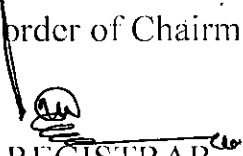


FORM OF ORDER SHEET

Court of _____

Case No. - 1838/2022

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. Abdul Shahab 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. Abdul Shahab son of Abdul Jabbar 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. 3468 /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. 1839/2022

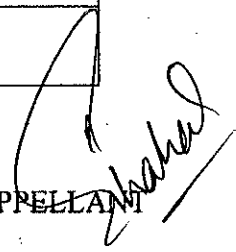
Abdul Shahab

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'	12-22
7.	Departmental Representation dated 17-06-2022	'D'	23
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	24
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	25
10.	Reminder application dated 17-10-2022	'G'	26
11.	Wakalatnama		27

APPELLANT


Through



BARRISTER

MUHAMMAD HASSAAN ADIL

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Abdul Shahab

Son of Abdul Jabbar
Resident of Dalazak Road, Saeed Abad No. 01, House No. 9, Street No. 01,
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 26.12.2012 (**Annex "A"**) in prescribed manner as Beheshti (BPS-01) 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 2014 is required to be placed senior to the fresh candidates appointed or promoted after 2014 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.

Through

APPELLANT
[Signature]

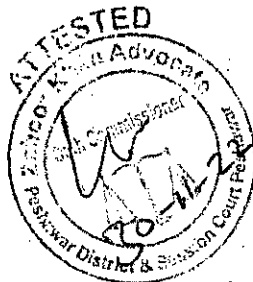
**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, Abdul Shahab Son of Abdul Jabbar, Resident of Dalazak Road, Saeed Abad No. 01, House No. 9, Street No. 01, 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



[Signature]

disposal of the instant appeal.
graciously be restrained from taking any adverse action against the appellant till the final
It is, therefore, prayed that on acceptance of this application, the respondents may

PRAYER:

purpose of titled appeal will become infructuous.

- 5) That if the relief as prayed for in the heading of this application is not granted, the very
- 4) That balance of convenience also leans in favour of appellant.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about its success.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 1) That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.

Respectfully Sheweth:

Application for restraining the respondents from taking any
adverse action against the appellant till the final disposal of the
instant appeal.

Abdul Shahab VS Government of KP and Others

Service Appeal No. _____/2022

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

5

6

APPELLANT

Hassaan

Shahab

Through

BARRISTER

MUHAMMAD HASSAAN ADIL

Advocate High Court

AFFIDAVIT

I, **Abdul Shahab** Son of **Abdul Jabbar**, Resident of **Dalazak Road, Saeed Abad No. 01, House No. 9, Street No. 01, 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.

Abdul Shahab
DEPONENT





PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN
Name
Abdul Shahab



Father Name
Abdul Jabbar

عبدالشباب

عبدالجبار



Handwritten signature

Holder's Signature

Gender Country of Stay
M Pakistan

Identity Number Date of Birth
17301-7776929-5 14.12.1985

Date of Issue Date of Expiry
20.09.2018 20.09.2028

7

17301-7776929-5

گمشدہ کارڈ ملنے پر قریبی ایڈریس میں ڈال دیں



10104130972
135-85-44242

Ministry of National Identity
Government of Pakistan

OFFICE ORDER

Consequent upon the approval of the Departmental Selection Committee held on 24/12/2012 at 10:00 AM in the office of the undersigned, Mr. Abdus Shahab S/O Abdul Jabbar residence of Saeed Abad No.1 Dalazak Road District Peshawar is hereby appointed under the retired Govt. Servants Son's quota as Behishi in BPS-01 (4800-150-9300) Plus usual allowances as admissible under the rules. His appointment in the Health Department Govt. of Khyber Pakhtunkhwa, will be subject to the following terms and conditions:

