

Appeal No. 15794/2020  
Zulfiqar Ali Khan vs Govt

02.07.2021

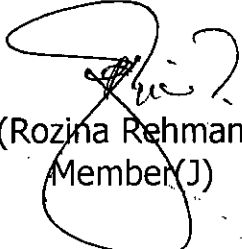
Mr. Shah Faisal Ilyas Advocate counsel for appellant  
present.

Muhammad Adeel Butt learned Additional A.G for  
respondents present.

Former has placed before us a copy of office order  
dated 17.05.2021 regarding appointment of appellant by  
promotion with the request for withdrawal of the appeal  
reserving as rights for legal remedies if needed. The appeal is  
dismissed as withdrawn with permission for the pursuit of  
legal remedies. File be consigned to the record room.

Announced

02.07.2021

  
(Rozina Rehman)  
Member(J)

  
Chairman

22.04.2021

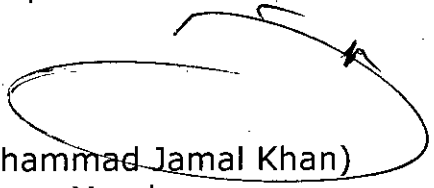
Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 02.07.2021 for the same as before.

  
Reader

24.02.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Ghulam Sarwar, Office Assistant, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments. Last chance is given to the respondents for filing of written reply/comments on 15.03.2021 before S.B. Respondents are restrained from making appointments against the promotion quota to the extent of appellant.

  
(Muhammad Jamal Khan)  
Member

15.03.2021


Due to tour of Camp Court Abbottabad and shortage of Members at Principal Bench Peshawar, the case is adjourned to 02.04.2021 before S.B.

  
Reader

02.04.2021

Appellant in person and Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Nisar, Monitoring Officer for official respondents No. 1 to 3 present. None present on behalf of private respondents No. 4 & 5 nor written reply/comments on their behalf submitted hence, they are proceeded against ex-parte.

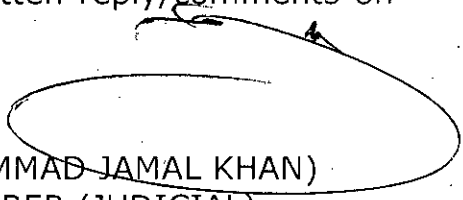
Official respondents No. 1 to 3 failed to furnish written reply/comments despite last chance, therefore, the appeal in hand is posed to D.B for arguments on 22.04.2021. Respondents are restrained from making appointments against the promotion quota to the extent of appellant.

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

06.01.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General, for the respondents are also present.

Neither written reply on behalf of respondents submitted nor any representative on their behalf is present, therefore, notices be issued to them for submission for written reply/comments. File to come up for written reply/comments on 21.01.2021 before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

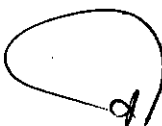
21.01.2021

Counsel for appellant present.

Noor Zaman Khattak learned District Attorney alongwith Ghulam Sarwar Superintendent for respondents present.

Representative of respondents made a request for short adjournment in order to submit reply/comments; granted. To come up for written reply/comments on 24.02.2021 before S.B.

Annexed with the memo of appeal is an application for grant of interim relief by restraining the respondents from making further appointments under promotion quota. Notice of the said application has already been served upon the respondents. Respondents are restrained from making appointments against the promotion quota to the extent of appellant.

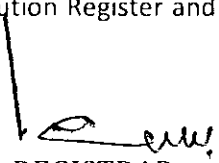

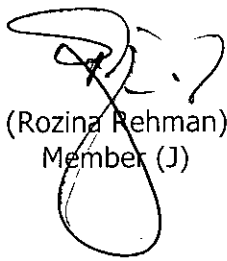
  
(Rozina Rehman)  
Member (J)

Form- A

FORM OF ORDER SHEET

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

Case No.- 10376 / 2020 **15794**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/11/2020	<p>The appeal of Mr. Zulfiqar Ahmad resubmitted today by Mr. Shah Faisal Ilyas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	09.12.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/12/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 06.01.2021 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

Appellant Deposited  
Security & Process Fee  
09/12/20

The appeal of Mr. Zulfiqar Ali Khan son of Abdul Sattar Ward Attendant DHQ Hospital Nowshera received today i.e. on 10.11.2020 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 may be got signed by the appellant.
- 2- Appellant is the employee of the health department while rules attached with the appeal (Annexure-F) are the rules of revenue department, relevant rules may be placed on file.

No. 3816 /S.T,

Dt. 11/11 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Shah Faisal Ilyas Adv. Pesh.

Respected Sir,  
These Rules are based on Establishment Notification which extend to Health department too, These are place before the bench please, Re Submitted  
Regards  
Faisal  
16-11-20

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

Service Appeal No. \_\_\_\_\_/2020

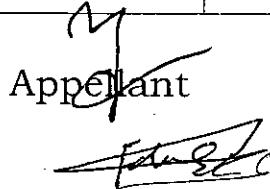
Zulfiqar Ali Khan. . . . . **APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

**I N D E X**

<b>S.No.</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Service Appeal with Affidavit		1-7
2.	Application for Interim Relief with Affidavit		8-10
3.	Addresses of the Parties		11
4.	Copies of the Appointment Order and Monthly Salary Slip	A	12-13
5.	Copy of the Employees Details and Commendation Letters	A/1	14-16
6.	Copies of the Seniority List and Promotion Order of Respondents No.4 & 5	B	17-19
7.	Copies of Duty Roster and Salary Slips	C	20-22
8.	Copy of Application dated 18.07.2020 vide Diary No.234	D	23
9.	Copy of Departmental Appeal dated 23.07.2020, vide Diary No.39138	E	24
10.	Copy of Rules	F	25-28
11.	Wakalatnama		29

Through  Appellant

**SHAH FAISAL ILYAS**  
Advocate,  
High Court, Peshawar  
Cell: 0300-5850207

Dated: 09.11.2020

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

Service Appeal No. **15794** 2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. **14372**  
Dated **10/11/2020**

Zulfiqar Ali Khan S/o Abdul Sattar  
Ward Attendant (BPS-4),  
DHQ Hospital, Nowshera. . . . .

