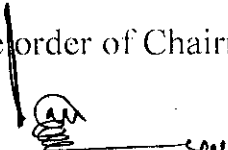


# FORM OF ORDER SHEET

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

Case No. - 1837/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/12/2022	<p>The appeal of Mr. Muhammad Altaf resubmitted today by Mr. Muhammad Hassaan Adil Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mr. Muhammad Altaf son of Subhan Ullah received today i.e. on 02.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

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

No. 3486 /S.T,

Dt. 05-12 /2022


  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Hasaan Adil Adv.  
High Court Peshawar.

(\*) All the objections have been removed.



NOTE: There is no appointment order. However, the details of appointment have been provided in the payroll.



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

Service Appeal No. 1837/2022

**Muhammad Altaf**

**VS**

**Government of KP and Others**

-----  
**INDEX**  
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<b>Sr. No</b>	<b>Description of Documents</b>	<b>Annexures</b>	<b>Pages</b>
1.	Service appeal		1-4
2.	Application for Temporary Injunction		5-6
3.	Copy of CNIC		7
4.	Appointment Order	'A'	8
5.	Seniority List	'B'	09-10
6.	Educational Documents	'C'	11-18
7.	Departmental Representation dated 17-06-2022	'D'	19
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	20
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	21
10.	Reminder application dated 17-10-2022	'G'	22
11.	Wakalatnama		23

  
APPELLANT

Through

  
BARRISTER  
MUHAMMAD HASSAAN ADIL

①

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

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

**Muhammad Altaf**

Son of Subhan Ullah  
Resident of Mohalla Bakru Baba, Tarangzai,  
Charsadda

....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 29.04.2013 (Annex "A") in prescribed manner as Behishti / Sweeper (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than nine 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;

**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 2015 is required to be placed senior to the fresh candidates appointed or promoted after 2015 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.

**PRAAYER:**

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 -

*Hassaan*

**BARRISTER  
MUHAMMAD HASSAAN ADIL**

Advocate High Court

**AFFIDAVIT**

I, **Muhammad Altaf**, Son of **Subhan Ullah**, Resident of **Mohalla Bakru Baba, Tarangzai, Charsadda**, 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

**Muhammad Altaf**

**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, **Muhammad Altaf, Son of Subhan Ullah, Resident of Mohalla Bakru Baba, Tarangzai, Charsadda**, 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**



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

Annex "A"



**Personal Information of Mr MUHAMMAD ALTAF d/w/s of SUBHAN ULLA**

Personnel Number: 00702228 CNIC: 1710158874455 NTN:  
Date of Birth: 28.03.1989 Entry into Govt. Service: 29.04.2013 Length of Service: 09 Years 05 Months 003 Days

**Employment Category: Active Temporary**

Designation: BEHISHTI/SWEEPER 81186488-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8863-District Support Manager PPHI 1522 2 NBP Haba PESHAWAR

Payroll Section: 009 GPF Section: 001 Cash Center:

GPF A/C No: GPF Interest applied GPF Balance: 86,186.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 03 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,900.00	1004	House Rent Allow 45% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	255.00	2199	Adhoc Relief Allow @10%	183.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Dispr. Red All 15% 2022KP	1,909.00
2347	Adhoc Rel Al 15% 22(PS17)	1,909.00			0.00

**Deductions - General**

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Benevolent Fund	-600.00
4004	R. Benefits & Death Comp:	-300.00	6173	CM Flood Relief Fund01-16	-2,061.00

**Deductions - Loans and Advances**

Loan	Description	Principal amount	Deduction	Balance

**Deductions - Income Tax**

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

Gross Pay (Rs.): 32,583.00 Deductions: (Rs.): -3,731.00 Net Pay: (Rs.): 28,852.00

Payee Name: MUHAMMAD ALTAF

Account Number: 4086155224

Bank Details: NATIONAL BANK OF PAKISTAN, 230517 MUNICIPAL CORPORATION PESHAWAR. MUNICIPAL CORPORATION (GT ROAD, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: CHARSADDA

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: altafjan1998@gmail.com

System generated document in accordance with APPM 4.6.12.9(82882/27.09.2022/v3.0)  
\* All amounts are in Pak Rupees  
\* Errors & omissions excepted (SERVICES/30.09.2022/17:21:41)