1. His appointment will be subject to Medical fitness and verification of character.
 2. He will be domiciled in Khyber Pakhtunkhwa Peshawar.
 3. He will not be entitled to any T/ADA for Medical examination and joining first appointment.
 4. He will be governed by such rules and orders as may be issued by the Govt. for the category of Govt. Servant to which he belongs.
 5. He will be served anywhere in Khyber Pakhtunkhwa.
 6. His appointment will be on purely temporary basis and not be entitled to Pension or gratuity but CP Fund as laid down by the Govt. of NWFP E & AD Notification No. E&A (1-3) 2005 dated 10/8/2005.
 7. If he wishes to resign from Govt. Service, he will have to submit resignation in writing one month in advance or deposit one month salary in the Govt. treasury. However he will continue to serve the Govt. till his resignation is accepted by the competent authority.
- If the above terms and conditions are accepted to him, he should report to the office of the undersigned for further posting in any Health facility within 14 days of the receipt of this order.

Sd/xxxxxxx

Executive District Officer
Health District Peshawar

No. 1578-81/EDOH/
Dated Peshawar the 26/12/2012

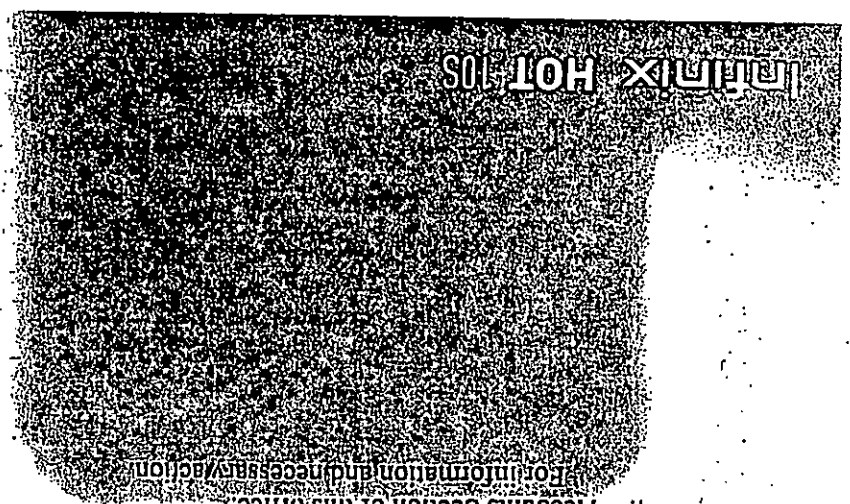
A copy is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. PA to District Coordination Officer City District Govt. Peshawar.
3. Mr. Abdus Shahab S/O Abdul Jabbar residence of Saeed Abad No.1 Dalazak Road Peshawar.
4. Accounts Section of this office.

For information and necessary action

Executive District Officer
Health District Peshawar

(Signature)



Intinix HOT-105

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



9

Personal Information of Mr ABDUL SHAHAB d/w/s of ABDUL JABBAR

Personnel Number: 00705501 CNIC: 1730177762295 NTN:
 Date of Birth: 14.12.1985 Entry into Govt. Service: 27.12.2012 Length of Service: 09 Years 09 Months 005 Days

Employment Category: Active Temporary

Designation: BEHISHTI 81186479-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8852-District Health Officer MCH Peshawar
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 106,284.00 (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%	176.00
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	-2,060.00

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.): 32,576.00 Deductions: (Rs.): -3,730.00 Net Pay: (Rs.): 28,846.00

Payee Name: ABDUL SHAHAB
 Account Number: 0878371661001999
 Bank Details: MCB BANK LIMITED, 241678 Dalazak Road Peshawar, Dalazak Road Peshawar., Peshawar

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:
 City: Peshawar Domicile: - Housing Status: No Official
 Temp. Address:
 City: Email: abdulshahab687@gmail.com

System generated document in accordance with APPM 4.6.12.9(82882/27.09.2022/v3.0)
 * All amounts are in Pak Rupee.
 * Errors & omissions excepted (S.O. No. CES/30.09.2022/17:23:21)

