


FORM OF ORDER SHEET

Court of _____

Case No.- 1840/2022

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. Shahid Islam 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. Shahid Islam son of Faqir Gul 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. 3475 /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. 1840/2022

Shahid Islam

VS

Government of KP and Others

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APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Shahid Islam

Son of Faqir Gul
Resident of Mohalla Gulshan Abad, Mattani,
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 16.04.2014 (**Annex "A"**) in prescribed manner as Ward Attendant (BPS-02) in the respondent no. 04's department. The appellant has rendered services for more than eight years in one and the same scale.
2. That the seniority list (**Annex "B"**) of the appellant-Class-IV is maintained separately in the office of respondent no. 04, whereas the seniority list of the employees-Class-IV of the respondent no. 3's office is maintained separately in their office. The services of the employee in the respondent no. 4's office is regulated by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hereinafter referred to as the Rules.
3. That the next post in the hierarchy to which the appellant can be promoted is that of Junior Clerk (BPS-11), and 33% quota is reserved by the Rules for the promotions amongst the Daftaries (BPS-04), Naib Qasids (BPS-03), Bailiff (BS-04), etc with 02 years' service experience as such, and who have passed Secondary School Certificate Examination.
4. That, numerous posts of the Junior clerk were advertised by the respondent No. 3 & 4 department. However, the same were filled by the respondent No. 3 by promoting the employees of his office only as well as through initial recruitment since long, but the respondents were taking no steps to fill the same by affording a chance of promotion to the appellant despite of the availability and allocation of post to the office of the respondent no. 04.
5. That though the appellant was having the required qualification (**Annex "C"**) at the time of advertisement of junior clerk post and the vacancies were also available at that time, but he was deprived, illegally, of the benefit of promotion at that juncture.
6. That the appellant along with other colleagues submitted an application / representation dated 17-06-2022 (**Annex "D"**) to the respondent-department for their promotion on the quota reserved for them. In response to application dated 17-06-2022, a letter was issued by respondent No. 03 vide letter no. 1776-856/Promotion cell, dated 18-08-2022 (**Annex "E"**), wherein the respondent No. 03 asked the respondent no. 04 to furnish the details of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33% quota. Following this, the respondent no. 04 vide letter No. 14703/DHO dated 01-09-2022 (**Annex "F"**) sent an answer to the respondent

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 2016 is required to be placed senior to the fresh candidates appointed or promoted after 2016 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

F. That appellant reserve his right to urge additional grounds with leave of the Tribunal, after the stance of the respondents becomes known to him.

PRAYER:

It is, therefore, most respectfully prayed that on acceptance of the instant appeal, the Hon'ble Tribunal may graciously be pleased to direct the respondents to promote the appellant to the post of Junior Clerk along with the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred. Furthermore, the respondents may also be directed to place the appellant senior to the fresh candidates appointed or promoted after his entitlement as Junior Clerk.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.

[Handwritten Signature]
APPELLANT

Through

[Handwritten Signature]
BARRISTER
MUHAMMAD HASSAN ADIL

Advocate High Court

AFFIDAVIT

I, **Shahid Islam** Son of **Faqir Gul**, Resident of **Mohalla Gulshan Abad, Mattani, 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.

[Handwritten Signature]
DEPONENT



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

Service Appeal No. _____/2022

Shahid Islam

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.

Shahid Islam

APPELLANT

Through

Hassan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Shahid Islam Son of Faqir Gul, Resident of Mohalla Gulshan Abad, Mattani, 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.

Shahid Islam

DEPONENT





PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN



Name
Shahid Islam



Father Name
Faqir Gul

شہید اسلام

فقیر گل



Gender | Country of Stay
M | Pakistan

Identity Number | Date of Birth
17301-3550466-9 | 06.04.1992

Date of Issue | Date of Expiry
29.06.2022 | 29.06.2032

شہید

Holder's Signature

ممبر: شہید اسلام، قریبی ایئر بس، قریبی دہلی، خیبر پختونخوا

17301-3550466-9



504451283579

گمشدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دیں

8

Annex "A"

