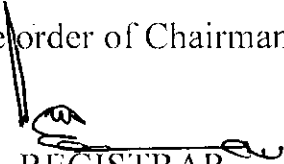


FORM OF ORDER SHEET

Court of _____

Case No.- 1853/2022

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. Saadullah 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. Saadullah Khan son of Sahibzada 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. 3483 /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. 1853/2022

Saadullah Khan

VS

Government of KP and Others

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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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7.	Departmental Representation dated 17-06-2022	'D'	19
8.	Letter no. 1776-856/Promotion cell, dated 18-08-2022	'E'	20
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Saadullah Khan

APPELLANT

Through

Hassan

BARRISTER

MUHAMMAD HASSAN ADIL

①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Saadullah Khan

Son of Sahibzada
Resident of Village Kochian, Warsak Road,
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 03.01.2012 (**Annex "A"**) in prescribed manner as Chowkidar (BPS-01) in the respondent no. 04's department. The appellant has rendered services for more than ten years in one and the same scale.
2. That the seniority list (**Annex "B"**) of the appellant-Class-IV is maintained separately in the office of respondent no. 04, whereas the seniority list of the employees-Class-IV of the respondent no. 3's office is maintained separately in their office. The services of the employee in the respondent no. 4's office is regulated by the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, hereinafter referred to as the Rules.
3. That the next post in the hierarchy to which the appellant can be promoted is that of Junior Clerk (BPS-11), and 33% quota is reserved by the Rules for the promotions amongst the Daftaries (BPS-04), Naib Qasids (BPS-03), Bailiff (BS-04), etc with 02 years' service experience as such, and who have passed Secondary School Certificate Examination.
4. That, numerous posts of the Junior clerk were advertised by the respondent No. 3 & 4 department. However, the same were filled by the respondent No. 3 by promoting the employees of his office only as well as through initial recruitment since long, but the respondents were taking no steps to fill the same by affording a chance of promotion to the appellant despite of the availability and allocation of post to the office of the respondent no. 04.
5. That though the appellant was having the required qualification (**Annex "C"**) at the time of advertisement of junior clerk post and the vacancies were also available at that time, but he was deprived, illegally, of the benefit of promotion at that juncture.
6. That the appellant along with other colleagues submitted an application / representation dated 17-06-2022 (**Annex "D"**) to the respondent-department for their promotion on the quota reserved for them. In response to application dated 17-06-2022, a letter was issued by respondent No. 03 vide letter no. 1776-856/Promotion cell, dated 18-08-2022 (**Annex "E"**), wherein the respondent No. 03 asked the respondent no. 04 to furnish the details of Junior Clerks who have been initially recruited as well as detail of Matriculate Class-IV who have been promoted in 33% quota. Following this, the respondent no. 04 vide letter No. 14703/DHO dated 01-09-2022 (**Annex "F"**) sent an answer to the respondent

No. 03 wherein the details provided were shown to be NIL, because all the posts, either made available / created in the office of respondent no. 04 or become available / vacant due to retirement etc, were used to be filled by the respondent no. 04 from the employees of his office and illegally ignoring the Class-IVs including the appellant from the office of the respondent no. 04. Needless to mention here that a reminder application dated 17-10-2022 (Annex "G") was also submitted to the department by the appellant along with other colleagues but the respondent's department didn't consider it necessary to even take up the file of the appellant into consideration.

