

21.09.2022

Appellant alongwith his counsel present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present. None present on behalf of private respondents No. 5, 6, 7 & 9, therefore, notices be issued to them as well as their counsel through registered post and to come up for arguments on 30.11.2022 before the D.B.

(Mian Muhammad)
Member (Executive)

(Salah-Ud-Din)
Member (Judicial)

All the mentioned respondents are out district & we cannot do contact us to send their notices

30.11.2022

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents present.

As learned Member (Executive) Mr. Mian Muhammad was not feeling well and has proceeded on short leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 25.01.2023 before the D.B.

(Salah-ud-Din)
Member (J)

**SCANNED
KPST
Peshawar**

25-1-23

Proper DB is not available

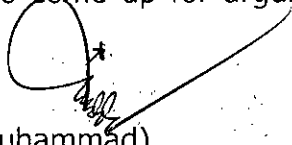
The case is adjourned to 5.5.23


Roude

03.06.2022

Appellant alongwith his counsel namely Mr. Zafar Ali Khan, Advocate present. Mr. Muhammad Adeel Butt, Additional Advocate General for official respondent No. 1 to 3 present. Mr. Muhammad Nasir Ghilzai, Advocate for private respondents No. 5, 6, 7 & 9 present.

Arguments could not be heard due to paucity of time. Adjourned. To come up for arguments on 26.07.2022 before the D.B.

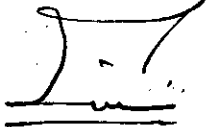

(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

26th July 2022

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 3 present.

Learned counsel for the appellant seeks adjournment in order to properly assist the court on the next date. Adjourned. To come up for arguments on 21.09.2022 before the D.B.


(Salah-Ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman

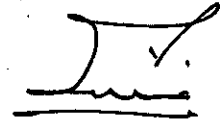
31.01.2022

Appellant with counsel present. Mr. Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for official respondents No.1 to 3 present. Nemo for the private respondents No.4 to 16.

Notice for prosecution of the instant appeal be issued to private respondents No.4 to 16 as well as their counsel. Adjourned. To come up for arguments on 31.03.2022 before the D.B.



(Rozina Rehman)
Member (J)

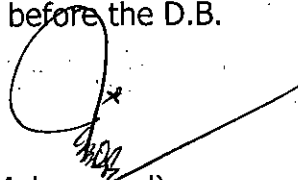


(Salah-Ud-Din)
Member (J)

31st March, 2022

Counsel for the appellant present. Mr. Muhammad Adeel Addl. A.G for the respondents present.

Learned counsel for the appellant seeks adjournment in order to properly assist the court. Adjourned. Last opportunity is granted. To come up for arguments on 03.06.2022 before the D.B.



(Mian Muhammad)
Member(Executive)



Chairman

S.A No. 1770/2019

15.11.2021

Appellant alongwith his counsel present. Mr. Safiullah, Section Officer for official respondent 2 alongwith Mr. Kabirullah Khattak, Additional Advocate General present. Learned counsel for private respondents No. 5, 6, 7 & 9 present.

Replies/comments on behalf of official respondents No. 1 & 2 as well as private respondents No. 5, 6, 7 & 9 have already been submitted. Neither reply/comments on behalf of respondent No. 3 submitted nor anyone on his behalf is present, therefore, notice be issued to him for submission of reply/comments as a last chance. Adjourned. To come up for submission of reply/comments on behalf of official respondent No. 3 as well as arguments before the D.B on 21.12.2021.



(Salah-Ud-Din)
Member (J)

21.12.2021

Appellant in person and Dr. Hafizullah for the respondent No. 3 alongwith Addl. AG for official respondents present.

Representative of the respondent No. 3 stated at the bar that respondent No. 3 relies on the written reply/comments submitted by respondents No. 1 & 3. The appeal is assigned to D.B for arguments on 31.01.2022.



Chairman

08.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 01.07.2021 for the same as before.


READER

01.07.2021

Junior to counsel for the appellant, Addl. AG for official respondents and counsel for private respondents No. 5, 6, 7 and 9 present.

Comments on behalf of respondents No. 5, 6, 7 and 9 have been submitted. Parawise comments on behalf of respondents No. 1 & 2 has already been furnished. Learned AAG is required to contact respondent No. 3 for submission of written reply/comments within 10 days in office, positively. In case written reply/comments are not submitted by respondent No. 3 within 10 days, office shall put up the file with a report of non-compliance. To come up for arguments on 15.11.2021 before the D.B.


Chairman

Stipulated period has passed and reply of R3 has not been submitted.

P.S

14.07.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.



Chairman

29.10.2020

Appellant in person present.

Mr. Kabir Ullah Khattak learned Additional Advocate General present.

Written reply on behalf of respondents No.3, 5, 6, 7 & 9 is still awaited. The said respondents be put on notice for 24.12.2020 for submission of reply, before S.B.


(Rozina Rehman)
Member (J)

24.12.2020

Nemo for appellant. Asstt. AG, for the official respondents present.

Reply/comments of respondents No. 3, 5, 6, 7, 9 and 13 is still awaited for which fresh notices be issued to them through registered post.

To come up for reply/comments of the said respondents on 10.02.2021, as last chance.


Chairman

10.02.2021

Appellant in person present.

Kabir Ullah Khattak learned Additional Advocate General present. Counsel for private respondents No.5 to 7 & 9 present. Nemo for respondents No.3 & 13.

Written reply ~~submitted~~ on behalf of respondents No.3, 5 to 7, 9 & 13 is still awaited. Counsel for private respondents No.5 to 7 & 9 requested for time to furnish reply. Last opportunity is granted to private respondents No.5 to 7 & 9 and respondents No.3 & 13 are placed ex-parte. To come up for written reply/comments of respondents No.5, 6, 7 & 9, on 08.04.2021 before S.B.


(Rozina Rehman)
Member (J)

04.08.2020

Appellant in person present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Saleem Javed, Litigation Officer and Mr. Muhammad Ayub, Advocate on behalf of private respondents No. 5, 6, 7 & 9 also present and submitted Vakalatnama in favour of private respondents No. 5, 6, 7 & 9.

Representative of official respondents as well as learned counsel for private respondents No. 5, 6, 7 & 9 seeks time to furnish requisite written reply/comments. Adjourned to 28.09.2020 on which date written reply/comments shall positively be submitted.


(MIAN MUHAMMAD)
MEMBER (E)

28.09.2020

Appellant in person, Saleem Javed, Litigation Officer for respondents No. 1 & 2 alongwith Addl. AG for respondents No. 1 to 3, junior to counsel for respondents No. 5, 6, 7 & 9 present.

Respondents No. 1 & 2 have already furnished parawise comments. Learned AAG on behalf of respondent No. 3 as well as respondents No. 5, 6, 7 and 9 seek further time to submit reply/comments. Nemo on behalf of respondents No. 4, 8, 10, 11, 12, 13, 14, 15 and 16 nor their reply/comments received, hence proceeded against ex-parte. To come up for reply/comments of respondents No. 3, 5, 6, 7 and 9 on 29.10.2020 before S.B.


Chairman

17.06.2020

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant was appointed as Dental Technician (BPS-9), later on the post of Dental Technician was re-designated as Junior Clinical Technologist (JCT) (Dental) (BPS-09) on 10.05.2006. The appellant was promoted to the post of Clinical Technician (Dental) (BPS-12) and was appearing at Serial No. 22 in the Provisional Seniority List of Clinical Technician (Dental) (BPS- 12). The appellant qualified the degree of BSs as well as B.S(Honors) in Dental Technology from Peshawar University. As per Service Rules of Paramedical Staff (2016), he was eligible for promotion to the post of Clinical Technologist (BPS-17) but the respondents promoted the private respondent No.4 by superseding the appellant. That respondent No.4 has been placed at serial No. 93 as Technologist (BPS-17) vide impugned seniority list dated 15.04.2019. That the appellant has been placed at serial No. 13 of the final seniority list of Degree holders of paramedics (Dental) 2009, in which he was shown junior to private respondents No. 5 to 16. Thereafter appellant filed Writ Petition No. 337-B/2018 which was disposed of on 06.03.2019. He filed departmental appeal which was not responded within the statutory period of ninety days, hence, the instant service appeal. Learned counsel for the appellant further contended that the appellant has been discriminated and not treated according to law and rules because his date of acquisition of higher qualification was earlier than the private respondents No. 4 to 16 for promotion to BPS-17.

Points urged need consideration. Service appeal is admitted subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 04.08.2020 before S.B.

Appellant Deposited
Security Process Fee

(MAIN MUHAMMAD)
MEMBER

28.01.2020 Appellant in person present. Clerk to counsel for the appellant present and seeks adjournment as learned counsel for the appellant is not available. Adjourn. To come up for preliminary hearing on 17.03.2020 before S.B.


Member

17.03.2020 Appellant in person present. Lawyer community is on strike on the call of Peshawar Bar Association. Adjourn. To come up for preliminary hearing on 25.03.2020 before S.B.


Member

25.03.2020 Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 17.06.2020 before S.B.

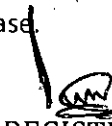



Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1770/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/12/2019	<p>The appeal of Mr. Irfan Ali Shah resubmitted today by Mr. Inayat Ullah Khan 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 12/12/19</p>
2-	13/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/01/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	16.01.2020	<p>Appellant present in person. Requests for adjournment due to general strike of the Bar. Adjourned to 28.01.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

RS

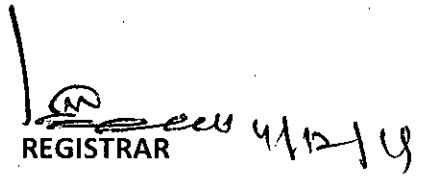
RS

The appeal of Mr. Irfan Ali Shah son of Abdul Ali Shah Clinical Technician Dental received today i.e. on 03.12.2019 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Addresses of respondent no. 05 to 16 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Objection petition preferred by appellatant against the seniority list dated 27.06.2019 and impugned promotion order mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.

No. 224 /S.T,

Dt. 4-12- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Inyatullah Khan Adv. Peshawar.

- ① complete addresses of respondents no. 5 to 16 of replied -
 - ② objection petition has been filed against Seniority list of Provisional (Dental) BS-12 of Clinical Technician appearing at where appellatant is attached at serial NO. 22 attached at page (13) Annexure - A²
- Resubmitted for placing before bench -
Inyatullah Khan
Adv
Peshawar
11/12/2019

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. 1770/2019

Irfan Ali Shah Appellant

Versus

Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents

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5	Copies of appellant's degrees of B.S.c and B.S (Honors) in Dental Technology	C & C/I	18-19
6	Copy of Recruitment Rules dated 10.05.2016	D	20-23
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Dated: 29.11.2019

Appellant
through


Inayat Ullah Khan

Advocate, Peshawar, High
Court
LLM (UK).

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. 1770 /2019

Irfan Ali Shah S/o Abdul Ali Shah
R/o Kotka Abdul Qadeer Shah (Bangash Khe!) Mandan,
Tehsil & District Bannu
Presently Serving as Clinical Technician BPS-12 (Dental) in the
office of erstwhile Agency Surgeon Tribal (District North
Waziristan),Appellant

Versus

- 1) Secretary Health, Govt. Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Director General Health, Govt of Khyber Pakhtunkhwa Peshawar.
- 3) The Agency Surgeon Tribal District North Waziristan.
- 4) Fazle Ala S/o Fazle Maula, Serving as Clinical Technologist (Dental in BPS-17 MTI Lady Reading Hospital, Peshawar.
- 5) Ajab Khan S/o Bashar Khan (BS-14), Senior Clinical Technician Dental present posting Civil Hospital Matta Swat.
- 6) Akbar Khan S/o Khoja Omar (BS-12), clinical technician dental, present posting, DHO Chitral.
- 7) Shakeel Raziq S/o Fazal Raziq (BS-14) Senior Clinical Technician Dental, Present posting, LRH Peshawar.
- 8) Sher Muhammad Khan S/o Noor Muhammad (BS-12), clinical technician dental, Present posting, Saidu Group Teaching Hospital, Swat.
- 9) Sohni Bibi d/o Sadar Jehan Mian (BS-12), clinical technician dental, Present posting, Civil Hospital Khuwaza Khela, Swat.
- 10) Murad Khan S/o Ghandal Khan (BS-12), clinical technician dental, Present posting, LRH Peshawar.
- 11) Hayat Muhammad Khan S/o Muhammad Sharif Khan (BS-12), Clinical Technician Dental, Present posting, rhc Koza Bandi, Batagram.

- 12) Tariq Saleem S/o Gul Hayao (BS-12), Clinical Technician Dental Present posting, DHQH Karak.
- 13) Ismail Khan S/o Zar Gul (BS-12), Clinical Technician Dental, Present posting, Services Hospital, Peshawar.
- 14) Saifullah S/o Shakirullah (BS-12), Clinical Technician Dental Present posting, Bacha Khan Medical College, Mardan.
- 15) Hidayatul Rehman S/o Tooti Rehman (BS-12), Clinical Technician Dental Present posting, DHQ Hospital Dir Upper.
- 16) Faizul Karim S/o Gul Khan (BS-14), Senior Clinical Technician Dental Present posting, Civil Hospital Makken Swat..... Respondents

APPEAL U/S 4 OF THE N.W.F.P SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED JOINT SENIORITY LIST OF TECHNOLOGIST (BS-17) IN VARIOUS CADRES IN HEALTH DEPARTMENT KHYBER PAKHTUNKHWA AS STOOD ON 15.04.2019, FINAL SENIORITY LIST OF DEGREE HOLDERS, CLINICAL TECHNICIANS, DENTAL/ SENIOR CLINICAL TECHNICIANS/ CHIEF CLINICAL TECHNICIANS AS STOOD ON 27.06.2019 AND IMPUGNED PROMOTION NOTIFICATION OF RESPONDENT NO.4 DATED 01.02.2018. And *provisional list of seniORITY is annexed at page 13.*

THE APPELLANT FILED HIS DEPARTMENTAL APPEAL DATED 20.08.2019 TO RESPONDENT NO.1 AGAINST THE SENIORITY LISTS AS REFERRED TO, IN THE HEADING OF THIS APPEAL BUT THE SAME HAS NOT BEEN RESPONDED DESPITE LAPSE OF STATUTORY PERIOD OF 90 DAYS HENCE

PRESENTS THIS SERVICE APPEAL
BEFORE THIS HONORABLE TRIBUNAL
WELL WITHIN 30 DAYS TIME PERIOD.

Prayer:

On acceptance of this appeal, the appellant may kindly be declared as Senior to private respondents No.4 to 16 and thereby promoted to the post of Technologist (BS-17) with effect from his passing/ acquiring the B.S.c Degree in Dental Technology in terms of the Recruitment Rules dated 10.05.2016 notified by Provincial government with all consequential back benefits.

Any other consequential relief which this Hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked-for may also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed as Dental Technician (BS-9), later-on the post of Dental Technician was re-designated as Junior Clinical Technologist (JCT) (Dental) (BS-9), on 10.05.2006. The appellant was promoted to the post of clinical technician (Dental) (BS-12) issued by respondent No.2.

It is pertinent to mention that the appellant is appearing at Sr.No.22 at the Provisional Seniority List of Clinical Technician (Dental) (BS-12).

(Copy of Provisional Seniority list of Clinical Technician (Dental) (BS-12) dated 07.12.2017 alongwith letter dated 07.12.2017 are attached as Annexure "A" & "B").

- 2) That the respondents in order to enhance the skills of paramedical staff, introduced Paramedics Degree Courses in various technologies including Dental Technology, therefore, the appellant also appeared to undergo two years B.S.c degree course in Postgraduate Paramedical institute at Lady Reading Hospital Peshawar in its 1st Batch/ Session 2004-2005.

On successful completion of the course the appellant got degree of B.S.c (Dental Tech) from KP Medical Faculty Peshawar.

It is pertinent to mention that the appellant later on also acquired the qualifications of four years degree course of B.S (Honors) in Dental Technology from University of Peshawar during Annual Session-2014.

(Copies of appellant's degrees of B.S.c and B.S (Honors) in Dental Technology are attached as Annexure "C" & "C/1").

- 3) That the Provincial Government introduced four stages promotion opportunities to the Paramedical Staff upto (BS-20) on the posts of Clinical Technologists (BS-17), Senior Clinical Technologist (BS-18), Chief Clinical Technologist (BS-19) and Principal Clinical Technologist (BS-20) and for that purpose promulgated recruitment rules vide gazette notification dated: 10.05.2016.

(Copy of Recruitment Rules dated 10.05.2016 are attached as Annexure "D").

- 4) That respondent No.4 vide Promotion Order dated 01.02.2018 passed by respondent No.1 & 2, whereby

respondent No.4 has been promoted to the post of Clinical Technologist (Dental) (BS-17) by superceding the appellant otherwise, then in accordance with the relevant recruitment rules as attached in Para No.3 above.

(Copy of promotion order dated 01.02.2018 of respondent No.4 is attached as Annexure "E").

- 5) That respondent No.4 has been placed at serial No.93 as Technologist (BS-17) vide impugned Seniority list dated 15.04.2019.

(Copy of Seniority List dated 15.04.2019 alongwith letter dated 08.06.2019 are attached as annexure "F and F/1").

- 6) That the appellant has been placed at Serial No. 13 of the Final Seniority List of Degree holders of paramedics Dental 2009, in which he was shown junior to private respondents No.5 to 16.

(Copy of Seniority List alongwith letter dated 27.06.2019 is attached as Annexure "G").

- 7) That the appellant also preferred his objection to the respondent No.2 through proper channel against the seniority lists and impugned promotion notification which was received in office vide daily diary No.7443 dated 21.02.2019 but no positive response was provided to him.

(Copy of objection petition is attached as Annexure "H").