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	Chowkidar	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Naib Qasid	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Ward Orderly	Matric
4	Hamad	Shahid Haraid	17301-5090803-1	6/4/1997	Ward Orderly	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid	Chowkidar	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	Ward Orderly	BA, Health Diploma
10	Muhammad Ishaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Ward Orderly	Mphil Microbiology+DT
11	Sohail Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol	Sanitary Petrol	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly	Ward Orderly	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar	Chowkidar	FA
14	Munir Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Naib Qasid	Naib Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid	Naib Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	Behishti	FA
19	Torgat Auzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	Chowkidar	FA
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	X-ray Attendant	MA+ Health Diploma
21	Abdul Shahab	Abdul Jabbar	17301-7776929-5	27/12/2012	Behishti	Behishti	MSc Economics
22	Muhammad Imran	Galeem Ullah	17301-3090264-1	29/12/2012	Chowkidar	Chowkidar	MA
23	Asif Naveed	Naveed Ahmad	17301-5904423	31/12/2012	X-ray Attendant	X-ray Attendant	FA
24	Muhammad Altaf	Subhan Ullah	17301-5887445-5	29-04-2013	Behishti	Behishti	DAE
25	Shahid Islam	Faqir Gul	17301-3550466-9	4/2/2014	Ward Orderly	Ward Orderly	FSC+ Surgical Diploma
26	Asfandyar Khan	Musharaf Khan	17301-6996238-7	4/2/2014	Ward Orderly	Ward Orderly	BA
27	Shams Ul Athar	Shams Ul Qamar	17301-8058948-7	27-03-2015	Behishti	Behishti	SSC
28	Zia-ul-Islam	Muhammad Qayum	17301-5067106-3	30/03/2015	Ward Orderly	Ward Orderly	MA+ Health Diploma
29	Salman Misbah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti	Behishti	BA
30	Shahid Islam	Faqir Gul		16-1-2016	Ward Orderly	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-849980-3	3/8/2016	Ward Orderly	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan	17301-4164590-9	3/8/2016	Naib Qasid	Naib Qasid	BSC

Annex - "B"

10

Suzdan Ali s/o
Mir Aslam

Sadullah s/o
Sulaiman

District Health Officer
Peshawar

34	Fareed Ullah	Afridi Khan Sali	17301-8762303-1	12/8/2016	Behishti	FA
35	Umar Khan	Pervaiz Khan	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Zaiban Shah	17301-8066889-5	29/05/2017	Naib Qasid	FA
37	Waqar Younis	Shafaras Khan	17201-6576098-3	19/01/2018	Chowkidar	Matrix Health Diploma
38	Syed Ghous Ali Shah	Syed Abid Shah	17301-9197840-5	19/01/2018	Ward Orderly	FSG
39	Muhammad Arif	Faiz Muhammad	17301-1800560-9	19/01/2018	Ward Orderly	MA
40	Muhammad Ihtisham	Dilshad Khan	17301-2618886-7	19/01/2018	Ward Orderly	BSC
41	Zeeshan Ahmad	Fareed Khan	17301-2621626-3	19/01/2018	Ward Orderly	M.COM
42	Faisal Ahmad	Habib ur Rehman	17301-5237207-1	20/02/2018	Ward Orderly	BA
43	Muhammad Saboor	Manzoor Khan	17301-6599340-5	3/10/2018	Chowkidar	FA
44	Farooq Haider	Khan Bahadur	17301-9784416-5	3/10/2018	Chowkidar	FA+ Health Diploma
45	Imran Khan	Izzat Khan	17101-1892366-1	30/10/2018	Chowkidar	FA
46	Rahim Shah	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	FA+Electric Diploma
47	Shehryar Khan	Faqir Hussain	17301-2332817-7	27/10/2020	Ward Orderly	DAE+ DT
48	Jehan Ullah	Ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	MA+DT Diploma
49	Amir Khan	Zaka Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FA
50	Muhammad Nouman	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	FSC
51	Muhammad Arif	Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
52	Mueen Qasmi	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	BA
53	Imran Khan	Abdul Sattar	17301-6952992-5	27/10/2020	Ward Orderly	MBA
54	Shahid Ahmad	Habib ur Rehman	17301-6701436-9	27/10/2020	Chowkidar	Matrix
55	Haroon Ur Rashid	Muhammad Dawood	17301-8767271-3	27/10/2020	Ward Orderly	FA
56	Aqib Zahoor	Zahoor Ud Din	17301-5569170-9	27-10-2020	Chowkidar	BA
57	Tahir Hafeez	Abdul Hafeez	17301-5242528-1	27-10-2020	Chowkidar	Matrix
58	Hamza Shah	Jalal Shah	17301-6527188-7	27-10-2020	Ward Orderly	B.COM
59	Muhammad Tayyab	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FA
60	Shehryar Hussain	Nighah Hussain	17301-6255930-7	27-10-2020	Ward Orderly	FSC+Health Diploma
61	Momin Khan	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	BSC Computer Science
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	Dilawar Khan	17301-3443294-5		Ward Orderly	Matrix

