

  
BARRISTER  
MUHAMMAD HASSAAN ADIL

Advocate High Court

**AFFIDAVIT**

I, Syed Zaffar Ali Son of Najaf Ali Shah, Resident of Village Hindo Kasi, P.O Mathra, 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

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

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

**Syed Zaffar Ali** 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, Syed Zaffar Ali Son of Najaf Ali Shah, Resident of Village Hindo Kasi, P.O Mathra, 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]*  
DEPONENT

*[Circular Stamp]*  
30-11-22



PAKISTAN National Identity Card



7

THE REPUBLIC OF PAKISTAN  
Name  
Syed Zafar Ali



Father Name  
Najaf Ali Shah

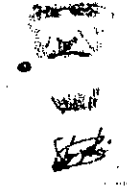
General Medicine OPD  
Category "D" Hospital  
Tara Tajik Hospital  
Date of Issue: 24.07.2020  
Date of Expiry: 24.07.2030

سید ظفر علی

نہج علی شاہ

13.10.1969

24.07.2030



Holder's Signature

17301-1698582-3



S05521361993  
137-00-319661

Minister General of Punjab

گمشدہ کارڈ ملنے پر قریبی ایسٹر جنس میں ڈال دیں

HEALTH AND FAMILY WELFARE

OFFICE OF THE DIVISIONAL DEPUTY DIRECTOR HEALTH SERVICES, PESHAWAR

OFFICE ORDER

Mr. Said Zafar Ali S/O Mr. Said Najaf Ali Shah of Village Hindu Kasi, Post Office Mathra Tehsil and District Peshawar is hereby offered a post of N/Qasid on vacant post in the office of the Divisional Deputy Director Health Services, Peshawar on the following terms and conditions:-

1. He is domiciled in NWFP.
2. He is <sup>Gen</sup>Medically Fit.
3. His services, offered are purely temporary and are liable to be terminated at any time without showing any cause or assigning any notice.
4. He will be bound to serve anywhere in N.W.F.P.
5. His posting is in time scale No.1 (BPS-I) i.e, Rs.600-13-860 with usual allowances sanctioned by the Government of N.W.F.P, from time to time.

*Said Zafar Ali*  
DIVISIONAL DEPUTY DIRECTOR,  
HEALTH SERVICES, PESHAWAR.

5157-57

No. /DDHS/6-1 dated Peshawar the > -5-1988.

A copy is forwarded to the:-

1. Director Health Services, N.W.F.P, Peshawar for information w/r to his letter No.7942/Admn dated 3-5-88 please.
2. Mr. Said Zafar Ali S/O Said Najaf Ali Shah Village of Hindu Kasi Post office, Mathra Tehsil and District Peshawar for information and n/action, if he accepts the post of N/Qasid on the above terms and conditions, he is hereby directed to report for duty in the office of the undersigned immediately.
3. Accounts Section for n/action
4. P/File.

DIVISIONAL DEPUTY DIRECTOR,  
HEALTH SERVICES, PESHAWAR.

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



**Personal Information of Mr SYED ZAFAR ALI d/w/s of MAHTAB KHAN**

Personnel Number: 00040171 CNIC: 1730116985823 NTN: 0  
 Date of Birth: 13.10.1969 Entry into Govt. Service: 07.05.1988 Length of Service: 34 Years 04 Months 025 Days

**Employment Category: Active Temporary**

Designation: NAIB QASID 81186485-GOVERNMENT OF KHYBER PAKI

DJO Code: PR8854-District Health Officer RHC Peshawar

Payroll Section: 009 GPF Section: 005 Cash Center:

GPF A/C No: JM 14614 GPF Interest applied GPF Balance: 462,555.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 04 Pay Stage: 30

