

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

Muhammad Asad

Versus

Medical Superintendent KATH Hospital Mansehra.

~~Khyber Pakhtunkhwa~~
Service Tribunal

Petition No. 4017

Dated 2/3/2023

**APPLICATION FOR SUBMISSION OF COMMENTS BY REVIEWING
AND SETTING A SIDE THE PASSED ORDER AGAINST
RESPONDENTS NO.1 TO 3 REGARDING STRICKING OF THE 'RIGHT
OF DEFENCE' DATED: 22-2-2023.**

Dear Sheweth;

1. That the titled court case was affixed for adjudication on 22-2-2023 in which comments were sought to be submitted from respondent's no. 1 to 3.
2. That by following the proper SOP the finalized comments were signed from respondent's No. 1 and 2 after having perused and vetted by the concerned 'Addition Advocate General' the awaited comments were ready to submit before your majesty.
3. That on the last court date: 22-2-2023 another court case before the Peshawar High Court Abbottabad bench titled Malik Yasir Ali vs Chairman KPK PPRA was also affixed under cause list dated. 22-2-23 serial no.22. So the appearance of respondents were most urgent before High Court. *(Copy of cause list dated:22-2-23 and order sheet of High Court of the same date are appended as an annexure-A&B)*

4. That the titled case was affixed on under serial No. 1 before your lordship and the due to the defendant's late arrival the right of submission of comments is stricken down. Whereas the late arrival was not intentional as the appearance before the High Court was mandatory. ***(Copies of attendance sheet before the High Court Judge, High Court order dated: 22/2/23 and attendance sheet before AG of Service Tribunal dated: 22/2/23 and 23/2/23 are appended as an annexure C, D, E and F)***

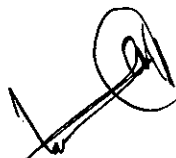
5. That application / review petition is right as per prevailing laws and nothing has been concealed from this Honorable Court.

PRAY:

It is humbly prayed that; in the view of upper mentioned facts your order may please be reviewed and comments may please be accepted.

Respondents No. 1 to 3

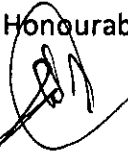
Through


**Medical Superintendent
KATH Mansehra.**

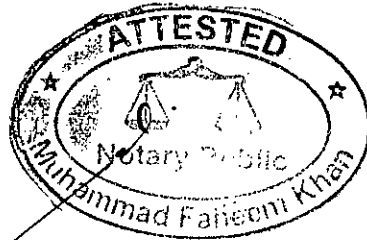
Dated: ___/___/23

AFFIDAVIT:

I, Dr Imdadullah, Litigation Officer KATH Mansehra representative of respondent No.1 to 3 do hereby solemnly affirm and declare on oath that the content of the foregoing comments are true and correct and nothing has been concealed from this Honourable Court.


Dr Imdadullah
(DEPONENT)

AFFIDAVIT:



7
12 / 02 / 2025

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

**DIVISIONAL BENCH [DB] CAUSE LIST FOR WEDNESDAY, THE 22nd,
FEBRUARY, 2023**

Anx "A"

BEFORE MR. JUSTICE WIQAR AHMAD, MR. JUSTICE FAZAL SUBHAN

MOTION CASES

- | | | | |
|--|---|---------------------------|-----------------|
| 1. CM No.369/22 (Correction)
in FAB No. 07-A/2022 | Kohistan Textile Pvt Ltd.
Sardar Muhammad Irshad | Vs Govt of KPK etc | (Date By Court) |
| 2. CrM No.101/23(other) in
Cr.A (Life) No. 327-A/2020 | Aqib
MAQBOOL HUSSAIN | Vs The State | |
| 3. CrM No.100/23(other) in
Cr.A (Life) No. 325-A/2020 | Saqib
MAQBOOL HUSSAIN | Vs The State | |
| 4. COC No. 99-A/2022 | Shoukat Zaman
Faizan Khurshid Tanoli | Vs Dr. Munawar Afridi etc | |
| 5. COC No. 19-A/2023 in WP | Kashif Shaheen
Abdul Saboor Khan | Vs Shakeel Hayat | |
| 6. COC No. 22-A/2023 in WP | Shakeel Ahmed
Malik Wasim Fazal | Vs Tariq Marwat etc | |
| 7. COC No. 24-A/2023 | Muhammad Waqas etc
Muhammad Arshad Khan Tanoli | Vs Rehmat Hasnaiei | |
| 8. Review Petition No. 03-
A/2023 in WP 1073/2022 | Mst. Nageena Bibi
Sardar Shahzad Akbar | Vs Govt of KPK etc | |
| 9. Review No. 05-A/2023 (in
WP) | Regional Head NBP etc
Mukhtar Ahmad Maneri | Vs Federal Govt etc | |
| 10. WP No. 163-A/2023(S) | Wajhat Ali
Aamir Malik | Vs Govt of etc | |

