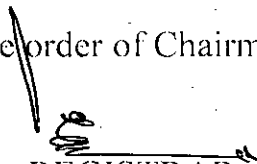


FORM OF ORDER SHEET

Court of _____

Case No. - 1851/2022

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. Shaharyar Khan 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. Shaharyar Khan son of Faqeer Hussain 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. 3502 /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. 1851 /2022

Shahryar Khan

VS

Government of KP and Others

INDEX

Sr. No	Description of Documents	Annexures	Pages
1.	Service appeal		1-4
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4.	Appointment Order	'A'	8-9
5.	Seniority List	'B'	10-11
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APPELLANT

Through


BARRISTER
MUHAMMAD HASSAAN ADIL

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Shaharyar Khan

Son of Faqeer Hussain
Resident of Shaheen Muslim Town, House No. 216, Mohalla Hanif Abad,
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 27.10.2020 (**Annex "A"**) in prescribed manner as Ward Orderly (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;

GROUNDS:

- 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.

[Signature]
APPELLANT

Through

[Signature]

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, Shahryar Khan Son of Faqeer Hussain, Resident of Shaheen Muslim Town, House No. 216, Mohalla Hanif Abad, 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.

[Signature]
30-11-22

[Signature]
DEPONENT

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

Service Appeal No. _____/2022

Shaharyar Khan 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 honorable 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

Shahryar Khan
APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, **Shahryar Khan** Son of **Faqeer Hussain**, Resident of **Shaheen Muslim Town, House No. 216, Mohalla Hanif Abad, 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.

Shahryar Khan

DEPONENT

Mr
30-11-22

7



C. Nadeem
ACCOUNTS OFFICER
Cyber City Medical College
Hyderabad Pakistan



Annex - "A"

8



OFFICE OF THE DISTRICT HEALTH OFFICER,
PESHAWAR

Phone No 091 9225387
Fax No 091 9225467

TO BE SUBSTITUTED OF EVEN NO. & DATE

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. Shahar Yar Khan ex Faqir Hussain (Vice, Khyber Yasmin Ex - DAI MB) resident of Shahzeen Muslim Town House No. 216, Mohallah Hadda, District Peshawar is hereby appointed under Medical Boarded Out quota in District Health Office Peshawar as Ward Officer BPS - 08 in Basic Pay Scale (9900-440-23100) plus all other allowances as admissible to him as per Government rules. o*

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

1. He will be on probation for a period of one year.
2. His services will be subject to medical fitness.
3. He will not be eligible 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 terminated without any notice during the probation period, if his work and conduct is not satisfactory.
6. If he/she resigns from the service he will have to submit resignation in writing 30 days in advance carrying 1 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.

The above mentioned terms and conditions are acceptable to him/her. He/she should report to District Health Officer, Peshawar on 20/10/2020 and receive receipt of appointment.

Subscribed
District Health Officer,
Peshawar

Dated Peshawar the 20/10/2020

No 16933-63

- Copy forwarded to:-
1. As on file of District Health Office 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 Communication.

[Handwritten Signature]
District Health Officer,
Peshawar

9

Personal Information of Mr SHARYAR KHAN d/w/s of FAQIR HUSSAIN

Personnel Number: 00063401 CNIC: 1730123328177 M/F: M
Date of Birth: 20.04.1980 Entry into Govt. Service: 27.10.2020 Length of Service: 01 Year 11 Months 00.51

Employment Category: Active Permanent

Designation: WARD ORDERLI 81186482-0000 GOVT. OF KHYBER PAKH

DDO Code: PR8855-DISTRICT HEALTH OFFICER PESHAWAR

Payroll Section: 009 GPF Section: 001 Cash Center:

GPF A/C No: GPF Interest applied: GPF Balance: 21,557.00 (provisional)

