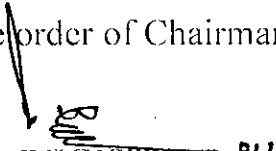


# FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1841/2022


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 Sulaiman resubmitted today by Mr. Muhammad Hassaan Adil Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

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

No. 3484 /S.T.

Dt. 05-12 /2022.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muhammad Hassaan Adil Adv.  
High Court Peshawar.

(\*) All the objections have been removed.

Hassaan

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

Hassaan

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

Service Appeal No. 1841 /2022

Muhammad Sulaiman

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
5.	Seniority List	'B'	9-10
6.	Educational Documents	'C'	11-17
7.	Departmental Representation dated 17-06-2022	'D'	18
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	19
9.	Letter No. 14703/DHO dated 01-09-2022	'F'	20
10.	Reminder application dated 17-10-2022	'G'	21
11.	Wakalatnama		22

  
APPELLANT

Through

  
BARRISTER  
MUHAMMAD HASSAAN ADIL

①

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

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

**Muhammad Sulaiman**

Son of Musafar Khan  
Resident of Mohalla Islamabad No. 2, Nishtar Abad, House No. 189,  
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 24.05.2010 (Annex "A") in prescribed manner as Beheshti (BPS-03) in the respondent no. 04's department. The appellant has rendered services for more than twelve 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;

**GRUNDS:**

- 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 2012 is required to be placed senior to the fresh candidates appointed or promoted after 2012 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

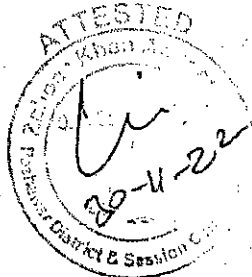
Through

  
**BARRISTER**  
**MUHAMMAD HASSAAN ADIL**  
Advocate High Court

**AFFIDAVIT**

I, **Muhammad Sulaiman** Son of **Musafar Khan**, Resident of **Mohalla Islamabad No. 2, Nishtar Abad, House No. 189, 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 Sulaiman**

**VS**

**Government of KP and Others**

---

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

---

**Respectfully Sheweth:**

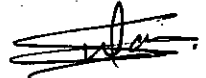
- 1) That the above titled appeal is being filed before this hon'ble Tribunal along with instant application.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about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