OFFICE OF THE DISTRICT HEALTH OFFICER PESHAWAR

OFFICE ORDER

Consequent upon approval accorded by the Departmental Selection Committee meeting held in the office of the District Health Officer Peshawar on 16/12/2014, Mr. Shahid Islam S/O Faqir Gul resident of Moh: Gulshan Abad Mattani Peshawar is hereby appointed as Ward Attendant BPS-02 (4900-170-10000) plus usual allowances as admissible under the government servant rules, subject to the following terms and conditions:

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

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

Sd/-XXXXX
Dist. Health Officer
Peshawar

No. 1713-2 /DH/OFF

Dated Peshawar the 16/04/2014

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Mr. Shahid Islam S/O Faqir Gul resident of Moh: Gulshan Abad Mattani Peshawar.
3. Personnel File.
4. Record Section
For information and action.

District Health Officer
Peshawar

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



Personal Information of Mr SHAHID ISLAM d/w/s of FAQIR GUL

Personnel Number: 00714687 CNIC: 1730135504609 NTN:
 Date of Birth: 06.04.1992 Entry into Govt. Service: 10.02.2014 Length of Service: 08 Years 07 Months 022 Days

Employment Category: Active Temporary

Designation: WARD ORDERLI 81186483-GOVERNMENT OF KHYBER PAKH
 DDO Code: PR8857-DISTRICT HEALTH OFFICER PESHAWAR
 Payroll Section: 009 GPF Section: 001 Cash Center:
 GPF A/C No: GPF Interest applied **GPF Balance:** 100,381.00 (provisional)
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 04 Pay Stage: 8

Wage type		Amount	Wage type		Amount
0001	Basic Pay	19,970.00	1004	House Rent Allow 45% KP21	3,576.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	253.00	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	2,013.00
2347	Adhoc Rel Ai 15% 22(PS17)	2,013.00			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	-2,148.00

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.): 33,886.00 Deductions: (Rs.): -3,818.00 Net Pay: (Rs.): 30,068.00

Payee Name: SHAHID ISLAM
 Account Number: 1001909
 Bank Details: MCB BANK LIMITED, 240311 MATTANI MATTANI

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:
 City: PESH. Domicile: - Housing Status: No Official
 Temp. Address:
 City: Email: shahidislam0344@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/30.09.2022/17:24:00)*

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in Job	Designation	Qualification
1	Zaffar Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Naib Qasid	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	BA
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Chowkidar	Matric
6	Ahmad Jan	Ghazi Khan	17301-1274726-3	30/04/1999	Naib Qasid	FA
7	Saiman Shah	Fazie 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 Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+DT
11	Sohail Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar	FA
14	Munir Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Naib Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liqaat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Forqat Auzai	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Rifayat Shah	Nurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	MA+ Health Diploma
21	Abdul Shahab	Abdul Jabbar	17301-7776929-5	27/12/2012	Behishti	MSC Economics
22	Muhammad Imran	Galeem Ullah	17301-3090264-1	29/12/2012	Chowkidar	MA
23	Asif Naveed	Naveed Ahmad	17301-5904442-3	31/12/2012	X-ray Attendant	FA
24	Muhammad Altaf	Subhan Ullah	17301-5887445-5	29-04-2013	Behishti	DAE
25	Shahid Islam	Faqir Gul	17301-3550466-9	4/2/2014	Ward Orderly	FSC+ Surgical Diploma
26	Asfandyar Khan	Musharaf Khan	17301-6996238-7	4/2/2014	Ward Orderly	BA
27	Shams Ul 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	Saiman Misyah	Misyah Ud din	17101-4426272-5	7/4/2015	Behishti	BA
30	Shahid Islam	Faqir Gul	17101-4426272-5	16-1-2016	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-8449980-3	3/8/2016	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan	17301-4164590-9	3/8/2016	Naib Qasid	BSC

Annex "B"

