


1124/2019

13th Oct., 2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. Addl. Advocate General for the respondents present.

Request for adjournment was made on behalf of learned senior counsel for the appellant due to his engagement before the Hon'ble Peshawar High Court today. Last opportunity is granted. To come up for arguments on 23.11.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

23.11.2022.

Due to rush of work. This case has been deleted.
To come up for the same as before on 25.01.2023.

25-1-23

Proper DB is not available ^{Cyfl} Reader.

The case is adjourned to 5-5-2023


Reader

16.03.2022


Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 20th, 2022. for the same as before.


Reader.

20th June, 2022

Appellant present in person and Mr. Muhammad Riaz Khan Painsdakhel, Asstt. AG for the respondents present.


Appellant seeks adjournment. Being an old appeal, last chance is given to the appellant for arguments, failing which the case will be decided on the basis of available record without the arguments. To come up for arguments on 11.08.2022 before the D.B.


(Fareeha Paul)
Member(E)

(Kalim Arshad Khan)
Chairman

11-8-2022

Proper DB not available the case is adjourned to 13-10-2022



Reader

29.12.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional Advocate General for respondents present.

Former submitted rejoinder which is placed on file. Private respondent No.4 present is in attendance through counsel today and on his application for setting aside ex-parte proceedings, the order sheet 24.08.2020 placing on him as ex-parte, is recalled. To come up for arguments on 16.12.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

16.12.21

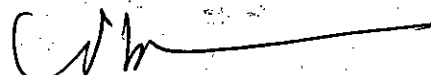
DB is on Tour case to come up
For the same on Dated. 16-3-22

~~R~~
Reodes

27.10.2020

Appellant in person and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 04.01.2021 for hearing before the D.B.



(Atiq-ur-Rehman Wazir)
Member



Chairman

04.01.2021

Junior to counsel for the appellant present.

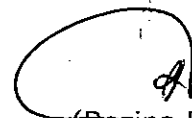
Riaz Khan Paindakhel Assistant Advocate General for respondents present.

Junior to counsel for the appellant requested for adjournment as senior counsel for the appellant is busy before Hon'ble Peshawar High Court, Peshawar.

Adjourned to 14.04.2021 for arguments before D.B.



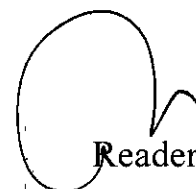
(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

14.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 29.07.2021 for the same as before.




Reader

01.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Salim Javid Litigation Officer for respondents No.1 & 2 present. None present on behalf of respondents No.3 & 4. Notice be issued to respondents No.3 & 4.

Again, a request for submission of comments on behalf of respondents No.1 & 2 was made which is allowed on cost of Rs.2000/-. It is worth mentioning that reply on behalf of respondent.No.3 has already been furnished and has been placed on file. To come up for attendance of respondent No.4 and comments on behalf of respondents No.1, 2 and 4, on 24.08.2020 before S.B.


Member (J)

24.08.2020


Appellant present in person.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Hazrat Shah Superintendent, Dr. Salim Javid Litigation Officer and Mustaqim Litigation Officer for official respondents #.1 to 3 present.

Representatives of respondents #. 1 and 2 furnished written reply alongwith cost of Rs. 2000/- which was received by appellant and in this regard his signature was obtained on the margin of order sheet.

Comments on behalf of respondent #.3 has already been filed.

None present on behalf of private respondent #.4 hence placed ex-parte. To come up for rejoinder, if any and arguments on 27.10.2020 before D.B.


Member (J)

Keenied Rs 2000/-
J.A.

23.01.2020

Appellant present in person. Dr. Mustaqeem, Medical Officer for respondent No. 3 alongwith Addl. AG for the official respondents and respondent No. 4 in person present.

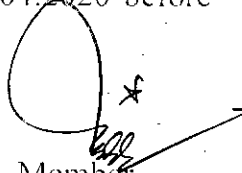
Representative of respondent No. 3 has furnished parawise comments on behalf of the said respondent. On behalf of respondents No. 1 and 2, learned AAG and respondent No. 4 request for further time.

Adjourned to 02.03.2020 on which date the requisite reply/comments by respondents No. 1, 2 and 4 shall positively be furnished.


Chairman

02.03.2020

Junior to counsel for the appellant present. Nemo for official respondents. Private respondent No. 4 in person present and requested for further time to furnish reply/comments. Fresh notices be issued to respondents No. 1 & 2. Last opportunity is granted to respondents No. 1, 2 & 4 to furnish requisite reply/comments on 09.04.2020 before S.B.