**PRAYER:**

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



6



APPELLANT

Through



BARRISTER

MUHAMMAD HASSAAN ADIL

Advocate High Court

**AFFIDAVIT**

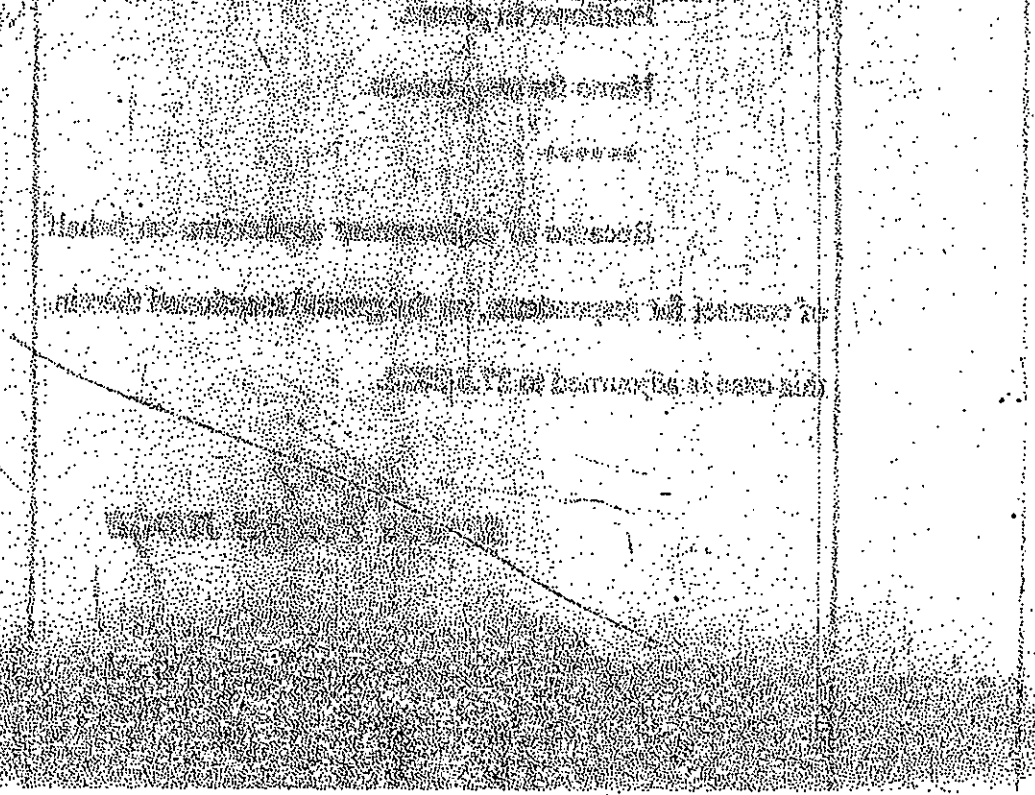
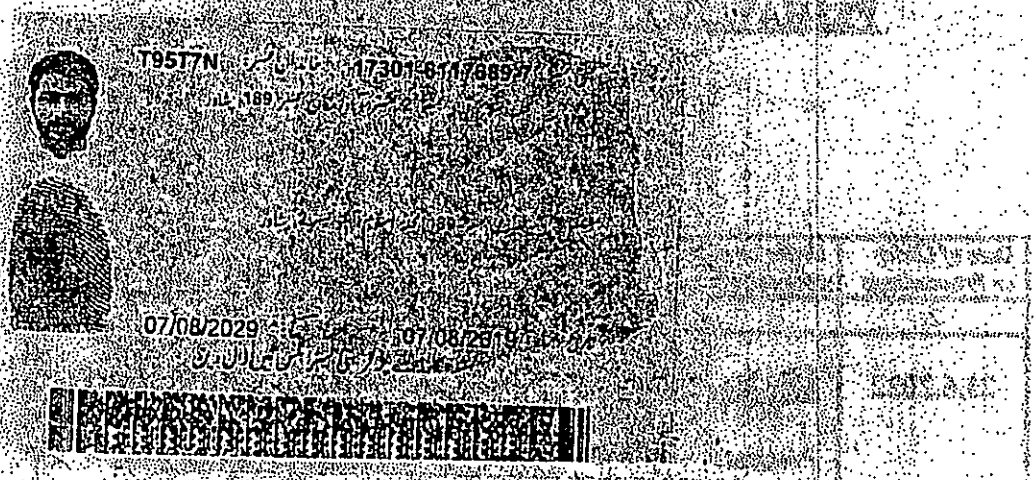
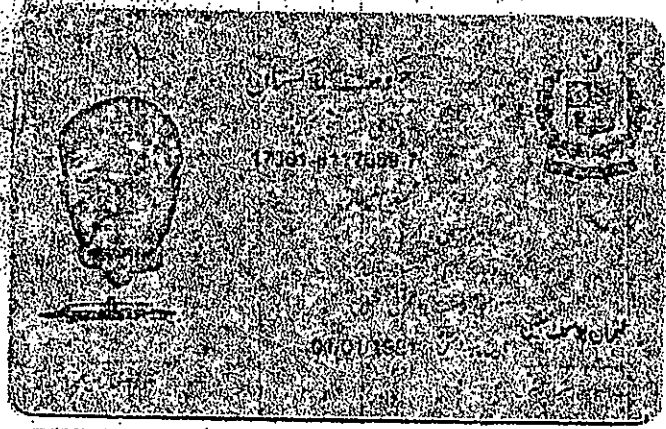
I, **Muhammad Sulaiman Son of Musafar Khan**, Resident of Mohalla Islamabad No. 2, Nishtar Abad, House No. 189, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble court.