**APPELLANT**

**VERSUS**

1. Medical Superintendent, District Head Quarter Hospital, Nowshera.
2. Director General, Health Services, District Courts Premises, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Ikram Jan S/o Muhammad Saleem, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.
5. Naeem Khan S/o Raheem Khan, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.

.....**RESPONDENTS**

**Filed to-day**

**Registrar**

**10/11/2020**

**SERVICE APPEAL U/S 4 OF THE**

**KHYBER PAKHTUNKHWA SERVICES**

**TRIBUNAL ACT, 1974.**

**Re-submitted to -day  
and filed.**

**Registrar**

**10/11/2020**



**Respectfully Sheweth:**

Facts giving rise to the instant Service Appeal are as under:-

1. That appellant was appointed as Ward Orderly (Class-IV) on 15.02.2008 and made arrival well within time and successfully completed two years probation, and till date performing his duty with zeal and devotion, without a single complaint, while respondents No.4 & 5 were appointed in the year 2011 as per seniority list duly signed by respondent No.1. **(COPIES OF THE APPOINTMENT ORDER AND MONTHLY SALARY SLIP ARE ANNEX "A")**.
2. That total sanctioned posts of DHQ, Nowshera of Junior Clerk (BPS-11) are 07 and on 40% promotion quota respondents were legally bound to promote Class-IV to Junior Clerk, keeping in view, seniority-cum-fitness of the employees, and appreciation certificates are annexed. **(COPY OF EMPLOYEES DETAILS AND COMMENDATION LETTERS ARE ANNEX "A/1")**.
3. That respondent No.1 prepared a seniority list in utter violation of Rules, on the basis of getting matriculation

certificate and the same was malafidely not displayed, and promotion orders were passed on the strength of same in backdate. **(COPIES OF THE SENIORITY LIST AND PROMOTION ORDER OF RESPONDENTS No.4 & 5 ARE ANNEX "B")**.

4. That the malafide respondent No.1 is further clarified from the duty roster, wherein till May, 2020, respondents No.4 & 5 drew the salaries of Class-IV and in backdate, order of promotion was made. **(COPIES OF DUTY ROSTER AND SALARY SLIPS ARE ANNEX "C")**.

5. That in order to get the order of promotions, and the concern documents, application was moved to respondent No.1 on 18.07.2020, vide Diary No.234, but the same was provided after hectic efforts. **(COPY OF APPLICATION IS ANNEX "D")**.

6. That being aggrieved from the promotion order passed by respondent No.1 in favour of respondents No.4 & 5, appellant moved a departmental appeal on 23.07.2020, vide Diary No.39138, to respondent No.2 but after lapse of 90 days, the same was not disposed off. **(COPY OF DEPARTMENTAL APPEAL IS ANNEX "E")**.

7. That the appellant being aggrieved and having no other remedy except to file instant service appeal, inter alia, on the following grounds;

**GROUND S:**

- A. That the seniority list is prepared on the basis of acquiring requisite qualification, and the Rules of seniority on the basis of seniority in appointment-cum-fitness is violated, thus the act of the respondent No.1 is based on malafide and in violation of Rules. **(COPY OF RULES IS ANNEX "F")**.
- B. That promotion order of respondents No.4 & 5 being junior to the appellant is illegal, unlawful and without lawful authority, therefore, needs to be set aside.
- C. That Rules of promotion of a civil servant are totally violated, just in order to promote blue-eyed on various considerations.
- D. That act of the respondents by not promoting the appellant is illegal, unlawful, void and ineffective, hence needs interference of this Hon'ble Tribunal.

- E. That the act of the respondents is also against the principles of natural justice, because the appellant is penalized for that wrong, which he has not done.
- F. That the act of the respondents is based on malafide and has been passed in arbitrary manner by bypassing the relevant law and facts on the subject.
- G. That performance of appellant was upto the standard and is entitled to be promoted.
- H. The appellant in his credit has more than 12 years continuous, regular and unblemished service record wherein he was never ever been punished for any disciplinary action.
- I. That no meaningful/ purposeful chance of personal hearing has been afforded to the appellant by the competent authority, so far.
- J. That prior to this, various Departments and Health Department cases had already decided in favour of the employees, thus the appellant is also entitled to be treated equally.
- K. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

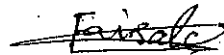
It is, therefore, humbly requested that on acceptance of this Service Appeal;

- i. the promotion order dated 30.11.2019 vide No.7197-7200 and 7192-96 DHQ NSR of respondents No.4 & 5 may graciously be declared as illegal, unlawful, without lawful authority and of no legal effect, and;
- ii. direct respondents to promote appellant to the post of Junior Clerk with all back benefits;
- iii. any other relief, not specifically asked for, which this Hon'ble Tribunal deems fit and appropriate may also be granted in favour of appellant.



Appellant

Through



**SHAH FAISAL ILYAS**

Advocate,

High Court, Peshawar

Dated: 09.11.2020

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

Service Appeal No. \_\_\_\_\_/2020

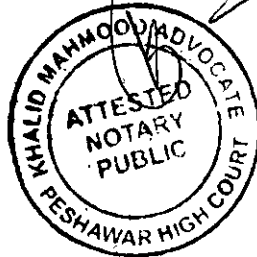
Zulfiqar Ali Khan. . . . . **APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

**A F F I D A V I T**

I, Zulfiqar Ali Khan S/o Abdul Sattar, Ward Attendant (BPS-4), DHQ Hospital, Nowshera, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2020

Zulfiqar Ali Khan. . . . . **APPLICANT/APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

**APPLICATION FOR GRANT OF  
INTERIM RELIEF BY RESTRAINING  
THE RESPONDENTS FROM MAKING  
FURTHER APPOINTMENTS TILL  
FILLING THE POSTS AMONGST  
PROMOTES UNDER PROMOTION  
QUOTA, TILL THE FINAL DISPOSAL  
OF THE CASE.**

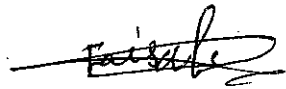
**Respectfully Sheweth:**

1. That the above mentioned service appeal is being filed by the applicant/ appellant, in which no date of hearing has yet been fixed.
2. That on the face of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.