Member

09.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 01.07.2020 for the same. To come up for the same as before S.B.


Read

17.10.2019

Counsel for the appellant present.

Contends that the appellant was appointed on 16.02.1984 as Laboratory Assistant (BPS-05) and due to general upgradation was placed in BPS-09 in the year 2011. Presently the appellant is performing duty in BPS-14. On the other hand, the respondent No. 4 was inducted in service as Laboratory Assistant (BPS-05) in the year 1987 and having qualification similar to the appellant was promoted to BPS-16. The impugned seniority was circulated in the year 2019, therefore, the promotion of respondent No. 4 to BS-16 could not be questioned at the relevant time. Further contends that the respondents had ignored the appellant from promotion to his rightful Basic Pay Scale and valuable rights of appellant have been violated.

In view of available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of written reply/comments on 16.12.2019 before S.B.

Appellant Deposited
Security & Process Fee


Chairman

16.12.2019

Appellant in person and Addl. AG alongwith Dr. Mustaqim Shah, Litigation Officer, Jaffar Ali, Senior Clerk for official respondents and private respondent No. 4 in person present.

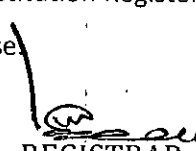

Respondents seek time to submit requisite reply/comments. Adjourned to 23.01.2020 on which date the respondents shall positively furnish their respective reply/comments.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1124/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/09/2019	<p>The appeal of Mr. Jamal Shah resubmitted today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 4/9/19</p>
2-	05/09/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/10/19</u>.</p> <p> CHAIRMAN</p> <p><i>Admit note dated 17-10-19 on page.</i></p>

The appeal of Mr. Jamal Shah Senior Clinical Technician Pathology District Charsadda received today i.e. on 30.08.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Address of respondent no. 4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 1534 /S.T,

Dt. 2-9- /2019.

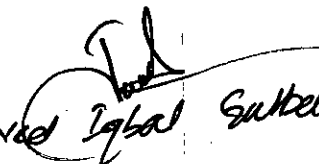

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Javed Iqbal Gulbela Adv. Pesh.

Respected Sir:-

*The address of Respondent NO.4 is
Main Laboratory, D.H.Q. Nowshetra.*

*The resubmission is completed now and
objection has been removed and kindly
resubmitted.*


Javed Iqbal Gulbela

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A 1124 /2018

Jamal Shah.

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
and others

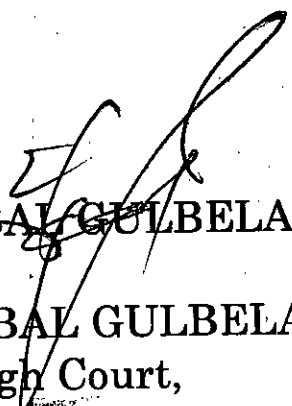
INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-6
2.	Affidavit		7
3.	Addresses of Parties		8
4.	Copies of Departmental Appeal	"A"	9-10
5.	Other Documents	"B to F"	11-30
6.	Wakalatnama		31

Dated : 26/08/2019


Appellant

Through


JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A 1124 /2018

Diary No. 1215

Dated 30/8/2019

Jamal Shah (Senior Clinical Technician Pathology), S/o
Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil
Tangi, District Charsada.

----- (Appellant)

VERSUS

1. Secretary Health Government of Khyber
Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
- ✓ 3. Medical Superintendent Women and Children
Hospital, Rajjar, Charsadda.
4. Nazir Taj Chief Clinical Technician, R/O Main
Laboratory, DHQ, Nowshera.

----- (Respondents).

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED SENIORITY
LIST WHEREBY THE APPELLANT HAS
ILLEGALLY BEEN BEEN ENLISTED
JUNIOR THAN REPENDENT NO.4
ALONGWITH DEPRIEVEMENT OF THE
APPELLANT FROM THE POST OF
TECHNICIAN SINCE 1993 IN A CURSORY
AND WHIMSICAL MANNER.**

Respectfully Sheweth,

1. That the Appellant is a naturally born
bonafide citizen of the Islamic Republic
of Pakistan & hails from respectable
family of District Charsadda.

Filed to-day

Registrar
30/8/19

Re-submitted to-day
Filed.

Registrar
4/9/2019

2. That appellant was inducted into service after going through the mandatory required tests and interview on 16/02/1984 as Lab Assistant BPS-5 in the Health Department.