11. WP No. 171-A/2023(S)	Asifullah Kiran Ayub Tanoli Atd	Vs	Govt of KPK etc
12. WP No. 190-A/2023(S) with IR	Asad Ullah syed Ammar Hussain Shah	Vs	Govt of KPK etc
13. WP No. 225-A/2023(Mines)	Malik Aman etc S.M Munir	Vs	Govt of KPK etc
14. WP No. 226-A/2023(22-A) {u/s 489-F}	Iftikhar Rasool Waqar Ahmed Khan	Vs	State etc
15. WP No. 227-A/2023(22A) {u/s 489-F PPC}	Iftikhar Rasool Waqar Ahmed Khan	Vs	State etc
16. WP No. 228-A/2023(22-A) {u/s 489-F PPC}	Iftikhar Rasool Waqar Ahmed Khan	Vs	State etc
17. WP No. 229-A/2023(22-A) {u/s 489-F}	Iftikhar Rasool Waqar Ahmed Khan	Vs	State etc
18. WP No. 239-A/2023(Mines) with IR	Syed Jaffar Shah Mehdi Zaman Khan	Vs	Govt of KPK etc
19. WP No. 805-A/2019 (S)	Badar Shahzad Ahmed Farooq Khan	Vs	Govt. of Pakistan etc DAG Abbottabad Zahid Idrees Mufti
20. WP No. 1236-A/2019 (S)	Waqas Zeb MALOOF UD DYIAN	Vs	Board of Director COMSATS etc
21. WP No. 348-A/2022 (S)	Mudassar Sultan KHAN AFSAR JADOON	Vs	AD, Local Govt. Haripur etc
22. WP NO. 868-A/2022 (other)	Malik Yasir Ali Sultan Ahmed Jamshed	Vs	Chairperson KPK PPRA etc

(Date By Court)

SESTAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

Case No..... of.....

Date of Order of Proceedings

Order of other Proceedings with Signature of Judge (s)

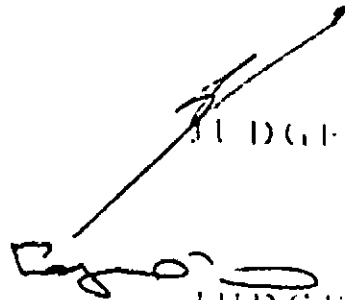
22.02.2023.

WP No. 868-A.2022.

Present: Mr. Sultan Ahmed Jamshed, Advocate for petitioner.

Mr. Sajid ur Rehman, AAG for official respondents.

The latter stated at the bar that parawise comments on behalf of respondent No. 4 have been filed. However, same are not available on file, hence, office is directed to locate the comments so filed on behalf of respondent No. 4 and place them on file. Adjourned to 06.04.2023.

JUDGE

JUDGE

OFFICE OF THE ADDITIONAL ADVOCATE GENERAL,
PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

Anx⁶⁰ C

Certified that Mr. Maghfoor Zaigham Designation. _____

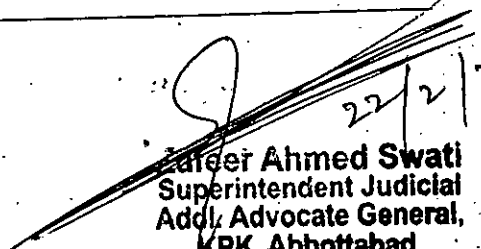
At office of the _____

Attended this office on Dated: 22-2-2023

In connection with case No. & titled: Malik Yasir Ali

Versus _____

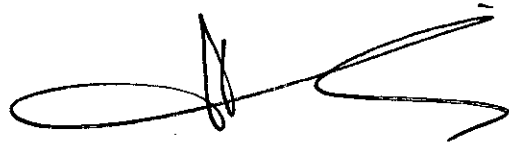
He has been paid no TA/DA by this office.


22/2/23
Saifur Ahmed Swati
Superintendent Judicial
Addl. Advocate General,
KPK, Abbottabad.

AM 10⁵⁶ 65.92
D

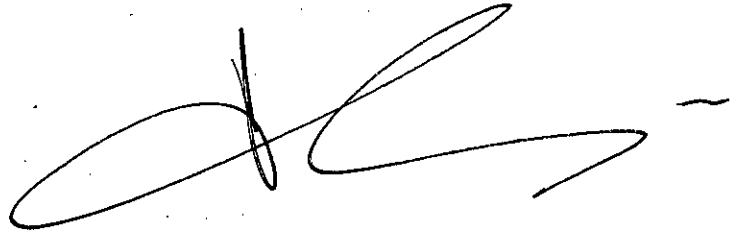
Attendance certificate

It is certified that Mr. Masfoor Zargom Litigation Assistant GPS (16) attended the Honorable Service Tribunal Peshawar (Emp Court Abbottabad) in case titled Muhammad A VS Melina Sumbul KATH Manshera on 23/2/2023.



Attornelce Certificates

It is certified that Mr. maghpor Zaylan litigation Assistant KATH member attended the Honorable Service Tribunal session (comp court session) in case titled Muhammad Assad vs medical superintendent KATH member on 22/2/2023.

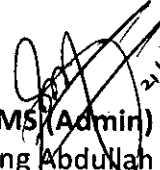


**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211: email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

Authority Letter

Certified that Dr. Imdad Ullah, DMS/Litigation Officer (BPS-19) of King Abdullah Teaching Hospital Mansehra is hereby authorized to attend the Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of undersigned in case titled Muhammad Assad VS medical Superintendent etc.

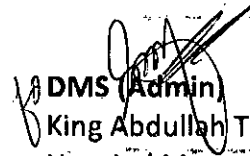

21/12/2023
DMS (Admin)
King Abdullah Teaching
Hospital Mansehra

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

Authority Letter

It is certified that Dr Imdadullah Litigation Officer BPS 19 of this Hospital is hereby authorized to attend the Peshawar High Court Abbottabad Bench on behalf of undersigned in case titled Malik Yasir Versus Chairperson KPK PPRA etc, on 22.02.2023.