District Health Officer
Peshawar

11

S. No. PB

141101

REVISED

Annex - "C"

12

Board of Intermediate & Secondary Education
PESHAWAR


DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination

(SCIENCE GROUP) ✓

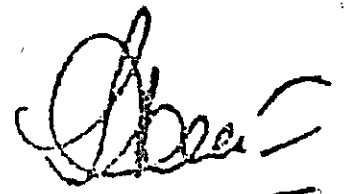
Session 19 2003 (Annual/Supplementary)Name Abdul Shahab.Father's Name Abdul Jabbar.Roll No. 1019

SUBJECT	Total Number of marks allotted	MARKS OBTAINED			
		Theory	Practical	In Figure	In Words
1. English	150		-	104	
2. Urdu	150			81	
3. Islamiyat	75			40	
4. Pakistan Studies	75			38	
5. Mathematics	100			44	
6. Physics	100	39	18	57	
7. Chemistry	100	26	18	44	
8. Biology	100	34	15	49	Four Hundred an
Total	850			457	C Fifty Seven

Note: Errors/Omissions excepted
F: Failed in the paper (s)

Prepared by: 

Checked by: _____

Date 31-08-2017


Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

S.No. 340141

Roll No. 1019

REVISED



Board of Intermediate and Secondary Education
Peshawar, Peshawar District, Pakistan
Secondary School Certificate Examination

SESSION 2003 - SUPPLEMENTARY

(Science Group)

This is to Certify that Abdul Shahab Son / Daughter of Abdul Jabbar
and a student of Peshawar District has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in September, 2003 as a Private
candidate. He / She obtained 457 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat
4. Pakistan Studies
5. Mathematics
6. Physics
7. Chemistry
8. Biology

Date of birth according to admission form December 14, 1985

Ass't Secretary

Issued in Lieu of OC # 285565 (S - 2003)

Secretary

13

This certificate is issued without alteration or erasure.

REVISED

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

161524

14



Roll No: 15711

PESHAWAR

PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (SUPPLY) EXAMINATION, 2009 HUMANITIES (Part-II)

Abdul Shahab Son of Abdul Latif
of Peshawar

has secured the marks shown against each subject in the H S S C Examination held on the month of
November as a Private Student

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	In Words
		Theory	Pract	Theory	Pract		
English	200	33	--	38	--	71	Seventy-One
Urdu	200	33	--	35	--	68	Sixty-Eight
Islamic Education	50	25	--	--	--	25	Twenty-Five
Pakistan Studies	50	--	--	31	--	31	Thirty-One
Islamic History	200	42	--	34	--	76	Seventy-Six
Islamic Studies	200	38	--	65	--	103	One Hundred and Three
Archaeology	200	47	--	27	--	74	Seventy-Four

Total: 1100

448-D Four Hundred Forty-Eight Only

Remarks:

Checked By: _____

Issue Date: September 26 2017

Controller of Examinations

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



(Computer Cell BISE Peshawar)