Wage type		Amount	Wage type		Amount
0001	Basic Pay	34,490.00	1004	House Rent Allow 45% KP21	3,576.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	508.00	2199	Adhoc Relief Allow @10%	348.00
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	3,465.00
2347	Adhoc Ref At 15% 22(PS17)	3,465.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Renevolent Fund	-600.00
3609	Income Tax	-44.00	4004	R. Benefits & Death Comp:	-300.00
6173	CM Flood Relief Fund01-16	-3,335.00			0.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

Payable: 521.08 Recovered till SEP-2022: 132.00 Exempted: 0.62 Recoverable: 389.70

**Gross Pay (Rs.): 51,737.00 Deductions: (Rs.): -5,049.00 Net Pay: (Rs.): 46,688.00**

Payee Name: SYED ZAFAR ALI

Account Number: CD-07796-004

Bank Details: THE BANK OF KHYBER, 080016 KHYBER BAZAR BR. PESHAWAR KHYBER BAZAR BR. PESHAWAR, Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIV DY DIR HEALTH PESHAWAR

City: Peshawar Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: Email: syedzafaralishahrhc@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	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Shazi Khan	17301-1274726-3	30/04/1999	Naib Qasid	FA
7	Saiman 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 Ishtaq	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	Naib Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torget Auzai	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kirayat Shah	Nurooz 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	Galeem 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	Musharaf Khan	17301-6996238-7	4/2/2014	Ward Orderly	BA
27	Shams Ul Arthar	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	Saiman 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	Goher Khan	17301-4164590-9	3/8/2016	Naib Qasid	BSC

Annex "B"

(10)

Suzain Naji s/o  
Mir Haseem

Saad Ullah s/o  
Sulaiman

District Health Officer  
Peshawar

34	Fareed Ullah	Afridi Khan Saifi	17301-4505337-1	3/8/2016	Naib Qasid	BA
35	Umair Khan	Pervais 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 Arif	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	BSC
40	Muhammad Ihtisham	DiShad 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
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	FA
49	Amir Khan	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FSC
50	Muhammad Nouman	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	BA
51	Muhammad Arif	Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
52	Mueen Qasmi	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	MBA
53	Imran Khan	Abdul Sattar	17301-6952992-5	27/10/2020	Chowkidar	Matrix
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	Matrix
57	Tahir Hafeez	Abdul Hafeez	17301-5242528-1	27-10-2020	Ward Orderly	B.COM
58	Hamza Shah	Jalal Shah	17301-6527388-7	27-10-2020	Ward Orderly	FA
59	Muhammad Tayyab	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FSC+Health Diploma
60	Shehryar Hussain	Nighah Hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
61	Momin Khan	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
62	Imran Shah	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
63	Anwar ul Haq	Zia Ul Haq	17301-5541278-7	2/3/2021	Behishti	FA
64	Salman Khan	Dilwar Khan	17301-3443294-5		Ward Orderly	Matrix (Pic)

District Health Officer  
Peshawar

(11)

(12)

Annex "C"

S. No. PB 00,300

Board of Intermediate & Secondary Education  
PESHAWAR

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)

Session 19 96 (Annual/Supplementary)

Name Syed Zahid Ali

Father's Name Muhammad Ali Shah Roll No. 9635

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	57	
2. Urdu	150	50	
3. Islamiyat Comp:	75	49	
4. Pakistan Studies	75	29	
5. Gen: Mathematics	100	43	
6. General Science	100	45	
7. <u>IS</u>	100	39	
8. <u>PA</u>	100	48	
<b>Total</b>	<b>850</b>	<b>360</b>	<u>Three hundred and Sixty</u>

This certificate is issued errors and omissions excepted.

Prepared by \_\_\_\_\_

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

Date \_\_\_\_\_ 19 \_\_\_\_\_

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

Handwritten Signature  
2  
General Medicines OPD  
Category "D" Hospital  
Gara Tajik Peshawar.