Vendor Number: -

Pay and Allowances: Pay Band: BPS 17-2022 Pay Scale: Pay Band: BPS: 04 Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	15,350.00	1004	House R. & Allow 45% KP21	3,576.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2311	Dress Allowance - 1021	1,000.00	2312	Wash. Allowance 2021	1,000.00
2313	Integrated Allowance 1021	0.00	2341	Depr. Allowance 2022KP	1,551.00
2347	Adhoc Rel Al (5% 22/PS17)	1,551.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3003	GPF Subscription	-770.00	3501	Beneficial Fund	-600.00
4004	R. Benefits & Depr - Comp.	-300.00	6173	CMIS - 11-1-1-1-101-16	-1,750.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recoverable: 0.00
Payable: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 27,913.00 Deductions: (Rs.): -3,420.00 Net Pay: (Rs.): 24,493.00

Payee Name: SHARYAR KHAN

Account Number: 0010075725940013

Bank Details: ALLIED BANK LIMITED, 250309 Gul Bahar Colony Peshawar Gul Bahar Colony Peshawar, Peshawar

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: PESHAWAR Domicile: - Housing Status: No Official

Temp. Address:

City: Email: sharyarkhan20041986@gmail.com

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	Najaf Ali Shah	17301-1698582-3	7/5/1988	Najib Qasid	Matric
2	Tahir Shah	Amir Zada	17301-8905148-5	2/1/1992	Chowkidar	Matric
3	Muhammad Riaz	Nasar Ullah	17301-1675304-7	16/03/1995	Ward Orderly	Matric
4	Hamad	Shahid Hamid	17301-5090803-1	6/4/1997	Ward Orderly	Matric
5	Ashfaq Ahmad	Sulaiman Khan	17301-1814298-7	5/1/1999	Ward Orderly	BA
6	Ahmad Jan	Ghazal Khan	17301-1274726-3	30/04/1999	Najib Qasid	FA
7	Salman Shah	Fazle Gadar	17301-7456183-7	9/1/2003	Ward Orderly	FA
8	Fazal Rabi	Sahar Gul	17301-9586454-7	11/8/2006	Ward Orderly	Matric
9	Sahibzada Amir	Mukhtar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA, Health Diploma
10	Muhammad Ishaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology+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	Najib Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Najib Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torqat Auzai	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kirayat Shah	Neurooz 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	Qateem 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 Altal	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	Salman Misaah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti	BA
30	Shahid Islam	Faqir Gul	17301-8449980-2	16-1-2016	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-4164590-9	3/8/2016	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan			Najib Qasid	BSC

Annex - B

10

Sulaiman Mir Hasham

Syed Ullah 5/6
Sulaiman 5/6

District Health Officer
Peshawar

34	Fareed Ullah	Sher Zaman	17301-8762303-1	12/8/2016	Behishti	FAI
35	Umair Khan	Afridi Khan Safi	17301-4505337-1	3/8/2016	Nab Qasid	BA
36	Sabir Shah	Pervaiz Khan	17301-8066889-5	29/05/2017	Nab Qasid	FA
37	Waqar Younis	Zaiban Shah	17201-6576098-3	19/10/2018	Chowkidar	Matric+ Health Diploma
38	Syed Ghous Ali Shah	Shafaraz Khan	17301-9197840-5	19/10/2018	Ward Orderly	FSC
39	Muhammad Arif	Syed Abid Shah	17301-1800560-9	19/10/2018	Ward Orderly	MA
40	Muhammad Ihtisham	Faiz Muhammad	17301-2618886-7	19/10/2018	Ward Orderly	BSc
41	Zeeshan Ahmad	Djishad Khan	17301-2621626-3	19/10/2018	Ward Orderly	M.COM
42	Faisal Ahmad	Fareed Khan	17301-5237207-1	20/02/2018	Ward Orderly	BA
43	Muhammad Saboor	Habib ur Rehman	17301-6599340-5	3/10/2018	Ward Orderly	FA
44	Farooq Haider	Mahzoor 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	Ihtsan 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	Muqeen Qasim	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	Hanzza 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	Nighat Hussain	17301-6255930-7	27-10-2020	Ward Orderly	BSc Computer Science
62	Imran Shah	Johar Ali	17301-7058253-5	27-10-2020	Ward Orderly	SSC
63	Anwar ul Haq	Sabir Shah	17301-3206617-7	8/12/2020	Ward Orderly	FSC
64	Saiman Khan	Zia Ul Haq	17301-5541278-7	2/3/2021	Behishti	FA
		Dilwar Khan	17301-3443294-5		Ward Orderly	Matric