7. That the appellant, realizing the violation of his rights, approaches this Hon'ble Court through instant appeal, *inter alia*, on the following grounds amongst others;

GROUND S:

- A. That the appellant was equipped with all the requisite qualification for promotion to the posts of Junior Clerk (BPS-11) long ago and also the vacancies were available but for no valid reason and illegally, the promotion was withheld and the posts were filled in through promoting the employee from the office of the respondent no. 03 as well as through initial recruitment by the respondent No. 03's office, unlawfully curtailing the right of promotion of the appellant; hence, as per the settled principal of law, the appellant is entitled to the back benefits from the date of his entitlement and the vacancies had occurred.
- B. That the appellant has a right and entitlement to the promotion as well as to the back benefits attached to the post from the day of his entitlement to the promotion and availability of the vacancies occurred.
- C. That the appellant being eligible to promotion in the year 2014 is required to be placed senior to the fresh candidates appointed or promoted after 2014 or after his entitlement as Junior clerk.
- D. That the appellant has been discriminated, which goes against the provision of Articles 25 and 27 of the Constitution, 1973.
- E. That the appellant has not been treated in accordance with law as against the provisions of Article 4 of the Constitution.

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

PRAYER:

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

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

Saadullah Khan

APPELLANT

Through

Hassaan

**BARRISTER
MUHAMMAD HASSAAN ADIL**

Advocate High Court

AFFIDAVIT

I, Saadullah Khan Son of Sahibzada, Resident of Village Kochian, Warsak Road, 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.

Saadullah Khan

DEIONENT



5

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2022

Saadullah 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 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
Saadullah Khan

APPELLANT

Through

Hassan

BARRISTER

MUHAMMAD HASSAN ADIL

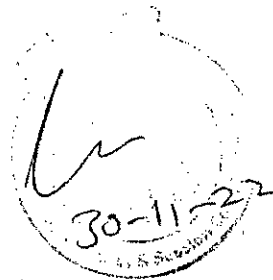
Advocate High Court

AFFIDAVIT

I, Saadullah Khan Son of Sahibzada, Resident of Village Kochian, Warsak Road, 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.

Saadullah Khan

DEPONENT



PAKISTAN National Identity Card

Name: Saad Ullah Khan

Father Name: Sahibzada

Gender: M Country of Stay: Pakistan

Identity Number: 17301-1655727-9 Date of Birth: 12.04.1991

Date of Issue: 16.03.2022 Date of Expiry: 16.03.2032

Holder's Signature

17301-1655727-9

QR Code

509971028795

کشمیر کا واسطے برقی شناختی کارڈ

OFFICE ORDER

(8)
Annex-"A"

Consequent upon the approval of the Departmental Selection Committee Health Department Peshawar held on 10/01/2012; in the office of the Executive District Officer Health Peshawar, Mr. Saadullah Khan S/O Sahibzada residence of Village Kochian, Warsak Road Peshawar, is hereby appointed as Chowkidar BPS-01 (4800-150-2300) plus usual allowances as admissible to him under the government servant rules subject to the following terms and conditions:

1. His will be on probation initially for a period of one year.
2. His service can be dispensed with during the probation period, if his work and conduct found satisfactory.
3. His appointment will be subject to medical fitness
4. He will not be entitled to any TADA for Medical examination and joining his first appointment.
5. 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.
6. As laid down vide 3 government of Khyber Pakhtunkhwa E&AD Notification No. E&AD(1-13)2005 dated 10/08/2005, he will not be entitled to pension or gratuity. However in lieu thereof, he will be entitled to receive such amount contributed by him towards the contributory provident fund along with the contributions made by the government to his account in the said fund.
7. 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 Executive District Officer Health Peshawar within 14 days of the receipt of this order

Sd/xxxxxx
Executive District Officer
(Health) District Peshawar

No. 5022/EDOH

Dated Peshawar the 31/1/2012

A copy is forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. PA to District Coordination Officer District Peshawar.
3. Mr. Saadullah Khan S/O Sahibzada residence of Village Kochian, Warsak Road Peshawar.
4. Personal file.
5. Accounts Section
For information and n/action.