S.No. 173732

REVISED

Roll No. 15711

Group: Humanities

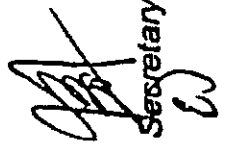
 BOARD OF INTERMEDIATE & SECONDARY EDUCATION
 PESHAWAR
 INTERMEDIATE EXAMINATION

SESSION 2005- SUPPLEMENTARY


This is to Certify that Abdul Shahab Son of Abdul Jabbar
 and a resident of Peshawar District Registered No. 280-B/P-2004

has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
 held in Nov, 2005 as a Private candidate. He obtained 448 Marks out of 1100 and

has been placed in grade D Representing Fair. The examination was taken in parts.


 Asstt Secretary

Issued in lieu of Certificate 172702


 Secretary

15

No 007754

University of Peshawar

16



Pakistan
Detailed Marks Certificate

Bachelor of Arts (B.A.)

Part-II

Supply Examination 2008

Peshawar



Private

Name: ABDUL SHAHAB

Gender: Male Roll No: 27754

Father's Name: ABDUL JABBAR

Registration No: 2006-PC-2717

Division: 2nd

Papers	Max Marks	Marks obtained	
		In Figures	In Words
English (Comp)	75	28	Twenty eight
Urdu	75	28	Twenty eight
Islamic Studies	75	49	Forty nine
Pakistan Studies	40	20	Twenty, only
Part-I	285	134	One Hundred and Thirty Four
Part-II	550	259	Two Hundred and Fifty Nine

Errors & omissions are subject to subsequent rectification

Chances Availed: 4

The Examination was taken in Parts

Examination held From 22-Jan-2009 to 24-Feb-2009

Result Declared on Monday, April 20, 2009

Issue Date: 21-Apr-2009

11:49 am

(Dr. Muhammad Shafi)

ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Prepared by Computer Cell

Computerized by RTC

جامعة ابي بكر صدیق

University of Peshawar

(Pakistan)

Session SUPPLEMENTARY 2003

JANUARY 2009

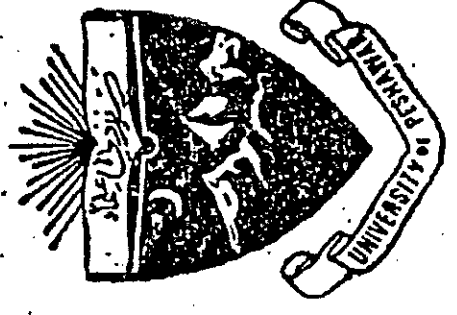
in connection with the Degree of

Bachelor of Arts

in SECOND Division

The Examination was taken as ~~whole~~ in parts

[Signature]
Registrar



Countersigned

[Signature]

Vice-Chancellor

17

Serial No. 0132231

Registration No. 2006-PC-2717

Roll No. 27093

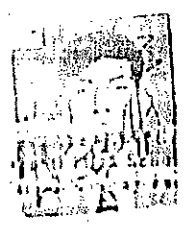
Result Declared on APRIL 20, 2009



University of Peshawar Pakistan

Detailed Marks Certificate

Master of Science in Economics
Final
Annual Examination 2016
District Peshawar



Private

Name: **ABDUL SHAHAB**
Father's Name: **ABDUL JABBAR**

Gender: *Male* Register No: 21692
Registration No: 2006-PC-2117

Division: *2nd*

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Econometrics-VI	100	57	Fifty Seven
Development Economics (G-I)-VII	100	52	Fifty Two
Managerial Economics (G-I)-VIII	100	56	Fifty Six
Economy of Pakistan (G-I)-IX	100	64	Sixty Four
Agricultural Economics (G-I)-X	100	51	Fifty One
International Economics (G-I)-XI	100	60	Sixty Only
Viva/Thesis	100	66	Sixty Six
Previous 11182:Annual-2015	500	230	Two Hundred and Thirty
Final	1200	636	Six Hundred and Thirty Six