11

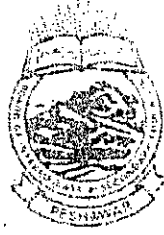
District Health Officer
Peshawar

Annex - "C"

12

26386

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



PESHAWAR
DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
Session 2002 (Annual)

Name: Shahar Yar Khan

Father's Name: Faqir Hussain

Roll No 31508

Subject	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	-	-	88	Eighty-Eight
2. Urdu	150	-	-	80	Eighty Only
3. Islamiyat (Comp)	75	43	-	43	Forty-Three
4. Pakistan Studies	75	38	-	38	Thirty-Eight
5. New Rizal	100	50	-	50	Fifty Only
6. Physics	100	35	21	56	Fifty-Six
7. Chemistry	100	36	14	50	Fifty Only
8. Biology	100	42	20	62	Sixty-Two

Total 850

467-C Four Hundred Sixty-Seven Only

Remarks

[Signature]
ACCOUNTS OFFICER
Shyhr Girls Medical College
Hayatabad Peshawar

[Signature]

Checked By: _____

Date: 29-08

Note: Error: _____

Knacker and: _____

Red

iso (KBSoh)

Controller of Examinations

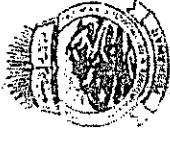
Signature: _____

Signature: _____

S.No. 237785

Roll No. 31508

ACCOUNTS OFFICER
Khyber Girls Medical College
Hayatabad Peshawar



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION 2002 - ANNUAL
(Science Group)

This is to Certify that

Shahar Yar Khan

Son / Daughter of

Faqir Hussain

and a student of

Govt. Technical High School, Gulbahar, Peshawar City

has passed the Secondary School Certificate

Examination of the Board of Intermediate and Secondary Education, Peshawar held in

March/April, 2002 as a

Regular

candidate. He / She obtained

467 Marks out of 850 and has been placed in Grade

C

Representing

Good

The Candidate passed in the following subjects:

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

He / She has been awarded Grade

B

on the basis of internal assessment by the institution concerned.

Date of birth according to admission form

April 20, 1986

[Signature]
Asstt Secretary

[Signature]
Secretary

13

39721

14

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



PESHAWAR - PAKISTAN
DETAILED MARKS CERTIFICATE
 INTERMEDIATE (ANNUAL) EXAMINATION, 2004
 HUMANITIES (Part-II)

Name : SHAHARYAR KHANFather's Name : FAQIR HUSSAINRoll No: 72221

Subjects	Marks	Marks Obtained					Marks in Words
		Part-I		Part-II		Total	
		Theory	Pract	Theory	Pract		
English	200	33	--	41	--	74	Seventy-Four
Urdu	200	60	--	61	--	121	One Hundred Twenty One
Islamic Education	50	32	--	--	--	32	Thirty-Two
Pakistan Studies	50	--	--	26	--	26	Twenty-Six
Islamic History	200	62	--	64	--	126	One Hundred Twenty-Six
Civics	200	55	--	50	--	105	One Hundred Five
Islamic Studies	200	66	--	59	--	125	One Hundred Twenty-Five
Total : 1100						609-C	Six Hundred Nine Only
Remarks :							

[Signature]
 ACCOUNTS OFFICER
 Shybr Girls Medical College
 Hayatabad Peshawar

Checked By : _____

Date : 31 July, 2004

Note: *not* / Omissions accepted

Computer Cell BISE, Peshawar.

