


# FORM OF ORDER SHEET

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

Case No. - 1839/2022

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 Nouman 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 style="text-align: right;">By the order of Chairman  REGISTRAR.</p>

The appeal of Mr. Muhammad Numan son of Noor Muhammad 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. 3487 /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. 1839/2022

**Muhammad Nouman**

**VS**

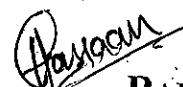
**Government of KP and Others**

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APPELLANT

Through

  
**BARRISTER**  
**MUHAMMAD HASSAAN ADIL**

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

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

**Muhammad Nouman**

Son of Noor Muhammad  
Resident of P.O Mewra, Nahaqi,  
Peshawar

....APPELLANT

*Versus*

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariate, Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Health Department, Civil Secretariate, Peshawar
3. Director General (DG), Health Service, Warsak Road, Peshawar
4. District Health Officer (DHO), Grand Trunk Road, Tehsil and District Peshawar

....RESPONDENTS

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**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.**

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**Respectfully Sheweth,**

1. That the appellant was appointed on 27.10.2020 (**Annex "A"**) in prescribed manner as Ward Attendant (BPS-04) in the respondent no. 04's department. The appellant has rendered services for more than two 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 2022 is required to be placed senior to the fresh candidates appointed or promoted after 2022 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.

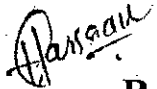
**PRAYER:**

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.

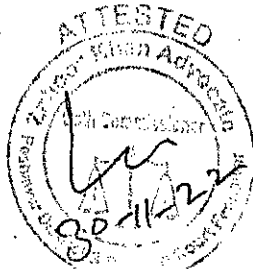
  
APPELLANT

Through

  
**BARRISTER  
MUHAMMAD HASSAAN ADIL**  
Advocate High Court

**AFFIDAVIT**

I, **Muhammad Nouman** Son of **Noor Muhammad**, Resident of **P.O Mewra, Nahaqi, Peshawar**, do hereby solemnly affirm and declare on Oath that the contents of accompanying Appeal are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.



  
DEPONENT

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

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

**Muhammad Nouman**

**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.**

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**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**

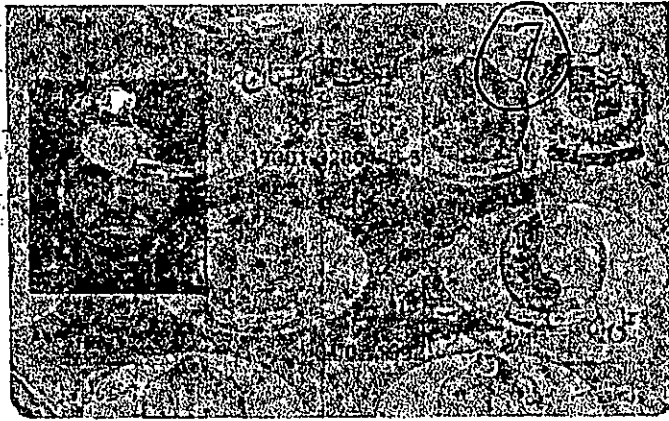
Advocate High Court

**AFFIDAVIT**

I, **Muhammad Nouman** Son of **Noor Muhammad**, Resident of **P.O Mewra, Nahaqi, Peshawar**, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.

*[Signature]*  
DEPONENT





REPUBLIC OF INDONESIA  
KEMENTERIAN KEHUTANAN DAN LINGKUNGAN BUDAYA

T85741

73013280188



31/05/2023

31/05/2023



Untuk dan...  
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OFFICE OF THE DISTRICT HEALTH OFFICER,  
PESHAWAR.

Phone No. 091 9225387  
Fax No. 091 9225467

Annex "A"

**OFFICE ORDER**

On the recommendation of Departmental Selection Committee in its meeting held on 20/10/2020 at 10:00 am under the chairmanship of the undersigned. *Mr. Muhammad Nouman S/o Noor Muhammad (MB) resident of Mewra P.O Nahaqi, District Peshawar is hereby appointed under deceased son's quota in District Health Office Peshawar as Ward Attendant BPS - 04 in Basic Pay Scale (9900-440-23100) plus all other allowances as admissible to him as per Government rules.*

His appointment in Health Department Govt. of Khyber Pakhtunkhwa will be subject to the following terms and conditions:-

1. He will be on probation initially for a period of one year.
2. His services will be subject to medical fitness.
3. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
4. He will be governed by such rules and orders as may be issued by the Government for the category of Government servant to which he belongs.
5. His services can be dismissed without any notice during the probation period, if his work and conduct found unsatisfactory.
6. If he/she wishes to resign from service he will have to submit resignation in writing 30-days in advance or deposit one month salary in the government treasury. However he will continue to serve the Government till the acceptance of his resignation by the competent authority.
7. He/She will serve in all health facilities under the control of District Health Office Peshawar.