10

Suzkan 99/1/10
Mir Hslem

Sard Ullah 9/10
Sai Kub 7/10

District Health Officer
Peshawar

34	Fareed Ullah	Afridi Khan Sati	17301-8762303-1	12/8/2016	Behishti	FA
35	Umar Khan	Pervaiz Khan	17301-8066889-5	29/05/2017	Naib Qasid	BA
36	Sabir Shah	Zaibn Shah	17201-6576098-3	19/01/2018	Naib Qasid	FA
37	Waqar Younis	Shafaras Khan	17301-9197840-5	19/01/2018	Chowkidar	Matric+ Health Diploma
38	Syed Ghous Ali Shah	Syed Abid Shah	17301-1800560-9	19/01/2018	Ward Orderly	FSC
39	Muhammad Arif	Faiz Muhammad	17301-2618886-7	19/01/2018	Ward Orderly	MA
40	Muhammad Ihtisham	Dilshad Khan	17301-2621626-3	19/01/2018	Ward Orderly	BSC
41	Zeshan Ahmad	Fareed Khan	17301-5237207-1	20/02/2018	Ward Orderly	M.COM
42	Faisal Ahmad	Habib ur Rehman	17301-6599340-5	3/10/2018	Ward Orderly	BA
43	Muhammad Saboor	Manzoor Khan	17301-9784416-5	3/10/2018	Chowkidar	FA
44	Farooq Haidar	Khan Bahadur	17101-1892366-1	30/10/2018	Ward Orderly	FA+ Health Diploma
45	Imran Khan	Izzat Khan	17301-8692584-1	27/10/2020	Chowkidar	FA+Electric Diploma
46	Rahim Shah	Sardar Khan	17301-2332817-7	27/10/2020	Ward Orderly	DAE+ DIT
47	Shehryar Khan	Faqir Hussain	17301-1797449-1	27/10/2020	Ward Orderly	MA+DIT Diploma
48	Shehan Ullah	Ihsan Ullah	17301-0416153-5	27/10/2020	Ward Orderly	FA
49	Amir Khan	Zaka Ullah	17301-3280446-5	27/10/2020	Ward Orderly	FSC
50	Muhammad Noqman	Noor Muhammad	17301-86494820-9	27/10/2020	Ward Orderly	BA
51	Muhammad Arif	Usman Khan	17301-6540441-7	27/10/2020	Ward Orderly	BA
52	Mueen Qasmi	Muhammad Hanif	17301-6952992-5	27/10/2020	Chowkidar	MBA
53	Imran Khan	Abdul Sattar	17301-8767271-3	27/10/2020	Ward Orderly	FA
54	Shahid Ahmad	Habib ur Rehman	17301-5569170-9	27-10-2020	Chowkidar	BA
55	Haroon Ur Rashid	Muhammad Dawood	17301-5242528-1	27-10-2020	Chowkidar	Matric
56	Aqib Zahoor	Zahoor Ud Din	17301-6527188-7	27-10-2020	Ward Orderly	B.COM
57	Tahir Hafeez	Abdul Hafeez	17301-1955764-1	27-10-2020	Ward Orderly	FA
58	Hamza Shah	Jalal Shah	17301-6255930-7	27-10-2020	Ward Orderly	FSC+Health Diploma
59	Muhammad Tayab	Masood Ahmad	17301-7058253-5	27-10-2020	Ward Orderly	BSC Computer Science
60	Shehryar Hussain	Nighah Hussain	17301-3206617-7	8/12/2020	Ward Orderly	SSC
61	Momin Khan	Johar Ali	17301-5541278-7	2/3/2021	Ward Orderly	FSC
62	Imran Shah	Sabir Shah	17301-3443294-5		Ward Orderly	FA
63	Anwar ul Haq	Zia Ul Haq			Matric (P.L.D.)	
64	Salman Khan	Dilwar Khan				

District Health Officer
Peshawar

(11)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

S.No. PB 135687

(12)

Annex "C"



Roll No: 29577

Group : SCIENCE

PESHAWAR



**PROVISIONAL AND DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION ANNUAL-2007**

Shahid Islam Son / Daughter of Faqeer Gul

of KOH-E-DAMAN MODEL SCHOOL MATANI ROAD PESHAWAR

has secured the marks shown against each subject, in the Secondary School Certificate Examination held in the month of May 2007 as Regular Student

Subject	Marks	MARKS OBTAINED			
		Theory Paper A	Practical Paper B	Total	In Words
1. English	150	-	-	97	Ninety-Seven
2. Urdu	150	-	-	104	One Hundred Four
3. Islamiyat (Comp)	75	58	-	58	Fifty-Eight
4. Pakistan Studies	75	31	-	31	Thirty-One
5. Maths	150	-	-	94	Ninety-Four
6. Physics	100	51	10	61	Sixty-One
7. Chemistry	100	41	10	51	Fifty-One
8. Biology	100	43	11	54	Fifty-Four