3. That in fact the appellant was selected and sent to National Institute of Health Islamabad (NIH) for two years training / course i.e "F.Sc Medical Laboratory Technology (M.L.T) Diploma" in 1991 and completed successfully the same in 1993, and per rules the appellant was entitled to Pathology Technician BPS-09, which was given to other colleagues all over the country, but the same right / post was denied to the appellant.

4. That it is pertinent to mention here that Respondent No.4 who had initially been appointed as Lab Assistant (BPS-05) on 29/03/1987 and was junior to the appellant was also later on selected for the subject F.Sc Medical Laboratory Technology Diploma Course and he completed his M.L.T Diploma in 1995.

5. That inspite of the fact that Respondent No.4 was junior to the appellant and sent for MLT Diploma latter than the appellant and he completed the same in 1995, but even then Respondent No.4 was given post of Technician (BPS-09) in 1995 on the basis of Diploma but was not extended to the appellant.

6. That later on the post of the appellant was upgraded in General Up gradation to BPS-09 with nomenclature of JCT (Junior Clinical Technician Pathology). In 2012 it was again upgraded with designation of CT (Clinical Technician) BPS-12 and again it was upgraded to Senior Clinical Technician (SCT) BPS-14 in 2014-15 and till now the appellant is working in the same rank and post, whereas Respondent No.4, who was not only junior to the appellant but had also completed his MLT Diploma in 1995 and the appellant who is not only senior but has also completed his MLT Diploma in 1993 even then now working in BPS-14 whereas Respondent No.4 is working as Chief Clinical Technician BPS-16, which is

not only illegal, unlawful, void-abintio but is also discriminatory.

7. That feeling aggrieved the appellant preferred departmental appeal on 09/05/2019, but inspite of laps of statutory period nothing came up over the same. (Copy of departmental appeal is annexed as annexure "A")
8. That feeling highly aggrieved the appellant prefers the instant Service appeal for revising the seniority list 2019 and for enlisting his name as Senior than Respondent No.4 alongwith retrospectively extended the post of Technician w.e.f 1993 (BPS-09) when the appellant completed the Diploma of MLT with all back benefit upon the following grounds inter alia:-

Grounds:-

- A. That the petitioner is naturally born bona-fide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land.
- B. That the impugned Seniority List 2019 is Quorum non judice, vide illegal,

unwarranted and is liable to be revised accordingly.

C. That the appellant was appointed in 1984 and was sent for MLT Diploma in 1991 and completed the same in 1993 whereas Respondent No.4 was appointed in 1987 and have completed his MLT Diploma in 1994, but inspite of it BPS-09 was given to Respondent No.4 in 1995 while the same was refused / denied to the appellant upto date, which is not only illegal, unlawful & un-warranted but highly discriminated.

D. That after completion of Diploma Course, which was in service Diploma Course, the appellant was entitled for the subject post of Technician (BPS-09) in 1993, which was denied and now junior is made senior to him as well give higher post as well.

E. That the appellant has been condemned unheard.

F. That from every angle the impugned seniority list 2019 is illegal, void and is liable to be revised accordingly.

G. That any other ground not raised here may graciously be allowed to raised at the time of arguments.

6

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the appellant be declared as entitled for and be extended the post of Technician (BPS-09) w.e.f 1993 i.e when the appellant completed his MLT Diploma with all back benefits in terms of promotion, arrears and seniority.

It is further prayed that the impugned office Seniority List 2019 be revised and the appellant be made senior than Respondent No.4 as per law and rules governing the subject with all back benefits.

Any other relief, not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.

Dated : 26/08/2019


Appellant

Through


JAVED IQBAL GULBELA
&

SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar

NOTE:-

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.


Advocate.

BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

In Re S.A _____/2019

Jamal Shah

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
and others

AFFIDAVIT

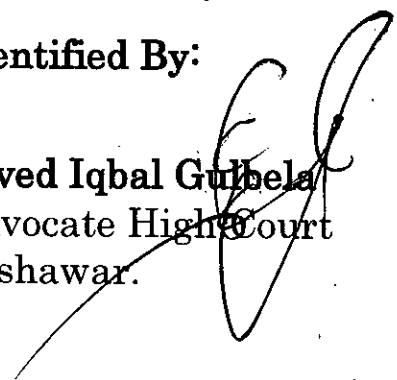
I, Jamal Shah (Senior Clinical Technician Pathology)
S/o Hamesh Khan R/o Safo Bariband, Mandani,
Tehsil Tangi, District Charsadda, do hereby solemnly
affirm and declare that all the contents of the
accompanied **appeal** are true and correct to the best
of my knowledge and belief and nothing has been
concealed or withheld from this Hon'ble Tribunal.