Errors & omissions are subject to subsequent rectification

Chanco: 1

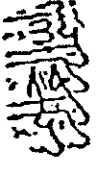
The Examination was taken As a Whole

Examination held from 01-Aug-2016 to 18-Sep-2016

Result Declared on Thursday, March 30, 2017

Issue Date: 03-Apr-2017
2:48 pm

(In Word Sheet)
GOVERNMENT OF EXAMINATIONS
UNIVERSITY OF PESHAWAR



University of Peshawar Pakistan

This certifies that

Abdul Shatab son of Abdul Jabbar

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

Master of Science in Economics

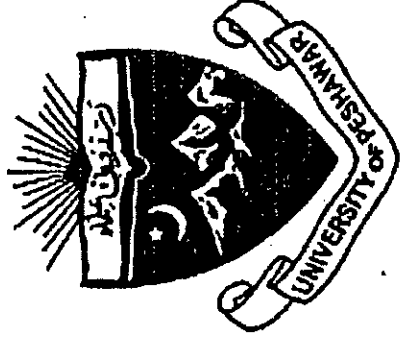
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 30th day of March, 2017.


Roll No: 21695


Session: Annual 2016

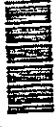
Reg. No: 2006-PC-2717



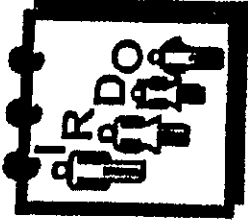
(19)


Registrar


Vice Chancellor



136240



Computer Literacy Programme (CLP)
Integrated Research and National Development
Development Organization & Management Council



CLP Central Secretariat: GBHSS # 1 City, Hashnagri, G.T. Road, Peshawar. PHONE: 253917

CERTIFICATE # Pew-043-0303 ISSUE DATE August 31, 2005

NAME OF CENTER Govt. Centennial Model High School City

CERTIFICATE OF EXCELLENCE

AWARDED TO

ABDUL SHAHAB S/O ABDUL JABBAR

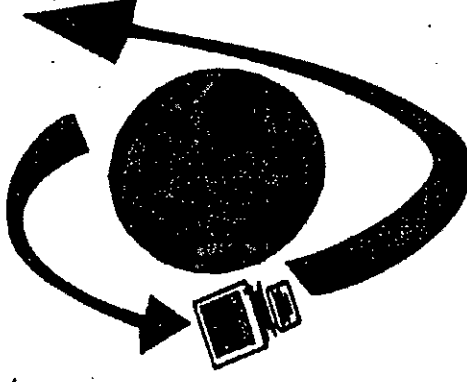
On Successfully Completion of
Two Month Office Automation Course

From June 16, 2005 to August 13, 2005

IT INSTRUCTOR

In collaboration with Education Department, Government of NWFP

Education, Communication, and Achievement



DIRECTOR CPL

20

fvo

Skill Development Council

N.W.F.P. PESHAWAR



S.No. 19772

Reg No. FVO/P/SC-27660

Session 2009-10

Duration of course from 10/04/2009 to 10/06/2009

Reg. No. 1661/5/3984

FUTURE VISION ORGANIZATION

This is to certify that

Mr/Mrs/Miss Abdul Shahab Son Of Abdul Jabber

Has successfully Completed a special training course organized by FVO
in the trade of

Auto CAD

Examination was held in the month of 20/07/2009

In recognition thereof, this Certificate is awarded to him/her on the **25th of July 2009**

Computer Based Certificate



Admin FVO

Chairman

Skill Development Council Peshawar

(21)



Registration No. 1661/5/3994
Date of Issue: 20/07/2009
To: Abdul Jabbar

ORGANIZATION

This is to certify that

Abdul Jabbar Son of *Abdul Jabbar*

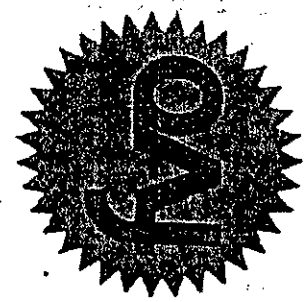
Has successfully Completed a special training course organized by FVO

in the trade of

Auto CAD

Examination was held in the month of **20/07/2009**

In recognition thereof, this Certificate is awarded to him/her on the **25th of July 2009**



[Signature]

Admin FVO

[Signature]

Skill Development Council

Peshawar

Annex - D⁴

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

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

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

Sir,

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

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

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

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

I would be obliged, please.