Total 900

550-B Five Hundred Fifty Only

Remarks

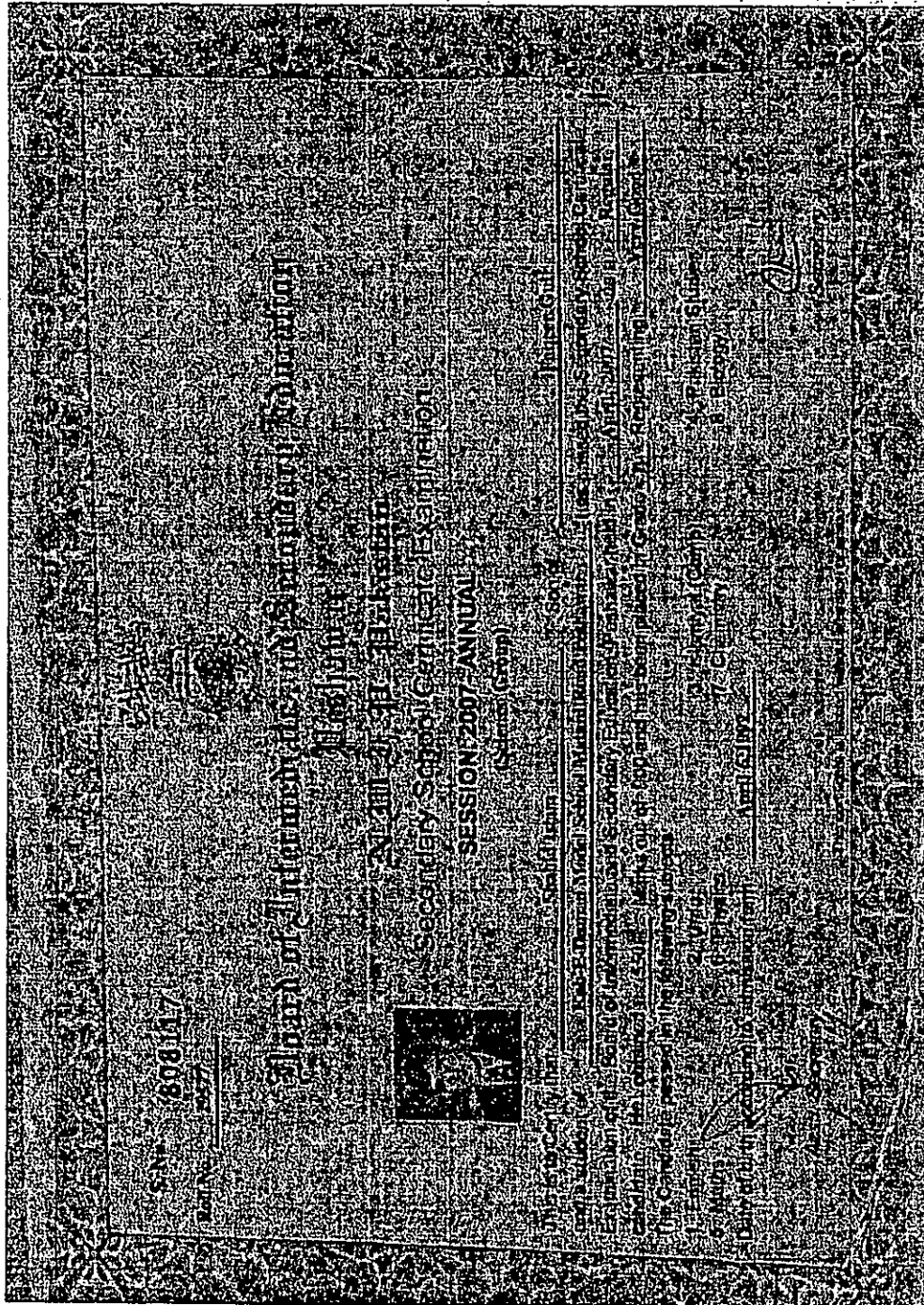
Date of Birth: 06th April, 1992

Issue Date: 16-07-2007

Controller of Examinations

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

Computer Cell BISE, Peshawar.