Executive District Officer
(Health) District Peshawar

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

9



Personal Information of Mr SAAD ULLAH KHAN d/w/s of SAHIB ZADA

Personnel Number: 00658712 CNIC: 1730116557279 NTN:
 Date of Birth: 12.04.1991 Entry into Govt. Service: 31.01.2012 Length of Service: 10 Years 08 Months 002 Days

Employment Category: Active Temporary

Designation: CHOWKIDAR

81186482-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8855-DISTRICT HEALTH OFFICER PESHAWAR

Payroll Section: 009

GPF Section: 001

Cash Center:

GPF A/C No: 658712

GPF Interest applied

GPF Balance:

25,073.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 03

Pay Stage: 9

Wage type		Amount	Wage type		Amount
0001	Basic Pay	19,480.00	1004	House Rent Allow 35% KP21	3,542.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	262.00	2199	Adhoc Relief Allow to 10%	183.00
2311	Dress Allowance - 2021	1,000.00	2312	Washing Allowance 2021	1,000.00
2313	Integrated Allowance 2021	600.00	2341	Disgr. Red All 15% 2022KP	1,968.00
2347	Adhoc Rel Al 15% 22(PS17)	1,968.00	3155	Adi. Disp. Red All 2022KP	1,968.00

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 Fund311-10	-1,979.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	57,800.00	-1,927.00	55,873.00

Deductions - Income Tax

Payable: 0.00 Recovered till SEP-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 35,356.00 * Deductions: (Rs.): -5,576.00 Net Pay: (Rs.): 29,780.00

Payee Name: SAAD ULLAH KHAN

Account Number: 07600-00-5

Bank Details: THE BANK OF KHYBER, 000016 KHYBER BAZAR BR. PESHAWAR KHYBER BAZAR BR. PESHAWAR, Peshawar

Leaves: Opening Balance: Aailed: Entred: Balance:

Permanent Address:

City: PESH.

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: saadullah415@gmail.com

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	Zaffer Ali	Najaf Ali Shah	17301-1698582-3	7/5/1988	Nalb 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	Ghazal Khan	17301-1274726-3	30/04/1999	Nalb Qasid	FA
7	Salman 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 Aamir	Mukhtiar Ahmad	17301-05982459	12/8/2006	Ward Orderly	BA. Health Diploma
10	Muhammad Ishfaq	Mir Akbar	17301-9823680-1	28-11-2006	Ward Orderly	Mphil Microbiology-DT
11	Soheil Ashiq	Muhammad Ashiq	17301-4002508-5	12/1/2009	Sanitary Petrol	BA
12	Ghulam Mujtaba	Ghulam Mustafa	17301-7148125-9	26/12/2009	Ward Orderly	BA
13	Ijaz Ahmad	Taza Gul	17301-5419523-7	31-12-2009	Chowkidar	FA
14	Munir Hussain	Faqir Hussain	17301-1311673-1	23/02/2010	Nalb Qasid	Matric
15	Naveed Khan	Muhammad Nawaz Kham	17301-6584400-1	3/3/2010	Nalb Qasid	BA
16	Muhammad Ibrar	Gul Mast Khan	17301-4408732-9	4/3/2010	Behishti	SSC
17	Muhammad Sulaiman	Musafar	17301-6117689-7	24-05-2010	Behishti	BA
18	Sajjad Ahmad	Liaqat Ali Khan	17301-8599458-3	13-06-2011	Behishti	FA
19	Torget Awzal	Javid Akhtar	16101-7487588-9	19-10-2011	Chowkidar	FA
20	Syed Kifayat Shah	Nauroz Shah	17301-1458161-3	31/12/2011	X-ray Attendant	MA+ Health Diploma
21	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 Naveed	Naveed Ahmad	17301-5904442-3	31/12/2012	X-ray Attendant	FA
24	Muhammad Akraf	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	Afsandyar Khan	Musharaf Khan	17301-6596238-7	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 Qayyum	17301-5067106-3	30/03/2015	Ward Orderly	MA+ Health Diploma
29	Salman Misbah	Misbah Ud din	17101-4426272-5	7/4/2015	Behishti	BA
30	Shahid Islam	Faqir Gul		16-1-2016	Ward Orderly	Surgical Diploma
31	Muhammad Sulaiman	Qabil Khan	17301-8449980-3	3/8/2016	Ward Orderly	FSC
32	Murshid Ali	Gohar Khan	17301-4164590-9	3/8/2016	Nalb Qasid	BSC