DEPONENT

CNIC: 17101-0337081-9

Identified By:


Javed Iqbal Guibela
Advocate High Court
Peshawar.



(8)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2018

Jamal Shah.

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
and others

ADDRESSES OF PARTIES

APPELLANT.

1. Jamal Shah (Senior Clinical Technician Pathology), S/o Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil Tangi, District Charsada.

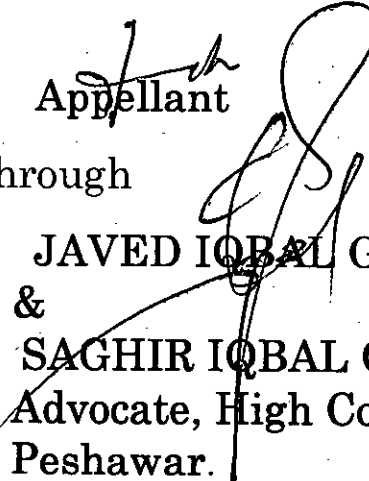
RESPONDENTS:

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendant Women and Children Hospital, Rajjar, Charsadda.
4. Nazir Taj Chief Clinical Technician.

Dated : 26/08/2019


Appellant

Through


**JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.**

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2018

Jamal Shah.

VERSUS

Secretary Health Government of Khyber Pakhtunkhwa
and others

ADDRESSES OF PARTIES

APPELLANT.

1. Jamal Shah (Senior Clinical Technician Pathology), S/o Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil Tangi, District Charsada.

RESPONDENTS:

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
3. Medical Superintendent Women and Children Hospital, Rajjar, Charsadda.
4. Nazir Taj Chief Clinical Technician R/O Main Laboratory, DHQ, Nowshera.

Dated : 26/08/2019

Appellant

Through

**JAVED IQBAL GULBELA
&
SAGHIR IQBAL GULBELA
Advocate, High Court,
Peshawar.**

9
Amir
Dated: 09/05/2019

To

1. Medical Superintendent
Women & Children Hospital Charsadda.
2. The Director General Health Services,
Khyber Road, Peshawar.

Subject: DEPARTMENTAL APPEAL.

Respected Sir,

It is stated that i humbly submit my legal objection on the Seniority list of Clinical Technician (Pathology) BPS-16 issued by DG Health office Vide dated: 29/03/2019, My appeal/Grievance is reflected as under.

1. I have been appointed as Lab. Assistant BPS-05 in K.T.H Peshawar in 16/02/1984, at that time KTH was attached to Civil Secretariat in 1990-91.
2. After 07 years i was selected for DMLT course in pathology and join National Institute of Health Islamabad (N.I.H), through department training.
3. In September 1993 i have completed my 02 year training and passed F.SC Medical Laboratory Technology Diploma.
4. After the competition of diploma, i was eligible for the post of Pathology Technician BPS-09, which is already given to my colleagues all over the country.
5. In September 1993, when i have join KTH, after the MLT Diploma, i have seen remind to KTH Establishment that i am eligible for Technician post BPS-09, But they ignore my application and told me that KTH Hospital is handed over to DG health. Then i apply for technician post BPS-09 in DG Health several time, but the Clerical Staff and Establishment Department of DG Health Dauges me that we will advertisement these posts.
6. After some time Mr. Nazir Taj Pathology Technician who is one year Junior to me in MLT Diploma has been appointed on the post of Technician in 1995 BPS-09 and put my name in most junior rank in the Seniority list and i have upgraded to BPS-09 in 2006, which is so cruel Decision in Civil Servant rules.
7. Mr. Nazir Taj completed his Diploma of MLT in 1994-95 session and i have completed diploma in 1993 session, Now Mr. Nazir Taj is working in BPS-16 Chief Clinical Technician and Eligible for BPS-17 and i am in BPS-14 Senior Technician (List Attached).

Therefore it is request to kindly sympathetically accept my appeal/grievance and correct my name in the revised seniority list 2019 and order accordingly, please.