(14)

S.No. PB

653914

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 60051



PESHAWAR PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2009 PRE-ENGINEERING (Part-II)

Shahid Islam Son / Daughter of Faqeer Gul

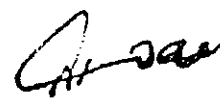
of Brilliant College Of Science Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of April 2009 as Regular Student

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	42	--	62	--	104	One Hundred Four
Urdu	200	52	--	70	--	122	One Hundred Twenty-Two
Islamic Education	50	26	--	--	--	26	Twenty-Six
Pakistan Studies	50	--	--	35	--	35	Thirty-Five
Mathematics	200	64	--	69	--	133	One Hundred Thirty-Three
Physics	200	50	9	64	9	132	One Hundred Thirty-Two
Chemistry	200	48	12	36	7	103	One Hundred Three
Total : 1100						655-C	Six Hundred Fifty-Five Only
Remarks :							

Checked By : _____

Date of issue: 21-07-09


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. 1350

Session JANUARY 2018

Faculty of Paramedical and Allied Health Sciences



Khyber Pakhtunkhwa
REGISTRATION CERTIFICATE

Registration No. 2014/mf/pimt/pew/st/fs/5

Name Shahid Islam

Father's Name Faqeer Gul

Roll Number 54542

Name of Institute Pakistan Institute of Medical Technology Peshawar

Diploma Serial No. 1354

Technology Surgical

Date 1-Aug-18 Retained upto 1-Aug-23

Prepared by: [Signature]

Checked by: [Signature]

Verified by: [Signature]

[Signature]
Chief Executive Officer

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. 1354

Roll No. 54642

Session 2014-2015

Faculty of Paramedical and Allied Health Sciences
 Khyber Pakhtunkhwa
 PARAMEDICAL DIPLOMA (TWO YEARS)

SHAHID ISLAM

Son/ Daughter of FAQEER GUL

PAKISTAN INSTITUTE OF MEDICAL TECHNOLOGY
 PESHAWAR

bearing Registration No. 2014/MIP/PIMT/PEW/ST/FS/5

JANUARY, 2018

having passed the prescribed examination held in _____ is this day admitted by the Faculty

SURGICAL

of Paramedical and Allied Health Sciences Khyber Pakhtunkhwa to the Diploma _____

Technology in C Grade.

Checked By [Signature]

Verified By [Signature]

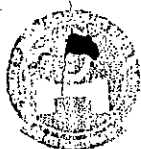
Result Declaration Date 03-May-2018

Print Date and Time 09-October-2018 4:00:46PM



[Signature]
 Chief Executive Officer

Note: Error(s) & omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this Diploma



Faculty of Paramedical and Allied Health Sciences (FPMA)

17

Khyber Pakhtunkhwa DETAILED MARKS CERTIFICATE

Registration No: 2014/MF/PIMT/PEW/ST/FS/5
 Student Name: SHAHID ISLAM
 Son/Daughter of: FAQEER GUL
 Institute: PAKISTAN INSTITUTE OF MEDICAL TECHNOLOGY PESHAWAR
 Course: Diploma New Course Technology SURGICAL



Subject Name	Total Marks	Passing Marks	Theory	Viva	Total Obtained	Result
Semester: 1 Session: MAY 2015 Roll No: 35785						
Anatomy	100	50	42	8	50	Pass
Physiology	100	50	46	4	50	Pass
BioChemistry	100	50	44	6	50	Pass
Computer Skill	50	25	26	10	36	Pass
Sub-Total	350				186	
Semester: 2 Session: MAY 2015 Roll No: 23092						
Pathology	100	50	39	11	50	Pass
Pharmacology	100	50	51	12	63	Pass
English	100	50	50	0	50	Pass
Islamiat	50	25	25	0	25	Pass
Public Health	100	50	45	5	50	Pass
First Aid & Patient Safety	50	25	25	4	29	Pass
Sub-Total	500				267	
Semester: 3 Session: JANUARY 2018 Roll No: 54642						
I-Apphed Anatomy, Physiology & CP	100	50	35	15	50	Pass
II-Surgical Procedure-I & CP	100	50	40	10	50	Pass
Medical Ethics	50	25	28	6	34	Pass
Sub-Total	250				134	
Semester: 4 Session: JULY 2017 Roll No: 72657						
English	100	50	50	0	50	Pass
Pak-Study	50	25	38	0	38	Pass
I-MICROBIOLOGY & CP	100	50	32	18	50	Pass
II-STERILIZATION, SUPPLIES & EQUIPMENT & CP	100	50	39	18	57	Pass
Sub-Total	350				195	
Grand Total	1450		655	127	782	