- 8) That according to Clause -(b) in Column No.5 against item No.4 of appendix to the ibid Recruitment Rules, 20% quota has been reserved for promotion on the basis of Seniority-cum-fitness from amongst the incumbents of the posts of Chief Technicians (BS-16), Senior Clinical Technician (BS-14) and Technicians (Bs-12), having acquired the qualifications prescribed for initial recruitment (i.e. B.Sc in

Dental Technology) with 03 years service in the relevant technology and according to the NOTE below the said Clause (b) in column No.5 Joint Seniority List of the said posts is to be maintained with reference to dates of acquiring the qualifications of B.Sc Degree. Keeping in view the ibid provision; the appellant having acquired the qualification of B.Sc (Dental Technology) during December 2005 in the first batch/ session of 2004-05, when none else of his colleagues/ seniors has acquired the said qualification; therefore, the appellant had to be shown on the top of the seniority list for the purpose of his promotion to the post of Clinical Technologist (Dental) (BS-17) against the 20% quota reserved for promotion of the qualified departmental candidates and deserved to have been promoted to the said post instead of the Respondent No.4 on 01.02.2018. However, the respondent No.2 has with a view to favour the respondent No.4 illegally and clandestinely prepared final seniority list of the qualified departmental candidates; vide letter No.17798-847/AE-VII dated 02.11.2017; without previous circulation of the same and even without preparation of Provisional Seniority List and calling for objections thereto from the affected employees; and showed therein the respondent No.4 at the top of the seniority list, while the appellant has been shown at S.No.14 with reference to date of his acquiring the qualifications of B.S (Hons) from the University of Peshawar during Annual-2014 instead of with reference to the date of his acquiring the qualification of B.Sc from the KPK Medical Faculty Peshawar, during December 2005.

It is pertinent to submit that the Degree of B.S(Hons) is equivalent to M.Sc, while the qualifications prescribed for promotion to the post of Clinical Technologist (Dental) in (BS-17) is the Degree of B.Sc. Hence, the impugned seniority list dated 02.11.2017 as

well the resultant promotion order dated 01.02.2018 is illegal and ineffective upon service rights of the petitioner.

(Copy of impugned seniority list dated 02.11.2017 is filed as Annexure "I").

- 9) That the appellant earlier approached to Honourable Peshawar High Court Bannu Bench vide Writ Petition No.337-B/2018 which was disposed off on 06.03.2019 with the direction to respondents to treat the writ petition as representation and thereafter decide the same in accordance with law within a period of one month from the date of receipt of the order.

(Copy of Writ Petition alongwith its order are attached as Annexure "J"& "J/1).

- 10) That the appellant was called for personal hearing on 29.07.2019 by the office of respondent No.2 in terms of the order passed by Honourable Peshawar High Court Bannu Bench but no decision was made vis-à-vis the objections raised by the appellant.

(Copy of personal hearing letter dated 19.07.2019 is attached as Annexure "K").

- 11) That the appellant preferred his departmental appeal dated 20.08.2019 to the respondent No.1 for redressal of his grievance but the same has not been responded despite lapse of statutory period of 90 days, hence this appeal is presented within 30 days which is well within time.

- 12) That the appellant feeling aggrieved and dissatisfied by not responding the departmental appeal, presents this service appeal on the following amongst other grounds.

(Copy of departmental Appeal dated 20.08.2019 is attested as annexure "L").

Grounds of appeal:

- a. That the appellant has not been treated in terms of Article-4 of the Constitution of Islamic Republic of Pakistan vis-à-vis his seniority and accrued promotion rights.
- b. That the appellant case is fully covered by notification dated 10.05.2016 whereby promotion to the post of Technologist (BS-17) has made subject to acquiring the qualification of Bachelors Degree in 2nd Class in the relevant technology from a recognized University/ Institution with having 3 years experience in the relevant technology.

It is pertinent to refer to the note of the Rules for ready reference of this Honorable Tribunal;

" NOTE For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No.3.

Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same sessions, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials."

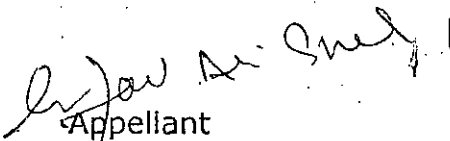
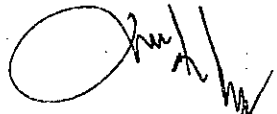
- c. That the appellant is legally entitled to be promoted to the post of Technologist (Bs-17) ahead of private respondents No.4 to 16 in terms of the Rules as referred to in ground B.
- d. That Article 25 and 27 of the Constitution of Pakistan confer fundamental right upon the appellant to be treated equally in accordance with law but the official respondents 1 to 4 failed to grant him promotion to which the appellant

is entitled under the ibid recruitment rules circulated vide notification dated 10.05.2016.

- e. That no meaningful opportunity of defence has been provided to the appellant so far, hence the provision of Article 10-A has not been complied-with which in essence speaks about the due process of law.
- f. Additional grounds will be raised at the time of arguments with the kind permission of this Honorable Tribunal.

Keeping in view the aforesaid submissions, it is, therefore, humbly prayed that On acceptance of this appeal, the appellant may kindly be declared as Senior to private respondents No.4 to 16 and thereby promoted to the post of Technologist (BS-17) with effect from his passing/ acquiring the B.S.c Degree in Dental Technology in terms of the Recruitment Rules dated 10.05.2016 notified by Provincial government with all consequential back benefits.

Any other consequential relief which this Hon'ble Tribunal deems appropriate in the circumstances of the case and not specifically asked-for may also be granted.


Appellant
through 

Inayat Ullah Khan
Advocate, Peshawar, High
Court
LLM (UK).

Dated: 29.11.2019

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.____/2019

Irfan Ali Shah Appellant

Versus

Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents**AFFIDAVIT**

I, Irfan Ali Shah S/o Abdul Ali Shah R/o Kotka Abdul Qadeer Shah (Bangash Khel) Mandan, Tehsil & District Bannu do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Irfan Ali Shah
Deponent

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.____/2019

Irfan Ali Shah Appellant

Versus

Secretary Health, Govt. Khyber Pakhtunkhwa,
Peshawar and others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Irfan Ali Shah S/o Abdul Ali Shah
R/o Kotka Abdul Qadeer Shah (Bangash Khel) Mandan,
Tehsil & District Bannu
Presently Serving as Clinical Technician BPS-12 (Dental) in the
office of erstwhile Agency Surgeon Tribal (District North
Waziristan)

RESPONDENTS:

- 1) Secretary Health, Govt. Khyber Pakhtunkhwa, Peshawar.
- 2) Director General Health, Govt of Khyber Pakhtunkhwa
Peshawar.
- 3) The Agency Surgeon Tribal District North Waziristan.
- 4) Fazle Ala S/o Fazle Maula, Serving as Clinical Technologist
(Dental in BPS-17 MTI Lady Reading Hospital, Peshawar.
- 5) Ajab Khan S/o Bashar Khan (BS-14), present posting DHO
Swat.
- 6) Akbar Khan S/o Khoja Omar (BS-12), present posting,
DHO Chitral.
- 7) Shakeel Raziq S/o Fazal Raziq (BS-14) Present posting,
LRH Peshawar.
- 8) Sher Muhammad Khan S/o Noor Muhammad (BS-12),
Present posting, SHT Hospital Swat.
- 9) Sohni Bibi D/o Sadar Jehan Mian (BS-12), Present posting,
DHO Swat.

- 10) Murad Khan S/o Ghandal Khan (BS-12), Present posting, LRH Peshawar.
- 11) Hayat Muhamamd Khan S/o Muhammad Sharif Khan (BS-12), Present posting, Batagram.
- 12) Tariq Saleem S/o Gul Payao (BS-12), Present posting, DHQH Karak.
- 13) Ismail Khan S/o Zar Gul (BS-12), Present posting, Services Hospital, Peshawar.
- 14) Saifullah S/o Shakirullah (BS-12), Present posting, BKMC Mardan.
- 15) Hidayatul Rehman S/o Tooti Rehman (BS-12), Present posting, DHQ Hosp Dir Upper.
- 16) Faizul Karim S/o Gul Khan (BS-14), Present posting, DHO Swat.

Inayat Ullah Khan
Appellant
through *Inayat Ullah Khan*

Inayat Ullah Khan
Advocate, Peshawar, High
Court
LLM (UK).

Dated: 29.11.2019

Annexure 2
"A"
13

PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIAN (DENTAL) BS-12
HEALTH DEPARTMENT KHYBER PAKHTUNKHWA 2017.

S.No	Name / Father Name	a)Old Nomenclature With BPS. b)New Nomenclature after restructuring with BPS.	Date of Joining Govt: Service/ promotion/ up-gradation	Place Of Present Posting	Date of Birth / Domicile	Date Of Retirement
1.	Ahmad Ali S/O Aurang Sher	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	12.08.1986 10.05.2006 11.08.2015	DHO Mardan	02.05.1965 Mardan	01.05.2025 Forgone his promotion to BS-12 vide letter No. 33649-53 dated 23.10.2012
2.	Rehmani Gul S/O Mabajwar	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.04.1987 10.05.2006 11.08.2015	DHO Swat	20.04.1963 Swat	19.04.2023 Forgone his promotion BS-12 vide letter No. 36280-85 dated 18.12.2012
3.	Umar Zada S/O Muhammad Younis	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	09.05.1988 10.05.2006 11.08.2015	DHO Swat	01.03.1970 Swat	28.02.2030 Forgone his promotion BS-12 vide letter No. 2559-63/E-I dated 28.01.2013
4.	Abdul Ghafoor S/O Abdul Qudoos	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.10.1988 11.08.2015	DHO DIKhan	15.09.1969 DIKhan	14.09.2029
5.	Muhammad Yousaf Zeb Khan S/O Aurangzeb	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.10.1988 10.05.2006 11.08.2015	DHQ Hosp; DI Khan	14.09.1966 / DI Khan	13.09.2026
6.	Muhammad Zahid S/O Muhammad Zaman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.10.1988 10.05.2006 11.08.2015	DHO Swat	10.04.1964 Swat	09.04.2024 Forgone his promotion BS-12 vide letter No. 2031-35 /EV/DT dated 16.01.2013 11.08.2015
7.	Muhammad Hameyun Khan S/O Gul Ayub Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	23.07.1989 10.05.2006 11.08.2015	DHO Bannu	02.07.1965 Bannu	01.07.2025
8.	Muhammad Jan S/O Faqir Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	21.08.1989 10.05.2006 11.08.2015	DHO Abbottabad	12.10.1966 / Abbottabad	11.10.2026
9.	Said Mian Khwaidad S/O Said Mian Shud	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	02.09.1989 10.05.2006 11.08.2015	DHQ Hosp; Dagger Buner	09.03.1969 Buner	08.03.2029
10.	Fazal Hakim S/O Muhammad Azim Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	03.09.1989 10.05.2006 11.08.2015	DHO Swat	29.07.1969 / Swat	26.07.2029
11.	Muhammad Javed S/O Muhammad Yaqoob	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	10.10.1989 10-05-2006 11.08.2015	DHO Haripur	15.01.1965 Mardan	14.01.2025
12.	Hamid Gul S/O Muhammad Saeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	10.10.1989 10.05.2006 11.08.2015	DHO Mansehra	04.07.1971 Mansehra	03.07.2031
13.	Muhammad Iqbal Khan S/O Ghulam Nasiruddin	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	16.10.1989 10.05.2006 11.08.2015	DHO Lakki Marwat	14.04.1962 Bannu	13.04.2022
14.	Muhammad Saeed S/O Abdur Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.11.1989 10.05.2006 11.08.2015	DHO Mansehra	12.01.1966 Mansehra	11.10.2026
15.	Ali Raza S/O Gohar Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.11.1989 10.05.2006 11.08.2015	DHO Mansehra	26.04.1966 Mansehra	25.04.2026
16.	Mushtaq Ahmed S/O Sira; Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	16.11.1989 10.05.2006 11.08.2015	DHO Peshawar	24.09.1971 Peshawar	23.09.2031
17.	Syed Taruf Hussain S/O Syed Abdul Jabber	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.11.1989 10.05.2006 11.08.2015	DHO Charsadda	14.11.1972 Charsadda	13.11.2032

Sl No: 22

18.	Muhammad Arshad S/O Muhammad Saeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.11.1989 10.05.2006 11.08.2015	LRH, Peshawar	24.10.1969 Peshawar	23.10.2029
19.	Muhammad Sajjad S/O Kala Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.11.1989 10.05.2006 11.08.2015	DHO Mansehra	30.03.1967 Mansehra	29.03.2027
20.	Farhatullah S/O Wreham Dad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	16.12.1989 10.05.2006 11.08.2015	KGNT Hosp; Bannu	11.11.1970 Bannu	10.11.2030
21.	S. Zahir Shah S/O S. Nasrab Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.01.1990 10.05.2006 11.08.2015	DHO Kohat	23.03.1970 Kohat	22.03.2030
22.	Irfan Ali Shah S/O Abdul Ali Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	17.06.1990 10.05.2006 11.08.2015	AS NWA	01.06.1971 Bannu	31.05.2031
23.	Tahir Naeem S/O Zaffar Ali Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	02.07.1990 10.05.2006 11.08.2015	DHQT Hosp; Bannu	12.06.1972 Bannu	01.06.2032
24.	Mukhtiar Ali S/O Abdullah Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	09.07.1990 10.05.2006 11.08.2015	DHO Mardan	05.01.1969 Mardan	04.01.2029
25.	Nek Daraz Khan S/O Muhammad Daraz Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.07.1990 10.05.2006 11.08.2015	DHO Bannu	16.03.1972 Bannu	15.03.2032
26.	Aurangzeb S/O Atlas Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.07.1990 10.05.2006 11.08.2015	AS NWA	25.06.1972 Bannu	19.06.2032
27.	Shafi ur Rehman S/O Shah Baraz Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	28.07.1990 10.05.2006 11.08.2015	DHO Lakki Marwat	12.01.1971 Bannu	11.01.2031
28.	Muhammad Ayub- ur-Rehman S/O Aziz-ur-Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	31.07.1990 10.05.2006 11.08.2015	DHO Peshawar	01.11.1968 Bannu	31.10.2028
29.	Baitullah Shah S/O Chaffar Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	06.08.1990 10.05.2006 11.08.2015	KGNT Hosp; Bannu	13.05.1971 Bannu	12.05.2031
30.	Shahid Janil S/O Abdul Latif	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	08.08.1990 10.05.2006 11.08.2015	Abbottabad	01.04.1970 Abbottabad	31.03.2030
31.	Siraj ud Daula S/O Abdul Manan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	15.08.1990 10.05.2006 11.08.2015	DHO Mansehra	15.11.1965 Mansehra	14.11.2025
32.	Ihsanullah S/O Misrab Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.08.1990 10.05.2006 11.08.2015	AS FR Kohat	05.04.1969 Kohat	04.04.2029
33.	Kishwar Ali Khan S/O Muhammad Kamil	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	12.09.1990 10.05.2006 11.08.2015	DHO Shangla	15.03.1970 Shangla	14.03.2030
34.	Rehmatullah S/O Khalil ullah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	30.09.1990 10.05.2006 11.08.2015	DHO Chitral	15.03.1971 Chitral	14.03.2031
35.	Gul Muhammad S/O Nek Amal Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	02.10.1990 10.05.2006 11.08.2015	DHO Bannu	02.06.1965 Bannu	01.06.2025
36.	Akbar Khan S/O Khawaja Umar.	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	15.10.1990 10.05.2006 11.08.2015	DHO Chitral	09.03.1964 Chitral	08.03.2024
37.	Fazal Banat S/O Fazal Rahim	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	17.10.1990 10.05.2006 11.08.2015	DHO Nowshera	06.03.1971 Peshawar	05.03.2031
38.	Muhammad Siraj S/O Said Rehman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.10.1990 10.05.2006 11.08.2015	DHO Nowshera	10.03.1968 Charsadda	09.03.2028
39.	Burhan Ud Din S/O Kamal Ud Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.10.1990 10.05.2006 11.08.2015	DHO Mardan	31.03.1968 Mardan	28.02.2028
40.	Tamiullah Shah S/O Sakhi Shah	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	23.10.1990 10.05.2006 11.08.2015	DHO Lakki Marwat	08.01.1964 Bannu	07.07.2024
41.	Ihsan S/O Adam Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	23.10.1990 10.05.2006 11.08.2015	DHO Mardan	14.02.1971 Mardan	13.02.2031
42.	Muhammad Hamayun Khan S/O Gul Ayub Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	23.07.1990 01.12.1990 11.08.2015	DHO Bannu	02.07.1965 Bannu	01.07.2025