[Signature]
 ACCOUNTS OFFICER
 Alama Iqbal Open University
 Regional Campus Peshawar

[Signature]
 Controller of Examinations

S.No. 145296

Roll No. 72221

Group. Humanities



Board of Intermediate and Secondary Education Peshawar N.W.F. Pakistan INTERMEDIATE EXAMINATION

[Signature]
ACCOUNTS OFFICER
Shyba Girls Medical College
Havelabad Peshawar

SESSION 2004-ANNUAL

This is to Certify that Shaharyar Khan Son of Faqir Hussain
and a student of Govt Superior Science College Peshawar Registered No. 583 -B/ISSC-2002
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2004 as a Regular Candidate. He obtained 609 Marks out of 1100
and has been placed in Grade C Representing Good. The Examination was taken as a whole.

[Signature]
Asstt Secretary

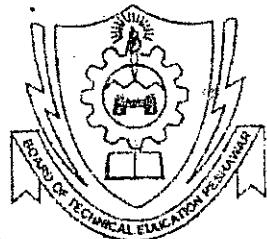
[Signature]
Secretary

15

This certificate is issued without alteration or erasure.

(16)
1265774
110706

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION PESHAWAR



DETAIL MARKS CERTIFICATE COMPUTER COURSE PART-II DIPLOMA IN INFORMATION TECHNOLOGY 2011

Name of Candidate SHAHARYAR KHAN
 Father's Name FAQIR HUSSAIN
 Roll No. 107026 Session IST TERM 2019
 Reg No. GCMS/P/DITR/2ND-19/2905
 Institute/College GOVERNMENT COLLEGE OF MANAGEMENT SCIENCES PESHAWAR



• Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Part-I Marks	700			561	
1 Introduction to DataBase	100 / 50	81	48	129	One hundred twenty-nine
2 MS Access	50 / 100	33	94	127	One hundred twenty-seven
3 E-Commerce & Web Technology	100 / 50	61	48	109	One hundred nine
4 Graphic Design	100 / 50	68	44	112	One hundred twelve
5 Project	100	-	98	98	Ninety-eight

1400

1136 One thousand one hundred thirty-six

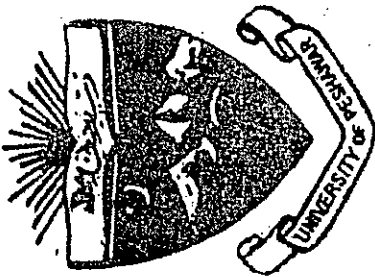
Shaharyar Khan
ACCOUNTS OFFICER
 Khyber Girls Medical College
 Kayatabad Peshawar

Prepared by Nasir Feroz
 Checked by _____

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.

293
CONTROLLER OF EXAMINATIONS



UNIVERSITY OF PESHAWAR

N.W.F.P.
(PAKISTAN)

Detailed Marks Certificate
Bachelor of Arts (Part-II), Annual Examination- 2006
Gov't Superior Science College, Peshawar

Roll No. 22359
Registration No. 2004-SP-1298

Name: **Shaharyar Khan**

Father's Name: **Faqir Hussain**

Certified that the candidate secured the following marks and is placed in **Second** division

SUBJECTS / PAPERS	Marks Obtained	
	Maximum Marks Allowed	In Words
English (Compulsory)	75	Twenty Four
Pakistan Studies	40	Twenty Six
Law	75	Fifty Two
Political Science	75	Twenty Five
B.A Part-I Marks	285	One Hundred and Thirty Six
Total:	550	Two Hundred and Sixty Three

Errors & omissions are subject to subsequent rectification.

The Examination was taken *as a Whole*

Declaration Date 30th September, 2006

Roll No. 006670

Prepared by *Asst*
30/09/06

Controller of Examinations
University of Peshawar

No. 2673

GOVT. SUPERIOR SCIENCE COLLEGE, PESHAWAR.



[Handwritten Signature]

PROVISIONAL AND CHARACTER CERTIFICATE

CHIEF ACCOUNTS OFFICER
Ayub Khan Medical College
Hayatabad Peshawar

Shahyar Khan
Faiz Hassan

appeared from this College under Board's / University Registration No. 04-SP-1298
and Roll No. 22359 in the Annual / Supplementary Examination, 2006
by the Board of Intermediate and Secondary Education, Peshawar/University of Peshawar
and has been declared successful in the said examination according to the Cassette
notification of the aforesaid examination.