Annex - "B"

10

Sudhar Ali /
Mir Aslam

Syed Ullah /
Sulaiman

District Health Officer
Peshawar

34	Fareed Ullah	Sher Zamian	17301-8762303-1	12/8/2016	Behishti	FA
35	Umair Khan	Afridi Khan Safi	17301-4505337-1	3/8/2016	Naib Qasid	BA
36	Sabir Shah	Pervaitz Khan	17301-8066889-5	29/05/2017	Naib Qasid	FA
37	Waqar Younis	Zaiban Shah	17201-6576098-3	19/01/2018	Chowkidar	Matric+ Health Diploma
38	Syed Ghous Ali Shah	Shafiqas 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	Faziz 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 Nouman	Zaka Ullah	17301-9416153-5	27/10/2020	Ward Orderly	FSC
51	Muhammad Arif	Noor Muhammad	17301-3280446-5	27/10/2020	Ward Orderly	BA
52	Muven 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	ESC+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	2/8/2021	Behishti	FA
		Dilwar Khan	17301-3443294-5		Ward Orderly	Matric (Med)

11

District Health Officer
Peshawar

Annex - "C"

12

S.No. PB 79507

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

Roll No: 81697
Group: SCIENCE



PESHAWAR

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

Saad Ullah Khan Son / Daughter of Sahib Zada

of HIRA MODEL SCHOOL MATHRA, PESHAWAR

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

Subjects	Marks	MARKS OBTAINED			
		Theory Paper A	Theory Paper B Or Practical	Total	In Words
1. English	150	-	-	74	Seventy-Four
2. Urdu	150	-	-	95	Ninety-Five
3. Islamiyat (Comp)	75	48	-	48	Forty-Eight
4. Pakistan Studies	75	47	-	47	Forty-Seven
5. Maths	150	-	-	87	Eighty-Seven
6. Physics	100	57	8	65	Sixty-Five
7. Chemistry	100	39	8	47	Forty-Seven
8. Biology	100	54	10	64	Sixty-Four
Total 900				527-C	Five Hundred Twenty-Seven Only
Remarks					

Date of Birth: 12th April, 1991

Checked by: _____

Issue Date: 15-07-2008

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.

Medical Officer
S.I.C. (S) of Taluk
Peshawar

S. No 025208

Roll No 81697

Board of Intermediate and Secondary Education
Peshawar

A. Q. J. P. Pakistan

Secondary School Certificate Examination

SESSION 2008- ANNUAL
(Science Group)



This is to Certify that Saad Ullah Khan Son of Sahib Zada

and a student of Hira Model School Mathra, Peshawar has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Peshawar held in April, 2008 as a Regular candidate. He obtained 527 Marks out of 900 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

1. English
2. Urdu
3. Islamiyat (Comp)
4. Pakistan Studies
5. Maths
6. Physics
7. Chemistry
8. Biology

Date of birth according to admission form April 12, 1991

Asstt Secretary

Medical Officer
AHC Peshawar
Kuchayla

13

Secretary

This certificate is issued without alteration or erasure.

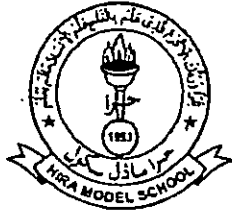
S. No. 147

Roll No. 81697

Hira Model School Mathera

WARSAK ROAD, PESHAWAR

Provisional Certificate



Session 2007-08 Annual

This is to certify that Mr./Miss Saad Ullah Khan

Son/Daughter of Sahib Zada

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education Peshawar held in April, 2008 as a regular candidate of Science/Arts Group. He/She obtained 527 out of 850 marks and has been placed in 2nd Division, Grade "C", representing Fair

He/She passed the following Subjects:

- | | |
|---------------|---------------------|
| 1- English | 5- <u>Maths</u> |
| 2- Urdu | 6- <u>Physics</u> |
| 3- Islmiyat | 7- <u>Chemistry</u> |
| 4- Pak. Study | 8- <u>Biology</u> |

His/Her date of birth according to the school record is

In Figure 12/04/1991 Words Twelveth April Ninty One

Registration No. 23-B/HMWP-2006 School Adm No. 1117

The result was declared on 15/07/2008 Dated 21/07/2008

[Signature]
Incharge

Medical Officer
BHC Gara Dujib
Kochian

[Signature]
PRINCIPAL
Hira Model School
Mathera Peshawar

15

S.No. PB

1232662

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No: 42383

PESHAWAR



DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2010

HUMANITIES (Part-I)

Saad Ullah Khan

Son / Daughter of Sahib Zada

of Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of April 2010 as a Private Student

Subjects	Marks	Marks Obtained				
		Theory Paper-A	Practical Paper-B	Total	Marks in Words	
English	100	52	—	52	Fifty-Two	
Urdu	100	50	—	50	Fifty Only	
Islamic Education	50	37	—	37	Thirty-Seven	
Islamic History	100	39	—	39	Thirty-Nine	
Civics	100	58	—	58	Fifty-Eight	
Islamic Studies	100	68	—	68	Sixty-Eight	
Total :				550	304	Three Hundred Four Only
Remarks :						

Medical Officer
RHC Sara Tajid
Kuchinda

Checked By : _____

Date of issue : 18-07-2010

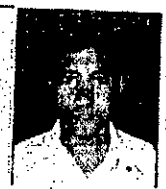
At Sab

Controller of Examinations

BOARD OF INTERMEDIATE & SECONDARY EDUCATION PESHAWAR



Roll No: 93105



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

Saad Ullah Khan Son / Daughter of Sahib Zada
of PESHAWAR

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

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	52	—	47	—	99	Ninety-Nine
Urdu	200	50	—	55	—	105	One Hundred Five
Islamic Education	50	37	—	—	—	37	Thirty-Seven
Pakistan Studies	50	—	—	26	—	26	Twenty-Six
Islamic History	200	39	—	33	—	72	Seventy-Two
Civics	200	58	—	53	—	111	One Hundred Eleven
Islamic Studies	200	68	—	67	—	135	One Hundred Thirty-Five
Total : 1100						585-C	Five Hundred Eighty-Five Only
Remarks :							

Medical Officer
RHC Gaja Taji
Kochi



Checked By : _____

Date of issue: 21-07-2011

Controller of Examinations

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

S NO. 62125



Roll No. 93105

Group. Humanities

Board Of Intermediate & Secondary Education PESHAWAR

ESJIBER Pakistanistan (Pakistan)



SESSION 2011-ANNUAL

This is to Certify that Saad Ullah Khan Son of Sahib Zada
 and a resident of Peshawar District Registered No. 70548-B/PVT-2010
 has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
 held in April, 2011 as a Private candidate. He obtained 585 Marks out of 1100 and
 has been placed in grade C Representing Good. The examination was taken as a whole.

[Signature]
Asst Secretary

This Certificate is issued without alteration or erasure.

[Signature]
Secretary

S. No. B 10295

10295



ROLL No. 6100

DIRECTORATE OF TECHNICAL EDUCATION & MANPOWER TRAINING

KHYBER PAKHTUNKHWA TRADE TESTING BOARD
PESHAWAR



Session A/2010-11

This is to certify that

Mr./Ms. SAAD ULLAH KHAN SID of Mr. SAHIB ZADA Resident of PESHAWAR
Registration No. BIT/PSH/CIT/10/D2 Trainee of BRAVO P.C. PESHAWAR appeared and passed

the **TRADE PROFICIENCY TEST** in accordance with the requirement of the Trade Testing Board Skill Standards for
(GEN. VLETT) prescribed by the Directorate of Technical Education and Manpower Training/Provincial Training Board
in the trade of CIT. The test was conducted by the Khyber Pakhtunkhwa Trade Testing Board in the
month of 25/02/11 He/She demonstrated the following standards of proficiency.