Establishment

12/11/19

JAVED IQBAL Gul Beh
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Mr. Jamal Shah

Sr. Technician Pathology

(10)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
WOMEN AND CHILDREN HOSPITAL CHARSADDA**

No: 2225 /WCH/Dev./Admin./2018-19

Dated: 13/05/2019

To

The Director General Health Services,
Khyber Road, Peshawar.

Subject: DEPARTMENTAL APPEAL.

Enclosed please find herewith a departmental appeal in respect of Mr. Jamal Shah Sr. Technician Pathology BPS-14, (which is self explanatory) for further necessary action please.

Encl. above

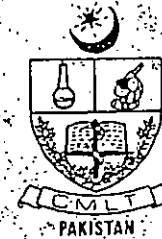
Medical Superintendent
Women & Children Hospital
Rajjar, Charsadda

OFFICE ADDRESS: Opp: Elementary Girls College Sheikh Abad, Tahhtgai Road Rajjar Charsadda.
PHONE: 091-6515290

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Serial No. 0009 - D

Reg. No. 856,



NATIONAL INSTITUTE OF HEALTH ISLAMABAD

COLLEGE OF MEDICAL LABORATORY TECHNOLOGY
DIPLOMA

This is to certify that JAMAL SHAH Son / ~~Daughter~~ of
HAMESH KHAN of Batch No. 28th Roll No. 09
has duly passed the certificate in *J.Sc. Medical Laboratory Technology*
Annual/Supplementary Examination obtaining ~~583~~ 583 Marks
out of ~~1100~~ 1100 Marks held in September/October, 1993.

PRINCIPAL
College of Medical Lab. Technology
N.I.H. Islamabad



EXECUTIVE DIRECTOR
National Institute of Health
Islamabad

JAVED IOBAL Jull Bela
Advocate High Court Peshawar
Mob: 0245-3405501

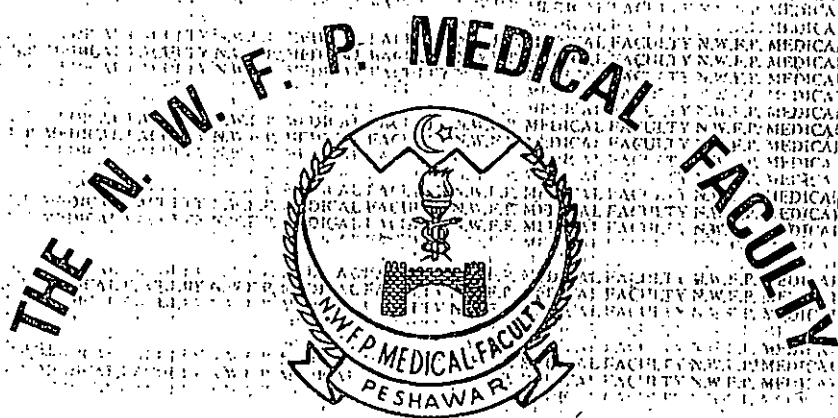
12

Am C

Serial No. 2576

Roll No. 1161

Exam: Session 1985



(This Certificate does not authorise the holder to practice Western Medical Science unless holding a licence of the N.W.F.P. Medical Faculty).

THIS IS TO CERTIFY that (MR) JAMAL SHAH

son/daughter of (MR) HAMEESH KHAN

has passed the Examination for LABORATORY ASSISTANT Certificate held by

the N.W.F.P. Medical Faculty in APRIL, 1985 and that he/she is

a fit person to perform the duties of a LABORATORY ASSISTANT

His/Her personal particulars are noted overleaf.

Signed on behalf of the Governing Body of the N.W.F.P. Medical Faculty

JAVED IQBAL Gul Beta
Daudzar Law Chamber
Advocate High Court Peshawar
Phone: 42-446581

Secretary

President

N.W.F.P. Medical Faculty

N.W.F.P. Medical Faculty

Peshawar (PAKISTAN)

Dated the 20th JULY 1985

This Certificate is issued without any alteration or erasure.