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.No	Name	Father Name	NIC Number	Date of Entry in	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	Matric
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Ward Orderly	BA
6	Ahmad Jan	Ghaz 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 Amir	Mukhtar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA, Health Diploma
10	Muhammad Ishaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DIT
11	Soheil 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	17301-311673-1	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	Torqat Auzai	David Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat 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	Qaleem Ullah	17301-3090264-1	29/12/2012	Chowkidar	MA
23	Asif Naveed	Naveed Ahmad	17301-5904442-3	31/12/2012	X-ray Attendant	FA
24	Muhammad Altaf	Subhan Ullah	17301-5887445-5	29-04-2013	Behishti	DAE
25	Shahid Islam	Faqir Gul	17301-3550466-9	4/2/2014	Ward Orderly	FSC+ Surgical Diploma
26	Asfandyar Khan	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 Gayum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Salman Misbah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti	BA
30	Shahid Islam	Faqir Gul	17301-8449980-3	16-1-2016	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-4164590-9	3/8/2016	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan		3/8/2016	Naib Qasid	BSC

District Health Officer  
Peshawar

Said Ullah s/o  
Said Ullah s/o  
Said Ullah s/o

BHU Terai

Annex II B

(9)

34	Fareed Ullah	Sher Zaman	17301-8762303-1	12/8/2016	Behishli	FA
35	Umair Khan	Arifdi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Pervaitz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
37	Waqar Younis	Zaiban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matric+ Health Diploma
38	Syed Ghous Ali Shah	Shafaras 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	Zeehan 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	Ward Orderly	FA
44	Farooq Haidar	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	Shehyar Khan	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	DAG+ DIT
48	Jehan Ullah	Faqir Hussain	17301-2332817-7	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 I
53	Imran Khan	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	MBA
54	Shahid Ahmad	Abdul Sattar	17301-6952992-5	27/10/2020	Chowkidar	Matric
55	Haroon Ur Rashid	Habib ur Rehman	17301-6701436-9	27/10/2020	Ward Orderly	FA
56	Aqib 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	Harza 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	Saiman Khan	Zia Ul Haq	17301-5541278-7	2/3/2021	Behishli	FA
		Dilawar Khan	17301-3443294-5		Ward Orderly	Matric (Died)

10

District Health Officer  
Peshawar

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No: 130418

Group: ARTS

## PESHAWAR

### PROVISIONAL AND DETAILED MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION Annual 2008 (Composite)

Muhammad Altaf Son / Daughter of Subhan Ullah

of CHARSADDA DISTRICT

has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of April, 2008 as Private Student

Subjects	Marks	MARKS OBTAINED			
		Theory Paper A	Theory Paper B Or Practical	Total	In Words
1. English	150	-	-	51	Fifty-One
2. Urdu	150	-	-	77	Seventy-Seven
3. Islamiyat (Comp)	75	25	-	25	Twenty-Five
4. Pakistan Studies	75	35	-	35	Thirty-Five
5. Maths	150	-	-	101	One Hundred One
6. General Science	100	47	-	47	Forty-Seven
7. Islamic Studies	100	42	-	42	Forty-Two
8. Pashto	100	46	-	46	Forty-Six

Total 900

424-D	Four Hundred Twenty-Four Only
PA, IS,	

Remarks

Date of Birth: 28th March, 1989

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

Issue Date: 15-07-2008

A. Sabi  
Controller of Examinations

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

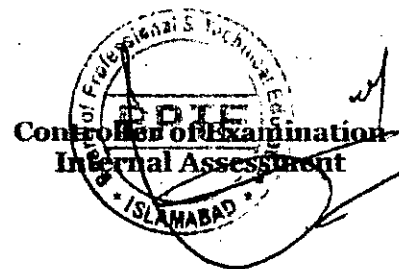


**DETAILS MARKS CERTIFICATE**  
**DIPLOMA IN INFORMATION TECHNOLOGY (DIT)**

MR/MRS/MISS MUHAMMAD ALTAF FATHER NAME: SUBHAN ULLAH REGISTRATION NO: RITPERI/54368/2012  
Session: 2012-2013 Roll No: 54368 INSTITUTE/ COLLEGE: ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL  
EDUCATION RAWAT ISB. . The Candidate has passed the examination by securing 72.14 % marks in the internal assessment.  
He/she awarded grade A. He/She offered the subjects and obtained the marks as follow.