DEPONENT



7



Dist. Govt. NWFP-Provincial  
District Accounts Office Peshawar Dist.  
Monthly Salary Statement (January-2018)



(8)

Annex "A"

Personal Information of Mr MUHAMMAD SULIMAN d/w/s of musafar :  
Personnel Number: 00538001 CNIC: 1730161176897  
Date of Birth: 01.01.1988 Entry into Govt. Service: 24.05.2010

NTN:  
Length of Service: 07 Years 08 Months 009 Days

Employment Category: Active Temporary

Designation: BEHISHTI 80004106-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6154-District Health Officer (BHU) Peshawar

Payroll Section: 004

GPF Section: 001

Cash Center:

GPF A/C No: 538001

Interest Applied: Yes

GPF Balance:

35,256.00

Vendor Number:

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil - BPS: 03

Pay Stage: 7

Wage type		Amount	Wage type		Amount
0001	Basic Pay	12,340.00	1001	House Rent Allowance 45%	1,413.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	285.00	2199	Adhoc Relief Allow @10%	196.00
2211	Adhoc Relief All 2016.10%	999.00	2224	Adhoc Relief All 2017 10%	1,234.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription - Rs 770	-770.00	3501	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	23,000.00	-1,000.00	9,000.00

Deductions - Income Tax

Payable: 0.00 Recovered till January-2018: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 19,752.00 Deductions: (Rs.): -2,521.00 Net Pay: (Rs.): 17,231.00

Payee Name: MUHAMMAD SULIMAN

Account Number: 1000186

Bank Details: MCB BANK LIMITED, 240693 G. T. ROAD. G. T. ROAD., PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: peshawar

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: salmanjan539@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SERVICES/01.02.2018/10-51-06/s.1.1)

\* All amounts are in Pak Rupees

\* Errors & omissions excepted

Seniority List Of Class IV Employees Working Under DHO Peshawar

S.NO	Name	Father Name	NIC Number	Date of Entry in	Designation	Qualification
1	Zafar Ali	Najar Ali Shah	17301-169882-3	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	Fazle Qadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Asmir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA, Health Diploma
10	Muhammad Ishaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+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	Naved Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Naib Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-440832-9	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 Anzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Naurooz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	MA+ Health Diploma
21	Abdul Shahab	Abdul Jabbar	17301-7776929-5	27/12/2012	Behishti	MSC Economics
22	Muhammad Imran	Qaleem Ullah	17301-3090264-1	29/12/2012	Chowkidar	MA
23	Asif Naved	Naved 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 Gayum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Saiman Mischah	Mischah 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	Naib Qasid	BSC

Annex "B"

9

Sunder Singh 3/5/10  
Mir Hasam

Sardar Ullah 3/5/10  
Sardar Ullah 3/5/10

District Health Office  
Peshawar

34	Fareed Ullah	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FA
35	Umar Khan	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Pervaz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
37	Waqar Younis	Zabhan 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	Zeeshan 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 Haider	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	Faqir Hussain	17301-2332817-7	27/10/2020	Ward Orderly	MA+DIT Diploma
49	Amir Khan	Ihsan Ullah	17301-1797449-1	27/10/2020	Ward Orderly	FA
50	Muhammad Nouran	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	Museen Qasmi	Usman Khan	17301-86494820-9	27/10/2020	Ward Orderly	BA
53	Imran Khan	Muhammad Hanif	17301-6540441-7	27/10/2020	Ward Orderly	MBA
54	Shahid Ahmad	Abdul Sattar	17301-6952992-5	27/10/2020	Chowkidar	Matric
55	Haroon Ur Rashid	Habib ur Rehman	17301-6701436-9	27/10/2020	Ward Orderly	FA
56	Aqib Zahoor	Muhammad Dawood	17301-8767271-3	27/10/2020	Chowkidar	BA
57	Tahir Hafeez	Zahoor Ud Din	17301-5569170-9	27-10-2020	Chowkidar	Matric
58	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	Behishti	FA
		Dilwar Khan	17301-3443294-5		Ward Orderly	Matric (Fied)

District Health Officer  
Peshawar

10

(11)