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43.	Shaukat Ali S/O Fazli Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	17.03.1991 10-05-2006 11.08.2015	DHO Swat	17.01.1971 Swat	16.01.2031
44.	Gohar Ali S/O Umer Din	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.04.1991 10.05.2006 11.08.2015	DHO Nowshera	11.02.1966 Charsadda	10.02.2026
45.	Fida Muhamad S/O Abdul Majeed	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	28.04.1991 10.05.2006 11.08.2015	DHO Charsadda	27.03.1971 Charsadda	26.03.2031
46.	Niaz Muhammad S/O Kulal	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	13.05.1991 10.05.2006 11.08.2015	DHO Charsadda	24.02.1969 Charsadda	23.02.2029
47.	Tariq Mehmood S/O Sufi Waris Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.08.1991 10.05.2006 11.08.2015	DHO Haripur	11.10.1968 Haripur	10.10.2028
48.	Amjad Wali S/O Wali Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Battagram	01.04.1971 Mansehra	31.03.2030
49.	Inayat ur Rehman S/O Muhammad Yousaf	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Haripur	01.03.1970 Haripur	28.02.2030
50.	Muhammad Fateh Ali S/O Mursalin	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	28.08.1991 10.05.2006 11.08.2015	DHQ Hosp; Swabi	15.04.1969 Buner	14.02.2029
51.	Bashir Ahmed S/O Muhammad Gharat Baig	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.09.1991 10.05.2006 11.08.2015	DHO Chitral	20.02.1967 Chitral	19.02.2027
52.	Afsar Zaman S/O Khan Zaman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.01.1992 10.05.2006 11.08.2015	KGNT Hosp; Bannu	08.11.1971 Bannu	07.01.2031
53.	Abdul Wahab S/O Abdul Malik	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.01.1992 10.05.2006 11.08.2015	FR Tank	20.05.1972 FR D.I. Khan	19.05.2032
54.	Rehmat ullah S/O Fazal Khatiq	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	31.01.1992 10.05.2006 11.08.2015	DHQ Hosp; Hangu	13.04.1970 Orakzai	12.04.2030
55.	Rehmat Khan S/O Asmat Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.02.1992 10.05.2006 11.08.2015	DHO Tank	15.03.1971 D.I. Khan	14.03.2031
56.	Khali ur Rehman S/O Ghulam Habib	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	01.02.1992 10.05.2006 11.08.2015	M & C Hosp; Kohat	06.05.1977 Kohat	05.05.2037
57.	Sher Ghulam S/O Chulam Rasool	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.02.1992 10.05.2006 11.08.2015	DHO DI Khan	28.10.1969 Tank	27.10.2029
58.	Sohail Akram S/O Muhammad Akram	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	11.02.1992 10.05.2006 11.08.2015	Ayub TH Abbottabad	01.03.1969 Abbottabad	28.02.2029
59.	Tariq Saleem S/O Gul Payo	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.02.1992 10.05.2006 11.08.2015	DHO Karak	03.09.1972 Karak	02.09.2030
60.	Almar Hussain S/O Muhammad Nazir	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	18.02.1992 10.05.2006 11.08.2015	AHQ Hosp; Parachinar	25.03.1973 Kurram Ag;	24.03.2033
61.	Abdul Ghaffar S/O Gul Shaip Kahn	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	DHO Karak	10.03.1971 Karak	09.03.2031
62.	Jawad Hussain S/O Rehmat Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	AS Kurram	14.03.1971 Kurram	13.03.2031
63.	Inayat Khan S/O Dilbar Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	19.02.1992 10.05.2006 11.08.2015	DHO Kohat	04.05.1972 Kohat	03.05.2032
64.	Ahmad Nasir S/O Sakhi Muhammad	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	20.02.1992 10.05.2006 11.08.2015	DHO Karak	20.03.1971 Karak	19.03.2031
65.	Muhammad Naeem S/O Ahmed Nawaz	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.02.1992 10.05.2006 11.08.2015	DHO Karak	05.01.1960 Karak	04.01.2020
66.	Arif Ali S/O Yaqeen Ali	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	22.02.1992 10.05.2006 11.08.2015	DHO Kohat	13.03.1971 Kohat	12.03.2031
67.	Muhammad Nawaz S/O Saeed Khan	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	25.02.1992 10.05.2006 11.08.2015	DHO Kohat	01.08.1971 Kohat	31.07.2031
68.	Shaukat Islam S/O Shafiqur Rahman	Dental Technician BS-09 JCT Dental Tech: B-9 Clinical Tech: Dental Tech: B-12	12.03.1992 10.05.2006 11.08.2015	DHO Mansehra	20.01.1972 Mansehra	19.01.2037

4 (15)

Anneixure B

16



DIRECTORATE GENERAL
HEALTH SERVICES, KHYBER
PAKHTUNKHWA, PESHAWAR
No. 19494-937/AE-VII
Dated: 07/12/2017

- To:
1. The Principal, RABTICD Peshawar
 2. The Principal, AMI, Amoghatai
 3. The Principal, Baita Khan Medical College, Mardan
 4. The Director Health Services, IATA Peshawar
 5. The Hospital Director, Govt. MPTRI, KTHI, IHC Peshawar
 6. The Medical Superintendent, Saidu Group of Teaching Hospital
 7. The Hospital Director, ATTA Ayaz Teaching Hospital Abbottabad
 8. The Hospital Director, Khaila Gul Nawaz MTH Hospital Bannu
 9. The Hospital Director, Multumung General MTH Hospital Chaman
 10. The Medical Superintendent, ID Children Hospital Peshawar
 11. The Medical Superintendent, Wazirabad Children Hospital Peshawar
 12. The Medical Superintendent, Govt. Children Hospital Peshawar
 13. The Medical Superintendent, Services Hospital, Peshawar
 14. The Medical Superintendent, Mardan Medical Complex, Mardan
 15. The Medical Superintendent, Hospital for Psychiatric Diseases, Peshawar
 16. The Medical Superintendent, Govt. Hospital Dardar, Munselwa
 17. The Medical Superintendent, Govt. Hospital KPKPATA
 18. The Medical Superintendent, Govt. Hospital Peshawar
 19. The Medical Superintendent, Govt. Hospital Peshawar

Subject: PROVISIONAL SENIORITY LIST OF CLINICAL TECHNICIANS (DENTAL) BS-12 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo Enclosed please find Provisional Seniority List of Clinical Technicians (Dental) BS-12 of Health Department Khyber Pakhtunkhwa for information and circulation amongst the officials working under your control.

The same may please be brought into the notice of all concerned and objections regarding correction in Name, Father Name, date of appointment, Place of posting, date of birth and date of retirement, may kindly be sent to this Directorate within one month of the receipt of this letter after which no representation will be accepted and the Final Seniority List will be issued.

Note: The provisional seniority list can be downloaded from the website www.dhickp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

No. 19494/AE-VII
Copy forwarded to the:
1. PS to Secretary to Govt of Khyber Pakhtunkhwa, Health Department Peshawar.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

LEGIBLE COPY

DIRECTORATE GENERAL

HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.

No. 19414-93/AE-VII

Dated. 07 /12/ 2017

17

To

1. The principals KMC/KCD Peshawar
2. The principal AMC Abbottabad
3. The principal Dacha Khan Medical College Mardan
4. The Director Health Services FATA Peshawar
5. The hospital Director
Govt MTI/LRH.KTH.HMC Peshawar
6. The medical superintend.
Saidu group of teaching hospital swat.
7. The hospital director.
MTI/Ayub Teaching Hospital Abbottabad.
8. The hospital director.
Khalifa Gul Nawaz MTI/Hospital, Bannu.
9. The hospital director.
Mufti Mehmood Memorial MTI/ Hospital D.I Khan
10. The Medical Superintendent.
ID Children Hospital .Peshawar
11. The Medical Superintendent.
Women & Children Hospital GT Road Peshawar
12. The Medical Superintendent.
Govt City Hospital Kohat Road Peshawar
13. The Medical Superintendent.
Services Hospital Peshawar
14. The Medical Superintendent.
Mardan Medical Complex Mardan.
15. The Medical Superintendent .Sarhad Hospital For Psychiatric Diseases . Peshawar
16. The Medical Superintendent. General & Mental Hospital Dara Mansehra
17. The All Medical Superintendents. DHQ/ AHQ Hospital in KPK/FATA
18. The All Agency Surgeons in FATA /FRs.
19. The all district Health Officers in Khyber Pakhtunkhwa Province.

Subject: PROVISINAL SENIORITY LIST CLINICAL TECHNICANS (DENTAL) BS-12 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA

Memo

Enclosed please find provisional seniority list of clinical technicians (Dental) BS-12 of health department Khyber pakhtunkhwa of information and circulation amongst the officials working under your control.

The same may please be brought into the notice of all concerned and objection regarding correction in name, father name, date of appointment, place of posting, date of birth and date of retirement, May kindly be sent to this Directorate within one month of the receipt of this letter after which no representation Will be accepted and the final seniority list will be issued.

Note . The Provisional Seniority list can be downloaded from the website :
www.dhiskp.gov.pk

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

No. _____/AE-VII

Copy Forwarded to the:-

1 PS to secretary to Govt of Khyber Pakhtunkhwa, health Department Peshawar.

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

S. No. 217

Reg. No. MF/15/PMT/DIK

Annexure "C"

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ (18)

Roll No. 102 1st Batch

Result Declared on 3/2006

N.W.F.P. Medical Faculty Peshawar (Pakistan)

This is to Certify that

MR. IRFAN ALI SHAH Son/Daughter of MR. ABDUL ALI SHAH and a student of

PGPI BRH having passed the prescribed examination held in December, 2005

is this day admitted by the N.W.F.P. Medical Faculty Peshawar To the Degree of

Bachelor of Science in DENTAL **Technology**

in the 2nd Division



SECRETARY
NWFP MEDICAL FACULTY
Peshawar (Pakistan)



CHAIRMAN
NWFP MEDICAL FACULTY
/SECRETARY to Govt. of
NWFP Health Department Peshawar

Dated: 17-7-2008

Note: This Two Years Degree is issued under N.W.F.P. Medical & Dental Degree Ordinance XXVI of 1982
Valid for Appointment/Promotion in Health Department NWFP



Annexure "C" 1

University of Peshawar (19)
Pakistan

This certifies that

Irfan Ali Shah son of **Abdul Ali Shah**

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

Bachelor of Science (Honours) in Paramedical Sciences

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

Given this 2nd day of August, 2017.


Roll No: 1057

Session: Annual 2014

Reg. No: 2005-PGPI-52



134885


Registrar


Vice Chancellor

EXTRAORDINARY
GOVERNMENT

Annexure



REGISTERED NO: PIII
GAZETTE

21

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, TUESDAY, 10TH MAY, 2016

GOVERNMENT OF THE KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

NOTIFICATION

Peshawar dated the 10th May 2016.

No. SOI-III/HD/3-5/2014 - In pursuance of the provision contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all Notifications issued in this behalf by the Health Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the posts of Paramedical Staff in the Health Department specified in column 2 of the said Appendix.

APPENDIX

S. No.	Nomenclature of the post.	Qualification for appointment by initial recruitment.	Age limits.	Method of recruitment.
	2	3	4	5
1	Principal Technologist (BS-20)			By promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technologists and Chief PHC Technologists with five years service in BS-19 or seventeen years service in BS-17 and above as such in the relevant technology.
	(i) Principal Clinical Technologist Dental;			
	(ii) Principal Clinical Technologist Pharmacy;			
	(iii) Principal Clinical Technologist Radiology;			
	(iv) Principal Clinical Technologist Pathology;			

<ul style="list-style-type: none"> (v) Principal Clinical Technologist Anesthesia; (vi) Principal Clinical Technologist Cardiology; (vii) Principal Clinical Technologist Surgical; (viii) Principal Clinical Technologist Dialysis; (ix) Principal Clinical Technologist Physiotherapy; 	<p style="font-size: 2em; border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block;">21</p>		
<ul style="list-style-type: none"> (x) Principal Clinical Technologist Pulmonology; (xi) Principal Clinical Technologist Gastroenterology; and (xii) Principal Clinical Technologist Ophthalmology / otorhinolaryngology; and <p><u>Principle PHC Technologist</u></p> <ul style="list-style-type: none"> (i) Principal PHC Technologist (Multi Purpose); and (ii) Principal PHC Technologist (MCH). 	<p style="font-size: 2em; border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block;">21</p>		
<p>2. <u>Chief Technologist</u> CB-18</p> <ul style="list-style-type: none"> (i) Chief Clinical Technologist Dental; (ii) Chief Clinical Technologist Pharmacy; (iii) Chief Clinical Technologist Radiology; (iv) Chief Clinical Technologist Pathology; (v) Chief Clinical Technologist Anesthesia; (vi) Chief Clinical Technologist Cardiology; (vii) Chief Clinical Technologist Surgical; (viii) Chief Clinical Technologist Dialysis; (ix) Chief Clinical Technologist Physiotherapy; (x) Chief Clinical Technologist Pulmonology; (xi) Chief Clinical Technologist Gastroenterology; and (xii) Chief Clinical Technologist Ophthalmology/ Otorhinolaryngology; and 	<p style="font-size: 2em; border: 1px solid black; border-radius: 50%; padding: 5px; display: inline-block;">21</p>		<p>By promotion, on the basis of seniority-cum-fitness, from amongst Senior Technologists and Senior PHC Technologists with seven years service in BPS-18 or twelve years service in BPS-17 and above as such in the relevant technology.</p>

Chief PHC Technologist			
<ul style="list-style-type: none"> (i) Chief PHC Technologist (Multi-Purpose); and (ii) Chief PHC Technologist (MCH). 			
<p>3 <u>Senior Technologist</u> (BS-18)</p> <ul style="list-style-type: none"> (i) Senior Clinical Technologist Dental; (ii) Senior Clinical Technologist Pharmacy; (iii) Senior Clinical Technologist Radiology; (iv) Senior Clinical Technologist Pathology; (v) Senior Clinical Technologist Anesthesia; (vi) SCT Senior Clinical Technologist Cardiology; (vii) Senior Clinical Technologist Surgical; (viii) Senior Clinical Technologist Dialysis; (ix) Senior Clinical Technologist Physiotherapy; (x) Senior Clinical Technologist Pulmonology; (xi) Senior Clinical Technologist Gastroenterology; and (xii) Senior Clinical Technologist Ophthalmology/Otorhinolaryngology; and <p><u>Senior PHC Technologist</u></p> <ul style="list-style-type: none"> (i) Senior PHC Technologist (Multi-Purpose); and (ii) Senior PHC Technologist (MCH). 	<p>At least Second Class Master's Degree or B.SC Honours/ BS (04-years) in the relevant technology or equivalent qualification from a recognized University / Institution.</p>	<p>20-35 years</p>	<ul style="list-style-type: none"> (a) Fifty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Technologists and PHC Technologists with five years service as such in the relevant technology; and (b) fifty percent by initial recruitment.
<p>4 <u>Technologist</u> (BS-12)</p> <ul style="list-style-type: none"> (i) Clinical Technologist Dental; (ii) Clinical Technologist Pharmacy; (iii) Clinical Technologist Radiology; (iv) Clinical Technologist Pathology; (v) Clinical Technologist Anesthesia; 	<p>At least Second Class Bachelor's Degree in the relevant Technology from a recognized University/ Institution</p>	<p>18-32 years</p>	<ul style="list-style-type: none"> (a) Forty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians and Chief PHC Technicians with three years service as such in the relevant technology;

	<p>(vi) Clinical Technologist Cardiology; (vii) Clinical Technologist Surgical; (viii) Clinical Technologist Dialysis; (ix) Clinical Technologist Physiotherapy; (x) Clinical Technologist Pulmonology; (xi) Clinical Technologist Gastroenterology; and (xii) Clinical Technologist Ophthalmology / Otorhinolaryngology); and</p> <p><u>PHC Technologist</u></p> <p>(i) PHC Technologist (Multi-Purpose); and (ii) PHC Technologist (MCH).</p>	<p>23</p>	<p>(b) twenty percent by promotion, on the basis of seniority-cum-fitness, from amongst the Chief Technicians, Senior Technicians and Technicians having qualification prescribed for initial recruitment with three years service as such in the relevant technology.</p> <p><u>Note:</u> For the purpose of promotion, there shall be maintained a joint seniority list of Chief Technicians, Senior Technicians and Technicians with reference to the dates of their acquiring qualification prescribed for initial recruitment as in column No. 3:</p> <p>Provided that if two or more officials acquired the qualification prescribed for initial recruitment in the same session, then the official who obtains the highest marks or grade in the examination shall be deemed to be senior to the other officials; and</p> <p>(c) forty percent by initial recruitment.</p>
<p>S</p>	<p><u>Chief Technician</u> (BS-16)</p> <p>(i) Chief Clinical Technician Dental; (ii) Chief Clinical Technician Pharmacy; (iii) Chief Clinical Technician Radiology; (iv) Chief Clinical Technician Pathology; (v) Chief Clinical Technician Anesthesia; (vi) Chief Clinical Technician Cardiology; (vii) Chief Clinical Technician Surgical; (viii) Chief Clinical Technician Dialysis; (ix) Chief Clinical Technician Physiotherapy; (x) Chief Clinical Technician Pulmonology; (xi) Chief Clinical Technician Gastroenterology; and</p>		<p>By promotion, on the basis of seniority-cum-fitness, from amongst the Senior Technicians and Senior PHC Technicians with at least two years service as such in the relevant technology.</p>



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT.

Dated the Peshawar 1st February, 2018

Annexure

"E"

NOTIFICATION

No. SOH-III/8-60/2018. Upon recommendations of the Departmental Promotion Committee, the following Paramedics (Relevant Degree Holders) are hereby promoted to the post of Technologists (BS-17) in different categories/specialties in Health Department with immediate effect in the public interest.

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1/2/18

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1. Chief Technician (Anesthesia) BS-16, Senior Technicians (Anesthesia) BS-14 & Technicians (Anesthesia) BS-12 to Clinical Technologist (Anesthesia) BS-17

S.NO	Name	Place of Present posting	Remarks
1.	Arbab Sikandar S/O Mir Ahmad Khan	MTI, KTH Peshawar.	Promoted.

2. Chief Technician (Dental) BS-16, Senior Technicians (Dental) BS-14 & Technicians (Dental) BS-12 to Clinical Technologist (Dental) BS-17

S.NO	Name	Place of Present posting	Remarks
1.	Fazle Aala S/O Fazio Maulla	MTI, LRH Peshawar.	Promoted.

3. Chief PHC Technician (MCH) BS-16, Senior PHC Technicians (MCH) BS-14 & PHC Technicians (MCH) BS-12 to PHC Technologist (MCH) BS-17

S.NO	Name	Place of Present posting	Remarks
1.	Ulfat Begum D/O Faza Ahmad	DHO Charsadda.	Promoted.
2.	Arzba Komal D/O Mir Ghani	Services Hospital Peshawar.	Promoted.
3.	Bibi Benazir D/O Mubarak Khan	DHO Chitral/BHU Shughora Chitral.	Promoted.

4. Chief Clinical Technician (Ophthalmology) BS-16, Senior Clinical Technician (Ophthalmology) BS-14, Technicians (Ophthalmology) BS-12 to Clinical Technologist (Ophthalmology) BS-17

S.NO	Name	Place of Present posting	Remarks
1.	Wahed Ullah Khan S/O Muhammad Khan	KGN Hospital/MTI Bannu.	Promoted.
2.	Muhammad Iqbal Khan S/O Mubarak Khan	PHC Feroz KDA Kohat.	Promoted.
3.	Abdul Wahid S/O Gul Muhammad Khan	NBMH Kohat Road Peshawar.	Promoted.

5. Chief PHC Technician (MIF) BS-16, Senior PHC Technicians (MIF) BS-14 & PHC Technicians (MIF) BS-12 to PHC Technologist (MIF) BS-17

S.NO	Name	Place of Present posting	Remarks
1.	Muhammad Iqbal Khan S/O Mubarak Khan	DHO Peshawar.	Promoted.
2.	Muhammad Iqbal Khan S/O Mubarak Khan	DHO Sharda.	Promoted.