Checked By [Signature]

Verified By [Signature]

Chief Executive Officer
Faculty of Paramedical & Allied Health Sciences,
Khyber Pakhtunkhwa

Result Declaration Date: Thursday, 03 May, 2018

Issue Date & Time:

Wednesday, August 01, 2018 11:26:03 am

Note: Error/Omission excepted. Any mistake in above particulars must be intimated within 15 days of the receiving of this certificate

CP Means Clinical Practice

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


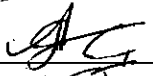

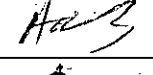
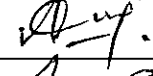

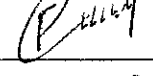
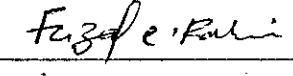
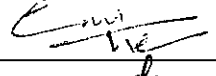
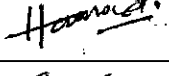
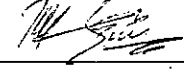
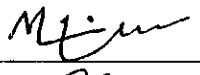
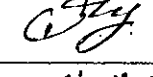


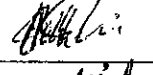
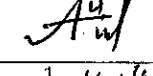
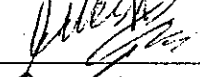
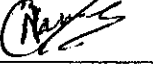

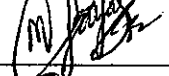
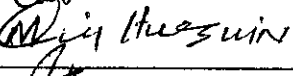
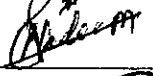
- SSII (S&O)
- AS - (DEV)
- AS - (MT)
- CH - (SRU)
- CFO
- DS - (RD)
- DS - (SG)
- SO - B-I
- SO - B-II

[Handwritten signatures and initials]

[Handwritten notes: "SO IV", "District", "Shahab", "Nurva"]

Handwritten signatures and names in Urdu script, including: Farhan, Amir, Muhammad, Abdul, Qasim, Fazal-e-Razi, Muhammad, Abdul, Qasim, Nawaz, Fahim, Sayyid, Abdul, Muhammad, Qasim, Hamid, I, Muhammad, Qasim, Muhammad.

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.	Muncer 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


 REGISTERED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

(19)

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



(20)

Annex "F"

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

SOFT REMINDER

(21)

To,

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

1755
17/10/2022
H38

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" there was two cadres in health Directorate against which different meetings was scheduled and now it was decided to merge these cadres into one cadre. But the order is still awaited.

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

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




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

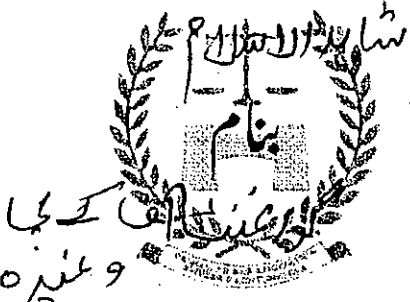
We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

*Chahida
Miyta*
[Signature]

50	129864			
Barrister M. Hassan Ad ایڈووکیٹ				
BC-116028 بار کونسل ایسوسی ایشن نمبر:				
0303-8373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
Service Tribunal, Peshawar				
بعدالت جناب:				

Appellant	مخائب:	Sr. Appeal	دعویٰ:
			علت نمبر:
			مورخہ:
			جرم:
			تھانہ:
باعت تحریر آنگہ			

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

آن مقام لعدناعر کے لیے لعدناعر محمد حسان محمدا ل 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 تقرر ثالث و فیصلہ بر خلاف دینے جواب دعویٰ اقبال و دعویٰ اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی 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 دیگر قانونی کوا لٹے کے ساتھ اپنے سمجھائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پر راحت منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں بلکہ وکالت نامہ لکھ دیا تاکہ سند رہے

Hassan

26/11/2022

العراق العواہف العواہف
پشاور مقام کے لیے منظور ہے۔