Dated: 17-05-2022.

Your Sincerely,

All qualified Class-IV staff

- SSII (B&D)
- AS - (DEV)
- AS - MTE
- CH - HSRU
- CPO
- DS - (B&D)
- DS - (Org)
- SO - B-I
- SO - B-II




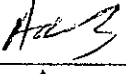
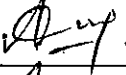
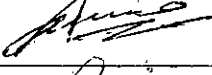
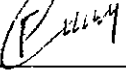
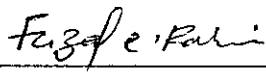
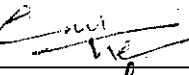
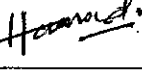
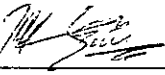
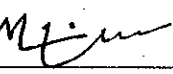

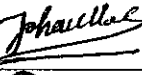

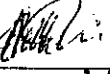
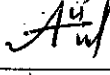
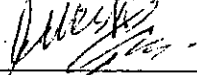
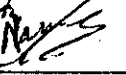
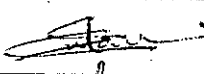

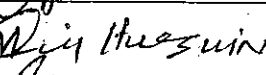
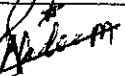
[Handwritten signatures and names of staff members]

[Handwritten initials and marks]

P.T.O

Naqvi ~~_____~~ Arif Tahir
Jaswanter Arif ~~_____~~ Arif
Fuzal e Raza Arif Arif Arif
Nadeem Arif Arif Arif
Sambal Arif Arif Arif
Hamid Arif Arif Arif

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.	Muneeer 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
27.	Sardar Ali	BPS-01	Sardar Ali
28.	Shahid Ahmad	BPS-04	Shahid
29.	Shahid Islam	BPS-02	Shahid
30.	Salman Shah	BPS-05	
31.	Shehryar Khan	BPS-04	Shehryar
32.	Sohail Ashiq	BPS-01	Sohail
33.	Muhammad Suliman	BPS-04	Muhammad
34.	Syed Zaffar Ali	BPS-04	Syed Zaffar
35.	Tahir Hafeez	BPS-04	Tahir
36.	Tahir Shah	BPS-01	Tahir
37.	Turkat Auzal	BPS-03	Turkat Auzal
38.	Umair Khan	BPS-03	Umair
39.	Waqas Ahmad	BPS-02	Waqas
40.	Waqas Ghulam	BPS-01	Waqas
41.	Zeeshan Ahmad	BPS-04	Zeeshan
42.	Zia-ul-Islam	BPS-02	Zia-ul-Islam

A
ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

24

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



Annex - "F"

25

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

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

HT/KU = 6
SOFT REMINDER

26

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

1755
17/10/2022

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

Sir,

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

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

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




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

We would be obliged, please.


Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

*Chilla
myla*
[Signature]

50	129845	  
Barrister M. Hasaan Adil ایڈووکیٹ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		
0303-8373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
Service Tribunal, Peshawar.		

بعدالت جناب:

Appellant: منجانب	Sr. Appeal: دعویٰ
 <p>عبد الشہاب بنام کوٹھلیٹ ایف بی پی 99 عیدہ</p>	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعت تحریر آنکہ	

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

آن مقام لہذا 19 کیلئے لیسٹر محید حسان عادل 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 تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم بھڑی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل گزرائی 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۔ بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا خد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Hasaan

26/11/22

المقوم:

العبد العبد

مقام لہذا 19 کے لیے منظور ہے۔