DMS (Admin)
King Abdullah Teaching
Hospital Mansehra

Dated; 21.02.2023

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHAWA PESHAWAR

Service Appeal No 1153 of 2022

Muhammad Assad Appellant

VERSUS

1. The Government of Khyber Pakhtunkhwa through Secretary Health Services / Department Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Medical Superintendent, King Abdullah Teaching Hospital (KATH) Mansehra.
4. Hashim Waheed son of Muhammad Waheed resident of village Suffaida Tehsil and District Mansehra.

.....Respondents

Service Appeal

Comments on the behalf of Respondent No.01 To 03

INDEX

S/No.	Particulars of Documents	Annexure	Pages
1.	Comments / written reply	1-3
2.	Affidavit	-4
2.	Copies of letters Medical Superintendent KATH Mansehra & DGHS Peshawar	"A-B"	5-6
3.	Copy of Notification No SOE.IV 9E&AD)/1-35/2014.	"C"	7-9
4.	Copies of typing test results.	"D"	10-32
5.	Copy of merit list	"E"	-33
6.	Copy of Departmental selection committee minutes along with Attendance sheet	"F"	34-36
7.	Wakalat Nama		

Respondent No.01 to 03

Medical Superintendent
King Abdullah Teaching
Hospital Mansehra ...

[Signature]
Medical Superintendent
3

①

**BEFORE THE SERVICE TRIBUNAL
K.P.K. PESHAWAR**

Service appeal No.1153 of 2022

Muhammad Assad

..... Appellant

VERSUS

1. The Government of Khyber Pakhtunkhwa through Secretary Health Services / Department Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. Medical Superintendent, King Abdullah Teaching Hospital (KATH) Mansehra.
4. Hashim Waheed son of Muhammad Waheed resident of village Suffaidda Tehsil and District Mansehra.

..... Respondents

WRITTEN STATEMENT ON BEHALF OF RESPONDENT 1 TO 3

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS

1. The appellant has got no cause of action.
2. That the appellant has not come to the Honorable Court with clean hands hence the suit is liable to be dismissed.
3. The appellant has suppressed and concealed material facts from this Honorable Court.
4. The appellant / plaintiff is estopped from his own conduct to file the instant appeal.
5. That the appeal is bad due to non-joinder and mis-joinder of the necessary parties.
6. That the present appeal is liable to be dismissed as the appellant concealed / suppressed and put false information in this appeal to distort the facts and figures.

7. That the appellant did not file the in hand appeal with clean hands, hence this appeal is liable to be set aside.
8. Rest of the preliminary objections shall be articulated at the time of arguments.
9. The instant service appeal is barred by law and limitation as regarding fitness. This Honourable Court has got no jurisdiction

FACTS:-

1. Para No.01, related to appellant.
2. Para No.02, related to appellant.
3. Para No.03 correct.
4. Para No.04 is correct. All the candidates were called upon for required typing test and interview on 22.02.22 vide letter No. 1428 and letter from the office of DGHS KP Peshawar vide No.998-99 dated 23.02.2022 (*Copies of MS letter and DGHS, are annexed as annexure "A, B"*).
5. Correct to the extent of promotion order rest of the para is denied being incorrect. The promotion order has been issued in accordance with law. (*Copies of notification no. SOE.IV (E&AD)/1-5/2014 dated: 18th July, 2019, typing test results, merit list, DSC committee minutes are annexed as annexure "C,D,E,F"*).
6. Para No. 6 is incorrect as the appellant fabricated the matter and intentionally deviating to waste the precious time of court and defendants. Rest of the points raised in para 06 are incorrect as the merit list was displayed on Notice Board.
7. Para No.07 Incorrect the merit list was displayed as mentioned above. Furthermore the respondent has made a time barred representation.
8. Para No.08, related to appellant.

GROUND

- a. That the facts are explained in Para No.05.
- b. Incorrect. The appointments are based upon purely on merit by following fitness criteria. The plaintiff is 3rd division pass and could not meet the criteria mentioned in letter no. SOE.IV (E&AD)/1-35/2014 dated: 18th July, 2019. The plaintiff is

promoted as per the SOP, qualification, requirement and rich experience.

- c. That point taken in Para 'C' is incorrect, as appellant does not fall in the required official criteria.
- d. That Par 'D' is incorrect. Promoting authority has not overlooked the relevant Rules and Law regarding the promotion of Class-IV employees.
- e. That, according to Minutes of the Departmental Selection/Promotion Committee KATH Mansehra after fulfilling all codal formalities, respondent No.04 legally promoted on the basis of approval/recommendation under seniority cum fitness.
- f. That Para 'F' is incorrect. Respondent No.4 is not promoted illegally nor against the Law, Rules/Regulations and Policy, but was promoted while observing all codal formalities.
- g. That the same is explained in Para No.05.
- h. That the same is explained in Para No.05.

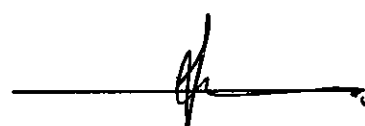
It is therefore, most humbly requested that on acceptance of written comments. The appeal may please be dismissed with cost throughout.