Division/Grade with 2nd 263 marks.
He was a regular student of this College of 2004-06 4th year bearing
Admission No. 06A-2060 during the session 2004-06
His character and conduct during his stay in this College was Good

Prepared by: [Signature]

Checked by: _____

Date: 9/2/06



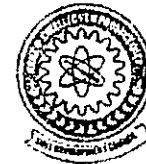
[Signature]
Principal,
Govt. Superior Science College,
Peshawar

S. No. 000643

Reg No. 126/011

SKILL DEVELOPMENT COUNCIL PESHAWAR

A JOINT PROJECT OF NATIONAL TRAINING BUREAU
GOVT. OF PAKISTAN, ILO, WORLD BANK & EFP.



CERTIFICATE

This is to certify that

Mr / Mrs ABDUL KARIM *No / D/o* PAKISTAN

has successfully completed Weeks Office Automation Course held at Technical Training Centre Peshawar
from 01-06-2005 *to* 30-08-2005

This course was arranged through Council for Promotion of Information Technology and Emerging Sciences.

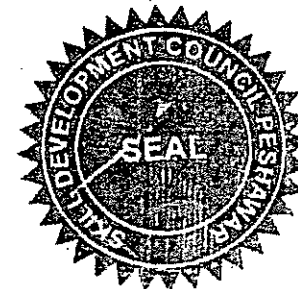
In recognition thereof this certificate is awarded to him/her

On the 17th *day of* DECEMBER 2005

Chief Administrative Office
CITES

Principal
Technical Training Centre
Peshawar

Chairman
Skill Development Council
Peshawar



Signature
Member of the Medical Council
Peshawar

19



University of Peshawar

Pakistan

Detailed Marks Certificate

Master of Arts in Islamiyat

Final
Annual Examination 2013

District Peshawar



Private

Name: **SHAHAR YAR KHAN**
Father's Name: **FAQIR HUSSAIN**

Gender: **Male** Roll No: **38397**
Registration No: **2004-SP-1298**

Division: **2nd**

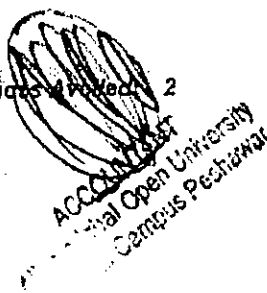
Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Al Quraan Translation 2nd Half & Com with Grammar-VI	100	51	Fifty One
Principles of Islamic Jurisprudence-VII	100	50	Fifty Only
Islam & Other World Religions-VIII	100	64	Sixty Four
Islam & Contemporary Muslim World-IX	100	66	Sixty Six
Islam, Modren Thought & Islamic Law of Inheritance-X	100	60	Sixty Only
Viva Voce	100	55	Fifty Five
Previous 20547: Annual-2010	500	282	Two Hundred and Eighty Two
Final	1100	628	Six Hundred and Twenty Eight

[Signature]
ACCOUNTS OFFICER
Khyber Girls Medical College
Mayatabad Peshawar

Errors & omissions are subject to subsequent rectification

The Examination was taken in Parts
Examination held From 21-Aug-2013 to 30-Sep-2013
Result Declared on Friday, January 17, 2014
Issue Date: 17-Jan-2014
8:22 pm

Changes of Project - 2



[Signature of Prof. Dr. Rashid Khan]

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

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: 17-06-2022.

Your Sincerely,

All qualified Class-IV staff

- SSN (S&D)
- AS - (DEV)
- AS - MTE
- CH - (SERV)
- DFO
- DS - (S&D)
- DS - (Comp)
- SO - B-I
- SO - B-II

[Handwritten signatures and initials]

[Signatures: Anwar, Amin, Zubair, etc.]