S.No. PB

96204

Annex "C"

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 128307

Group: ARTS



## PESHAWAR

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

Muhammad Sulaman Son / Daughter of Musafar Khan

of PESHAWAR DISTRICT

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

Subjects	Marks	MARKS OBTAINED			
		Theory Paper A	Theory Paper B Or Practical	Total	In Words
1. English	150	-	-	69	Sixty-Nine
2. Urdu	150	-	-	85	Eighty-Five
3. Islamiyat (Comp)	75	31	-	31	Thirty-One
4. Pakistan Studies	75	37	-	37	Thirty-Seven
5. Maths	150	-	-	52	Fifty-Two
6. General Science	100	61	-	61	Sixty-One
7. Islamic Studies	100	45	-	45	Forty-Five
Art & Model Drawing	100	-	-	47	Forty-Seven
<b>Total</b>		<b>900</b>		<b>427-D</b>	<b>Four Hundred Twenty-Seven Only</b>
		Remarks		IS,ART,	

Date of issue: 02nd April, 1989

Checked by:

Issue date: 15-07-2008

Controller of Examinations

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

Attested by  
Fazal Ahmad

Member Officer  
BHU Peshawar

S. No 037645

Roll No 128307

Board of Intermediate and Secondary Education  
Peshawar



A. Q. J. P. Pakistan

Secondary School Certificate Examination

SESSION 2008- ANNUAL  
(Arts Group)

This is to Certify that Muhammad Sulaman Son of Musafar Khan

and a resident of Peshawar District has passed the Secondary School Certificate

Examination of the Board of Intermediate and Secondary Education, Peshawar held in April, 2008 as a Private

candidate. He obtained 427 Marks out of 900 and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- |                    |                        |                     |                     |
|--------------------|------------------------|---------------------|---------------------|
| 1. English         | 2. Urdu                | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. General Science | 6. Art & Model Drawing | 7. Maths            | 8. Islamic Studies  |

Date of birth according to admission form April 2, 1989

  
Asstt Secretary

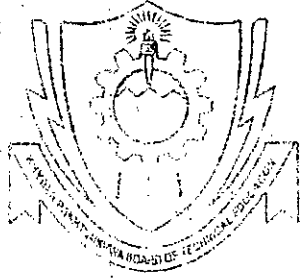
  
Secretary

This certificate is issued without alteration or erasure.

(13)

213596

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION



**PESHAWAR**  
**DETAIL MARKS CERTIFICATE**  
**DIPLOMA IN COMMERCE**  
**PART-II**  
**ACCOUNT GROUP (REVISED 2006)**



Name of Candidate MUHAMMAD SULAMAN

Father's Name MUSAFAR KHAN

Roll.No. 60079 Session ANNUAL 2010

Reg.No. QCC/P/AC/08-10804

Institute/College QUTAIBA COLLEGE OF COMMERCE & BUSINESS ADMINISTRATION PESHAWAR

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Part-I Marks				318	
1 English	100	62	-	62	Sixty-two
2 Urdu	100	55	-	55	Fifty-five
3 Pakistan Studies	50	22	-	22	Twenty-two
4 Business I, T-II	75 / 25	43	23	66	Sixty-six
5 Principle of Economics	50	30	-	30	Thirty
6 Communication Skills	50	39	-	39	Thirty-nine
7 Financial Accounting -II	100	62	-	62	Sixty-two
8 Applied Accounting	50	32	-	32	Thirty-two

1200

686 Six hundred eighty-six

*Attested by*  
*FB/ia Affandi*  
 Medical Officer  
 BHU Hazarkhwa  
 Peshawar

Prepared by Aamir Iqbal

Checked by [Signature]

Theory Passing Marks=40% Practical Passing Marks=50%

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

[Signature]  
**CONTROLLER OF EXAMS**

13/08/2010



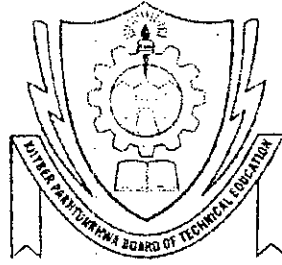
03228

Serial No.