PRAYERS

It is therefore requested that the service appeal of the appellant is not maintainable on merit hence service appeal is liable to be dismissed in accordance with prevailing laws.

Respondent No.1

Secretary Health
Government of KPK Peshawar



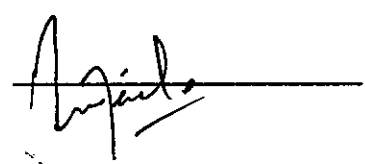
Respondent No.2

Director General Health Services
Government of KPK Peshawar



Respondent No.3

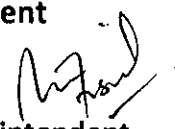
Medical Superintendent
King Abdullah Teaching
Hospital Mansehra.



AFFIDAVIT:

It is verified that all the content of ongoing the written reply is true and correct to the best of my knowledge and belief and nothing has been suppressed / concealed from this Honorable Court.

Deponent



Medical Superintendent
King Abdullah Teaching
Hospital Mansehra

(5)

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

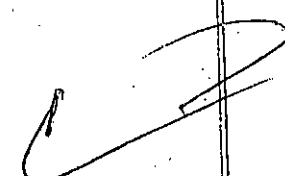
No. 1497
Dated 23-02/2022

To

The Director General
Health Services
Khyber Pakhtunkhwa Peshawar

Subject:- **DEPARTMENTAL SELECTION / PROMOTION COMMITTEE.**

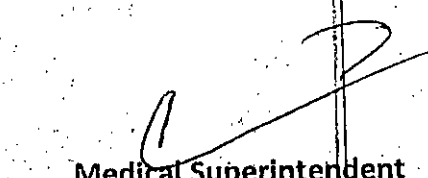
In reference to our letter No.1216-18 dated 12.02.2022; your good office is requested to please nominate your representative for conduction of walk and interview for the promotion of Class-IV to Junior Clerk (BPS-11) at King Abdullah Teaching Hospital Mansehra held on 01.03.2022 (Tuesday) at 11: 00 AM to proceed further in the matter please.


Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

No. 1498-99

Copy to:-

1. All Members Committee KATH Mansehra for necessary action.
2. All concerned candidates/Class-IV staff KATH Mansehra with the direction to appear for typing test/Walk and interview before Departmental Selection/Promotion Committee on above mentioned date and time along with all relevant original documents positively.


Medical Superintendent
King Abdullah Teaching Hospital
Mansehra



(6)

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

Office Ph: 091 - 9210269 Exchange 091 - 9210187 091 - 9210196 Fax: 091 - 9210230

OFFICE ORDER

Dr. Mudassir Iqbal, Deputy DHO Torghar is hereby nominated as representative of this office to attend Departmental Selection Committee / Promotional Committee Meeting to be held on 01.03.2022 at 11:00 AM at King Abdullah Teaching Hospital Mansehra.

SD/x.x.x.x.x.x.x.x.
DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

Dated Peshawar the 21/02/2022

No. 998-99 / Personnel

Copy forwarded to the:

1. MS King Abdullah Teaching Hospital, Mansehra. Director Finance, DGHS Office, Peshawar w/r to his letter 1497 dated 03.02.2022.
2. Dr. Mudassir Iqbal, Deputy DHO Torghar for necessary action.

DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

King Abdullah Teaching Hospital
Mansehra

No. 577

Date 28-03-22

Mudassir Iqbal
28/2/22

[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 18th July, 2019

NOTIFICATION

No.SO.E.IV(E&AD)/1-35/2014:-

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SO.E.IV (E&AD)/1-35/2012 dated 6th December, 2012, the following amendments shall be made, namely:

AMENDMENTS

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

1.	2.	3.	4.	5.
4.	Junior Clerk.	(i) FA/ F.Sc with <u>second division or equivalent</u> qualification from a recognized Board; and (ii) a speed of thirty (30) words per minute in <u>typing.</u>	18 to 30 years.	(a) Forty per cent by promotion, on the basis of <u>seniority-cum-fitness</u> , from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat <u>with two years</u> service as such, who have passed FA/F.Sc Examination or its equivalent qualification from a recognized Board; and (b) sixty per cent by initial recruitment. Note: For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification:

5 months

[Handwritten notes and signatures in the left margin, including 'Seniority' and 'only']

1.	2.	3.	4.	5.
				<p>Provided that-</p> <p>(i) if two or more officials have acquired the FA/F.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post.</p> <p>(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>
				<p>Provided further that: The condition of FA/F.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11).</p>

ON

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Interview

4/3/2022

Total marks - 109

(29)

①	Zubeen Khan	10
②	M. Asad	18
③	Heghin Waheed	18
④	M. Sahail	8
⑤	Adil Malak	8
⑥	Nomana	10
⑦	Shakir Saeed	8

Signature
2

Signature

Signature

31/3/2022

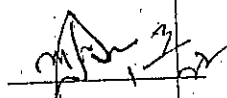
7

Muhammad Assad

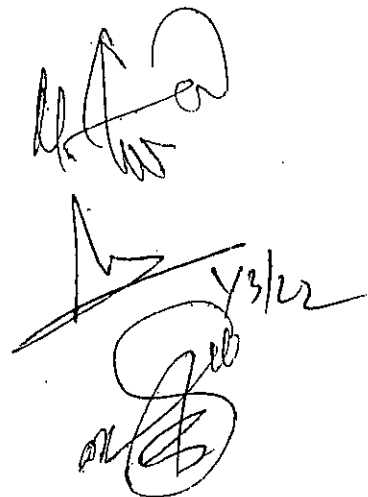
has today successfully completed a computer based TypingMaster typing test with the following results:

Test name: What is a cast?
Date: 28/02/2022 11:20 PM
Duration: 2:00 min.
Done: 2:00 min.
Gross speed: 10 wpm
Accuracy: 50%
Net speed: 5 wpm
Gross strokes: 104
Error hits: 50 (10 errors * 5)
Net strokes: 54

Signature:



FA 3rd Division



(R)

my file 3/1/22

TYPING TEST - PASSED

User: Muhammad Assad
Test name: What is a cast?
Date: 28/02/2022 11:20 PM

TEST RESULTS

Duration:	2:00 min. of total 2:00 min.	Gross strokes:	104
Gross speed:	10 wpm	Error hits:	50 (10 errors * 5)
Accuracy:	50%	Net strokes:	54
Net speed:	5 wpm		

TEST TEXT

- 6> if you;like [you're] _ [like] mostt [most] kids;you [kids,] ;ve [you've]
- 2> proubly [probably] broken a bone; Or maybe you know someone else who
- 2> has,That [has.] _ [That] means

Completed
12:30
01/03/2022

Handwritten signatures and initials

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

9

To,

The Deputy Commissioner
Mansehra

D. Ali

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely

HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

05/20

Muhammad Asad

M. Asad
1/3/22
01/3/22

Asad

10

Muhammad Sohail

has today successfully completed a computer based TypingMaster typing test with the following results:

Test name: The Tale of Peter Rabbit
Date: 28/02/2022 11:29 PM
Duration: 2:00 min.
Done: 2:00 min.

Gross speed: 23 wpm
Accuracy: 66%
Net speed: 15 wpm

Gross strokes: 238
Error hits: 80 (16 errors * 5)
Net strokes: 158

Signature:

1/3/22

Muhammad Sohail

Copyright 1992-2007 by TypingMaster, Inc. All rights reserved.
More information at <http://www.TypingMaster.com>

Muhammad Sohail

01/03/2022

[Handwritten signature]
[Handwritten signature]
[Handwritten signature]
1/3/2022

(11)

TYPING TEST : PASSED

User: Muhammad Sohail *Sohail Fichani*
Test name: The Tale of Peter Rabbit *11/2/22*
Date: 28/02/2022 11:29 PM

TEST RESULTS

Duration:	2:00 min. of total 2:00 min.		
Gross speed:	23 wpm	Gross strokes:	238
Accuracy:	66%	Error hits:	80 (16 errors * 5)
Net speed:	15 wpm	Net strokes:	158

TEST TEXT

3> once up [upon] oa [a] time there were four little rabbits. Their
5> names were; flopsy, mopsy [Mopsy,] cottontail, and peter.
2> they lived with their mother under the root of a very big fir tree.

4> noe, ["Now,] childeren [children,] said old mrs [Mrs.] rabbit
2> one morning[,] you may go into the

Sohail Fichani
2
01/03/2022

[Handwritten signature]
[Handwritten signature]
[Handwritten signature]

(12)

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

No.
DATE

To,

The Deputy Commissioner
Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program. Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks.

Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

Muhammad Sohail

10/20

1/3/22 *in shaid*
wha

1/3/22

agunand
1/3/2022

[Signature]

(13)

TYPING TEST - PASSED

User: Shakir Saeed *SS*
Test name: Hubble Space Telescope
Date: 01/03/2022 12:00 AM

1-3-2022

TEST RESULTS

Duration: 2:00 min. of total 2:00 min.
Gross speed: 12 wpm Gross strokes: 127
Accuracy: 60% Error hits: 50 (10 errors * 5)
Net speed: 7 wpm Net strokes: 77

TEST TEXT

4> the hubble sapce [Space] telescope [Telescope,] also called the
2> hst [HST,] is a telescopic obseravtory [observatory] that orbits
4> 6000 kilometer [kilometers] above the earth [Earth.] its [It] is
the

Shakir Saeed
SS
1/3/22

14

Shakir Saeed

has today successfully completed a computer based
TypingMaster typing test with the following results:

Test name: Hubble Space Telescope

Date: 01/03/2022 12:00 AM

Duration: 2:00 min.

Done: 2:00 min.

Gross speed: 12 wpm

Accuracy: 60%


Net speed: 7 wpm

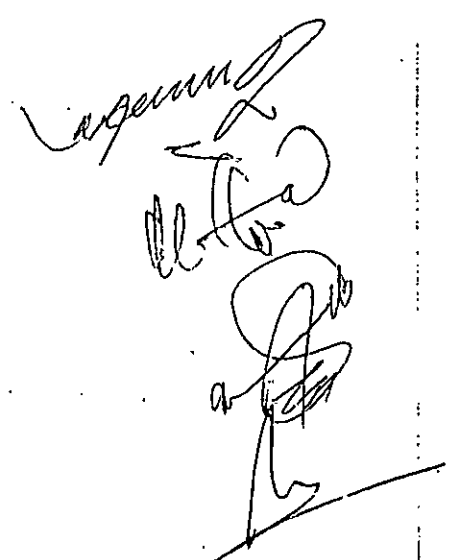
Gross strokes: 127

Error hits: 50 (10 errors * 5)

Net strokes: 77

Signature:

 1-3-2022



OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

(15)