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3.	Abdul Razzaq S/O Muhammad Yousaf	DHO Haripur.	Promoted
4.	Fazal Hadi S/O Lajbar	PMIT Swat.	Promoted
5.	Muhammad Iqbal S/O Karim Gul	DHO Peshawar.	Promoted
6.	Syed Maqsood Anwar S/O Syed Muhammad Shah	DHO Abbottabad RHC Kund.	Promoted
7.	Zainul Abidin S/O Izat Khan	DHO Charsadda	Promoted
8.	Jan Muhammad S/O Nowshad Khan.	DHO Dir Lower	Promoted
9.	Amir Khan S/O Khan Baz	DHO Peshawar	Promoted
10.	Bashir ul Haq S/O Habibul Haq	DHO Charsadda	Promoted
11.	Muhammad Hashini S/O Gul Zarin	Agency Surgeon Bajaur	Promoted
12.	Muhammad Usman S/O Muhammad Haroon	DHO Mardan	Promoted
13.	Janas Khan S/O Amin Khan	DHO Kohat	Promoted
14.	Qaisar Khan S/O Muhammad Hanif	DHO Kohat	Promoted
15.	Aziz ur Rehman S/O Bahadar Khan	DHO Lower Dir.	Promoted

- 6. They will be on probation for a period of one year.
- 7. Posting/transfer Notification in favor of above mentioned officers will be issued later on.

**SECRETARY HEALTH
GOVT. OF KHYBER PAKHTUNKHWA**

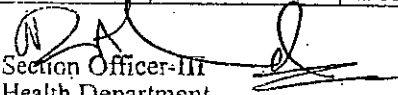
Endst. Even No. and Date

Copy forwarded to:

- 1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. The Director General Health Services, Khyber Pakhtunkhwa.
- 3. The Director General Provincial Health Services Academy, Peshawar.
- 4. The Director Health Services, PATA.
- 5. Hospital Directors, MTIs, Khyber Pakhtunkhwa concerned.
- 6. Medical Superintendents, DHO, Teaching Hospitals, Khyber Pakhtunkhwa concerned.
- 7. Principals/Deans, KMC/KCD/PGH, Peshawar.
- 8. District Health Officers, Khyber Pakhtunkhwa concerned.
- 9. District Accounts Officers, Khyber Pakhtunkhwa concerned.
- 10. The Deputy Director, Health Department.
- 11. PS to Senior Minister Health, Khyber Pakhtunkhwa.
- 12. PS Secretary Health, Khyber Pakhtunkhwa.
- 13. PS to Additional Secretary (Establishment) Health, Khyber Pakhtunkhwa.
- 14. PS to Deputy Secretary (Admin) Health, Khyber Pakhtunkhwa.
- 15. Officers concerned.

**FINAL JOINT SENIORITY LIST OF TECHNOLOGISTS BPS-17 IN VARIOUS CADRES IN THE
HEALTH DEPARTMENT KP. As on 15.04-2019**

S.No	Name & Father Name	Qualification /Academic Qualification	Date of birth & Domicile.	Date of 1st Entry into Govt. Service as Paramedic	Regular Appointment/Promotion to Present Post.			Present Posting
					Date	BPS	Method of Recruitment	
1.	Awal Badshah S/O Sharbat Khan	MSc Micro Biology	15.03.1960 Karak	21.07.1988 04.01.2005	a. Lab Tech: b. Clinical Technologist (Pathology)	BS-09 BS-17	By initial By promotion	KMC/MTI Peshawar
2.	Niaz Muhammad S/O Muhammad Sharif	B.A /Certificate	08.04.1960 Peshawar	01.10.1978 26.12.1990 28.04.2010 11.05.2012	a. Lep. Tech: b. DLS c. Chief PHC Tech: d. PHC Technologist (MP)	BS-07 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Peshawar. 03005835377
3.	Said Rehman S/O Gul Rahman	Metric/Certificate	06.03.1962 Mardan	06.01.1981 06.01.1997 28.04.2010 11.05.2012	a. Lep. Tech: b. DLS c. Chief PHC Tech: d. PHC Technologist (MP)	BS-07 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Mardan
4.	Abdul Karim S/O Abdul Latif	F.A/ Certificate	15.05.1960. Haripur	10.01.1981 22.03.1999 28.04.2010 11.05.2012	Lep. Tech: DLS Chief PHC Tech: PHC Technologist (MP)	BS-07 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Abbottabad
5.	Shahid Ahmad S/O Aftab Ahmad	B.A	01.04.1964 Abbottabad	15.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Abbottabad. 03335045265
6.	Mrs. Naheed Aziz D/O Azizur Rehman	F.A/Certificate	01.05.1959 Haripur	16.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Haripur 0333-5074536
7.	Muhammad Ihsan S/O Ashiq Hussain	Matric/Diploma	27.02.1961 Peshawar	16.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	PGPI Peshawar


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8.	Riaz Ahmad S/O Rahimullah	Certificate/B.A	15.09.1961 Charsadda	16.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Peshawar.
9.	Zahir Shah	Certificate/Matric	28.04.1960 Charsadda	17.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Charsadda
10.	Aneesur Rehman S/O Rizwanullah	M.A/Diploma	22.04.1961 Charsadda	17.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Charsadda
11.	Habibur Rehman S/O Muhammad Zaman	Certificate/Matric	28.04.1959 Manshra	18.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	PMI Abbotbad
12.	Abdur Rashid S/O Abdul Hamid	Certificate/Matric	16.03.1962 Haripur	18.02.1982 14.07.1991 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Hospital Haripur
13.	Nawaz Khan S/O Saleh Khan	B.A/MPH	01.06.1959 D.I.Khan	20.02.1982 30.09.1999 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO D.I.Khan
14.	Bashir Ahmad S/O Taj Muhammad	BA/MPH	24.04.1960 Swabi	20.02.1982 30.09.1999 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Swabi
15.	Ghulam Gillani S/O Muhammad Zaman	Certificate/matric	01.08.1960 Bannu	20.02.1982 30.09.1999 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Bannu
16.	Shahid Saleem S/O Raza Khan	BSc (Hon)	20.03.1960 Charsadda	22.02.1982 30.09.1999 28.04.2010 11.05.2012	a. Medical Tech: b. SMT c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Charsadda. 0345-9416697 0301-5963361

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Khyber Pakhtunkhwa.

The words "office or not" belonging to the same seniority of a civil servant service or prescribed as may be prescribed

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17.	Abdul Majeed S/O Abdul Halim	B.A	02.05.1959 Charsadda	25.05.1992 25.08.2006 28.04.2010 11.05.2012	a. DSV b. PHC Tech: c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Swabi
18.	Javed Khan S/O Painda Khan	F.A	15.04.1961 Charsadda	25.05.1992 25.08.2006 28.04.2010 11.05.2012	a. Asstt: Evaluator b. PHC Tech: c. Sr. PHC Tech: d. PHC Technologist (MP)	BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHS FATA
19.	Muhammad Tariq S/O S. Mubarak - Hussain	M.A	18.05.1963 Mardan	26.10.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	a.FSV b.TSV c. DSV d. PHC Tech: e. Sr. PHC Tech: f. PHC Technologist (MP)	BS-07 BS-09 BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion By promotion	DHO Peshawar
20.	Johar Muhammad S/O Faiz Muhammad	B.A	25.04.1962 Charsadda	01.11.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	a.FSV b.TSV c. DSV d. PHC Tech: e. Sr. PHC Tech: f. PHC Technologist (MP)	BS-07 BS-09 BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion By promotion	DHO Mardan
21.	Sajid Ali S/O Habibullah Khan	F.A	10.04.1963 Charsadda	01.11.1983 04.05.1986 25.05.1992 25.08.2006 28.04.2010 11.05.2012	a.FSV b.TSV c. DSV d. PHC Tech: e. Sr. PHC Tech: f. PHC Technologist (MP)	BS-07 BS-09 BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion By promotion	DHO Charsadda
22.	Wali Sardar S/O Sakhi Sardar	Matric/Certificate	03.07.1959 Miranshah	01.01.1985 04.05.1986 25.05.1992 25.08.2006 28.04.2010 14.05.2012	a.FSV b.TSV c. DSV d. PHC Tech: e. Sr. PHC Tech: f. PHC Technologist (MP)	BS-07 BS-09 BS-11 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion By promotion	SWA Miranshah
23.	Salim Shah S/O Wahab Shah	BSc (Hon)	01/01/1960 Peshawar	A.01/08/1978 B.21/04/1985 C.12/05/1991 D.02.08.2012	a. Anes: Assitt b. Anes: Tech; c. Chief Anesthesia Tech: d. Clinical Technologist(Anesthesia)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	KTH/MTI Peshawar

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department or office or sub-section (1), the service, cadre
as the case may be, to confer any vested

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24.	Muhammad Zulfiqar S/O Noor Zama Jan	BSc.	25.12.1963 Karak	09.01.1996 02.08.2012	a.Ch: Clinical (Lab)Tech: b. Clinical Technologist(Pathology)	BS-16 BS-17	By promotion	HMC/MTI Peshawar
25.	Abdul Latif		01.06.1959 Peshawar	17.09.1996 02.08.2012	a. Chief Clinical (Lab)Tech: b. Clinical Technologist(Pathology)	BS-16 BS-17	By promotion	KTH/MTI Peshawar
26.	Qayyum Jan S/O Taj Muhammad	Matric /Certificate	01/10/1960 Peshawar	19/04/1980 14/02/1983 12/08/1998 02.08.2012	a. O.T Assitt b. O.T. Tech; c. Chief OTT d. Clinical Technologist (Surgical)	BS-05 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	KTH/MTI Peshawar
27.	Isam Gul S/O Gul Mir	Matric /Certificate	10/06/1960 Peshawar	02/10/1980 14/02/1983 12/08/1998 02.08.2012	a. O.T Assitt b. O.T. Tech; c. Chief OTT d. Clinical Technologist (Surgical)	BS-05 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	LRH/MTI Peshawar
28.	Asifaq Ullah S/O Safid Ullah Khan	F.A.	01-08-1965 Nowshera	03-03-1991 06.03.2010 02.08.2012	a. Modler b. Sr. C. Tech: c. Clinical Technologist(Pharmacy)	BS-11 BS-14 BS-17	By initial By promotion By promotion	DHQH Nowshera
29.	Tajmir Shah S/O Fazli Hakeem	B.A/LLB	19.03.1963 Charsadda	01.07.1992 06.03.2010 02.08.2012	a. ECT Tech: b. Sr. C. Tech: c. Clinical Technologist(Pharmacy)	BS-11 BS-14 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
30.	Mian Zia ul Haq S/O Mian Hamdul Haq	FSc /Diploma	25.12.1965 Peshawar	06.07.1992 15.02.2010 02.08.2012	a. Laser Tech. b. Sr. Clinical (Oph) Tech: c. Clinical Technologist (ophthalmology)	BS-11 BS-14 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
31.	Sheraz Khan S/O Taj Muhammad	FSc /Diploma	15.03.1973 Charsadda	15-02-2010 06.03.1999 02.08.2012	a. Laser Technician b. Sr. Clinical (Oph)Tech: c. Clinical Technologist Ophthalmology	BS-11 BS-14 BS-17	By initial By promotion By promotion	HMC/MTI Peshawar
32.	Muhammad Jamshed S/O Ghulam Qasim	B.A /Diploma	20.05.1976 D.I.Khan	26.06.1999 25.08.2006 02.08.2012	a.Modler b. CT Pharmacy c. Clinical Technologist Pharmacy	BS-11 BS-12 BS-17	By initial By promotion By promotion	DHQH/MTI D.I.Khan
33.	Nusrat Gul S/O Abad Gul	BSc (H)/ Certificate	15.03.1969	11.11.1990 29.03.1995 02.03.2010 02.08.2012	a. ECG Tech; b. EEG (Pharmacy) Tech; C. Tech c. Clinical Technologist (Pharmacy)	BS-09 BS-12 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar 0301-8881433
34.	Khalid Khan S/O Waheedullah	B.A/Diploma	01.01.1976	26.08.1995 02.03.2010 02.08.2012	a. EEG Tech: b. C. Tech c. Clinical Technologist Pharmacy	BS-09 BS-12 BS-17	By initial By promotion By promotion	HMC/MTI Peshawar 0342-9118244
35.	Sartaj Bahadar S/O Khan Bahadar	BSc/MA/Diploma	05/11/1962 Peshawar	15/02/1984 05.03.2010 02.08.2012	a. Pulmonary Function Test Tech: b. Clinical Tech: c. Clinical Technologist(Pulmonology)	BS-09 BS-12 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar. 0321-9071398

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Khyber Pakhtunkhwa.

whether serving the same department or not, as the case may be, under any vested provisions of sub-section (1), the

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36.	Gul Rehman S/O Haji Abdul Hameed	BSc (H)	03/05/1961 Charsadda	28/05/1988 20/07/1992 05.03.2010 02.08.2012	a. Dispenser b. Pulmonary Function Test Tech: c. Clinical Tech: d. Clinical Technologist (Pulmonology)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	LRH/MTI Peshawar
37.	Farah Deebea D/O Muhammad Nawaz	F.A/Diploma	17/11/1959 Lakki Marwat.	17/02/1979 15/07/2004 29.04.2010 19.08.2013	a. LHV b. AIHS c. Sr PHC Tech d. PHC Technologist (MCH)	BS-09 BS-12 BS-14 BS-17	By initial By promotion By promotion By promotion	DHO Lakki Marwat.
38.	Afzal ur Rehman S/O Mira Khan	MA/Diploma	09/05/1966 Swabi	12/12/1989 20.04.2010 19.08.2013	a. X-Ray Tech b. Clinic Tech c. Clinical Technologist (Radiology)	BS-09 BS-12 BS-17	By initial By promotion By promotion	DHQ Hosp: Swabi
39.	Gul Sher Khalil S/O Fazal Sher Khalil	B.A/Certificate	01.10.1971 Peshawar	03.03.1991 20.04.2010 19.08.2013	a. X-Ray Tech b. Clinic Tech c. Clinical Technologist (Radiology)	BS-09 BS-12 BS-17	By initial By promotion By promotion	KTH/MTI Peshawar
40.	Razeem Khan S/O Fazali Rahman	BSc/Certificate	04.12.1967 Mardan	04.03.1991 20.04.2010 19.08.2013	a. X-Ray Tech b. Clinic Tech c. Clinical Technologist (Radiology)	BS-09 BS-12 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
41.	Jamil Khan S/O Muhammad Amir Khan	Matric/Diploma	01/01/1969 NW Agency	18/03/1993 20.04.2010 19.08.2013	a. X-Ray Tech b. Clinic Tech c. Clinical Technologist (Radiology)	BS-09 BS-12 BS-17	By initial By promotion By promotion	KTH/MTI Peshawar
42.	Muhammad Alam S/O Habibur Rehman	FSc/Certificate	28/04/1971 Swat	12/03/1999 20.04.2010 19.08.2013	a. X-Ray Tech b. Clinic Tech c. Clinical Technologist (Radiology)	BS-09 BS-12 BS-17	By promotion	STH Swat.
43.	Abdur Rahman S/O Gul Hassan Badshah	Matric/Diploma	25.09.1973 Karak.	27.12.1994 31.08.2000 20.04.2010 19.08.2013	a. R.Grapher b. X-Ray Tech c. Clinic Tech d. Clinical Technologist (Radiology)	BS-06 BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	KGN Hosp: MTI Bannu.
44.	Tasleem D/O HabibUllah	Matric/Certificate	30.06.1959 Nowshera	01.03.1979 29.04.2010 19.08.2013	a. LHV b. PHC Tech: c. PHC Technologist (MCH)	BS-09 BS-12 BS-17	By initial By promotion By promotion	DHO Peshawar
45.	Nighat Rashid D/O Abdul Ashid	Matric/Diploma	27.04.1960 Peshawar	01.03.1979 19.08.2013	a. LHV b. PHC Technologist (MCH)	BS-09 BS-17	By initial By promotion	PHS Nishtarabad. Peshawar
46.	Syed Hasnain S/O Syed Muhammad Sibtain	BS (H) Radiology	01.04.1973 Kurram	27-12-1994 30.08.2003 19.08.2013	a. Radiographer b. X-Ray Tech: c. Clinical Technologist (Radiology)	BS-06 BS-09 BS-17	By initial By promotion By promotion	PIMS Islamabad On Deputation.

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Section Officer-III
Health Department
Khyber Pakhtunkhwa.