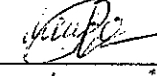
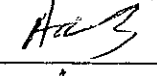
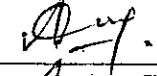
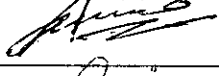
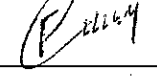
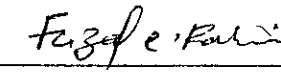
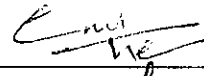
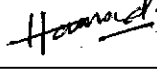
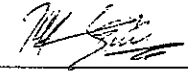
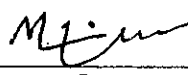


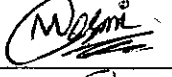
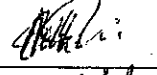
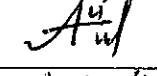
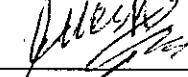
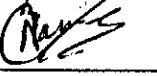




[Signatures: T-Anwar, Saad, etc.]

[Signatures: Shahab, Nurwaq, etc.]

P.T.O

Ali Ali Ali Tahir
Jawahir Amir Ali Ali
Fazal Ali Ali Ali
Nasir Ali Ali Ali
Sahib I Ali Ali
Hamid

Names, Scales and Signatures of Candidates

<u>Sr No.</u>	<u>Name of Candidate</u>	<u>Scale</u>	<u>Signature</u>
1.	Abdul Shahab	BPS-01	
2.	Ahmad Jan	BPS-01	
3.	Amir Khan	BPS-04	
4.	Aqib Zahoor	BPS-03	
5.	Asfandyar Khan	BPS-02	
6.	Asif Naveed	BPS-02	
7.	Fareedullah Safi	BPS-03	
8.	Fazal-e-Rabi	BPS-02	
9.	Ghulam Mujtaba	BPS-02	
10.	Hamad	BPS-02	
11.	Haroon-ur-Rasheed	BPS-03	
12.	Imran Khan	BPS-03	
13.	Izzat Ullah	BPS-01	
14.	Jahanullah Khan	BPS-01	
15.	Mueen Qasmi	BPS-04	
16.	Muhammad Altaf	BPS-03	
17.	Muhammad Arif	BPS-04	
18.	Muhammad Ihtisham	BPS-04	
19.	Muhammad Nouman	BPS-04	
20.	Muhammad Sulaiman	BPS-03	
21.	Muhammad Tayyab	BPS-04	
22.	Muneer Hussain	BPS-01	
23.	Nadeem Khan	BPS-03	


ATTENDED

21(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
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.

22

SECRET

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.



Annex - "F"

23

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

No. 14703 /DHO dated Pesh: 1/09/2022

To,

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar.

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

Sir,

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

The requisite information is hereby submitted as mentioned below:

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

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

Proforma for Junior Clerks initially recruited.

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

District Health Officer
Peshawar

HT/IKR-9
1755
17/10/2022
Health
24

SOFT REMINDER

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

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. 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.

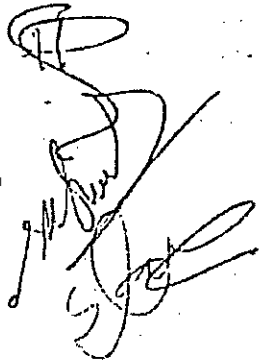
It is pertinent to mentioned that the seniority list of Class-IV Staff have already been prepared at DHO Peshawar against which promotions can be possible.




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
Mjla


50	129836			
Barrister M. Hassan Adil: ایڈووکیٹ				
RC-116028 بار کونسل ایسوسی ایشن نمبر:				
03038373453 رابطہ نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		

Service Tribunal Peshawar.

بعدالت جناب:

منجانب: Appellant.	دعویٰ: Sv- Appeal
شعبہ: خیبر پشاور	علت نمبر:
بنام: گورنمنٹ آف کینیڈا	موردہ:
گورنمنٹ آف کینیڈا	جرم:
	تھانہ:

یافتہ تحریر آگے

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

آن مقام پشاور کیلئے ایڈووکیٹ محمد حسن ایڈووکیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری ٹیکٹ فرم 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 مختار قانونی کو اپنے امراء یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر 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 Adil

26-11-22

المقوم:

بعدالت جناب

مقام پشاور کے لیے منظور ہے۔

شعبہ خیبر پشاور
فقیہ حسین کنہ شاہین مسلم ٹاؤن پشاور