Roll No

(14)  
47197

**Khyber Pakhtunkhwa Board of Technical Education**



**PESHAWAR (PAKISTAN)**

**DIPLOMA IN INFORMATION TECHNOLOGY**

Session 1st Term 2012

*This is to certify that*


Mr./Miss. MUHAMMAD SULAMAN  
Son/Daughter of MUSAFAR KHAN  
Registration No. GCMS/P/DIT/2ND-11/24552  
of GOVERNMENT COLLEGE OF MANAGEMENT SCIENCES PESHAWAR

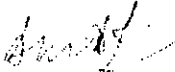
*has satisfactorily completed the one year duration Information Technology course titled " Diploma in Information Technology" and passed the Examination held by the Khyber Pakhtunkhwa Board of Technical Education, peshawar, in the month of February 2012*

He/She secured 1117 Marks out of 1700 and has been placed in  
Grade B

*In recognition thereof, this Diploma In Information Technology is awarded to him/her at Peshawar,*

*on the 23Th day of April 2013*

  
**ASSISTANT SECRETARY**

  
**SECRETARY**

*This Diploma is issued without any alteration or eraser*

15



# University of Peshawar

Pakistan

## Detailed Marks Certificate

Bachelor of Arts.

Part-II  
Supplementary Examination 2013  
Govt: College, Peshawar City



Regular

Name: MUHAMMAD SULAMAN  
Father's Name: MUSAFAR KHAN

Gender: Male Roll No: 9824  
Registration No: 2011-GP-7313

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	24	Twenty Four
Political Science	75	30	Thirty Only
Law	75	40	Forty Only
Pakistan Studies	40	26	Twenty Six
Part-I 9469:Annual-2013	285	132	One Hundred and Thirty Two
Part-II	550	252	Two Hundred and Fifty Two

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken In Parts

Examination held From 18-Dec-2013 to 20-Jan-2014

Result Declared on Wednesday, March 26, 2014

Issue Date: 27-Mar-2014

3:21 pm

(Prof. Dr. Rashid Khan)  
CONTROLLER OF EXAMINATIONS  
UNIVERSITY OF PESHAWAR

# University of Peshawar Pakistan

This certifies that

**Muhammad Sulaman son of Musafar Khan**

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

**Bachelor of Arts**

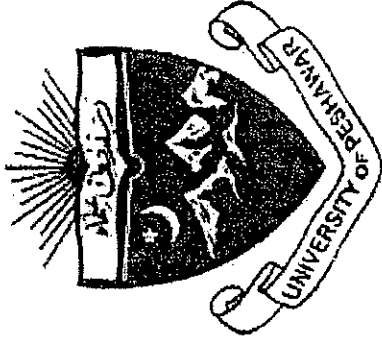
and is entitled to all the rights, honours and privileges thereunto appertaining.


Given this 26th day of March, 2014.

Roll No: 9824

Session: Supplementary 2013

Reg. No: 2011-GP-7313



  
Registrar

  
Vice Chancellor



126852

16

Reg. No. ....



REGISTERED

# AFTAB

## TYPING & SHORTHAND ACADEMY

### Certificate of Achievement

Serial No. 00015  
Aftab Typing & Shorthand Academy  
S.D.C.

*This is to certify that*

Mr./Miss **MUHAMMAD SULAMAN**

Son/Daughter of **MURAD ALI KHAN**

has successfully completed *Typing / Shorthand Course*

From **17-03-2011**

To **30-09-2011**

*He has passed the Tests and has achieved the following speed per minutes:-*

1. Shorthand Speed: **XXXXXXXX** Words Per Minute

2. Typing Speed: **40** Words Per Minute

Date: **05-10-2011**

*[Signature]*  
Principal  
Aftab Typing & Shorthand Academy

Annex - D

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

To

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

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

Sir,

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

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

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

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

I would be obliged, please.

Dated: 17-05-2022.