3. That the balance of convenience also in favour of applicant/ appellant.
4. That if the interim relief is not granted, then the applicant/ appellant would sustain an irreparable loss.
5. That grounds of main appeal may be considered as part and parcel of the instant application.

It is, therefore prayed that on acceptance of this application, the interim relief as prayed for in heading of the application may kindly be granted in favour of applicant/ appellant, till the final disposal of the main appeal.

Through Applicant/Appellant

  
**SHAH FAISAL ILYAS**  
Advocate,  
High Court, Peshawar

Dated: 09.11.2020



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

Service Appeal No. \_\_\_\_\_/2020

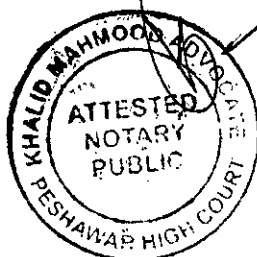
Zulfiqar Ali Khan. . . . . **APPLICANT/APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

**A F F I D A V I T**

I, Zulfiqar Ali Khan S/o Abdul Sattar, Ward Attendant (BPS-4), DHQ Hospital, Nowshera, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



3  
**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2020

Zulfiqar Ali Khan. . . . . **APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

**ADDRESSES OF THE PARTIES**

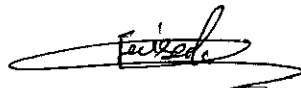
**APPELLANT:**

Zulfiqar Ali Khan S/o Abdul Sattar  
Ward Attendant (BPS-4), DHQ Hospital, Nowshera.

**RESPONDENTS:**

1. Medical Superintendent, District Head Quarter Hospital, Nowshera.
2. Director General, Health Services, District Courts Premises, Peshawar.
3. Secretary Health, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
4. Ikram Jan S/o Muhammad Saleem, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.
5. Naeem Khan S/o Raheem Khan, Junior Clerk (BPS-11), District Head Quarter Hospital, Nowshera.

Appellant  
Through



**SHAH FAISAL ILYAS**  
Advocate,  
High Court, Peshawar

Dated: 09.11.2020

12

**EXECUTIVE DISTRICT OFFICER  
HEALTH NOWSHERA.**

**APPOINTMENT ORDER**

As desired by the District Coordination Officer Nowshera, Mr. Zulfiqar Khan S/O Sattar Khan hereby appointed as Ward Orderly plus usual allowances as admissible under the Rules.

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

1. He will be on probation initially for a period of two years extendable for a further period that exceed.
2. His services can be dispensed with during the probation period, if his work and conduct found unsatisfactory
3. His appointment will be subject to medical fitness and verification of character and antecedents.
4. He will not be entitled to any TA/DA for medical examination and joining the first appointment.
5. He will be governed by such Rules and Orders as may be issued by the Govt for the category of Govt Servants to which he belongs.
6. As laid down vide Govt NWFP E&AD Notification No. E&A(1-3)/2005 dated 10/3/2005, he will not be entitled to pension or gratuity however in lieu thereof, will be entitled to receive such amount contributed by him towards the contributory provident fund alongwith 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 salary in the Govt treasury. However he will continue to serve the Govt. till his resignation is accepted by the competent authority.

If the above terms and conditions are acceptable to him he should report to the under signed for duty within 14 days of the receipt of this order.

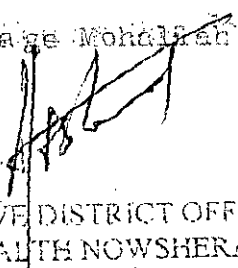
Sd-/XXXXXXXXXX  
EXECUTIVE DISTRICT OFFICER  
HEALTH NOWSHERA.

No 268-72 /E.D.O (H) Dated Nowshera the. 15/2 2008.  
Copy forwarded to the :-

1. P.S. to District Nazim District Nowshera.
2. District Coordination Officer Nowshera.
3. District Account Officer Nowshera.
4. Accounts Section of EDO(H) Office Nowshera.
5. Mr; Zulfiqar Khan S/O Sattar Khan of Village Mohallah Bano Khel Nowshera-Kalan.

For information and necessary action.

  
**ATTESTED**

  
EXECUTIVE DISTRICT OFFICER  
HEALTH NOWSHERA.

Government of Khyber Pakhtunkhwa

District Accounts Office Nowshera  
Monthly Salary Statement (May-2020)

13



Personal Information of Mr ZULFIQAR ALI KHAN d/w/s of SATTAR KHAN

Personnel Number: 00401163

CNIC: 1720121105637

NTN:

Date of Birth: 14.09.1978

Entry into Govt Service: 15/02/2008

Length of Service: 12 Years 11 Months 01 Days

Employment Category: Active Permanent

Designation: WARD ATTENDANT

80814324-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4306-District Headquarter Hospital Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No: 401163

Interest Applied: Yes

GPF Balance:

117,432.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 04

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,740.00	1000	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,560.00
2148	15% Adhoc Relief All-2013	313.00	2199	Adhoc Relief Allow @10%	221.00
2211	Adhoc Relief All 2016 10%	1,124.00	2224	Adhoc Relief All 2017 10%	1,474.00
2247	Adhoc Relief All 2018 10%	1,474.00	2264	Adhoc Relief All 2019 10%	1,474.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-830.00	3501	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till May-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 25,563.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 23,982.00

Payee Name: ZULFIQAR ALI KHAN

Account Number:

Bank Details:

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

*[Signature]*  
**ATTESTED**

(140122/18.05.2020/13:09:35) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