No
Date 1.3.22

To,

The Deputy Commissioner
Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

Shakir Saeed

[Handwritten signature]

1-3-2022

[Handwritten signature]

[Handwritten signature]
01/3/22

[Handwritten signature]

16

TYPING TEST - PASSED

User: Nouman Ali *Ali* 01-03-22
Test name: The Eight Tools for Creating New Value
Date: 28/02/2022 11:54 PM

TEST RESULTS

Duration: 2:00 min. of total 2:00 min.
Gross speed: 17 wpm Gross strokes: 173
Accuracy: 62% Error hits: 65 (13 errors * 5)
Net speed: 10 wpm Net strokes: 108

TEST TEXT

- 1> manegaers [Managers] need a new toolkit to manage at the
- 4> protfolio [portfolio] leve [level.] some are very new[;]
- 4> other [others] may look familiar[.] butr [But] dont[t] be
- 4> fooled[.] to create new value whit [with] a brand protfolio [portfolio] approach

Nouman Ali
28/02/2022

(17)

Nouman Ali

has today successfully completed a computer based TypingMaster typing test with the following results:

Test name: The Eight Tools for Creating New Value

Date: 28/02/2022 11:54 PM

Duration: 2:00 min.

Done: 2:00 min.

Gross speed: 17 wpm

Accuracy: 62%

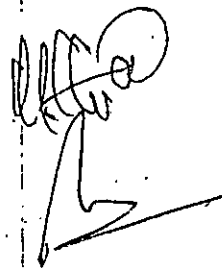
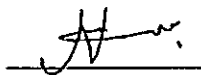
Net speed: 10 wpm

Gross strokes: 173

Error hits: 65 (13 errors * 5)

Net strokes: 108

Signature:




OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

(18)

No. _____
Date: _____

To,

The Deputy Commissioner
Mansehra

Subject: - **DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.**

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely.

- 1.HMB fund.
- 2.HMC fund.
- 3.Regular Budget.
- 4.Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

16/20

Medical Superintendent
King Abdullah Teaching
Hospital
Mansehra

Noman Ali

[Signature]

01-03-2022

[Signature]
1/3/22

[Signature]

[Signature]
1/3/2022

19

TYPING TEST - PASSED

User: Adil malik
Test name: Stinging Insects
Date: 01/03/2022 12:07 AM

[Handwritten signature]
1-3-2022

TEST RESULTS

Duration:	2:00 min.	of total 2:00 min.	Gross strokes:	172
Gross speed:	17 wpm		Error hits:	55 (11 errors * 5)
Accuracy:	68%		Net strokes:	117
Net speed:	11 wpm			

TEST TEXT

5> we live in [a] world filled with insect [insects.] [When] when
 1> you play or work outside[,] it is easy to get bitten or stung.
 3> bees [Bees,] fire ant [ants,] anmd [and] ticks are some of the most
 1> common types of biting andd [and]

Uagumif
2

[Handwritten signature]

[Handwritten signature]
y3/22

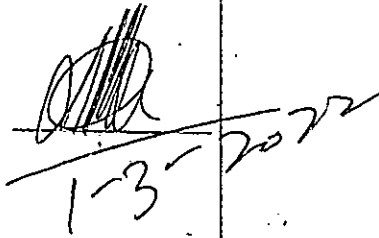
20

Adil malik

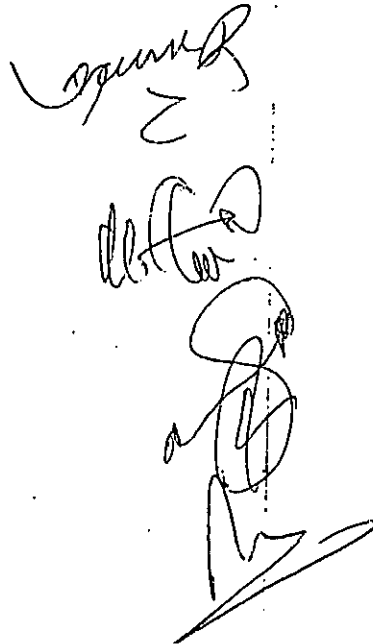
has today successfully completed a computer based
TypingMaster typing test with the following results:

Test name:	Stinging Insects
Date:	01/03/2022 12:07 AM
Duration:	2:00 min.
Done:	2:00 min.
Gross speed:	17 wpm
Accuracy:	68%
Net speed:	11 wpm
Gross strokes:	172
Error hits:	55 (11 errors * 5)
Net strokes:	117

Signature:



1-3-2022



Logan
2
Adil Malik
Adil Malik

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**
Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

(21)

To,
The Deputy Commissioner Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

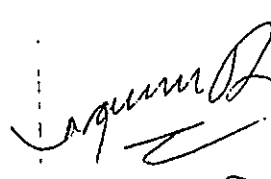
12
PO

Adil Malik

~~Adil Malik~~
1-3-2022

1/3/22




1-3-2022


(22)

Hashim Waheed

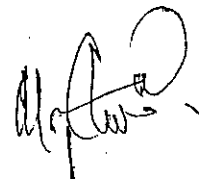


has today successfully completed a computer based TypingMaster typing test with the following results:


Test name: Aesop's fables
Date: 28/02/2022 11:37 PM
Duration: 2:00 min.
Done: 2:00 min.
Gross speed: 43 wpm
Accuracy: 91%
Net speed: 39 wpm
Gross strokes: 430
Error hits: 35 (7 errors * 5)
Net strokes: 395