- 1. Practical 189/200
- 2. Theory 89/100

and in recognition thereof this **TRADE CERTIFICATE** is issued on the 20th day of the month of August; 2011

Medical Officer
Dr. Saira Taji

[Signature]
CHAIRMAN

[Signature]
SECRETARY

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 to 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

- SSM (B&D)
- AS - (DEV)
- AS - (ITE)
- CH - (SERV)
- DPO
- DS - (SED)
- DS - (Gr-2)
- SO - B-I
- SO - B-II

(Handwritten signatures and initials covering the list of recipients)

So IV

Chohan

T-Angal

Arif

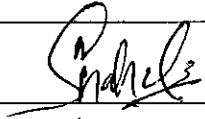

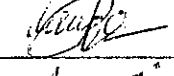
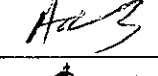
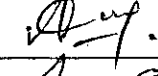
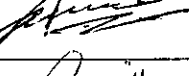
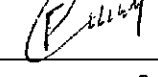
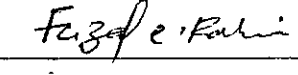
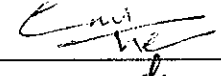
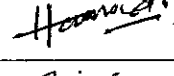
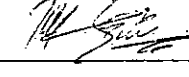
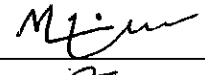
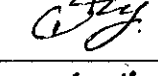

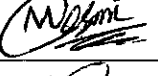
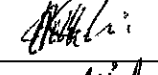
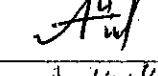
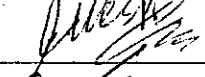
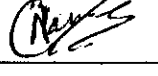


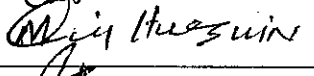

Shahab

Nurva

P.T.O.

Ali Ali Ali Tahir
Jasman Amir Ali Ali
Fuzal & Putri Utsho Ali Ali
Nawson Ali Ali Ali
Sandwich I Ali Ali
Hamud Ali Ali Ali

Names, Scales and Signatures of Candidates

<u>Sr No.</u>	<u>Name of Candidate</u>	<u>Scale</u>	<u>Signature</u>
1.	Abdul Shahab	BPS-01	
2.	Ahmad Jan	BPS-01	
3.	Amir Khan	BPS-04	
4.	Aqib Zahoor	BPS-03	
5.	Asfandiyar 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	

(H)
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


ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

20

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

Annex - "E"

No. 1776-856 Promotion Cell Dated Peshawar the 18/08/2022

To

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

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

Memo:


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

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

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

Proforma for Junior Clerks initially recruited.

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


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



Annex - "F"

21

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

No. 14703 /DHO dated Pesh: 10/9/2022

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

MINICA-9
SOFT REMINDER

To,

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

1755
17/10/2022
HEALTH

(22)

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

Sir,

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

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

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




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

We would be obliged, please.


Date: 13.10.2022

Yours Sincerely,
All Qualified Class-IV Staff

*Chahida
Mujt*
[Signature]

50	129865	  
Barrister M. Hassan Adil ایڈووکیٹ		
BC-116028 بار کونسل ایسوسی ایشن نمبر:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ Service Tribunal, Peshawar
0303-8373453 رابطہ نمبر:		

بعدالت جناب:

Appellant: منجانب 	Sy. Appeal: دعویٰ _____: عدالت نمبر _____: صورت _____: جرم _____: تھانہ
---	---

بامت تحریر آگے

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

آن مقام جسٹس سید محمد حسان عادل کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا طرفہ 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 کے لئے ہر اور ماہیہ سمجھائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو ترمیم ہر جانہ 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

المرقوم: Armacall

العبد _____

مقام پشاور

سید اللہ خان و مہ صاحبزادہ کین 19 سک 1 اور پشاور

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