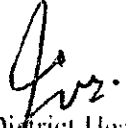
If the above mentioned terms and conditions are acceptable to him/her. He/she should report to District Health Office, Peshawar within 14 days after the receipt of this appointment order.

Sd/-----  
District Health Officer,  
Peshawar.

No 16920-25 /DHO/E-19  
Copy forwarded to the:-

Dated Peshawar the 27/10/2020

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Peshawar.
4. Coordinator DHIS Section DHO office Peshawar.
5. Account Section of this Office.
6. Official Concerned.

  
District Health Officer.

6#1

Postwar Dept

# Sact:004 Month:December 2021  
PW5579 -DisttSuprBng/PEHI-1522-2  
"DisttSuprMngr/PEHI-1522

Pers #: 00968826 Buckle:  
Name: MUHAMMAD NUNAN

DAI  
CNIC No 1730132004465  
GPF Interest Applied  
04 Active Permanent

PAYS AND ALLOWANCES:  
0301-Basic Pay  
1004-House Rent Allow 45% KP21  
1210-Corvey Allowance 2005  
1500-Medical Allowance  
2211-Adhoc Relief All 2015 10%  
2224-Adhoc Relief All 2017 10%  
2247-Adhoc Relief All 2018 10%  
2264-Adhoc Relief All 2019 10%  
2309-Adhoc Relief All 2021 10%  
Gross Pay and Allowances  
DEDUCTIONS:

GPF Finance 11,102.00  
4501-Benevolent Fund  
6004-Benefits & Death Comp:

Total Deductions

D.O.B 04.07.1992  
01 Years 02 Months 005 Days

LFP Quota:  
ALLIED BANK LIMITED Gar Mandi Peshawar C  
9314075695510015

SW 2

Postwar Dept

# Sact:004 Month:December 2021  
PW5579 -DisttSuprBng/PEHI-1522-2  
"DisttSuprMngr/PEHI-1522

Pers #: 00968826 Buckle:  
Name: MUHAMMAD NUNAN

DAI  
CNIC No 1730132004465  
GPF Interest Applied  
04 Active Permanent

PAYS AND ALLOWANCES:  
2311-Dress Allowance - 2021  
2312-Washing Allowance 2021  
2313-Integrated Allowance 2021

Gross Pay and Allowances  
DEDUCTIONS:

GPF Balance 11,102.00  
Subro:

Total Deductions

D.O.B 04.07.1992  
01 Years 02 Months 006 Days

LFP Quota:  
ALLIED BANK LIMITED Gar Mandi Pesh  
9314075695510015

(9)

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zafar Ali	Nejaf Ali Shah	17301-3698582-3	7/5/1988	Nalb Qasid	Matric
	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Nalb Qasid	FA
7	Salman Shah	Fazle Qadar	17301-7456183-7	19/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DIT
11	Sohail Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar	FA
14	Munir Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Nalb Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Nalb Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Laqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torgat Aurzai	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Nauroz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	MA+ Health Diploma
21	Abdu 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 Akaf	Subhan ullah	17301-5887445-5	29-04-2013	Behishti	DAE
25	Shahid Islam	Faqir Gul	17301-3550465-9	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 Athar	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	Salman Mibbah	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	Gohar Khan	17301-4164590-9	3/8/2016	Nalb Qasid	BSC

Annex "B"

10

Suehar Ali s/o  
Mir Aslam

Said Ullah s/o  
Said Ullah

District Health Officer  
Peshawar

34	Fareed Ullah	Sher Zaman	17301-8762303-1	12/8/2016	Behshil	FA
35	Umair Khan	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Pervais 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	Shafaraz 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	Chowkidar	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	Shehryar Khan	Sardar Khan	17301-8692584-1	27/10/2020	Ward Orderly	DAE+ DIT
48	Jehan Ullah	Faiz 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 Qasri	Usman Khan	17301-86694820-9	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 Satar	17301-6992992-5	27/10/2020	Chowkidar	Matric
55	Haroon Ur-Rashid	Habib ur Rehman	17301-6701436-9	27/10/2020	Ward Orderly	FA
56	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	Hamza Shah	Abdul Hafeez	17301-5242528-1	27-10-2020	Ward Orderly	B.COM
59	Muhammad Tayyab	Jalal Shah	17301-6527188-7	27-10-2020	Ward Orderly	FA
60	Shehryar Hussain	Masood Ahmad	17301-1955764-1	27-10-2020	Ward Orderly	FSC+Health Diploma
61	Momin Khan	Nighah Hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSC Computer Science
62	Imran Shah	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
63	Anwar ul Haq	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
64	Salman Khan	Zia Ul Haq	17301-5541278-7	2/3/2021	Behshil	FA
		Dilwar Khan	17301-3443294-5		Ward Orderly	Matric (Field)