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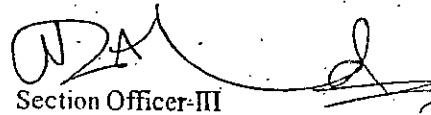
47.	Muhammad Fayaz Khan S/O Rehan Shah	DPT	03/02/1977 Mardan	27/08/1997 2011	a. Physiotherapy Tech. b. Clinical Technician Physiotherapy c. Clinical Technologist (Physiotherapy)	BS-09 BS-12 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
48.	Asghar Khan S/O Asal Jan	BSc (MLT)	13-05-1974	Regularized under Act on 11-04-2017	Clinical Technologist (Pathology)	BS-17	By initial	KGN/MTI Bannu.
49.	Farman Ullah	BS (vision sciences)	10-03-1979	Regularized under Act on 11-04-2017	Clinical Technologist (Ophthalmology)	BS-17	By initial	KGN/MTI Bannu.
50.	Asif Mehmood S/O Noor Khan	Bsc (Hon) - Microbiology	02-08-1985	Regularized under Act on 11-04-2017	Clinical Technologist (Pathology)	BS-17	By initial	KGN/MTI Bannu.
51.	Muhammad Haroon S/O Abdul Qayyum	MPH/Diploma	01-01-1960	15.02.1984 21.02.2011 11.05.2012 11-08-2015 17-05-2017	a. Health Tech: BPS 09 b. PHC Tech: BS-12 c. Sr. PHC Tech: B-14 d. PHC Technologist (MP-BS-17)	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By S.C Of Pakistan Decision	KGN/MTI Bannu. DHO Mansehra
52.	Sher Dil S/O Muhammad Akram	Matric/Certificate	15.09.1959	06.08.1977 02.10.1986 26.05.1992 21-07-2017	a. Ans Asst: b. Ans Tech: c. Ch; Anaesth; d. Clinical Technologist (Anesthesia)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	KTH/MTI Peshawar
53.	Tahir Gul	Matric/Certificate	11.11.1959	07.01.1978 22.12.1987 12.08.1998 21-07-2017	a. Ans Asst: b. Ans Tech: c. Ch; Anaesth; d. Clinical Technologist (Anesthesia)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	KTH/MTI Peshawar
54.	Habib Khan S/O Hashim Khan	Matric/Diploma	18.06.1961	20.05.1984 05.10.1985 31.12.2005 21-07-2017	a. Lab Asst: b. Lab Tech: c. Chief Lab Tech d. Clinical Technologist (Pathology)	BS-05 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	KGN Bannu
55.	Hidayatullah S/O Eid Muhammad	M.A/Certificate	01.06.1959	22.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHCT e. PHC Technologist (MF)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Kohat

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Section Officer-III
Health Department
Khyber Pakhtunkhwa

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56.	Rafiullah S/O Dakhil Gul	M.A	03.05.1963	22.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHCT e. PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Tank
57.	Shabir Nawaz S/O Ghareeb Nawaz	M.A	15.05.1963	22.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHCT e. PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Karak
58.	Abid Iqbal S/O Kachkool Bacha	BS (H)	08.10.1959	23.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHC Tech: e. PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Dir Lower
59.	Shoukat Ali S/O Roshnai Gul	M.A/Certificate	15.08.1963	24.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHC Tech: e. PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Karak
60.	Hameedullah	F.A/certificate	15.08.1963	27.02.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHC Tech: e. PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Bannu
61.	Zari Badshah	F.A	09.01.1960	28.02.1982 24.08.1983 11.05.2012 11.05.2012 21-07-2017	a. Med: Tech: b. Med Tech: c. PHC Tech: d. Chief PHC Tech: e. PHC Technologist (MP)	BS-07 BS-09 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Mardan
62.	Bashir Ahmad S/O Faqir Muhammad	MA/ Certificate	01-03-1962	03.03.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	Med: Tech: BPS-07 Med Tech: BPS-09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Shangla


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 Health Department
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63.	Fazal Ahmad	Matric/certificate	26.11.1959	13.03.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a.Med. Tech: b.Med Tech: c.PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Lakki Marwat
64.	Muhammad Bashir S/O Gohar Rehman	Matric/Certificate	01.04.1961	15.03.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a.Med. Tech: b.Med Tech: c.PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Abbotabad
65.	Nageena Azmat	Matric/Certificate	10.11.1963	20.04.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a.Med. Tech: b.Med Tech: c.PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Peshawar
66.	Sher Zada	Matric/Certificate	20.09.1959	21.04.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a.Med. Tech: b.Med Tech: c.PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Charsadda
67.	Rashida Akhtar	F.A	01.07.1963	21.04.1982 24.08.1983 21.02.2011 11.05.2012 21-07-2017	a.Med. Tech: b.Med Tech: c.PHC Tech: d.Chief PHC Tech: e.PHC Technologist (MP)	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Nowshera 03005941032
68.	Abdul Latif S/O Muhammad Nazeef	Certificate/Matric	10.10.1959	29/10/1978 02.03.2010 02.08.2012 21-07-2017	a.Dispenser b.C. Tech c.Chief Tech: d.Clinical Technologist (Pharmacy)	BS-06 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Bannu
69.	Muhammad Ishfaq S/O Inayatullah.	Diploma/M.A	03.03.1962	26.10.1982 18.09.1988 20.04.2010 02.08.2012 21-07-2017	a.Dispenser b.Dialysis Tech c.Sr. Ct. Tech: d.Chief Tech: e.Clinical Technologist (Dialysis)	BS-06 BS-11 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	KTH/MTI Peshawar


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Khyber Pakhtunkhwa.

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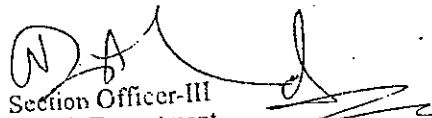
70.	Muhammad Ishaq S/O Khan Bahadar	Diploma/M.A	12.11.1959	24.05.1979 26.08.1987 19.09.1993 20.04.2010 02.08.2012 21-07-2017	a. Dispenser b. Kdny Mach:Tech c. Dialysis Tech d. Sr. Cl: Tech: c. Chief Tech: e. Clinical Technologist (Dialysis)	BS-06 BS-11 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	LRH/MTI Peshawar
71.	Muslim Jan S/O Muhammad Sharif	Matric/Diploma	1/12/1967	02/09/1987 08.04.2010 02.08.2012 21-07-2017	a.BBT b.Clinical Tech: c.Chief Tech: d.Clinical Technologist (Pathology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHQ Mardan.
72.	Khushdil Khan S/O Abdur Rahman	Matric/Certificate	24/05/1965	10/02/1981 20/10/1987 08.04.2010 02.08.2012 21-07-2017	a.Lab Asst: - b.BBT c.Clinical Tech: d.Chief Tech: e.Clinical Technologist (Pathology)	BS-05 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	LRH/MTI Peshawar.
73.	Habib Akbar	Matric/Diploma	16.12.1964	01.02.1983 16.09.1984 5.04.2010 02.08.2012 21-07-2017	a.O.T Asst: b.O.T Tech: c.CT (Surgical) d.Ch; CT (Surgical) e.Clinical Technologist (Surgical)	BS-05 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	HMC/MTI Peshawar
74.	Malik Tahir Awan S/O Malik Akhtar Awan	D.com/ Certificate	23.03.1965 Peshawar	29/10/1988 20.04.2010 02.08.2012 21-07-2017	a.FlourescienAngioTech. b.Clinical Tech: c.Chief Ophth: Tech: d.Clinical Technologist (Ophthalmology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	LRH/MTI Peshawar 03129127770
75.	Wisal Muhammad S/O Siraj Muhammad	Certificate/B.A	11/8/1960	12/01/1982 20.05.2010 02.08.2012 21-07-2017	a.ECG Tech b.C/Tech: c. Chief Tech: d.Clinical Technologist (Cardiology)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	HMC/MTI Peshawar 0315-9831549
76.	Iftikhar Ahmad S/O Abdul Ghafar	M.A	15.04.1964	10/11/1994 02.08.2012 21-07-2017	a.Ophthalmic Tech. b.Chief Ophth: Tech: c.Clinical Technologist (Ophthalmology)	BS-09 BS-16 BS-17	By initial By promotion By promotion	KTH/MTI Peshawar
77.	Muhammad Saleem S/O Ali Muhammad	B.A/Diploma	10.03.1960	02/12/1979 01/06/1995 02.08.2012 21-07-2017	a.Dispenser b.Ophth: Tech: c.Chief Ophth: Tech: d.Clinical Technologist (Ophthalmology)	BS-06 BS-09 BS-16 BS-17	By initial By promotion By promotion By promotion	DHQ/MTI Hosp: DI Khan

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Health Department
Khyber Pakhtunkhwa.

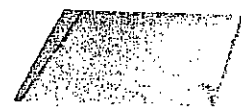
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78.	Tariq Saeed S/O Ghulam Rahmani	BS Ophthalmic	01.01.1972	02/04/1996 02.08.2012 21-07-2017	a. Ophth. Tech. b. Chief Ophth. Tech: c. Clinical Technologist (Ophthalmology)	BS-09 BS-16 BS-17	By initial By promotion By promotion	LRH/MTI Peshawar
79.	Nisar Ahmad S/O Muhammad Ashraf	Matric/ Certificate	01.03.1962	18.12.1989 15.04.2010 02.08.2012 21-07-2017	a. CSSD Tech b. CT (Surgical) c. Ch; CT (Surgical) d. Clinical Technologist (Surgical)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	KGN/MTI Techning Hospital BAnnu.
80.	Ajmal Khan S/O Sarfaraz	Matric/Certificate	2.1.1961	05.01.1981 01.03.1991 15.04.2010 02.08.2012 21-07-2017	a. O.T Asst: b. O.T Tech: c. CT (Surgical) d. Ch; CT (Surgical) e. Clinical Technologist (Surgical)	BS-06 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	KTH/MTI Peshawar
81.	Rukhtaj D/O Muhammad Azeem	Matric /Certificate	04-12-1959	16.03.1980 29.04.2010 24.07.2013 21-07-2017	a. LHV b. PHC Tech: c. Chief PHC Tech: d. PHC Technologist (MCH)	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Mansehra
82.	Sakina Bibi D/O Abdul Ghaffar	Matric /Certificate	5/9/1960	13.03.1980 24.07.2013 21-07-2017	a. LHV b. Chief PHC Tech: c. PHC Technologist (MCH)	BS-09 BS-16 BS-17	By initial By promotion By promotion	DHO D.I Khan
83.	Shafi ur Rehman S/O Shad Ali Khan	B.A /Certificate	07.11.1962	01.12.1983 27.01.2011 02.08.2012 11-08-2015 21-07-2017	a. Disp: b. C/Tech: c. Sr. Tech: d. Chief Tech: e. Clinical Technologist (Pharmacy)	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Hosp: Karak 03449002142
84.	Farkhanda Jabeen S/O Muhammad Shafiq	Matric/Certificate	31.03.1963	08.03.1981 29.04.2010 24.07.2013 11-08-2015 21-07-2017	a. LHV b. PHC Tech: c. Sr. PHC Tech: d. Chief PHC Tech: e. PHC Technologist (MCH)	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Peshawar
85.	Syed Maqsood Anwar S/O Muhammad Shah	BS (H) (Health Technology)	02.08.1960 Peshawar	19.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PGPI Haripur


 Section Officer-III
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86.	Khalid Khan S/O Durrani Khan	BS (H) (Health Technology)	01.03.1961	21.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	As Disp: BS-06 Med: Tech: BPS-07 Health Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-06 BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PGPI Peshawar
87.	Fazal Hadi S/O Lajbar	BS (H) (Health Technology)	24.05.1959 Swat	27.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PMIT Swat
88.	Jan Muhammad S/O Nowshad Khan	BS (H) (Health Technology)	17.11.1961	25.06.1983 24.08.1983 21.02.2011 11.05.2012 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Dir Lower
89.	Kamal Zada S/O Muhammad Nawab	MA/MPH Diploma	02.04.1981	14.06.2004 10.05.2006 11.05.2012 23-02-2018	CDC Sup: BPS-11 PHC Tech: BPS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-11 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Shangla
90.	Naik Zamin S/O Zarif Khan	FA/Certificate	16.04.1960	24.02.1979 11.05.2006 02.03.2010 02.08.2012 23-02-2018	Dispenser BPS 06 Tech BS-12 Sr. Tech: BS-14 Chief CT (Pharmacy) BS-16 C.T Pharmacy BS-17	BS-07 BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Malakand
91.	Meher Shah S/O Akbar Khan	Matric/certificate	04.04.1960	18.09.1978 11.05.2006 02.03.2010 02.08.2012 23-02-2018	Dispenser BPS 06 JCT (Pharmacy) BS-09 CT (Pharmacy) BS-12 Chief CT (Pharmacy) BS-16 C.T Pharmacy BS-17	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHS FATA 0341-9389308
92.	Inam Jan S/O Rafullah	MA/Certificate	20/05/1960	20/05/1979 20/10/1987 08.04.2010 02.08.2012 23-02-2018	Lab Asst: BS 05 BET BS 09 Clinical Tech: B-12 Chief Tech: BS-16 Clinical Technologist (Pathology) BS-17	BS-06 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Mardan Mardan 03018939665
93.	Fazle Aala S/O Fazle Moula	BS (H) Dental Technology	15.10.1965	24.03.1983 20.04.2010 30.08.2012 23-02-2018	Dental Tech B-9 Clinical Tech: BS-12 Chief Tech: BS-16 C.T Dental BS-17	BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	LRH Peshawar

Section Officer-III
Health Department
Khyber Pakhtunkhwa.

... take effect from the date of service, unless otherwise provided in the service rules or orders. The provisions of the service rules or orders shall apply to the employees of the department in relation to other departments.

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94.	Malik Irfanullah S/O Malik Afzal Khan	BS (H) (Health Technology)	01.01.1973 Kohat	17/09/1996 02.08.2012 23-02-2018	Ophth: Tech. BPS-09 Chief Ophth: Tech: BS-16 Clinical Technologist (Ophth) BS-17	BS-09 BS-16 BS-17	By initial By promotion By promotion	DHQ Hosp: KDA Kohat 31.12.2032
95.	Waheedullah Khan S/O Muhammad Karim	BS (H) (Ophthalmology)	20.02.1978 Bannu	08/12/2005 02.08.2012 23-02-2018	Refractionist BPS-09 Chief Ophth: Tech: BS-16 Clinical Technologist (Ophth) BS-17	BS-09 BS-16 BS-17	By initial By promotion By promotion	KGN Teaching Hospital Bannu.
96.	Zainul Abidin S/O Izzat Khan	BS (H) (Health Technology)	02.11.1959 Peshawar	15.10.1985 21.02.2011 11.05.2012 11-08-2015 23-02-2018	Health Tech: BPS 09 PHC Tech: BS-12 Sr. PHC Tech: B-14 Chief PHC Tech: B-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-16 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Charsadda
97.	Hamida Begum S/O Umar Gul	Matric/ Certificate	06.07.1959 Mardan	19.03.1981 29.04.2010 24.07.2013 11.08.2015 23-02-2018	LHV BPS 09 PHC Tech: B 12 Sr. PHC Tech: BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-16 BS-14 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Charsadda
98.	Shaheen Miraj S/O Yousaf Muhammad	Matric/ Certificate	15.04.1962 Swabi	24.03.1981 29.04.2010 24.07.2013 11-08-2015 23-02-2018	LHV BPS 09 PHC Tech: B 12 Sr. PHC Tech: BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Swabi
99.	Muhammad Iqbal S/O Karim Gul	BS (H) (Health Technology)	01.05.1963 Peshawar	09.02.1984 21.02.2011 11.05.2012 11-08-2015 23-02-2018	Med: Tech: BPS-07 Med Tech: BPS 09 PHC Tech: BS-12 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-07 BS-09 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	PGPI Peshawar
100.	Aziz ur Rehman S/O Bahadar Khan	BS (H) (Health Technology)	16.05.1959 Dir Lower	17.02.1984 11.05.2012 11-05-2012 11-08-2015 23-02-2018	Health Tech: BPS 09 PHC Tech: (MP) B-12 Sr. PHC Tech: (MP) BS-14 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHS FATA
101.	Ulfat Begum S/O Fazal Ahmad	BS (H)	20.10.1962 Mardan	20.03.1982 02.08.2012 11.08.2015 25-10-2017 23-02-2018	Lady Health Visitor BS-09 PHC Tech; (MCH) BS-12 SPHC Tech; (MCH) BS-14 Chf PHC The (MCH BS-16 PHC Technologist (MCH) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Peshawar
102.	Qaisar Khan S/O Muhammad Hanif	BS (H) (Health Technology)	05.10.1963	12.02.1986 02.08.2012 11.08.2015 25-10-2017 23-02-2018	Health Tech: BPS 09 PHC Tech: (MP) B-12 SPHC Tech: (MP) B-14 Chief PHCT BS-16 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-14 BS-16 BS-17	By initial By promotion By promotion By promotion By promotion	DHO Kohat

Section Officer-II
Health Department
Khyber Pakhtunkhwa.

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103.	Abdul Razaq S/O Muhammad Yousaf	BSc (H) (Health Technology)/ (MSPH)	15/05/1965 Haripur	08.03.1988 11.05.2012 11.08.2015 23-02-2018	JR. PHC Tech: (MP) BS-09 PHC Tech: (MP) B-12 Sr. PHC Tech: (MP) BS-14 PHC Technologist (MP) BS-17	BS-9 BS-12 BS-16 BS-17	By initial By promotion By promotion By promotion	DHO Haripur
104.	Bashir ul Haq S/O Habib ul Haq	BS (H) (Health Technology)	14.04.1966 Charsadda	13.05.1986 11.05.2012 23-02-2018	Health Tech: BPS-09 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHS FATA
105.	Bibi Benazir D/O Mubarak Khan	BS (H) (Health Technology)	06.06.1968 Chitral	14.03.1992 11-08-2015 23-02-2018	LHV BPS-09 PHC Tech: (MCH) BS-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHO Chitral
106.	Amir Khan S/O Khan Baz	BS (H) (Health Technology)	04.04.1962	11.04.1995 11-08-2015 23-02-2018	JPHC Tech: (MP) BS-9 PHC Tech: (MMP) BS-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion	DHS FATA
107.	Arbab Sikandar S/O Mir Ahmad Khan	BS (H) Anesthesia	02.02.1972	06.02.1995 10.05.2006 11.08.2015 23-02-2018	a) Anaesthesia Asst: B-6 b) JCT Anaesthesia: B-9 c) C.T. Anaesthesia: B-12 Clinical Technologist (Anesthesia) BS-17	BS-06 BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	KDA Kohat
108.	Muhammad Usman S/O Muhammad Haroon	BS (H) (Health Technology)	02.04.1984 Mardan	07.12.2006 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	PMIT Swat
109.	Muhammad Hashim S/O Gul Zarin	BS (H) (Health Technology)	04.01.1981 Bajaur	26.12.2006 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHS FATA
110.	Janas Khan S/O Anin Khan	BS (H) (Health Technology)	11.11.1968 Kohat	02.08.2007 11.08.2015 23-02-2018	JPHC Tech (MP) B-9 PHC Tech: (MP) B-12 PHC Technologist (MP) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	DHO Hangu
111.	Abdul Wahid S/O Gul Muhammad	BS (H) (Ophthalmology)	03.08.1983 Karak	16.11.2009 11.08.2015 23-02-2018	JCT Ophthalm: BS-09 CT Ophthalm: BS-12 C Technologist (Ophthalmology) BS-17	BS-09 BS-12 BS-17	By initial By promotion By promotion By promotion	NBM Hosp: Peshawar

Section Officer-III
Health Department
Khyber Pakhtunkhwa.

on to other civil service, or to any other department or office, shall be effective from the date of the order of the Government of Khyber Pakhtunkhwa.