**ATTESTED**

Personnel No	Employee Name	Employee Group	POSITION	ID of related object	Job Description	BPS	OPEN/ FILLED
136830	MUHAMMAD SHUAIB	1	80669981	00101635	MEDICAL SUPERINTENDENT	19	FILLED
213600	SABRINA SIRAJ	7	80770429	00100622	CHIEF MEDICAL OFFICER	20	FILLED
189173	DR RAHMATULLAH	1	80770427	00100622	CHIEF MEDICAL OFFICER	20	FILLED
141898	WAHIDZAMAN	7	80741252	00100622	CHIEF MEDICAL OFFICER	20	FILLED
94457	DR NOOR ALAM	7	80741250	00100622	CHIEF MEDICAL OFFICER	20	FILLED
502188	DR. SHAZIA HAFEEZ	1	80669616	00100622	CHIEF MEDICAL OFFICER	20	FILLED
237661	DR ARSHAD UL ISLAM	7	80669933	00101041	DISTRICT SPECIALIST	20	FILLED
50186325	MUHAMMAD RAUF KHAN	1	80670016	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
141835	SADDEEQ ULLAH	1	80670014	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
137335	DR RAHIM IQBAL SHAH	1	80670013	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
141796	SYED MUHAMMAD TARIQ SHAH	1	80670012	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
231274	DR. MUJEEB UR REHMAN	1	80670002	00101758	ORTHOAEDIC SURGEON	19	FILLED
152190	DR-GUL RAHIM JAN	1	80670018	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
49717	DR EJAZ HUSSAIN ZAIDI	1	80670017	00101866	PRINCIPAL MEDICAL OFFICER	19	FILLED
114001	DR AMIR HAMZA KHAN	1	80670033	00102157	SENIOR ENT SPECIALIST	19	FILLED
588733	NAEEM KHAN	7	80785299	00101411	JUNIOR CLERK	11	FILLED
401522	IKRAM JAN	7	80785298	00101411	JUNIOR CLERK	11	FILLED
136663	IBNE AMIN	1	80669888	00101411	JUNIOR CLERK	11	FILLED
563747	SHAKEEL AHMAD KHAN	1	80669890	00101411	JUNIOR CLERK	11	FILLED
		1	80669889	00101411	JUNIOR CLERK	11	OPEN
		7	80785295	00101411	JUNIOR CLERK	11	OPEN
		7	80785296	00101411	JUNIOR CLERK	11	OPEN
		7	80785297	00101411	JUNIOR CLERK	11	OPEN

*[Signature]*  
**ATTESTED**

# Certificate of Appreciation. 15

جناب حضرت حسین یونین کونسل کابل ریور کا بہترین  
پولیو الیٹریٹرز ایسوسی ایشن ہے۔ آپ نے مسلسل چار سال  
تک یہ خدمات سر انجام دی۔ خاص طور پر ان حالات  
میں جب پولیو ورکرز کو نشانہ بنایا جاتا تھا اور پوک  
ضلع نوشہرہ پولیو میسنگ ورکر گئی تھی۔ تو آپ  
ان نامساعد حالات میں اپنی جان کی پروا نہ کیے بغیر  
آگے بڑھے اور اپنی یونین کونسل حسین یونین پولیو میسنگ  
آغاز کروایا۔

آپ ایک محنتی، ایماندار، نڈر اور فحاصل الیٹریٹرز ایسوسی ایشن ہے۔

*[Handwritten Signature]*

**ATTESTED**

ذریافت خان  
UCPO, Kabul River  
*[Handwritten Signature]*

**EXPERIENCE CERTIFICATE**

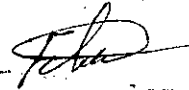
It is certified that Mr. Hazrat Hussain S/o Sardar Hussain has been working with me dental OPD DHQ Hospital nowshera as Dental Assistant, from 1994 to 2008.

He assisted me in various dental procedure i.e.

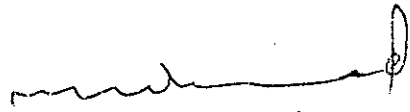
Oral surgery , <sup>Conservation</sup> ~~Conservation~~ ect.

His behavior conduct was very good during this period.

I wish him good luck in future.



**ATTESTED**



Dr. Muhammad Tariq  
Principal D/Surgeon  
DHQ Hospital Nowshera

### Seniority List of Class IV For the post of Junior Clerk DHQ Hospital Nowshera

S.No	Name	Father Name	Date of Birth	Matric Passing Year	Date Of Appointment	Basic SSC		
						1st	2nd	3rd
✓ 1	Hazrat Hussain	Sardar hussain	15-04-1966	1984	1994			328
X 2	Naeem khan	Raheem khan	13-12-1975	1991	03-07-11		414	
X 3	Ikram Jan	Muhammad saleem	04-10-73	1991	08-01-11		392	
4	Muhammad Tahir	Syed Bad Shah	23-08-1977	1994	(10-09-07)		477	
5	Muhammad ali	Murad Ali	02-02-76	1994	04-11-09			318
6	Intehab Gul	Mamoor Gul	16-11-1976	1994				352
7	Fayaz Muhammad	Fida Muhammad	17-02-1977	1995	20-07-2017		403	
8	Meer Bashar Khan	Ajmeer khan	25-08-1981	1996				330
✓ 9	Zulfiqar Ali	Abdus Sattar	14-09-1978	1998	15-02-2008			375
10	Ijaz Ahmad khan	Haya Muhammad	26-08-1985	2002			393	

*[Signature]*

**ATTESTED**

*[Signature]*

Medical Superintendent  
DHQ Hospital Nowshera





18

**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, MR. NAEEM KHAN S/O RAHEEM KHAN is hereby appointed as Junior Clerk BPS-11 (33% Reserved Quota for Class IV) plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
Medical Superintendent,  
DHQ Hospital, Nowshera

Date: 30/11/2019

No. 7197-7200 / DHQNSR

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Naeem Khan S/O Raheem Khan Resident of Marhati Banda, Post Office Akora Khattak, Tehsil & District Nowshera.
5. Office Record.

**ATTESTED**

\_\_\_\_\_  
Medical Superintendent,  
DHQ Hospital, Nowshera



19

**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 30-11-2019, MR. IKRAM JAN S/O MUHAMMAD SALEEM is hereby appointed as Junior Clerk BPS-11 (33% Reserved Quota for Class IV) plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd - \_\_\_\_\_  
Medical Superintendent,  
DHQ Hospital, Nowshera


No. 7192-86, DHQNSR

Date: 30/11/2019

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Ikram Jan S/O Muhammad Saleem Resident of Mohallah Zwani Khel, House No. 127, Nowshera Kalan, Tehsil & District Nowshera.
5. Office Record.