11

District Health Officer  
Peshawar

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION**

**PESHAWAR**

REVISED



Roll No 152529  
Group ARTS

**PESHAWAR**

**PROVISIONAL AND DETAILED MARKS CERTIFICATE  
SECONDARY SCHOOL CERTIFICATE EXAMINATION  
SESSION ANNUAL-2009**

Muhammad Numan Son/Daughter of Noor Muhammad  
of GOVT. HIGH SCHOOL TAKHT ABAD PESHAWAR  
has secured the marks shown against each subject, in the Secondary School Certificate Examination  
held in the month of March 2009 as Regular Student

Subjects	Marks	MARKS OBTAINED				Total	In Words
		9Th		10Th			
		Theory Paper A	Practical Paper B	Theory Paper A	Practical Paper B		
1. English	150	25	--	45	--	70	Seventy Only
2. Urdu	150	39	--	46	--	85	Eighty-Five
3. Islamiyat (Comp)	75	40	--	--	--	40	Forty Only
4. Pakistan Studies	75	--	--	47	--	47	Forty-Seven
5. Maths	150	47	--	42	--	89	Eighty-Nine
6. General Science	150	36	--	46	--	82	Eighty-Two
7. Islamic Studies	150	48	--	45	--	93	Ninety-Three
8. Health & Phys Education	150	35	7	34	7	83	Eighty-Three

Total 1050

589-C Five Hundred Eighty-Nine Only

Remarks

HPE:IS:

Date of Birth: 11 July, 1997

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

Issue Date: 21-10-2011

**Controller of Examinations**

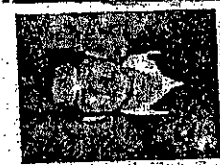
Note: Error(s) / Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

S. No. 078012

Roll No 152529

REVISED

# Board of Intermediate and Secondary Education Peshawar



**R. W. J. P Pakistan**

**Secondary School Certificate Examination**

**SESSION 2009- ANNUAL**  
(Arts Group)

Noor Muhammad  
Son of Noor Muhammad  
has passed the Secondary School Certificate  
in March, 2009 as a Regular  
Representing Good

Muhammad Numan  
Son of Muhammad Numan  
Govt. High School Takht Abad Peshawar

Examination of the Board of Intermediate and Secondary Education, Peshawar held in  
candidate. He obtained 589 Marks out of 1050 and has been placed in Grade C

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat (Comp)
4. Pakistan Studies
5. General Science
6. Maths
7. Islamic Studies
8. Health & Phys: Education

Date of birth according to admission form 04 July, 1992

*Bani*  
Asstt. Secretary

Issued in lieu of OC#:75243 (A-9)

Secretary

13

This certificate is issued without alteration or erasure.



# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



REVISED

Roll No: 76426

PESHAWAR



## PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE(ANNUAL) EXAMINATION, 2011 HUMANITIES ( Part-II )

Muhammad Numan Son / Daughter of Noor Muhammad

of Govt. Centennial Model High School Nahagi Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of April 2011 as Regular Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	46	--	39	--	85	Eighty-Five
Urdu	200	44	--	60	--	104	One Hundred Four
Islamic Education	50	30	--	--	--	30	Thirty Only
Pakistan Studies	50	--	--	29	--	29	Twenty-Nine
Civics	200	57	--	74	--	131	One Hundred Thirty-One
Islamic Studies	200	54	--	75	--	129	One Hundred Twenty-Nine
Health & Physical Education	200	47	12	56	5	120	One Hundred Twenty Only
<b>Total : 1100</b>						628-C	Six Hundred Twenty-Eight Only
Remarks :							

Checked By : \_\_\_\_\_

Date of issue: 23-01-2012

Controller of Examinations

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

S NO. 54248

Group. Humanities

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Roll No. 76426

# Board Of Intermediate & Secondary Education PESHAWAR



**Khyber Pakhtunkhwa (Pakistan)**

SESSION 2011- ANNUAL

This is to Certify that Muhammad Numan Son of Noor Muhammad  
 and a student of Govt. Centennial Model High School Nahaqi Peshawar Registered No. 0069-B/GCMSN-2009  
 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar  
 held in April, 2011 as a Regular candidate. He obtained 628 Marks out of 1100 and  
 has been placed in grade C Representing Good. The examination was taken as a whole.

*[Signature]*  
Asst. Secretary

*[Signature]*  
Secretary

15

This Certificate is issued without alteration or erasure.