	Code	Subjects/Paper	Total Marks		Obtained Marks		Remarks
			Theory	Pr	Theory	Pr	
1 <sup>st</sup> Semester	IT-101	Information & Communication Technology	100	-	62	-	Passed
	IT-114	Office Automation	50	50	40	38	Passed
	IT-104	Graphic Design	50	50	38	34	Passed
	IT-106	Computer Networks	50	50	33	32	Passed
	IT-115	Computer Programming C/C++	50	50	44	32	Passed
	ENG-105	English Comp	100	-	92	-	Passed
	PS-117	Pak. Studies	50	-	41	-	Passed
	IS-116	Islameyat	50	-	40	-	Passed
<b>Total Marks/Obtained Marks</b>			<b>700</b>		<b>526</b>		
2 <sup>nd</sup> Semester	Code	Subjects/Paper	Total Marks		Obtained Marks		Remarks
			Theory	Pr	Theory	Pr	
	IT-201	Introduction to Database	50	50	40	26	Passed
	IT-202	MS Access	50	50	49	30	Passed
	IT-203	E-Commerce & Web Technology	50	25	36	22	Passed
	IT-215	Operating System	50	25	41	20	Passed
	IT-205	MS Office Automation	50	50	34	31	Passed
	IT-204	Managing Networks and Systems	50	50	36	26	Passed
	IT-217	Hardware & Maintenance	50	50	38	25	Passed
IT-211	Project	-	50	-	30	Passed	
<b>Total Marks/Obtained Marks</b>			<b>700</b>		<b>484</b>		

Marks Obtained	1010
Total Marks	1400
Remarks	Passed



DATE OF ISSUE/03/12/2013

Prepared & Checked by Theory Passing Marks = 50%  
Error & Omission(s) any mistake in above particular must be intimated within 30 days of the issuance of this certificate.

(13)

**Board Of Professional & Technical Education**  
www.bptei.edu.pk  
Islamabad (Pakistan)



**VERIFICATION LETTER**

It is to certify that the certificate/diploma issued in favor of **MUHAMMAD ALTAF S/D/O SUBHAN ULLAH** with Registration number **RITPERI/54368/2012** and Roll No **54368** trained and elevated by **ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL EDUCATION RAWAT ISB**, the trade of **DIPLOMA IN INFORMATION TECHNOLOGY (DIT)** (01 Year) is found genuine according to this office record with the following transcript.

Total Marks	Obtained Marks	Percentage	Grade
1400	1010	72.14%	A

BPTe  
Secretary  
BPTe Islamabad  
ISLAMABAD



Roll No. 54368

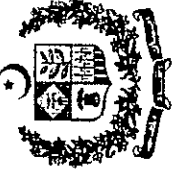
Session: 2012-2013

# Board of Professional & Technical Education Established under Act 1882: Govt of Pakistan Islamabad (Pakistan)

www.bptel.edu.pk

Regular Based Profession Award

## Diploma



B P T E

S.No 010151

Certified that Mr./Mrs/Miss MUHAMMAD ALTAF S/D/W/O SUBHAN ULLAH

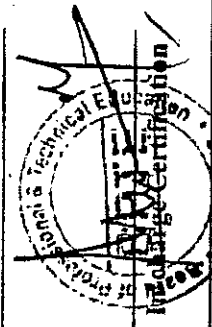
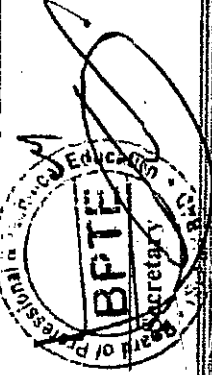
has successfully completed his/her formal /informal training/research & appeared/passed the trade proficiency test in accordance with the requirements and skill standard prescribed by the "Board of Professional & Technical Education Islamabad (Established under Act-1882 Government of Pakistan)" in the Trade of DIPLOMA IN INFORMATION TECHNOLOGY (DIT)

Registration No: RITPERI/54368/2012 level/duration ONE Year(s). This award has been granted to candidate

on his/her tentative regular/experience in the said field. His/Her proficiency in the trade test is as under.

Total Marks	Marks Obtained	Percentage	Grade
1400	1010	72.14%	A

Trained/Evaluated by: ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL EDUCATION RAWAT ISB



VERIFICATION LETTER

It is to certify that the certificate diploma issued in favor of MUHAMMAD ALTAF S/O SUBHAN ULLAH with Registration number RITPERI/53551/2009 and Roll No 53551 trained and elevated by ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL EDUCATION RAWAT ISB. in the trade of DIPLOMA OF ASSOCIATE ENGINEER (CIVIL TECHNOLOGY) (03 Years) is found genuine according to this office record with the following transcript.