  
**ATTESTED**

  
Medical Superintendent,  
DHQ Hospital, Nowshera

	Place of Duty	Morning	Evening	Night
	<b>Supervision</b>	<b>Zulfiqar, Tahir Gul</b>	<b>Haris</b>	<b>Akhtar Gul</b>
01	M/S Office	Fazli Raziq, Hukam Khan, Naeem Khan Umar Zaman	Tariq	
02	Account Section	Waheed, Khaista Ahmad, Awal Khan, Bilal		
03	DMS Office	Niamat Ullah, Gul Zada, Riaz Ahmad, Asif, Zahid.		
04	Assistant Office	Muhammad, Himad, Mohsin, Awais Ali, Tashfeen		
05	Orthopedic OPD	Zahir Shah, Anis		
06	Skin OPD	Taqueer, Ibrar		
07	Cardiology OPD	Hazrat Hussain, Naveed.		
08	Medical OPD	Junaid . Zakir		
09	Surgical OPD	Sohail, Shahsam Khan.		
10	Eye OPD	Zaib, Irfan.		
11	ENT OPD	Ikram Jan, Safi Ullah, Nouman		
12	Children OPD	Anwar, Diyan.		
13	Psychiatrist OPD	Amir Khatkalay, Shehryar.		
14	Dental OPD	Ishaq. Waqar		
15	Chest OPD	Asad, Ishfaq Ullah		
	Urology OPD	Maaz		
16	Gastroenterologist	Hamad Ali . Shah Fahad		
17	Children Ward	Amir Mumtaz, Waseem Meher . Zahoor	Jamraz Khan Waqar	Rehan, Fayaz Iqbal
18	F Medical Ward			
19	Cardiology Ward			
20	Gynae, FS Ward	Sulman, Zahoor 2, Sajid.	Asad	Hasan, Salman
21	Mali	Nowsherawan, Rajo, Abad Khan, Hamza Khan		
22	Record Section	Waseem Sajjad, Imran, Qayyum, Safeer		
23	Physiotherapy Unit	Tahir, Misal Khan . Waqas		
24	MS Ward	Sufyan, Bilal, Bacha Muhammad.	Waseem . Meher	Hamza Iqbal, M Farooq
25	HCV Program	Falak Niaz, Khalid Khan.		
26	Ultra Sound	Shahzeb, Khalil-ur-Rehman.		
27	Waste Management	Hamad Amjid, Imran Khan		
28	OT	Rehan, Imran Rauf, Said Ali Shah		
29	Dispensary	Muhammad Ali, Mir Bashir		
30	Laboratory	Shahzad, Fayaz, Hussain, Zulfiqar, Saddam	Imran-3	Bilal, Amir Satar
31	Casualty	Hub Ali , Sabir Islam, Ihtisham 1, Imran Ali Ihtisham 2, Imran Ali, Bakht Munir Tehseen .	Essa Khan, Farzand, Habib Ullah, Shahid, M Amir, Asad, Ismail	Atta Ullah. Haneef . Shad Ali . Aizaz. Awais Qarni Muhammad Khalid
32	Main Store	Intikhab Gul, Shah Zaman, Shahab, Jalil		
33	X-Ray Unit	Abdur Rehman, Farzand	Zulqarnain, Saqib Nisar	Daryafat, Iftikhar
34	Labour Room	Miraj, Hamza Khattak, Sherzaib	Aman Ullah	Tayab, M:hammad, Saleem
35	Generator & T.Well	Falak Niaz 1, Irfan Wajid, Taimour	Akhtar Nawaz, Asif	Hamad Ali Shah, Asif Iqbal
36	Sunday	Labour Room Kaleem Ullah . , Ihtisham . Bilal Gynae, Hayat Khan Children, Generator & Tubewell Shahid Ali Khan, Majid Iqbal, MSW Awais Khattak, Jamal FSW		
37	Revenue counter	Waqas, Mahmood	Tufail	
39	Ambulance duty	Amir	Asmat	Nauman, Ubaid Khan.
40	Buzerg Shehree	Zaibullah		
41	Laundry	Inam Ur Rehman, Sunny		
42	DHIS	Muhammad Umar		
43	Pharmacist	Zarshaid, Nauman Ali		
44	ECG Room	Akhtar		
45	Try Age	Amjid , Sabir Shah	Aman Ullah	

**ATTESTED**

**MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA.**

Government of Khyber Pakhtunkhwa  
District Accounts Office Nowshera  
Monthly Salary Statement (May-2020)

21

Naeem Khan



Personal Information of Mr NAEEM KHAN d/w/s of RAHIM KHAN  
Personnel Number: 00588733 CNIC: 1720128135029  
Date of Birth: 13.12.1975 Entry into Govt. Service: 08.03.2011

NTN:  
Length of Service: 09 Years 02 Months 025-Days

Employment Category: Active Temporary

Designation: WARD ATTENDANT

80814324-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4306-District Headquarter Hospital Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

66,478.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 04

Pay Stage: 8

Wage type	Amount	Wage type	Amount
0001 Basic Pay	13,420.00	1000 House Rent Allowance	1,458.00
1210 Convey Allowance 2005	1,785.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	277.00	2199 Adhoc Relief Allow @10%	196.00
2211 Adhoc Relief All 2016 10%	1,050.00	2224 Adhoc Relief All 2017 10%	1,342.00
2247 Adhoc Relief All 2018 10%	1,342.00	2264 Adhoc Relief All 2019 10%	1,342.00

Deductions - General

Wage type	Amount	Wage type	Amount
3004 GPF Subscription	-830.00	3501 Benevolent Fund	-300.00
4004 R. Benefits & Death Comp.	-451.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till May-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 23,712.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 22,131.00

Payee Name: NAEEM KHAN

Account Number:

Bank Details:

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

**ATTESTED**

Government of Khyber Pakhtunkhwa  
District Accounts Office Nowshera  
Monthly Salary Statement (May-2020)

22



Personal Information of Mr IKRAM JAN d/w/s of MUHAMMAD DALEEM

Personnel Number: 00401522 CNIC: 1720162187563

Date of Birth: 04.10.1973 Entry into Govt. Service: 01.03.2008

NTN:

Length of Service: 12 Years 03 Months 001 Days

Employment Category: Active Permanent

Designation: WARD ORDERLI

80814324-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4306-District Headquarter Hospital Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

66,693.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 04

Pay Stage: 11

Wage type		Amount	Wage type		Amount
0001	Basic Pay	14,740.00	1300	House Rent Allowance	1,458.00
1210	Convey Allowance 2005	1,785.00	1300	Medical Allowance	1,500.00
2148	15% Adhoc Relief All-2013	313.00	2199	Adhoc Relief Allow @10%	221.00
2211	Adhoc Relief All 2016 10%	1,124.00	2224	Adhoc Relief All 2017 10%	1,474.00
2247	Adhoc Relief All 2018 10%	1,474.00	2264	Adhoc Relief All 2019 10%	1,474.00

Deductions - General

Wage type		Amount	Wage type		Amount
3004	GPF Subscription	-830.00	3301	Benevolent Fund	-300.00
4004	R. Benefits & Death Comp:	-451.00			-0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till May-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 25,563.00 Deductions: (Rs.): -1,581.00 Net Pay: (Rs.): 23,982.00

Payee Name: IKRAM JAN

Account Number: 10550484

Bank Details: UNITED BANK LIMITED, 210120 NOWSHERA CANTT NOWSHERA CANTT.

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

**ATTESTED**

محمد رفیق صاحب - ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا

عنوان: فارمیں حقوق میروٹوش آڈیٹر

منشیہ کا پی پیٹ میروٹوش کیس  
فائل نمبر ایف ایم ایف

منشیہ کا پی پیٹ

گورنمنٹ آف پاکستان - ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا

منشیہ کا پی پیٹ میں فیڈ بک کے ذریعے ایف ایم ایف کو پیشکش کرنا

فونڈ مینجمنٹ کے ذریعے ایف ایم ایف کو پیشکش کرنا

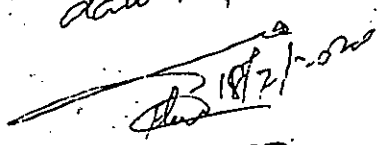
ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا  
ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا

- ① ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا
- ② منشیہ کا پی پیٹ میروٹوش کیس
- ③ فائل نمبر ایف ایم ایف

18-07-2020

No. 2524/D4e

date: 18/7/2020



**ATTESTED**

~~محمد رفیق صاحب~~

محمد رفیق صاحب  
ایف ایم ایف کے ذریعے ایف ایم ایف کو پیشکش کرنا

24

D.No = 39138

To:

Dated = 23-7-2020

The Director General,  
Health Services,  
Khyber Pakhtunkhwa.

Subject: -

APPEAL AGAINST THE ILLEGAL/ MALICIOUS PROMOTION  
ORDER ISSUED BY THE MEDICAL SUPERINTENDENT,  
DISTRICT HEADQUARTER HOSPITAL NOWSHERA

Respected Sir,

Most respectfully, I Zulfiqar Ali Khan, Ward Boy, District Headquarter Hospital, Nowshera hereby submitted the following facts for favourable consideration and request to set aside the above quoted illegal/malicious promotion order issued by the Medical Superintendent, District Headquarter Hospital Nowshera: -

The Medical Superintendent, District Headquarter Hospital Nowshera has promoted the following two officials from BPS-4 to BPS-11 in violation of promotion policy 2019, rules, regulation, procedure and seniority list who stand junior than this appellant. (Annexure-A)

1. Mr. Ikram Jan, Ward Boy.
2. Mr. Naeem Khan, Ward Attendant.

The appellant was appointed as Ward Orderly BPS-2 in Health Department, Nowshera vide No. 268-72/EDO (H) dated 15/2/2008 and joined duty on 16/2/2008 (Annexure-B) while the other two junior official as listed above were also appointed in the Health Department, Nowshera vide No. 263-67/Estt./2007-08 dated 15/2/2008 in BPS-1 reported arrival for duty on 1/3/2008 and vide Office Order No. Nil dated on 8/3/2011 in BPS-1 respectively (Annexure-C). Detail of our service record is also attached herewith as Annexure-D.

Accordingly both the officials are junior as they have less service on their credit than the appellant. However, they were promoted by the Medical Superintendent, District Headquarter Hospital Nowshera on the basis of favoritism and nepotism in violation of all established/prescribed rules, regulation, procedure and seniority as well as merit particularly promotion policy 2019 as stated above.

Due to this illegal and un-lawful act committed by the Medical Superintendent, District Headquarter Hospital Nowshera, this appellant has been deprived off from his due right which causes irreparable mental and financial losses. Even this illegal action of the Medical Superintendent, District Headquarter Hospital Nowshera is against the motive of the government regarding merit policy.

It is, therefore, requested that the matter may kindly be re-visited and be given my due right and saved from financial and mental loses.

Thanks.

  
**ATTESTED**

Sincerely Yours

  
Zulfiqar Ali Khan  
Ward Boy,  
DHQ Hospital Nowshera

23/07/2020

GOVERNMENT OF KHYBER PAKHTUNKHWA,  
BOARD OF REVENUE,  
REVENUE & ESTATE DEPARTMENT

25

Peshawar Dated the 23/01/2015

NOTIFICATION

No. 2074/Estt:III/135/SSRC

In pursuance of provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa, Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Revenue & Estate Department, in consultation with Establishment Department and the Finance Department, hereby lays down the method of recruitment qualification and other condition specified in column 3 to 5 of the Appendix to this Notification and applicable to posts borne on the cadre strength of Deputy Commissioners specified in column 2 of the said Appendix.

APPENDIX

S.No	Nomenclature of posts with BPS	Minimum qualification for appointment by initial recruitment	Age Limit	Method of Recruitment
1	2	3	4	5
1	Superintendent (BPS-17)			By promotion, on the basis of seniority-cum-fitness, from amongst the Assistants (BPS-16) of the district concerned with atleast five years service in the offices of respective Deputy Commissioner and Political Agents.