Signature:

 H. Waheed 11/3/2022

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More information at <http://www.TypingMaster.com>



 1/3/22



TYPING TEST - PASSED

User: Hashim Waheed
Test name: Aesop's fables
Date: 28/02/2022 11:37 PM

af
01-03-2022
(23)

TEST RESULTS

Duration:	2:00 min. of total 2:00 min.	Gross strokes:	430
Gross speed:	43 wpm	Error hits:	35 (7 errors * 5)
Accuracy:	91%	Net strokes:	395
Net speed:	39 wpm		

TEST TEXT

Aesop was one of the great Greek writers. He is best known for his
1> fables, stories that have ga [a] moral. They teach us something about
1> how we should li [live] our lives. Aesop wrote thousands of these
1> stories. Here are a few.[.]

2> The Wolf inb [in] Sheep's Clothing.

Once upon a time, a Wolf decided to disguise the way he looked. He
1> thouh [thought] it would help him get food more easily. He put on
1> the skin of a sheep, then he went out wiht [with] the flock into the

Signature

af
01-03-2022
(23)

(24)

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

No _____ /
Date _____ 2022

To,

The Deputy Commissioner
Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

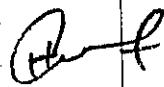
We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

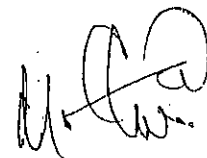
15720


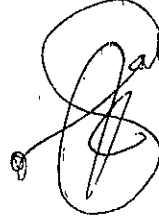
Medical Superintendent
King Abdullah Teaching Hospital
Mansehra


Hashim Waheed

01/03/2022






1/3/22


(25)

TYPING TEST - PASSED

User: Zubair Khan
Test name: The Life of Calamity Jane
Date: 28/02/2022 11:47 PM

PK Date 01-03-22

TEST RESULTS

Duration:	2:00 min.	of total 2:00 min.	Gross strokes:	131
Gross speed:	13 wpm		Error hits:	25 (5 errors * 5)
Accuracy:	80%		Net strokes:	106
Net speed:	10 wpm			

TEST TEXT

4> my maiden name was Marthy C [Cannary.] i wass [was] born in
1> Princetion, [Princeton,] Missouri, May 1st, 1852. My father and
mother were natives of Ohio. I had two

Zubair Khan

PK
PK
PK
1/3/22

(26)

Zubair khan

has today successfully completed a computer based TypingMaster typing test with the following results:

Test name: The Life of Calamity Jane

Date: 28/02/2022 11:47 PM

Duration: 2:00 min.

Done: 2:00 min.

Gross speed: 13 wpm

Accuracy: 80%

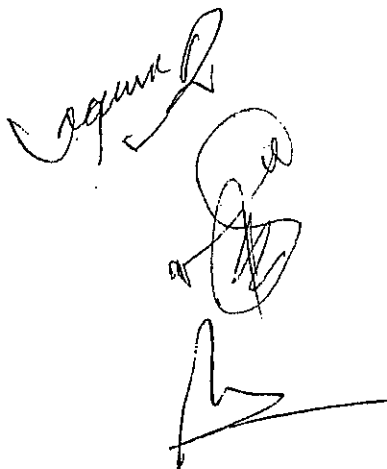
Net speed: 10 wpm

Gross strokes: 131

Error hits: 25 (5 errors * 5)

Net strokes: 106

Signature:



27

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211; email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

No1050

To,

Date 01/03/22
01

The Deputy Commissioner
Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

We are facing severe deficiency of budget to run hospital. Over all financial sources are blocked namely

HMB fund. HMC fund. Regular Budget. Sehat Sahulat Program.

Due to expiry of Public Private Partnership from 19 July 2021 we failed to pay salaries of 46 contract employees and 25 Security Guards for the last four months recruited under HMB fund.

Thanks

Medical Superintendent
King Abdullah Teaching Hospital
Mansehra

09/20

Zubair Khan

RR

01/03/22

Signature

Signature

1/3/2022

(28)

**OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA**

Tel: 0997-920096, Fax: 0997-540211: email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

Sample format for To,
correction

The Deputy Commissioner
Mansehra

Subject: - DEFICIENCY OF BUDGET AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA.

Respected Sir,

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Thanks

Medical Superintendent
King Abdullah Teaching Hospital.
Mansehra

Signature
2
1/3/2022

Signature
Signature

DETAIL LIST OF CLASS-IV STAFF FOR PROMOTION FROM CLASS-IV TO JUNIOR CLERK (BPS-11) AT KING ABDULLAH TEACHING HOSPITAL MANSEHRA - 2022