Your Sincerely,

All qualified Class-IV staff

- SSI (B&D)
- AS - (REV)
- AS - MTE
- CH - HR/II
- CHO
- DS - (B&D)
- DS - (Eng)
- SO - B-I
- SO - B-II



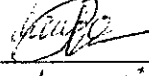
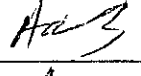
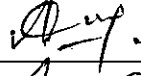
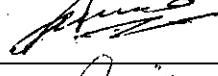
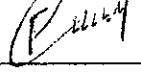
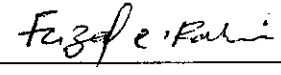
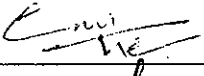
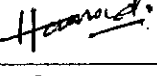
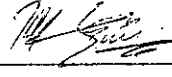
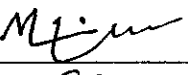
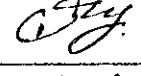


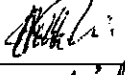
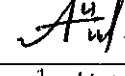
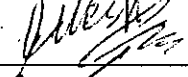
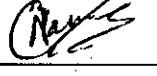

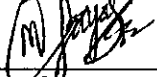
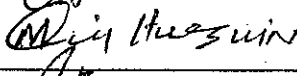
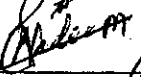
*[Handwritten signatures and initials of various staff members, including names like Anwar, Amir, and others, are present over the list and the 'All qualified Class-IV staff' line.]*

P.T.O

Ali Ali Ali Tahir  
Jasman Ali Ali Ali  
Fizal Ali Ali Ali  
Nur Ali Ali Ali  
Sahab Ali Ali Ali  
Hamid Ali Ali Ali

18(A)

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.	<u>Muhammad Sulaiman</u>	BPS-03	
21.	Muhammad Tayyab	BPS-04	
22.	Muneer Hussain	BPS-01	
23.	Nadeem Khan	BPS-03	

  
ATTESTED

18(B)

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

ATTESTED





DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA, PESHAWAR

Annex "E"

19

No. 776-85 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: 09/09/2022

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

(21)

17/10/2022

Annex "G"

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

Sir,

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

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

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

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




We would be obliged, please.

Date: 13.10.2022

Yours Sincerely,  
All Qualified Class-IV Staff

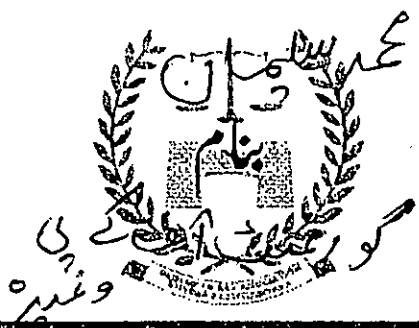
*Chilla  
myla*

*[Handwritten signature]*

50	129867			
Barrister M. Hassan AAD ایڈووکیٹ:				
BC-116028 بار کونسل ایسوسی ایشن نمبر:				
0303-8373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

Service Tribunal, Peshawar

بعدالت جناب:

Appellant مجانب:	Sr. Appeal دعوی:
	علت نمبر:
	مورد:
	جرم:
	تھانہ:

**باعث تحریر آگہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی وجواب دہی کاروائی متعلقہ

آن مقام پشاور کے لئے لیسٹر محمد حسان علی لیل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے اور تقریر ثالث و فیصلہ بر حلف دینے، طواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت ضرورت بیروی یا ڈگری یا طرفہ یا اپیل کی سرکاری اور منسوقی، نیز دائر کرنے اور اپیل گزرائی و نظر ثانی و بیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار ہوائی کو اختیار ہے کہ وہ اپنے ہر اختیار سے مستفاد ہوگا اور صاحب مقرر شدہ کو اپنی جملہ مذکورہ بالا امتیازات حاصل ہوں گے اور ان کی ساختہ و اختہ منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی بمقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ بیروی مذکورہ کر لیں لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



26/11/2022

المقوم:

مقام پشاور کے لیے منظور ہے۔

محمد سلیمان ولد مصطفیٰ خان سکندر نشتر ابر پشاور