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112.	Khair-ur-Rehman S/O Anwar-ul-Haq	BS (H) (Health Technology)	20.08.1966 Shangla	11.10.2012 11.08.2015 23-02-2018	JPHC Tech(MP)B-9 PHC Tech;(MP)B-12 PHC Technologist (MP) BS-17	BS-9 BS-12 BS-17	By initial By promotion By promotion	DHO Swat.
113.	Areeta Kumari D/O Mir Chand	BS (H)	12.10.1986 Buner	02.01.2014 11.08.2015 23-02-2018	JPHC Tech; (MCH) BS-9 PHC Tech; (MCH) BS-12 PHC Technologist (MCH) BS-17	BS-9 BS-12 BS-17	By initial By promotion By promotion	DHO Peshawar
114.	Muhammad Khalid S/O Muhammad sharif Khan	BSc MLT /MSc Hematology	08-09-1975 Tank.	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar
115.	Iqbal Muhammad S/O Mumtaz Hussain	BSc MLT /MSc Micro/ M Phil Micro	15-04-1980 Shangla	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar
116.	Muhammad Tariq S/O Fateh Mul Khan	BS (H) MLT	12-01-1989 Dir Lower	26-02-2018	Clinical Technologist, Pathology BS-17	BS-17	By initial Reg through Act 26-02-18	RBC Hayatbad Peshawar

Note:- It is certified that the seniority list is final and undisputed and has been prepared after circulation of tentative Seniority list & during stipulated period of tentative no objections have been received from any officer concern.

Verified

[Signature]

Section Officer-III
Health Department
Khyber Pakhtunkhwa

[Signature]
Director General Health Services,
Khyber Pakhtunkhwa Peshawar.

... shall take effect from ...
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Annexure F-2

40



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

7353

8.8.19 Dated the Peshawar 08th August, 2019

NOTIFICATION.

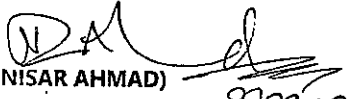
No. SOH-III/10-4/2019. In terms of sub-section (5) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Establishment Department's circular letter No. SOR-I(E&AD)3-15/88(Vol-I), dated: 09-05-2002, the Competent Authority has been pleased to notify the final joint seniority list of Technologists (BS-17), in various cadres in the Health Department Khyber Pakhtunkhwa as stood on 15-04-2019 for information of all concerned.

**Secretary to Govt. of Khyber Pakhtunkhwa,
Health Department**

Endst No. of even No and Date.

Copy forwarded to:-

1. The Director General Health Services, Khyber Pakhtunkhwa, Peshawar **with the direction to circulate the final joint seniority list of Technologists (BS-17) in various cadres in Health Department to all concerned.**
2. Deputy Director (I.T) Health, Khyber Pakhtunkhwa with the request to upload it on the website of Health Department.
3. PS to Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary Health, Khyber Pakhtunkhwa.
5. PA to Additional Secretary (Estab.) Health, Khyber Pakhtunkhwa.
6. Officers concerned.

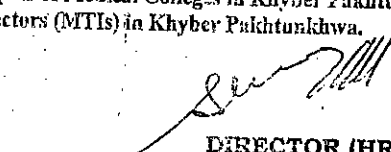

(NISAR AHMAD)
SECTION OFFICER (E-III) 8/8/19

**OFFICE OF THE DIRECTOR GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA PESHAWAR.**

No. ~~17288~~ -350 /E-V Dated Peshawar the ~~07/08~~ /2019.

Copy of the above is forwarded to the mention below for information with request to circulate amongst All officers concern under your control.

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.


DIRECTOR (HRM)
DIRECTORATE GENERAL HEALTH
KHYBER PAKHTUNKHWA, PESHAWAR.

**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.
Exchange Ph. 091-9210187 - 196 Fax. 091-9210130 Web. www.healthkp.gov.pk

Anheuser G.



(41)

To:

1. The DG PHSA Peshawar.
2. The Director Health Services Merged Districts Peshawar.
3. All Sub-Offices of Health Services in Khyber Pakhtunkhwa/ Merged Districts.
4. All Deans/Principals of Medical Colleges in Khyber Pakhtunkhwa.
5. All Hospital Directors (MTIs) in Khyber Pakhtunkhwa.

Subject: **FINAL SENIORITY LIST OF (DEGREE HOLDERS) CLINICAL TECHNICIANS DENTAL/ SR. C.TECHNICIANS DENTAL / CHIEF CLINICAL TECHNICIANS DENTAL (AS PER APPROVED SERVICE RULES) OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.**

Memo:

Enclosed please find final Seniority List of Qualified (Degree Holders) Clinical Technicians Dental (BS-12) / Sr. Clinical Technicians Dental (BS-14) / Chief Clinical Technicians Dental (BS-16)(as per approved service Rules) of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned.

Note:- Final Seniority List has also can be downloaded from the official website of Directorate General Health Services KP, Peshawar. www.dghskp.gov.pk

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

No. 103/3 - ⁴⁰³ IAE-VII Dated 27/6/2019

Copy forwarded to the:-

1. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar

**DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

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Final Seniority list of Degree Holder Paramedics Dental 2019.

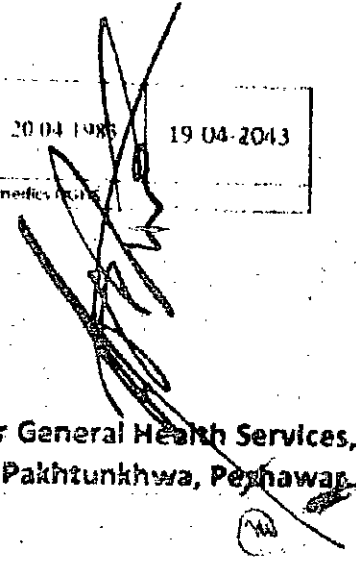
S. No.	Name & Father Name	BPS	Date of 1st appointment	Date of Passing Degree	Total / Obtained Marks & Division.	%age	University	Present Posting	Domicile	Date of Birth	Date of Retirement
1.	Ajab Khan S/O Bashir Khan	BS-14	07 05 1988	Feb 2012 BS (H)	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01 03 1988	28 02 2028
2.	Akbar Khan S/O Khoja Omar	BS-12	15 10 1960	Feb 2012 BS (H)	3151 / 5000	63 02	University of Peshawar	DHO Chitral	Chitral	09 03 1964	23/2024
3.	Shakrullah S/O Faraz Faraz	BS-14	03 08 1987	Feb 2012 BS (H)	3115/5000	62.3	University of Peshawar	LRH Peshawar	Peshawar	14 11 1988	13-11-2028
4.	Shir Muhammad Khan s/o Noor Muhammad	BS-12	22 08 1984	Feb-12 BS (H)	2744 / 5000	54.88	University of Peshawar	SGT Hosp Swat	swat	30 03 1984	29-03-2084
5.	Sohail Bilal U/O Sadaq Jehan Mian	BS-12	19 11 2013	Feb 12 BS (H)	2772 / 5000	54.44	University of Peshawar	DHO Swat	Swat	20 09 1988	18 09 2048
6.	Murad Khan S/O Ghansai Khan	BS-12	12 10 1983	12/2/2015 BS (H)	3044 / 5000	71.68	University of Peshawar	LRH Peshawar	Charsadda	27 03 1974	28 03 2034
7.	Hayat Muhammad Khan S/O Muhammad Shariq Khan	BS-12	21-12-2001	12/2/2015 BS (H)	3314/5000	66.28	University of Peshawar	DHO Batagram	Batagram	17 04 1979	18-04-2039
8.	Tariq Saleem S/O Gul Fayaz	BS-12	18 02 1982	12/2/2015 BS (H)	3131 / 5000	62.62	University of Peshawar	DHO Karak	Karak	03 09 1972	02 09 2032
9.	Ismail Khan S/O Zar Gul	BS-12	15.07 2015	17/03/2017 BS (H)	361	76.3	KMU UNI	Services Hosp Peshawar	Peshawar	01 03 1991	28/02 2051
10.	Sarf Ullah S/O Shakirullah	BS-12	09 01 2013	17/03/2017 BS (H)	352	75.2	KMU UNI	BKMC Mardan	Niwshera	02 10 1985	01 10 2045

11.	Hidayatulrehman S/O Tooti Rehman	BS-12	24.04.2009	17/03/2017 BS (H)	2.88	68.8	KMU UNI	DHQ Hosp; Dir Upper	Dir Upper	01.03.1984	28-02-2044
12.	Faizul Karim S/O Gul Khan	BS-14	02.05.1988	2/8/2017 BS (H)	5000/3151	63.02	University of Peshawar	DHO Swat	Swat	01.01.1968	31.12.2027
13.	Irfan Ali Shah S/O Abdul Ali Shah	BS-12	17.06.1990	2/8/2017 BS (H)	2947/5000	58.94	University of Peshawar	AS NWA	Bannu	01.06.1971	31.05.2031
14.	Farhatullah S/O Wresham Dad	BS-12	16.12.1989	2/8/2017 BS (H)	2908/5000	58.16	University of Peshawar	KGNT Hosp; Bannu	Bannu	11.11.1970	10.11.2030
15.	Nawab Khan S/O Akbar Khan	BS-12	24.12.1997	2/8/2017 BS (H)	2731/5000	54.62	University of Peshawar	DHQ Hosp; Mardan	Mardan	16.12.1968	15-12-2028
16.	Noor Habib S/O Tawas Khan	BS-12	14.09.1994	2/8/2017 BS (H)	2711/5000 DMC Req.	54.22	University of Peshawar	DHQ Hosp; Dir Upper	Dir Upper	02.09.1971	1/9/2031
17.	Hidayatullah S/O Hidayatur ehman	BS-12	21.02.2001	2/8/2017 BS (H)	2898/5000	57.96	University of Peshawar	KCD Peshawar	Swat	05.04.1964 / Swat	4/4/2024
18.	Seema Azim D/O Fazal Azim	BS-12	31.01.2009	2/8/2017 BS (H)	2882/5000	57.64	University of Peshawar	DHQ Hosp; Shangla	Shangla	01.06.1985	31.05.2045
19.	Fida Muhamad S/O Abdul Majeed	BS-12	28.04.1991	30/08/2017 BS (H)	2637/5000	52.74	University of Peshawar	DHO Charsadda	Charsadda	27.03.1971 Charsadda	26-03-2031
20.	Shahid Khan S/O Zarad Ali Khan	BS-12	20.09.2013	12/1/2018 BS (H)	4800/3584	74.67	Bacha Khan UNI	DHO Mardan	Mardan	03.04.1989	02.04.2049
21.	Arshad Ahamad S/O Bakhat Jamal	BS-12	16.01.2013	20-02-2018 BS (H)	3.92	3.92	KMU UNI	BKMC Swabi	Swabi	06.04.1978	5/4/2038
22.	Fazal Jamal S/O Mu- hammad Johar	BS-12	07.11.2006	19-11-2018 BS (H)	3.2	3.2	Bacha Khan UNI	DHO Shangla	Shangla	01.02.1972	31-01-2032
23.	Syed Adil Hussain Shah S/O Syed arif Hussain Shah	BS-12	01-03-2008	21-05-2018 BS (H)	2.80	2.80	Bacha Khan UNI	DHO Mansehra	Mansehra	03-03-1980	02-03-2040

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24.	Zia Ullah S/O Abdul Rauf	BS-12	14.03.2007	30-06-2018 BS (H)	3.62	3.62	KMU Peshawar	DHO Hosp. Battagram	Battagram	20.04.1983	19.04.2013
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pared by Syed Amd Ali Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mahmood Ali Shah J/C cum C.O Rosh Ullah C.O Muhammad Anwar J/C & Checked by Sheeraz Khan Deputy Director Paramedics



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

Annexure

H
45

To:-

The Director General
Health Services (Govt of KPK, Peshawar)

Through Proper Channel

Subj:- OBJECTION OVER PROVISIONAL SENIORITY LIST OF QUALIFIED (DEGREE HOLDER) DENTAL TECHNICIANS/ SENIOR TECHNICIANS/CHIEF TECHNICIANS

Respected Sir;

It is respectfully submitted; with reference to Your Office letter No. 701-790/AE-VII dated 25-1-2019; floated on Facebook page with ID name "Syed Mehmood Bukhari"; that according to Item No. 4 in APPENDIX to the Health Department (Govt of KPK) Notification No. SOH-III/HD/3-5/2014 dated 10-5-2016 (Published in Extraordinary Gazette of the Govt of KPK dated 10-5-2016), the basic qualification required for promotion to the post of Dental Technologist (BPS-17) against 20% quota is Bachelor's Degree in the relevant Technology, which I have acquired in December 2005 in 2nd Division from NWFP now KPK Medical Faculty Peshawar, valid for appointment/promotion in Health Department (Govt of KPK) in terms of NWFP Medical and Dental Degree Ordinance-1982. Copy of the Verified copy of B.Sc Degree (Dental Technology) is submitted herewith as Annex "A".

2. It is further submitted that I have also acquired the qualification of Degree of B.S.(Hons) during Annual Session-2014 from the University of Peshawar but the Degree has been issued to me on 02-8-2017. Hence the delay in issue of the Degree is at the Part of the University for which I cannot be penalized. Copy of the said Degree of B.S.(Hons) in Paramedical Sciences is submitted herewith as Annex "B".

3. It is further submitted that none-else (employed in my cadre of Dental Technology in Health Department, Govt of KPK) has

main copy sent - 1/2
Applicant
7443 / EM
21/8/19
J.G.H.
Office
20/8/19

(46)

acquired the required qualification of B.Sc (Dental Technology) prior to me, therefore, it was obligatory for Your worthy Office (in terms of the provisions of Para-(b) in Column No; 5 against item No. 4 of the APPENDIX to the Health Department's ibid Notification dated 10-5-2016) to have listed me at S.No. 1 of the Joint Seniority List of Qualified Paramedics (Dental) instead of S.No. 10 of the said list circulated vide your ibid letter dated 25-1-2019.

4. It is pertinent to submit that in the Provisional Seniority List, the date of my qualification has been shown to be 02-8-2017, which is the date of issue of B.S.(Hons) Degree to me by the University of Peshawar notwithstanding the fact that the said Degree (Annex "B") clearly speak that I had passed the prescribed examination in Annual Session-2014. Even otherwise, the qualification required for promotion to the post of Dental Technologist (BPS-17) against 20% quota is B.Sc. Degree, which I have passed in December 2005. Since Mr. Ajab Khan listed at S.No. 1 has acquired the Degree of BS(Hons) on 02-1-2012 i.e. seven years later than my passing the prescribed qualification, therefore, my name was required to have been shown at S.No. 1.

5. In view of the above humble submissions it is earnestly prayed that my name may kindly be listed at S.No. 1 of the impugned Provisional Seniority List dated 25-1-2019 instead of S.No. 10.

APPLICANT

Miranshah
Dated:- 14-2-2019
Encls:- (Annex "A" & "B")

Irfan Ali Shah
IRFAN ALI SHAH
Dental Technician (BPS-12)
Office of the Agency Surgeon,
Dist/Agency:NWA, Miranshah



Annexure 'I' (47)

**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR.**

No. 17798-847/AE-VII
Dated. 2 / 11 / 2017

To

1. All Principals, of Medical Colleges in KPK.
2. The Principal PGPI, Buddha Road Douran Pur, PIMTs DI Khan, Abbottabad, Swat.
3. All Hospital Directors, of Medical Teaching Institutions in KPK.
4. Director General Provincial Health Services, Academy KPK Peshawar.
5. The Director Health Services, FATA Peshawar.
6. The Medical Superintendent, Saidu Group of Teaching Hospital Swat.
7. The Medical Superintendent, Molvi Ameer Shah Memorial Hospital, GT Road Peshawar.
8. The Medical Superintendent, Govt. NKB, Memorial Hospital, Kohat Road Peshawar.
9. The Medical Superintendent, Services Hospital, Peshawar.
10. The Medical Superintendent, SGS Memorial Hospital, Peshawar.
11. The Medical Superintendent, Sarhad Hospital for Psychiatric Diseases, Peshawar.
12. The Medical Superintendent, General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendents, DHO/ AHQ Hospitals in KPK/FATA.
14. All Agency Surgeons in FATA/FRs.
15. All District Health Officers in Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF DEGREE HOLDERS (CLINICAL TECHNICIANS) (DENTAL) BS-12 (SR. CLINICAL TECHNICIANS) (DENTAL) BS-14 (CHIEF CLINICAL TECHNICIANS) (DENTAL) BS-16 OF HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

Memo.

Enclosed please find Final Seniority List of Degree Holders Clinical Technicians (Dental) BS-12 (Sr. Clinical Technicians) (Dental) BS-14 (Chief Clinical Technicians) (Dental) BS-16 of Health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned officials working under your control.

Note: The Final seniority list has also been downloaded from the website www.dhiskp.gov.pk

Attest
Adh
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Cc. #

PS to Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.

LEGIBLE COPY

DIRECTORATE GENERAL

HEALTH SERVICES KHYBER.
PAKHTUNKHWA PESHAWAR.
No. 17798-847/AE-VII

Dated. 2 / 11 / 2017

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To

1. All principal, of medical colleges in KPK.
2. The Principal PGPI, Buddhni Road Douran Pur, PMITs DI Khan Abbottabad, Swat
3. All Hospital Directors, Of Medical Teaching Institutions in KPK.
4. Director General Provincial Health Services, Academy KPK Peshawar
5. The Director-Health Services , FATA Peshawar
6. The Medical Superintendent, Saidu Group Of Teaching Hospital Swat.
7. The Medical superintendent, Molvi Ameer Shah Memorial Hospital ,GT Road Peshawar.
8. The medical superintendent , Govt NKB, Memorial Hospital, Kohat Road Peshawar
9. The medical superintendent , Services Hospital Peshawar
10. The medical Superintendent ,SGS Memorial Hospital Peshawar.
11. The Medical Superintendent .Sarhad Hospital For Psychiatric Diseases , Peshawar.
12. The Medical Superintendent .General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendent , DHQ/AHQ Hospitals in KPK/FATA.
14. All Agency Surgeons in FATA /FRs.
15. All District Health Officers In Khyber Pakhtunkhwa.

Subject: Final Seniority List Of Degree Holders (Clinical Technicians) (Dental) BS-12 (SR. Clinical Technicians) (Dental) BS-14 (Chief Clinical Technicians) (Dental) BS-16 Of Health Department Khyber Pakhtunkhwa.

Memo

Enclosed please find final seniority list of degree holders clinical Technician (Dental)BS-12 (Sr. clinical technicians) (Dental) BS-14 (Chief Clinical Technician) Dental BS-16 of health Department Khyber Pakhtunkhwa for information and circulation amongst all the concerned officials working under your control.

Note: The final Seniority List has also been downloaded from the website www.dhiskp.gov.pk

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PUKHTUNKHWA, PESHAWAR

Cc.