Total Marks	Obtained Marks	Percentage	Grade
3350	2345	70%	A





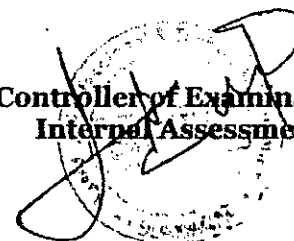
## DETAILS MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER (CIVIL TECHNOLOGY)

MR/MRS/MISS MUHAMMAD ALTAF FATHER NAME: SUBHAN ULLAH REGISTRATION NO: RITPERI/53551/2009 Session: 2009-2012 Roll No: 53551INSTITUTE/ COLLEGE: ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL EDUCATION RAWAT ISB. The Candidate has passed the examination by securing 70% marks in the internal assessment. He/she awarded grade A. He/She offered the subjects and obtained the marks as follow.

	Code	Subjects/Paper	Total Marks		Obtained Marks		Results
			Theory	Prac	Theory	Prac	
1st Year	CE-101	Applied Chemistry	100	50	70	31	Passed
	CE-102	Applied Physics I	100	50	72	43	Passed
	CE-103	Basic Engineering Drawing & CAD	100	50	60	33	Passed
	CE-104	Intro to Computer Programming	100	50	70	30	Passed
	CE-106	Digital & Industrial Electronics	100	50	60	35	Passed
	CE-114	Concrete Technology	100	50	74	34	Passed
	ENG-105	English-I	100	-	71	-	Passed
	PK-117	Pak Studies	50	-	40	-	Passed
	IS-116	Islameyat	50	-	43	-	Passed
<b>Total Marks/Obtained Marks</b>			<b>1100</b>		<b>766</b>		
2nd Year	Code	Subjects/Paper	Total Marks		Obtained Marks		Results
			Theory	Prac	Theory	Prac	
	CE-201	Applied Physics II	100	50	69	40	Passed
	CE-202	Business Management	100	50	52	30	Passed
	CE-203	Metallurgy	100	50	80	33	Passed
	CE-204	Industrial Economics	100	50	7	39	Passed
	CE-205	Engineering Drawing	75	25	60	22	Passed
	ENG-115	English-II	100	-	79	-	Passed
	CE-217	Installation Planning & Estimating	100	50	92	32	Passed
CE-301	Civil Drafting I	100	50	68	34	Passed	
<b>Total Marks/Obtained Marks</b>			<b>1100</b>		<b>800</b>		
3rd Year	Code	Subjects/Paper	Total Marks		Obtained Marks		Results
			Theory	Prac	Theory	Prac	
	CE-311	Project Management	100	50	70	35	Passed
	CE-312	Quantity Surveying	100	50	60	31	Passed
	CE-313	Public Health Engineering	100	50	60	30	Passed
	CE-314	Hydraulics & Irrigation	100	50	65	33	Passed
	CE-206	Railway Docks	100	50	55	32	Passed
	CE-403	Concrete Tech RCC Design	100	50	87	31	Passed
	CE-411	Civil Drafting II	50	25	45	19	Passed
CE-402	Civil Engineering Materials	50	25	43	21	Passed	
CEP-316	Civil Engineering Project	-	100	-	62	Passed	
<b>Total Marks/Obtained Marks</b>			<b>1150</b>		<b>779</b>		

Marks Obtained	2345
Total Marks	3350
Remarks	Passed

Controller of Examination  
Internal Assessment



Roll No. 53551

Session: 2009-2012

**Board of Professional & Technical Education**  
 Established under Act 1882: Govt of Pakistan  
 Islamabad (Pakistan)  
 www.bptei.edu.pk  
 Regular Based Profession Award



B P T E

# Diploma

S.No 30117

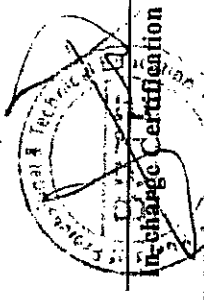
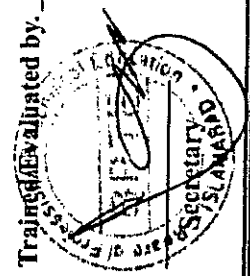
Certified that Mr./Mrs/Miss MUHAMMAD ALIAF S/D/W/O SUBHAN ULLAH

has successfully completed his/her formal /informal training/research & appeared/passed the trade proficiency test in accordance with the requirements and skill standard prescribed by the "Board of Professional & Technical Education Islamabad (Established under Act-1882 Government of Pakistan)" in the Trade of DIPLOMA OF ASSOCIATE ENGINEERING (CIVIL TECHNOLOGY)

Registration No: BIPERU/53551/2009 level/duration THREE Year(s). This award has been granted to candidate on his/her tentative regular/experience in the said field. His/Her proficiency in the trade test is as under.