S.No. 1293

(16)

**BACHA KHAN UNIVERSITY**

CHARSADDA, PAKISTAN

**DETAIL MARKS CERTIFICATE**

*Bachelor of Arts (B.A) Part II, Annual  
Examination, 2014*

Name Muhammad NumanRollNo. 2798Father's Name: Noor MuhammadRegistration No. 2012-CA-667Certified that the candidate secured the following marks and is placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
English Compulsory	75	27	Twenty-Seven
Urdu	75	26	Twenty-Six
Islamic Studies	75	55	Fifty-Five
Pak Studies	40	22	Twenty-Two
<i>Part- I Marks</i>	285	147	One Hundred Forty-Seven
<i>Part- II Marks</i>	550	277	Two Hundred Seventy-Seven

The Examination was taken as a Whole

To Pass 33% Marks in each Subject (Written Practical Separately)  
36% Marks in Aggregate.

Result Declared on: 22-Sep-14

Dr. Zafar Hayat Khan  
Controller of Examinations  
Bacha Khan University Charsadda

Errors and omissions are subject to  
subsequent rectification.

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: 17-06-2022.

Your Sincerely,

All qualified Class-IV Staff

- SSII (B&D)
- AS - DEV
- AS - MTE
- CH - HSRU
- DHO
- DS - (RSD)
- DS - CHSE
- SO - B-I
- SO - B-II

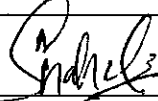
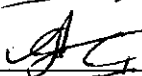


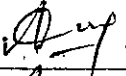
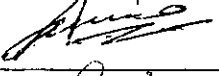
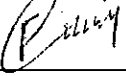
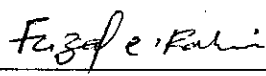
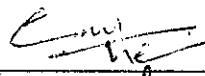
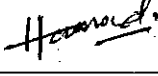
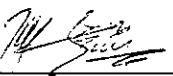
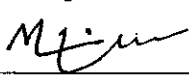




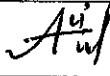
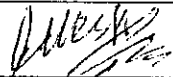
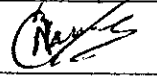
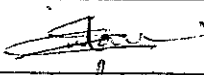

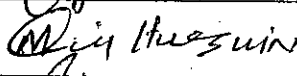

*[Handwritten signatures and names of staff members]*  
 T-Angal  
 Anwar  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir  
 Amir

P.T.O

Scanned with CamScanner

Ali Ali Ali Tahir  
Jasman Ali Ali Ali  
Fizal Ali Ali Ali  
Nasir Ali Ali Ali  
Sahib I Ali Ali  
Ali Ali Ali Ali

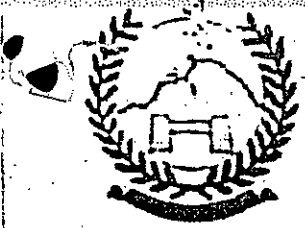
Names, Scales and Signatures of Candidates

<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
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

AT  
ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES (18)  
KHYBER PAKHTUNKHWA, PESHAWAR

Annex 'E'

No. 776-856 Promotion Cell Dated Peshawar the 18/08/2022

To

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

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

Memo:

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

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

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

Proforma for Junior Clerks initially recruited.

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

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





(19)

Annex "F"

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

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

To,

The Director General Health Services,  
Khyber Pakhtunkhwa,  
Peshawar.

**SUBJECT: APPEAL/REQUEST FOR PROMOTION OF CLASS-IV STAFF**

Sir,

Reference your letter No. 11776-856/Promotion Cell dated: 18.08.2022.

The requisite information is hereby submitted as mentioned below:

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

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

**Proforma for Junior Clerks initially recruited.**

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

District Health Officer  
Peshawar

SOFT REMINDER

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

1755  
17/10/2022  
Health Department

26

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

*Chaudhry  
Mujib*

*[Handwritten signature]*

50	129839			
Advocate: <u>Adil</u> <u>Barister M. Hassan</u>				
Bar Council Registration No: <u>BC-116028</u>				
Contact No: <u>03038373453</u>		پشاور بار ایسوسی ایشن، خیبر پختونخوا		
Service Tribunal Peshawar				

مخائب:	دعوی:
Appellant	Sr. Appeal
محمد لؤی حسان	علت نمبر:
بنام	مورخہ:
گوا محمد علی آف ایف کے بی وغیرہ	جرم:
	تھانہ:
<b>باعت تحریر آگہ</b>	

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

آن مقام پشاور کیلئے بے سٹر محمد حسان صاحب 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 و تقریر ثالث و فیصلہ بر حلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا دگری یا غیر طرف یا اپیل کی ہراسمندی 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، بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Hassan

26-11-2022

الرقوم:

مقام پشاور کے لیے منظور ہے۔