*[Signature]*

**ATTESTED**



2	Stenographer (BPS-16)	university, (ii) a speed of 70 words per minute in shorthand in English and 45 words per minutes in typing; and (iii) Knowledge of computer using MS Word, MS Excel.	26	such in the offices of respective Deputy Commissioners and Political Agents; and (b) forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Computer Operators with atleast five years service as such in the offices of respective Deputy Commissioners and Political Agents: Provided that if no suitable person is available for promotion then by initial recruitment.
3	Assistant (BPS-16)	At least Second Class Bachelor's Degree from a recognized University.	20 to 30 years	(a) Seventy five percent by promotion, on the basis of seniority-cum-fitness, from amongst the Senior Clerks with atleast five years service as Junior and Senior Clerk in the Offices of Deputy Commissioners and Political Agents of district concerned; and (b) twenty five percent by initial recruitment from amongst the candidates of the district concerned.
4	Head Clerk (BPS-14)			By transfer from amongst Senior Clerks (BPS-14) of the district concerned.
5	Stenographer (BPS-14)	(i) At least Second Class Intermediate or equivalent qualification from a recognized Board;	18 to 30 years	By initial recruitment from amongst the candidates of the district concerned.

*[Signature]*  
**ATTESTED**

		(ii) a speed of 50 words per minute in shorthand in English and 35 words per minute in typing; and (iii) knowledge of computer in using MS Word, MS Excel.		
6.	Senior Clerk (BPS-14)			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerks of the district concerned with atleast two years service as such.
7.	Computer Operator (BPS-12)	(i) At least Second Class Bachelor's Degree in Computer Science/ Information Technology (BCS/BIT four years), from a recognized university; (ii) at least Second Class Bachelor's Degree from a recognized University with one year Diploma in Information Technology from a recognized Board of Technical Education.	18-to 28 years	By initial recruitment from amongst the candidates of the district concerned.
8.	Pesh Inam (BPS-12)	Sanad in Dars-e- Nizami or a Sanad of Fazel-e-Arabi	18-to 32 years	By initial recruitment from amongst the candidates of the district concerned.
9.	Sub Engineer (BPS-11)	<u>Note: Preference will be given Hafiz-e-Quran.</u> Diploma in Associate Engineering in Civil Technology from Board of Technical Education with certificate in Computer Aided Design (CAD) from recognized Institution.	18-30 years	By initial recruitment from amongst the candidates of the district concerned.
10.	Junior Clerk (BPS-11)	(i) At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing.	18 to 30 years	(a) Thirty three percent by promotion, on the basis of seniority-cum-fitness, from amongst the Qasids and Naib Qasids including holders of other equivalent posts in the district concerned with two years service as such, who have passed Secondary School Certificate Examination; and (b) sixty seven percent by initial recruitment from

*[Handwritten Signature]*

**ATTESTED**

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the candidates of the district concerned.  
Note: For the purpose of promotion there shall be maintain a common seniority list of Qasid and Naib Qasid etc with reference to the date of their appointment:

Provided that no separate seniority list of Matric and non-matric BS-1 (Class-IV) employees can be maintained being single cadre. Their seniority shall be fixed with reference to the date of their regular appointment:

Provided further that where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possession the requisite qualification shall be promoted in preference to the senior official or officials.

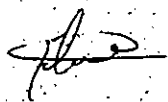
By initial recruitment from amongst the candidates of the district concerned.

11.	Reader/Record Keeper (BPS-7)	At least second division in Secondary School Certificate or equivalent qualification from a recognized Board.	18 to 30 years	By initial recruitment from amongst the candidates of the district concerned.
12.	Alhamad (BPS-5)	At least Second Class Secondary School Certificate or equivalent qualification from a recognized Board.	18-30 years	By initial recruitment from amongst the candidates of the district concerned.
13.	Driver (BPS-4)	Literate having LTV driving license issued by the competent authority. Preference will be given to those who have sufficient experience in driving, repair and maintenance of vehicles.	18-32 years	By initial recruitment from amongst the candidates of the district concerned.
14.	Khadim (BPS-4)	Literate. Note: Preference will be given to Hafiz-e-Quran	18-32 years	By initial recruitment from amongst the candidates of the district concerned.

  
**ATTESTED**

6.	Qasid (BPS-2)		---	By promotion on the basis of Seniority-cum-fitness, from amongst the Naib Qasids with two years as such.
17.	Naib Qasid/ Chowkidar/Sw eeper/Mali (BPS-1)	Literate.	18-32 years	By initial recruitment from amongst the candidates of the district concerned."

Sd/-  
 SECRETARY TO GOVERNMENT OF  
 KHYBER PAKHTUNKHWA  
 REVENUE & ESTATE DEPARTMENT



**ATTESTED**

o.207. Estt:VII/135/SSRC

Copy forwarded for information and necessary action to the:-

1. Secretary to Government of Khyber Pakhtunkhwa Establishment Department.
2. Secretary to Government of Khyber Pakhtunkhwa Finance Department.
3. Secretary to Government of Khyber Pakhtunkhwa Law Department.
4. Secretary Khyber Pakhtunkhwa Public Service Commission.
5. Registrar Peshawar High Court.
6. Accountant General Khyber Pakhtunkhwa.
7. All Commissioners / Political Agents in Khyber Pakhtunkhwa.
8. All Deputy Commissioners, in Khyber Pakhtunkhwa.
9. Private Secretary to Minister for Revenue Khyber Pakhtunkhwa.
10. Controller, Government Printing Press Peshawar with the request to publish the above notification in the official Gazette and supply 50 printed copies thereof to the undersigned for record.

  
DEPUTY SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA  
REVENUE & ESTATE DEPARTMENT

  
**ATTESTED**

# WAKALATNAMA

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. \_\_\_\_\_/2020

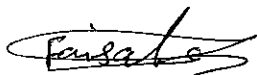
Zulfiqar Ali Khan. . . . . **APPELLANT**

**VERSUS**

Medical Superintendent,  
DHQ Hospital, Nowshera & others. . . . . **RESPONDENTS**

I, Zulfiqar Ali Khan S/o Abdul Sattar, Ward Attendant (BPS-4), DHQ Hospital, Nowshera, the petitioner in the above noted **Service Appeal** do hereby appoint and constitute **Shah Faisal Ilyas**, Advocate High Court and Federal Shariat Court of Pakistan, to appear, plead, act, compromise, withdraw or refer to arbitration to me/us as my/our Counsel in the above noted matter, I/we also authorized the said Counsel to file appeal, revision, review, application, and make any miscellaneous application in Criminal/Civil matters or arising out of the matter and to withdraw and receive in my/our behalf all sums and amounts deposited on my/our account in the above noted matter.