PS to secretary to Govt: of Khyber Pakhtunkhwa. Health Department Peshawar

(50)

Final Seniority list of Qualified Paramedics Degree Holders Dental.v

S. No.	Name	Father Name	Date of 1st appointment	Date of Passing Degree	Total Obatened Marks & Division.	%age	Board/ University/ Institution	Present Posting	Domicile	Date of Birth	Date of Retirement
1	2	3	4	5	6	7	8	9	10	11	12
1	Fazle Aala	Fazle Maula	24.03.1983	2011-Annual	3342/5000	66.84	University of Peshawar	LRH Peshawar	Peshawar	15.10.1965	14-10-2025
2	Ajab Khan	Bashar Khan	07.05.1988	2011-Annual	3213/5000	64.26	University of Peshawar	DHO Swat	Swat	01.03.1968	28.02.2028
3	Akbar Khan	Khoja Omar	15.10.1990	2011-Annual	3151 / 5000	63.02	University of Peshawar	DHQH Chitral	Chitral	09.03.1964	8/3/2024
4	Shakeel Raziq	Fazal Raziq	03.08.1987	2011-Annual	3115/5000	62.3	University of Peshawar	LRH Peshawar	peshawar	14.11.1968	13-11-2028
5	Sher Muhammad Khan	Noor Muhammad	22.09.1994	2011-Annual	2744 / 5000	54.88	University of Peshawar	PMT swat	swat	30.03.1964	29-03-2064
6	Sohni Bibi	Sadar Jehan Mian	11.11.2013	2011-Annual	2722 / 5000	54.44	University of Peshawar	DHO Swat	Swat	20.09.1988	19.09.2048
7	Ismail Khan	Zar Gul	15.07.2013	2013	3.63	90.75	KMU	DHQ Hosp; Nowshera	Peshawar	01.03.1991 Peshawar	28.02.2051
8	Saif Ullah	Shakirullah	09.01.2013	Spring-2013	3.52	88	KMU	BKMC Mardan	Nowshera	02.10.1985	01.10.2045
9	Hidayat Ur Rahman S/O	Tooli Khan	24.04.2009	Spring-2013	2.88	72	KMU	DHQ Hosp; Upper Dir	Upper Dir	01.03.1984	28-02-2044
10	Murad Khan	Ghandal Khan	12.10.1993	2014-Annual	3584 / 5000	71.68	University of Peshawar	LRH Peshawar	Charsadda	27.03.1974	26.03.2034
11	Hayat Muhammad Khan	Muhammad Sharif Khan	23.12.2003	2014-Annual	3314/5000	66.28	University of Peshawar	DHO Balagram	Balagram	17.04.1979	16-04-2039
12	Faizul Karim	Gul Khan	02.05.1988	2014-Annual	3151	63.02	University of Peshawar	DHO Swat	Swat	01.01.1968	31.12.2027

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13	Tariq Saleem	Gul Payao	02.1992	2014-Annual	3131/5000	62.63	University of Peshawar	DHO Karak	Karak	03.09.1972	02.09.2032
14	Imran Ali Shaha	Abdul Ah Shaha	17.06.1990	2014-Annual	2947/5000	58.94	University of Peshawar	ASNA	Bannu	01.09.1991	11.09.2031
15	Farhatullah	Wesham Dad	16.12.1989	2014-Annual	2528/5000	58.16	University of Peshawar	KGM Hosp. Bannu	Bannu	11.11.1970	10.11.2030
16	Hidayatullah	Hidayatur Chohan	21.02.2001	2014-Annual	2598/5000	52.96	University of Peshawar	KCD Peshawar	Swat	05.04.1964	1/4/2021
17	Nawab Khan	Arbab Khan	24.12.1967	2014-Annual	2731/5000	54.62	University of Peshawar	DHO Havel	Havel	15.12.1968	15.12.2028
18	Noor Habib	Fawas Khan	14.09.1994	2014-Annual	2711/5000	54.22	University of Peshawar	DHO Hosp. Dir Upper	Dir Upper	02.09.1971	1/9/2031
19	Abdul Mujib	Abdul Haseeb	28.04.1991	2015-Annual	2617/5000	52.74	University of Peshawar	DHO Chitral	Chitral		

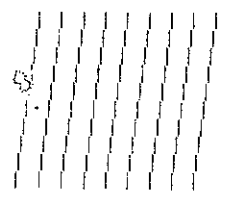
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

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13	Tariq Saleem	Gul Payao	02.1992	2014-Annual	3131/5000	62.62	University of Peshawar	DHQ kark	Kark	03.09.1972	02.09.2023
14	Irfan Ali Shah	Abdul Ali Shah	17.06.1990	2014-Annual	2947/5000	58.94	University of Peshawar	AS NWA	Bannu	01.06.1971	31.05.2031
15	Farhatullah	Waresham Dad	16.12.1989	2014-Annual	2908/5000	58.16	University of Peshawar	KGNT Hosp Bannu	Bannu	11.11.1970	10.11.2010
16	Hidayat ullah	Hidayatur ehman	21.02.2001	2014-Annual	2898/5000	57.96	University of Peshawar	KCD Peshawar	Swat	05.04.1964 Swat	04.04.2024
17	Nawab khan	Akbar Khan	24.12.1997	2014-Annual	2731/5000	54.62	University of Peshawar	DHQ Hosp Mardan	Mardan	16.12.1968	15.12.2028
18	Noor Habib	Twas Khan	14.09.1994	2014-Annual	2711/5000	54.22	University of Peshawar	DHQ Hosp Dir Upper	Dir Upper	02.09.1971	01.09.2031
19	Fida Muhammad	Abdul Majeed	28-04-1991	2015-Annual	2637/5000	52.74	University of Peshawar	DHQ Charsadda	Charsadda	27.03.1971	26.03.2031



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DIRECTOR GENEBAZ HEALTH SERVICE
KHYBER PUKHTUNKHWA, PESHAWAR



Annexure

IN THE PESHAWAR HIGH COURT, BANNU BENCH

Writ Petition No. 33 BANNU BENCH of 2018

Irfan Ali Shah s/o Abdul Ali Shah
R/O: Kotka Abdul Qadeer Shah (Bangash Khel) Mandan,
Tehsil & District: Bannu
Serving as Clinical Technician (Dental) in the office of
Agency Surgeon (NWA), Miranshah-----PETITIONER

VERSUS

The Govt of Khyber Pakhtunkhwa, through:-

1. The Secretary (Health Department) Govt of KPK, Peshawar
 2. The Director General Health (Govt of KPK), Peshawar
 3. The Agency Surgeon (NWA), Miranshah
 4. Fazole Aala s/o Fazole Maula, Serving as
Clinical Technologist(Dental) in BPS-17
MTI Lady Reading Hospital, Peshawar
- RESPONDENTS

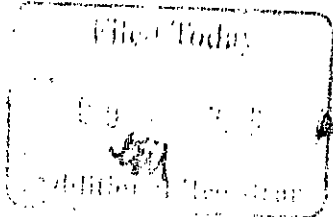
**WRIT PETITION UNDER ARTICLE: 199(1)(a)&(c)
OF THE CONSTITUTION OF PAKISTAN-1973**

Being aggrieved by and dissatisfied with the promotion order dated 01-2-2018, passed by the Respondent No. 1&2 vide S.No. 2 of the Notification No. SOH-III/3-60/2018 dated 01-2-2018, whereby the Respondent No. 4 has been promoted to the post of Clinical Technologist (Dental) in BPS-17 while superseding the Petitioner otherwise than in accordance with the relevant Recruitment Rules, therefore, the Petitioner is compelled to prefer this writ petition for the enforcement of his inalienable constitutional and fundamental rights, inter alia, on the following facts and grounds:-

Copy of the impugned Notification dated 01-2-2018 is filed as Annex "A"

FACTS

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Adv for P/2



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Peshawar High Court
Bannu Bench

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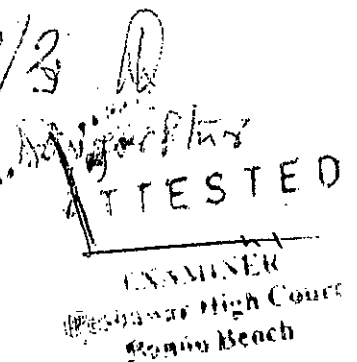
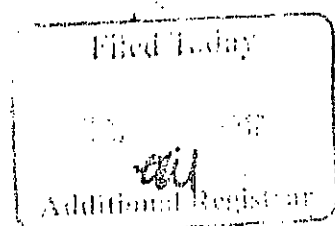
1. That the Petitioner has joined service as Dental Technician (BPS-9) under the Respondents No. 1&2 on 17-6-1990, which was re-designated as JCT(Dental) (BPS-9) on 10-5-2006 and was promoted to the post of Clinical Technician (Dental) (BPS-12) wef 11-8-2015, as reflected at S.No. 22 of the Provisional Seniority List of Clinical Technicians (Dental) (BPS-12) issued by the Respondent No. 2 vide his letter No. 19414-93/AE-VII dated 02-11-2017.

Copy of the Respondent No. 2's letter dated 02-11-2017 alongwith its enclosed Seniority List is filed herewith and marked as Annex "B".

2. That with a view to enhance the skills of Paramedical Staff, the Respondents No. 1&2 had introduced the Paramedics Degree Courses in various technologies including Dental Technology and the Petitioner was detailed to undergo two (02) years B.Sc. Degree course in the Postgraduate Paramedical Institute at Lady Reading Hospital Peshawar in its FIRST Batch/Session; 2004-05. On successful completion of the course the trainees were subjected to exhaustive examination by the NWFP (now KPK) Medical Faculty Peshawar during December 2005 and the Petitioner was granted the Degree of B.Sc(Dental Tech) by the KPK Medical Faculty Peshawar. It is pertinent to mention that the Petitioner has later on acquired the qualifications of 4 years' Degree course of B.S. (Hons) in Dental Technology from the University of Peshawar during Annual 2014.

Copies of the Petitioner's Degrees of B.Sc & B.S.(Hons) in Dental Technology are filed herewith and marked as Annex "C/1&2".

3. That after imparting graduate and postgraduate training to the paramedical staff of Health Department, the provincial Govt introduced four (04) stages promotion opportunities to the paramedical staff upto BPS-20 in the posts of Clinical Technologist (BPS-17), Senior Clinical Technologist (BPS-18), Chief Clinical Technologist (BPS-19) and Principal Clinical Technologist (BPS-20) and for that purpose promulgated Recruitment Rules vide Gazette Notification dated 10-5-2016.



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(13)

Copy of the Recruitment Rules dated 10-5-2016 is filed as Annex "D".

4. That according to Clause-(b) in Column No. 5 against item No. 4 of Appendix to the *ibid* Recruitment Rules, 20% quota has been reserved for promotion on the basis of seniority-cum-fitness from amongst the incumbents of the posts of Chief Technicians(BPS-16), Senior Clinical Technician (BPS-14) and Technicians(BPS-12), having acquired the qualifications prescribed for initial recruitment (i.e. B.Sc in Dental Technology) with 03 years service in the relevant technology and according to the NOTE below the said Clause-(b) in Column No. 5 Joint Seniority List of the said posts is to be maintained with reference to dates of acquiring the qualifications of B.Sc Degree. Keeping in view the *ibid* provision; the Petitioner having acquired the qualification of B.Sc (Dental Technology) during December 2005 in the first batch/session of 2004-05, when none-else of his colleagues/seniors had acquired the said qualification; therefore, the Petitioner had to be shown on the top of the seniority list for the purpose of his promotion to the post of Clinical Technologist (Dental) in BPS-17 against the 20% quota reserved for promotion of the qualified departmental candidates and deserved to have been promoted to the said post instead of the Respondent No. 4, on 01-2-2018. However, the Respondent No. 2 has; with a view to favour the Respondent No. 4 illegally and clandestinely prepared final seniority list of the qualified departmental candidates; vide letter No. 17798-847/AE-VII dated 02-11-2017; without previous circulation of the same and even without preparation of Provisional Seniority List and calling for objections thereto from the affected employees; and showed therein the Respondent No. 4 at the top of the Seniority List, while the Petitioner has been shown at S.No. 14 with reference to date of his acquiring the qualifications of D.S(Hons) from the University of Peshawar during Annual-2014 instead of with reference to the date of his acquiring the qualification of B.Sc from the KPK Medical

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Faculty Peshawar, during December 2005. It is further pertinent to submit that the Degree of B.S(Hons) is equivalent to M.Sc., while the qualifications prescribed for promotion to the post of Clinical Technologist (Dental) in BPS-17 is the Degree of B.Sc. Hence, the impugned seniority list dated 02-11-2017 as well the resultant promotion order dated 01-2-2018 is illegal and ineffective upon service rights of the Petitioner.

Copy of the impugned Seniority list dated 02-11-2017 is filed as Annex "E".

5. That in the above circumstances the Petitioner sees no remedy except to beseech before this Hon'ble High Court for the enforcement of his inalienable constitutional and fundamental rights; inter alia; on the following grounds:-

GROUNDS

(A) That, the Petitioner has no other alternate and efficacious remedy against the illegal atrocities of the Respondents, except through institution of this Petition, because neither PROVISIO to Section: 22 of the KPK Civil Servants Act-1973 allows any departmental appeal or representation against matters relating to the determination or fitness of a person to hold a particular post or to be promoted to a higher post or grade nor Section; 4(b) of the KPK Service Tribunal Act-1974 allows appeal to the KPK Service Tribunal against an order or decision of a departmental authority determining the fitness or otherwise of a person to be appointed to or a particular post or to be promoted to a higher post or grade. Hence the only remedy available to the Petitioner is to beseech before this Hon'ble Court for judicial review of the impugned promotion order of the Respondent No. 4, passed by the Respondents No. 1&2, under Article: 199 of the Constitution of Pakistan-1973.

(B). That Article; 4 of the constitution of Pakistan-1973 confers upon the Petitioner his inalienable constitutional right of his

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treatment in accordance with law but despite the fact that despite the fact that the Petitioner is lawfully entitled for promotion in preference to the Respondent No. 4 by virtue of having acquired the prescribed qualification during December 2005 while the Respondent No. 4 has no doubt acquired higher qualifications of B.S(Hons) but five (05) year later than the Petitioner. Therefore, the Petitioner is lawfully entitled to have been promoted to the post of Clinical Technologist (Dental) in BPS-17 in preference to the Respondent No. 4. Hence the impugned promotion order of the Respondent No. 4 is null and void ab-inito and ineffective upon the service rights of the Petitioner.

(C). That Articles: 25&27 of the Constitution of Pakistan-19073 confer upon the Petitioner his fundamental right to equal treatment/protection under the law but the Respondents No. 1&2 have discriminated against the Petitioner in the matter of his promotion to the post of Clinical Technologist (Dental) in BPS-17 otherwise than in accordance with the relevant Recruitment Rules. Hence the instant writ petition is lawfully maintainable for the enforcement of fundamental right of the Petitioner.

(D). That Advocate for the Petitioner craves leave of this Hon'ble High Court to urge more grounds at the time of hearing of this Petition.

PRAYERS

6. In view of the above humble submissions, it is earnestly prayed that this Hon'ble High Court may graciously be pleased to:-

(a). Declare that the Petitioner has been treated in the matter of his promotion to the post of Clinical Technologist (Dental) in BPS-17 otherwise than in accordance with the relevant law/rules and

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High Court
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(b). Issue an appropriate writ to the Respondents No. 1&2 review/revise the impugned promotion order dated 01-2-2018 and substitute the name of the Petitioner instead of the Respondent No. 4 with all consequential benefits.

(c). That as an INTERIM RELIEF this Hon'ble Court may graciously be pleased to suspend operation of the impugned Notification dated 01-2-2018 to the extent of promotion of the Respondent No. 4 only till final disposal of the instant writ petition.

(d). Any other relief(s) which this Hon'ble High Court may deem fit and necessary in circumstances of the case.

Prayed accordingly in the interest of justice.

Shah Waliullah
PETITIONER

Through:-

Bannu
Dated:- 23-2-2018

(Signature)
(Sher Muhammad Khan)
Advocate High Court, at Bannu
I. D. No. BC-09-2433

LIST OF BOOKS

1. The Constitution of Pakistan-1973.
2. The KPK Civil Servants Act-1973
3. The West Pakistan Civil Servants (A,P&T) Rules-1989
4. KPK Health Department's Recruitment Rules of the post of Clinical Technologist (Dental) issued vide Notification dated 10-5-2016.,

CERTIFICATE

It is certified that no such like Writ Petition has earlier been filed in this Hon'ble Court as per information furnished to me by the Petitioner.

(Signature)
Advocate for the Petitioner

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EXAMINER
Keshwar High Court
Bannu Bench

Filed Today
(Signature)
Date: _____
Year: _____

Annexure

J-2

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PESHAWAR HIGH COURT,
BANNU BENCH.

FORM 'A'
FORM OF ORDER SHEET

Date of order or proceedings	Order or other proceedings with signature of Judge (s).
(1)	(2)
06-03-2019	<p><u>W.P No.337-B of 2018.</u></p> <p>Present:</p> <p>Sher Muhammad Khan advocate for petitioner..</p> <p>Mr. Shahid Hameed Qureshi, AAG for official respondents</p> <p>Fazle Ala (respondent No.4)</p> <p>***</p> <p><u>MUHAMMAD NASIR MAHFOOZ, J.---</u></p> <p>Through the instant Writ petition, the petitioner has challenged the vires of seniority list dated 02-11-2017 and subsequent Notification No.SOH-III/6-60/2018 dated 01-02-2018, whereby the respondent No.4 has been promoted to the post of Clinical Technologist (Dental) in BPS-17 while superseding the petitioner, hence prayed for declaring the impugned seniority list dated 02-11-2017 as well as the promotion order/notification dated 01-02-2018 as</p>

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Peshawar High Court

illegal and ineffective upon right of the petitioner

2- After arguing the case at some length, learned counsel for the petitioner stated at the Bar that he would not press the instant petition, provided the same be treated as representation and sent to the competent authority for decision in accordance with law.

3- Learned Additional AG present in the court, in some other case, accepts the notice and has got no objection

4- In view of the above, the petition is treated as Representation and send to the competent authority for decision in accordance with law within a period of one month from the date of receipt of this order.