Total Marks	Marks Obtained	Percentage	Grade
3350	2345	70%	A

Training Evaluated by: ROYAL INSTITUTE OF TECHNICAL AND PROFESSIONAL EDUCATION RAWAT ISB.



S.No. SCC/CHD/3659

Reg No. S-E/1723

**SPECTRUM ENGLISH LANGUAGE PROGRAM**  
**TANGI ROAD CHARSADDA.**

REG:NO:-2309-15

**CERTIFICATE OF ACHIEVEMENT**

Mrs. Misses/Mrs. MUHAMMAD ALTAF Son/Daughter of Mr. SURHAN ILLAH

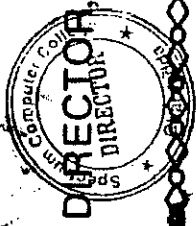
has satisfactorily completed SIX MONTHS Months/ Years Course of English Language

Consists of 3rd Levels in GOOD position.

During his stay in this institution his conduct was VERY GOOD In recognition thereof of

this certificate of achievement is awarded to him/her on the 5th day of JULY 2006 2006.

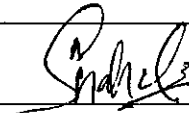

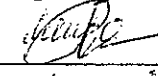
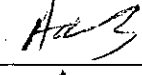
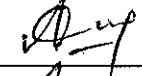
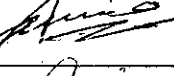
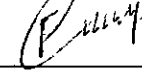
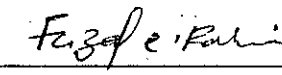
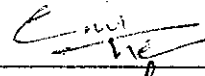
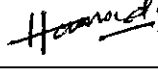
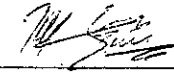
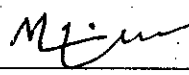
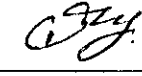



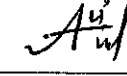
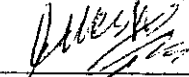
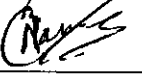
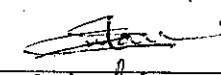
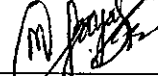
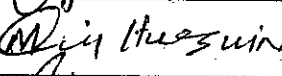

**PRINCIPAL**  
Spectrum  
Tangi Road Charsadda





Abdul Ali Ali Tahir  
Jaswanth Amir Abdullah Ali  
Fazal e Bari Intesar Abdullah Abir  
Nabeem Fahim Safat Ali int  
Sandhu I Abdullah 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	

(A)  
ATTENDED



24.	Saadullah Khan	BPS-01	Saadullah Khan
25.	Sabir Shah	BPS-03	Sabir
26.	Sahibzada Amir	BPS-02	Amir Khan
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 Hafeez
36.	Tahir Shah	BPS-01	Tahir Shah
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair Khan
39.	Waqas Ahmad	BPS-02	Waqas Ahmad
40.	Waqas Ghulam	BPS-01	Waqas Ghulam
41.	Zeeshan Ahmad	BPS-04	Zeeshan Ahmad
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR

26

Annex

"E"

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



(21)

Annex "F"

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

No. 14703 /DHO dated Pesh: 16/9/2022

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 (22)  
17/10/2022  
Health  
Annex "G"

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.

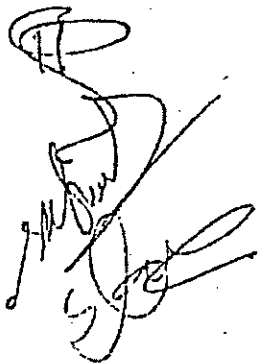
It is pertinent to mentioned that the seniority list of Class-IV Staff have already been prepared at DHO Peshawar against which promotions can be possible.




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*  
*Mujta*  


50	129847			
Barrister M. Hameed Aidi ایڈووکیٹ: ایدوکیٹ		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		عدالت جناب: Service Tribunal, Peshawar		
0303-8373453 رابطہ نمبر:				

مخائب: Appellant	دعویٰ: Sr. Appeal
محکمہ الطائف بنام گورنمنٹ آف پاکستان کے پی وغیرہ	علت نمبر: _____
	مورثہ: _____
	جرم: _____
	تھان: _____
<b>بابت تحریر آگے</b>	

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

آن مقام پشاور کے لیے لبریسٹر محمد حسان عماد کے کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے اور تقرر 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 ٹیکٹرفہ یا ایبل 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 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا جائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو دعویٰ جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ بر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر چاہے اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیش 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

*M. Hameed*

26/11/2022

الرقوم:

مقام پشاور کے لیے منظور ہے۔