ATTESTED & ACCEPTED



**SHAH FAISAL ILYAS**

**(BC-09-1400)**

Advocate, High Court, Peshawar  
CNIC: 17201-8581525-7  
Off: 17-B, Haroon Mansion,  
Khyber Bazar Peshawar City  
(Cell: 0300-5850207)

CLIENT(S)



**Zulfiqar Ali**

CNIC: 17201-2110563-7

Cell: 0321-9736138

# انٹرنیٹ کی سہولتوں کے تحت

حکومت نے پٹرول 2.31 روپے ڈیزل 1.80 روپے اور مٹی کے

اگر انے پٹرول 10.68 روپے لیٹر اور ڈیزل 8.37 روپے لیٹر

اسلام آباد (انٹرنیٹ ڈیک) وفاقی حکومت نے پٹرول کی قیمت میں 2.31 روپے ڈیزل کی قیمت میں 2 روپے 31 پیسے کا اضافہ کر دیا ہے، پٹرول کی روٹے کا اضافہ پٹرول 10.68

اللہ ہی کیلئے ہیں مشرق و مغرب القرآن

## DAILY MASHRIQ PESHAWAR

پشاور عہدہ کے بانی سید تاج میر شاہ روزنامہ

# مشرق

مستقل شاعت کے 54 سال

ABC

## JOB OPPORTUNITIES

District Headquarter Hospital Nowshera invites applications through ETEA from eligible bonafide candidates (Male & Female) residents of District Nowshera for filling up the following posts of Junior Clerk BPS-11. Candidates must possess the minimum required qualifications and age as noted against post. Online application at [www.etea.edu.pk](http://www.etea.edu.pk) will be submitted from 05-01-2021 to 22-01-2021. After due date no application will be entertained.

S #	Post & Designation	No. of Post	Age (Years)	Qualification
1	Junior Clerk	04	18-30	1. At least 2nd Class Intermediate or Equivalent Certificate from recognized board. 2. English typing 30 word per minutes

### TERMS & CONDITIONS:

- Candidates will be provisionally allowed to appear in the ETEA screening test in District Nowshera. However detailed scrutiny will be earned out by the appointing authority and if any candidate is found ineligible in any respect at any stage of the recruitment process. He/she will be disqualified by the appointing authority.
- Interview calls letter will be issued to short listed candidates only.
- Shortlisting will be based on the screening test conducted by ETEA.
- Candidates should be eligible in all respect by the last date of receipt of the application i.e 22nd Jan, 2021.
- Incomplete applications and applications received after due date will not be entertained.
- Relaxation of age will be admissible as per existing Govt. Rules.
- The candidates working in Government / Semi-Government bodies should apply through proper channel.
- 33% quota reserved for Class-IV employees of DHQ Hospital Nowshera.
- Original documents along with one set of attested copies of all the relevant documents shall be produced at the time of interview.
- Number of vacancies can be decreased.
- Competent authority reserves the right to cancel / reject any application without assigning reason
- No TADA will be admissible for test / interview.

### HOW TO APPLY:

- Interested candidates may first visit [www.etea.edu.pk](http://www.etea.edu.pk) and apply for the post online.
- After successful submission of online application, a prescribed UBL online deposit slip (having token number) Project code & candidate personal information) will be generated.
- Take a printout of the generated UBL deposit slip & deposit Rs. 500/- as test fee (non-refundable) in any branch of UBL on that prescribed printed deposit slip of UBL.
- After successful fee submission. Please keep the original deposit slip (candidate copy) having bank desired stamp with yourself and do not share it with anyone else.
- After online apply, don't send documents/testimonials to ETEA office. copies of testimonials/documents will however, be provided by the candidates who qualify the screening test, as and when required by ETEA or the appointing authority for scrutiny purposes.
- Availability of online application form on [www.etea.edu.pk](http://www.etea.edu.pk) on 05-01-2021
- Last date for submission of online application is 22nd Jan, 2021.
- Candidates will be informed through SMS by ETEA to download and print their Roll No. Slips from [www.etea.edu.pk](http://www.etea.edu.pk). Candidates are directed to do not give ponded/converted mobile number.
- Test Date, Time & Venue will be mentioned on Roll No. Slip.
- No separate Call Letter will be issued to candidates for screening test through postal / communication.

### NOTE IMPORTANT:

- Please keep your documents and passport size scanned picture (soft copy) with you at the time of online applies.
- Read the instruction thoroughly before filling the online application form.
- ETEA shall verify deposit fee at any stage. If your payment is not verified, your candidature shall be rejected.
- Fee deposit on someone else CNIC shall not be verified.
- Unclaimed qualification will not be accepted.
- Keep the bank printed receipt safe with yourself and do not share it with anyone else.
- Applications of all those candidates who do not give correct information while filling the online application form will not be rejected only, but would be proceeded against and strict action shall be taken against them.

آپ کے لیے دستیاب ہے: 150 روپے کا ہونگے

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**OFFICE OF THE MEDICAL SUPERINTENDENT,  
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

**OFFICE ORDER**

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 10-05-2021, **MR. ZULFIQAR ALI KHAN S/O SATTAR KHAN** is hereby appointed as **Junior Clerk BPS-11 (33% Reserved Quota for Class IV)** with pay protection plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is fund forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd \_\_\_\_\_  
*Medical Superintendent,  
DHQ Hospital, Nowshera*

No. 007-011 /MS/DHQH- NSR

Date: 17/05/2021

**Copy forwarded to the:**

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Zulfiqar Ali Khan S/O Sattar Khan Resident of Flat No. 2, DHQ Hospital Nowshera.
5. Office Record.

*Medical Superintendent,  
DHQ Hospital, Nowshera*