S/No.	Name of Class-IV	Date of birth	Qualification	Technical qualification	Date of arrival	Passing date SSC	Seniority 30 Marks	Qualification 11 Marks	Typing 30 Marks	Formatting 20 Marks	Interview 19 Marks	Total
1.	Muhammad Assad Ward Orderly BS-4	08.04.1976	BA	Nil	01.02.2013	1992	13	7	5	5	18	48
2.	Muhammad Sohail Chowkidar BS-3	15.02.1997	FA	06 months short course	22.01.2018	2012	6	5	15	10	8	44
3.	Shakir Saeed Ward Orderly BS-4	21.04.1988	BA	Nil	08.01.2018	2004	6	7	7	10	8	38
4.	Noman Ali Ward Orderly BS-4	14.10.1995	FA	DIT Diploma	05.01.2018	2011	6	7	10	18	10	49
5.	Adil Malik X-Ray Adt BS-4	02.04.1978	BA	06 months short Course	21.05.2008	1993	20	7	11	12	8	58
6.	Hashim Waheed BB Adt BS-4	05.08.1996	MA	DIT Diploma	06.06.2020 (contract) 13.10.2021 (Regular)	2012	1	11	30	15	18	75
7.	Zubair Khan Ward Orderly BS-4	02.01.1994	BA	06 months short course	23.09.2015	2010	10	7	10	5	10	42

1. Dr. Muhammad Amjad, DMS (Admin) KATH Mansehra, Chairman

2. Dr. Mudassar Iqbal DDO Torghar / Representative of DGHS KP Peshawar

3. Dr. Abdul Haleem, Orthopedic Surgeon KATH Mansehra, Member

4. Dr. Muhammad Shoaib, Chief Medical Officer KATH Mansehra, Member

5. Dr. Muhammad Ilyas Qureshi, Medical Officer KATH Mansehra, Member

6. Mr. Maghfoor-Noshad, Computer Operator KATH Mansehra, Member

(Handwritten signatures and marks corresponding to the list of members)

OFFICE OF THE MEDICAL SUPERINTENDENT
KING ABDULLAH TEACHING HOSPITAL MANSEHRA

(31)

Tel: 0997-920096, Fax: 0997-540211, email: mskathmansehra@gmail.com
Website: www.kathmansehra.com

No. 1817 / Dated 07/03/2022

A meeting of Departmental Selection/Promotion Committee was held on 01.03.2022 (Tuesday) at 02:00 PM, under the Chairmanship of DMS (Admin) King Abdullah Teaching Hospital Mansehra.

The following attended the meeting:-

1. Dr. Muhammad Amjad, DMS (Admin) KATH Mansehra : (Chairman)
2. Dr. Mudassir Iqbal, DDHO Torghar/Representative of DGHS : (Member)
3. Dr. Abdul Haleem, Orthopedic Surgeon KATH Mansehra : (Member)
4. Dr. Muhammad Shoab, Chief Medical Officer KATH Mansehra : (Member)
5. Dr. Muhammad Ilyas Qureshi, Medical Officer KATH Mansehra : (Member)
6. Mr. Maghfoor Noshad, Computer Operator KATH Mansehra : (Member)

AGENDA

The agenda of meeting is pertaining to promotion of Class-IV to Junior Clerk BPS-11.

PROCEEDING

Meeting started with the recitation of Holy Quran. The Chair welcome to the participants. The dealing Clerk presented the paper vacant position 02 of Junior Clerk post in King Abdullah Teaching Hospital Mansehra for promotion cases of the Class-IV to Junior Clerk and policy of Government of Khyber Pakhtunkhwa Health Department Peshawar. As per policy 40% quota is reserved for promotion of Class-IV, but no Class-IV employee was upgraded/promoted. Therefore it was decided that 02 vacant positions be reserved for upgraded of Class-IV as per Law/policy.

The members of the Committee thoroughly checked the Files/documents one by one with assistance of dealing Ministerial staff.

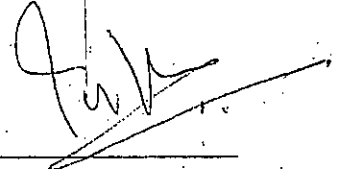
The Committee also checked typing result which was conducted on 01.03.2022 (Tuesday) at 11:00 AM at King Abdullah Teaching Hospital Mansehra and following candidate passed the test for promotion from Class-IV to Junior Clerk on the basis of seniority cum fitness.

S/No	Name of Class-IV	Father Name	Qualification	Date of 1 st appointment	Remarks
1.	Hashim Waheed	Muhammad Waheed	MA	13.10.2021	Eligible
2.	Adil Malik	Muhammad Nazir Awan	BA	21.05.2008	Eligible

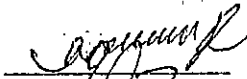
Decision

After thoroughly checking the documents and policy/result the Members of the Committee unanimously approved/recommended the above Class-IV for the promotion of Junior Clerk. Medical Superintendent King Abdullah Teaching Hospital Mansehra is authorized to issue the promotion order of above recommended candidates with immediate effect.

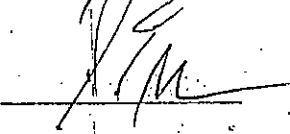
1. Dr. Muhammad Amjad, DMS (Admin) KATH Mansehra, Chairman



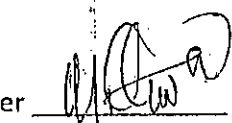
2. Dr. Mudassir Iqbal, DDHO Torghar/Representative of DGHS, Peshawar



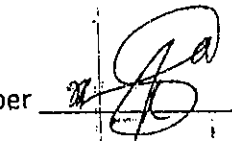
3. Dr. Abdul-Haleem, Orthopedic Surgeon KATH Mansehra, Member



4. Dr. Muhammad Shoaib, Chief Medical Officer KATH Mansehra, Member



5. Dr. Muhammad Ilyas Qureshi, Medical Officer KATH Mansehra, Member



6. Mr. Maghfoor Noshad, Computer Operator KATH Mansehra, Member