13

S.-A

Roll No. 9635

75065

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION**



**Peshawar N.W.F.P. Pakistan**  
**PROVISIONAL CERTIFICATE**  
**SECONDARY SCHOOL CERTIFICATE EXAMINATION**  
 Session 19 96 Annual/Supplementary

THIS IS TO CERTIFY THAT Syed Zafar Ali  
 Son/Daughter of Najaf Ali Shah  
 and a candidate of Pesh: Dist.  
 has passed the Secondary School Certificate Examination of the  
 Board of Intermediate and Secondary Education, Peshawar held in oct 1996  
 as a Regular/Private candidate. He/She obtained 360 Marks out of 850 and has  
 been placed in Grade( D ) Representing Fair

The Candidate passed in the following subjects.

- |               |              |              |                     |
|---------------|--------------|--------------|---------------------|
| 1. English    | 2. Urdu      | 3. Islamiyat | 4. Pakistan Studies |
| 5. <u>lys</u> | 6. <u>GM</u> | 7. <u>Is</u> | 8. <u>Art</u>       |

Internal assessment Grade by the institution concerned is ( )

Date of birth according to admission form is Thirteenth oct:

One thousand nine hundred and Sixty Nine (13-10-1969)

Prepared by \_\_\_\_\_

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

Date of Preparation 13-1-97

*[Signature]*  
 Joint Secretary (Certificate)  
 Board Intermediate and  
 Secondary Education (II)  
 Peshawar.

*[Signature]*  
 2  
 92

General Medicines OPD  
 Category "D" Hospital  
 Gara Tajik 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. 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,



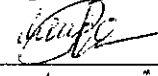
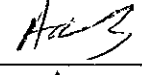
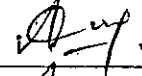
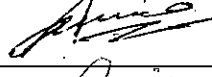
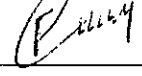
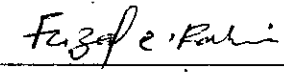
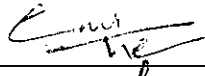
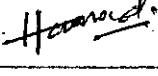
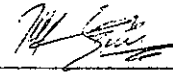
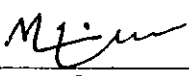

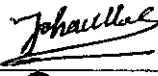

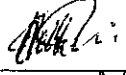
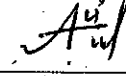
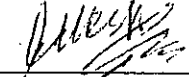


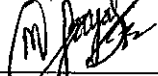


All qualified Class-IV staff

SSII (S&D)  
AS - (REV)  
AS - I/II  
CH - HSRU  
DHO  
DS - (S&D)  
DS - On ps  
SO - B-I  
SO - B-II

*(Handwritten signatures and initials)*

Reza Amir Arif Tahir  
Jessamathas Amir Wahid Amir  
Fuzale Ratu Utsher Ali Abis  
Nalson Adis Safarali Amir  
Sandhu I Amir Amir  
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 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
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" 15

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



16

Annex "F"

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

No. 14703 /DHIO 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

To:

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

Annex "G"

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

*Chahida  
Miyta*  
*[Signature]*  
*[Signature]*

50	129838	  
Barrister M. Hassan Adil: ایڈووکیٹ بار کونسل ایسوسی ایشن نمبر: BC-116028 رابطہ نمبر: 030383 73453		پشاور بار ایسوسی ایشن، خیبر پختونخواہ بعدالت جناب:
Service Tribunal Peshawar		

Appellant سید ظفر علی بنام گورنمنٹ آف ایس ایچ سی وغیرہ	Sr. Appeal دعویٰ: علت نمبر: مورثہ: جرم: تھانہ:
<b>باعت تحریر آگے</b>	

سید ظفر علی و سلم نجف علی شاہ کلنہ صفا پشاور

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام پشاور کیلئے بئرسٹر محمد حسن ان و اہل کو وکیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقررات ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی سزا کی اور منسوخی، نیز  
 دائر کرنے اپیلی نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ 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  
 المرقوم: 26-11-22  
 العباد العباد  
 مقام پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