Sd/-Mr. Justice Muhammad Hashim Khan

Sd/-Mr. Justice Saad Ahmad

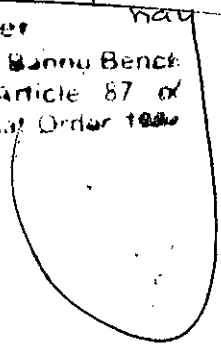
Announced.
06-03-2019

CERTIFIED TO BE TRUE COPY

Examiner

Peshawar High Court Bannu Bench
Authorised under Article 87 of
the Qanun-e-Shahadat Order 1988

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06/03/2019





Annexure "k" (61)
**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR**

No. _____ / AE-VII

Dated: _____ / 07/2019

Registered

To

Mr. Irfan Ali Shah S/O Abdul Ali Shah
R/O: Kotka Abdul Qadeer Shah (Bangash Khel) Mandan
Tehsil & District Bannu.

Subject: **WP NO. 337-B/2018 - IRFAN ALI SHAH VERSUS GOVT. OF
KHYBER PAKHTUNKHWA AND OTHERS**

I am directed to refer to the subject noted above and to direct to attend office of the Director General Health Services Khyber Pakhtunkhwa, Peshawar on 29.07.2019 at 10:00 AM positively for personal hearing.

Deputy Director (Paramedics)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

No. 12800 / AE-VII

Dated 19/07/2019

Through Fax

Copy forwarded to the:-

- > District Health Officer Tribal District Miransha (NWA).
- > He is requested to direct the above official to appear before the GHS, KP on the above date and time positively.

*Fax to asad -
DHS Merged Dist*

[Signature]
Deputy Director (Paramedics)
Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

Annexure "L"

To:-

The Secretary
Health Department (Govt of KPK, Peshawar)

Through Proper Channel

**Appeal Under Rule: 3 of the KPK Civil Servants (Appeal)
Rules-1986**

Respected Sir;

It is respectfully submitted that I had submitted; my objections dated 14-2-2019 (copy enclosed as **Annex "A"**); to the Director General Health Services (KPK), over the Provisional Seniority List of qualified (Degree Holders) Dental Technicians/Senior Tech (Dental)/Chief Tech (Dental); issued under DGHS (KPK) letter No. 701-790/ AE-VII dated 25-1-2019 and floated on Facebook page with ID name of "Syed **Mehmood Bukhari**" for the purpose of promotion to the post of Dental Technologist (BPS-17).

2. It is pertinent to submit that I had submitted the said objections through proper channel and were forwarded by the office of Agency Surgeon (Tribal District North Waziristan) to the DGHS (KPK) Peshawar under his covering letter No. 497/D-2 dated 14-2-2019 and delivered by hand to the office DGHS (KPK) Peshawar under Inward Dak Diary No. 7444 dated 21-2-2019 (copy enclosed as **Annex "B"**).

3. It is further submitted that without disposal of my elaborated objections dated 14-2-2019 over the provisional seniority list dated 25-1-2019; wherein I had claimed my seniority position at top of the impugned provisional seniority list dated 25-1-2019 instead of assigning my Seniority at S.No.10 of the impugned provisional seniority list dated 25-1-2019; office of the worthy DGHS (KPK) Peshawar has issued Final Seniority List of the Degree Holder Paramedics (Dental) vide their letter No. 10313-403/AE-VII dated 27-6-2019 (copy enclosed as **Annex "C"**) and listed me at S.No. 13 of the Final Seniority List instead of my due seniority position at the top of the Seniority List and even instead of the assigned seniority at S.No. 10 of the Provisional Seniority List.

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4. It is further submitted that the office of DGHS (KPK) had previously on 02-11-2017 clandestinely issued Final Seniority List of the the Qualified Paramedics (Dental) without first issue of Provisional Seniority List and arranged to promote illegally my junior Fazle Aala, Dental Tech at LRH Peshawar to the post of Dental Technologist (BPS-17), vide your office Notification No. SOH-III/8-60/ 2018 dated 01-2-2018, therefore, I had to challenge the said promotion in the Hon'ble Peshawar High Court Bannu Bench through Writ Petition No. 337-B/2018, which has been disposed off vide judgement/order dated 06-3-2019 (copy enclosed as **Annex "D"**) and remitted to your Office as representation for the departmental redress of my grievances but no response has so far been received from your office despite my personal hearing by the DGHS (KPK) on 29-7-2019 duly called for the same vide his office letters (1) NO. 12799/AE-VII dated 19-7-2019 and (2) No. 12800/AE-VII dated 19-7-2019 (copy enclosed as Annex **"D/1&2"**).

5. In view of the above humble submissions it is earnestly prayed that the office of DGHS (KPK) Peshawar may kindly be directed to reconcile and assign me my due seniority position on the top of the Seniority List of qualified Degree Holders Paramedics (Dental) for the purpose of my promotion to the post of Dental Technologist (BPS-17) and may also be pleased to grant me proforma promotion to the ibid post with effect from 01-2-2018 i.e. the date of promotion of my junior namely Fazle Aala.

Miranshah

Dated:- 20-8-2019
Encs:- (Annex "A" to "D/2")

(19 Pages)

APPLICANT

Irfan Ali Shah

IRFAN ALI SHAH

Dental Technician (BPS-12)
Office of the Agency Surgeon,
Tribal District; North Waziristan
Miranshah

بعدالت

BEFORE THE PROVINCIAL
SERVICE TRIBUNAL

IRFAN
ALISHAH

2 جناب

بنام

KPK PESHAWAR
SECRETARY
HEALTH GOVT
KPK E.T.C

موزخه --- 1 ---
مقدمہ --- 2 ---
دعویٰ 2019 S.A ---
جزم --- 1 ---

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و گل کاروائی متعلقہ
Inayatullah Khan A.D.V کے P.H.C کے
High Court Peshawar LHM (UK)

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی گل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقریر ثبات فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے گل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 28 ماہ 11 2019

Irfan Ali Shah
Secretary
Peshawar

Attested
accepted by

Inayatullah Khan
LHM (UK)
Peshawar

بمقام

قیمت 50 روپے	54436	  
ایڈوکیٹ:		
بار کونسل ایسوسی ایشن نمبر: 166732		<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p>
رابطہ نمبر: 03349214808		

بعدالت جناب: خیر محزون خواجہ سرسبز

منجانب: سید الہم بڑ (5, 6, 7, 9)	دعویٰ:
عبدمنان علی شاہ	علت نمبر:
بنام	مورخہ:
سید صاحبہ صوفیہ	جرم:
	تھانہ:

بامث تحریر آگہ

سرحدی بی سٹریٹ
Sohmi
15602-5567653-8

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی کاروائی متعلقہ
 ان مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے
 المرقوم:

بمضان
Alhassan
بمضان

مقام: 04/08/20
 PESHAWAR BAR KHYBER PAKHTUNKHWA
 محمد ایوب گلزئی
 Muhammad Ayub Khan Advocate
 نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

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

SERVICE APPEAL NO. 1770 OF 2019

Irfan Ali Shah.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

Respectfully Sheweth:

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary Objections:-

1. That the Appellant has got neither cause of action nor locus standi to file the instant Appeal.
2. That the Appellant has filed the instant appeal just to pressurize the respondents.
3. That the instant Appeal is against the prevailing Law and Rules.
4. That the Appeal is not maintainable in its present form and also in the present circumstances of the issue.
5. That the Appellant has filed the instant Appeal with mala-fide intention hence liable to be dismissed.
6. That the Appellant has not come to the Tribunal with clean hands.
7. That the Appeal is time barred.
8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
9. That the instant Appeal is bad for mis-joinder and non-joinder of the necessary parties.

ON FACTS:

1. Para No. 1 is incorrect. The Appellant was appointed as Dental Technician in BPS-09 and the post of Dental Technician BPS-09 was re-nomenclatured as Jr. Clinical Technician (Dental) BPS-09 on 25/08/2006 (after approval of Service Structure of Paramedics). However the posts of Clinical Technician (Dental) BPS-09 was upgraded in BPS-12 and renomenclatured as Clinical Technician (Dental) on 11/08/2015 and not on 10/05/2006. At present the Appellant is at S. No. 21 of the Seniority list.

2. Para No. 2 pertains to record, hence no comments.
3. Para No. 3 is correct, but 20% quota (posts) reserved for 4 years degree holders in the relevant field. The Appellant had acquired the BS (Honors) 4 years degree from Peshawar University during session 2014 and has been placed in the seniority list of degree holders in proper place.
4. Para No. 4 is correct. The Respondent No. 4 has been promoted to BPS-17 as Clinical Technologist (Dental) on Seniority cum fitness basis after approval of the Departmental Promotion Committee, as he was on top of the seniority list of degree holders.
5. Para No. 5 is incorrect. The Respondent No. 4 has been placed in the Seniority list of Clinical Technologist/PHC Technologist (BPS-17) in proper place while the Appellant is in BPS-12.
6. Para No. 6 is incorrect. The Appellant has been placed in the seniority list of degree holders (Dental) in proper place as per approved Service Rules notified by Govt. on 10/05/2016.
7. Para No. 7 is incorrect. Appeal of the Appellant was not considered being not covered under the rules.
8. Para No. 8 is incorrect. The Appellant acquired 02 years degree from Medical Faculty Khyber Pakhtunkhwa during the year 2005. As the Medical Faculty Khyber Pakhtunkhwa is not a degree awarding body/institute being not registered with any Chartered University/Institution recognized by Higher Education Commission (HEC). Therefore the Degree 02 years awarded by Medical Faculty Khyber Pakhtunkhwa cannot be considered. However, the Appellant has been included in the seniority list of degree holders (Dental) from the date of acquiring degree from Peshawar University i.e. 2014 as per approved Service Rules notified by the Govt. of Khyber Pakhtunkhwa Health Department on 10/05/2016 and he will be promoted on his turn.
9. Para No. 09 is correct, hence need no comments.
10. Para No. 10 is incorrect. The Appellant was called for personnel hearing on 29/07/2019 in light of orders of the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar and the Appeal has been regretted by the Competent Authority i.e. DGHS Khyber Pakhtunkhwa vide letter No. 17227/AE-VII dated 02/10/2019 (Annex-A).

11. Para No. 11 is incorrect. The same has already been furnished in preceding para.
12. Para No. 12 is incorrect. Reply has already been furnished in Para No. 10 above.

ON GROUNDS:

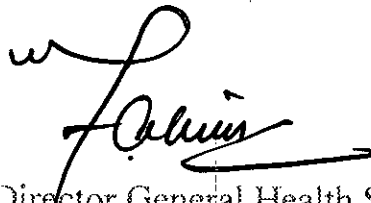
- a. Para-a is incorrect. Reply has already been furnished in Para No. 8 of Facts above.
- b. Para-b is incorrect, as in preceding para.
- c. Para-c is incorrect. Reply has already been given in Para-a above.
- d. Para-d is incorrect. Reply has already been furnished in preceding paras.
- e. Para-e is incorrect. Reply has already been furnished in Para No. 8 of Facts.
- f. Para-f needs no comments being formal.

PRAYER:

It is therefore most humbly prayed that on acceptance of comments, the instant Appeal may very graciously be dismissed with cost.



Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 01



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 02



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**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR**

No. 17727 /AE-VII

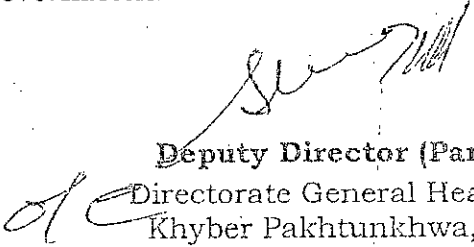
Dated: 2 / 10 / 2019

To

The District Health Officer,
Tribal District Miranshah.

Subject: APPEAL UNDER RULE-3 OF THE KP CIVIL SERVANTS
APPEAL RULES 1986.

I am directed to refer to your letter No. 2905/Miranshah, dated 20.08.2019 on the subject noted above and to state that the subject case has been discussed and decided in the presence of the applicant (Mr. Irfan Ali Shah) and the appeal has been regretted by the competent authority in the light of instructions of the Government.


Deputy Director (Paramedics)

Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

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

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3. Para No. 3 is correct, but 20% quota (posts) reserved for 4 years degree holders in the relevant field. The Appellant had acquired the BS (Honors) 4 years degree from Peshawar University during session 2014 and has been placed in the seniority list of degree holders in proper place.
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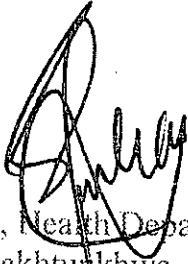
11. Para No. 11 is incorrect. The same has already been furnished in preceding para.
12. Para No. 12 is incorrect. Reply has already been furnished in Para No. 10 above.

ON GROUNDS:

- a. Para-a is incorrect. Reply has already been furnished in Para No. 8 of Facts above.
- b. Para-b is incorrect, as in preceding para.
- c. Para-c is incorrect. Reply has already been given in Para-a above.
- d. Para-d is incorrect. Reply has already been furnished in preceding paras.
- e. Para-e is incorrect. Reply has already been furnished in Para No. 8 of Facts.
- f. Para-f needs no comments being formal.

PRAYER:

It is therefore most humbly prayed that on acceptance of comments, the instant Appeal may very graciously be dismissed with cost.



Secretary, Health Department,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 01



Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 02



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**DIRECTORATE GENERAL
HEALTH SERVICES KHYBER
PAKHTUNKHWA PESHAWAR**

No. 17227 /AE-VII

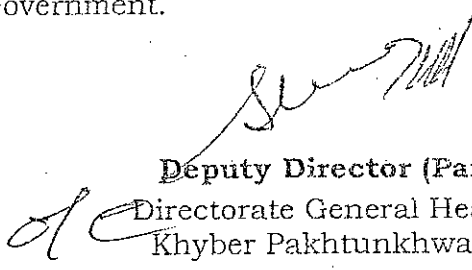
Dated: 2 / 10 / 2019

To

The District Health Officer,
Tribal District Miranshah.

Subject: APPEAL UNDER RULE-3 OF THE KP CIVIL SERVANTS
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I am directed to refer to your letter No. 2905/Miranshah, dated 20.08.2019 on the subject noted above and to state that the subject case has been discussed and decided in the presence of the applicant (Mr. Irfan Ali Shah) and the appeal has been regretted by the competent authority in the light of instructions of the Government.


Deputy Director (Paramedics)

Directorate General Health Services
Khyber Pakhtunkhwa, Peshawar

Irfan Ali Shah

V E R S U S

Secretary Health, & Others

SCANNED
KPST
Peshawar

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RESPONDENTS NO. 5, 6, 7 & 9

Ajab Khan S/O Bashar Khan

Akbar Khan S/O Khoja Omar

Shakeel Raziq S/O Fazal Raziq

Sohni Bibi D/O Safdar Jehan

Through Counsel

Muhammad Nasir Ghilzai

Aziz Khan

Muhammad Ayub

Advocate High Court

11. Para no. 11 pertains to respondent no. 1, hence no comments.
12. Para no. 12 pertains to grounds which are replied as under against each: -

GROUNDS

- A. Para no. A already replied in para no. 8 of the facts.
- B. Para no. B is incorrect, hence denied.
- C. Para no C is incorrect, hence denied.
- D. Para no D pertains to respondent no 1 to 4, hence no comments.
- E. Para no E does not pertains to respondents no-5, 6, 7 & 9, hence no comments.
- F. No comments on para no F.

It is therefore humbly prayed that on acceptance of instant comments, the appeals of the appellant may kindly be dismissed with cost.

RESPONDENTS NO. 5, 6, 7 & 9

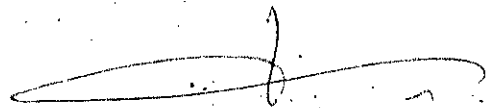
Ajab Khan S/O Bashar Khan

Akbar Khan S/O Khoja Omar

Shakeel Raziq S/O Fazal Raziq

Sohni Bibi D/O Safdar Jehan

Through Counsel



Muhammad Nasir Ghilzai

Aziz Khan

Muhammad Ayub

Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Irfan Ali Shah

V E R S U S

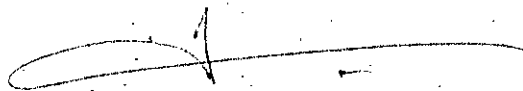
Secretary Health, & Others

AFFIDAVIT

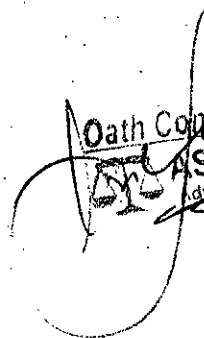
I, Shakil Raziq S/O Fazal Raziq (**Respondent No 4**), do hereby solemnly affirm and states on oath that the contents of accompanying comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent Shakil Raziq

IDENTIFIED BY



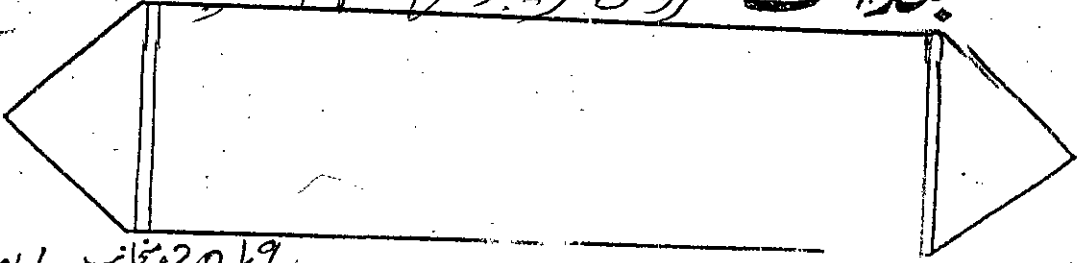
Muhammad Nasir Ghilzai
Advocate High Court



Oath Commissioner
ASAD KHAN
Advocate High Court

07-04-21

بعدالت سروس ٹریبونل ۲۰۱۹ء



۲۰۱۹ء بمطابق ۲۰۱۹ء

مورخہ
مقدمہ
دعویٰ
جرم

سروس ٹریبونل ۱۷۷۰/۱۹
عمران علم شاہ
بنام گورنمنٹ آف پاکستان

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی کی مختلفہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشین التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted by
20

المرقوم _____ ماہ _____ 20

_____ واہ العی _____

بمقام کے لئے منظور ہے۔

Imran Shah

0110/403503