SERIAL NO. 0009-PM

REG. NO. 856

COLLEGE OF MEDICAL LABORATORY TECHNOLOGY
NATIONAL INSTITUTE OF HEALTH
ISLAMABAD

MARK-SHEET INTERMEDIATE SCIENCE MEDICAL LABORATORY
TECHNOLOGY COURSE PRELIMINARY EXAMINATION

NAME **JAMAL SHAH** FATHER'S NAME **HAMESH KHAN**
ROLL NO. **09** BATCH NO. **28** SESSION **1990 - 1993**

ANNUAL/SUPPLEMENTARY

S. NO.	SUBJECT	MARKS				TOTAL	
		THEORY		PRACTICAL		TOTAL	OBTAINED
		TOTAL	OBTAINED	TOTAL	OBTAINED		
1	ELEMENTARY CHEMISTRY & CHEMICAL PATHOLOGY	50	26	50	28	100	54
2	HAEMATOLOGY AND BLOOD BANKING	50	25	50	29	100	54
3	MICROBIOLOGY - I	50	29	50	25	100	54
4	MICROBIOLOGY - II	50	27	50	35	100	62
5	ELEMENTARY ANATOMY & MICRO TECHNIQUE	50	27	50	25	100	52
6	CLINICAL PATHOLOGY AND SEROLOGY	50	26	50	31	100	57
7	ENGLISH	200	76	--	--	200	76
8	ISLAMIAT	50	33	--	--	50	33
9	PAK. STUDIES	50	44	--	--	50	44
10	URDU/PAK. CULTURE	200	87	--	--	200	87
		800	410	300	173	1100	583

PREPARED BY (SH. ARIF AZIZ)

CHECKED BY (ZAHID MALIK)

PRINCIPAL
COLLEGE OF MEDICAL LABORATORY TECHNOLOGY
NATIONAL INSTITUTE OF HEALTH
ISLAMABAD

JAVED IQBAL Gul Bela
Qadisi Law Chamber
Advocate High Court Peshawar
Mobile: 071-3540591

JAVED QADRI
 Director
 Provincial Health Services
 Peshawar

FINAL SENIORITY LIST OF CHIEF CLINICAL TECHNICIAN (PATHOLOGY)
BS-16 IN THE HEALTH DEPARTMENT KPK.

S. No.	Name	Father Name	Date of Entry in the Cadre	Date of 1st appointment	Present Posting	Domicile	Date of Birth	Date of Retirement	Remarks
17	Habib Khan	Hashim Khan	a. Lab Asstt: BS 05 b. Lab: Tech: BS 09 c. Chief Lab Tech B 16	a.20.05.1984 b. 05.10.1985 c. 31.12.2005	DHQ Hosp: Kohat	Karak	18.06.1961	17.06.2021	
R	Shah Jehan	Saeedullah	a. Lab Asstt: BS 05 b. Lab: Tech: BS 09 c. Chief Lab Tech B 16	a. 12.12.1978 b. 01.02.1988 c. 31.12.2005	KTH Peshawar	Peshawar	20.03.1958	19.03.2018	
R	Rahat Ullah		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	25/08/1987 08.04.2010 02.08.2012	KTH Peshawar	Peshawar	15/04/1958	14/04/2018	
R	Irshad Ali		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	27/08/1987 08.04.2010 02.08.2012	KTH Peshawar	Peshawar	2/2/1958	01/02/2018	
17	Muslim Jan	Muhammad Sharif	BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	02/09/1987 08.04.2010 02.08.2012	DHQ Hosp: Mardan	Charsadda	1/12/1967	30/11/2027	

15

17

17R

17

6.	Inam Jan		Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	20/05/1979 20/10/1987 08.04.2010 02.08.2012	DHQ Hosp: Charsadda	Peshawar	20/05/1980	19/05/2020	
7.	Farman Ullah		Lab Asst: BS 05 BBT BS-09 Clinical Tech: B-12 Chief Tech: BS-16	07/02/1981 20/10/1987 08.04.2010 02.08.2012	LRH Peshawar	Peshawar	20/09/1957	19/09/2017	
8.	Khushdil Khan		Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	10/02/1981 20/10/1987 08.04.2010 02.08.2012	DHQ Hosp: Kohat		24/05/1965	23/05/2025	
9.	Latif-Ur-Rehman		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	25/05/1989 08.04.2010 02.08.2012	ATH Abbottabad				
10.	Abdur Rashid	Abdul Manan	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	08/03/1978 08/08/1989 08.04.2010 02.08.2012	DHQ Teaching Hosp: Kohat	Charsadda	3/3/1959	02/03/2019	
11.	Farhad Ali		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	01/10/1988 08.04.2010 02.08.2012	KTH Peshawar	Peshawar	Peshawar	17/05/2020	
12.	Ikramullah		Lab Asst: BS 05c)	01/02/1988	KTH Peshawar	Charsadda	5/4/1964	04/04/2022	

JAVED IQBAL Gul Bela
Zaidzai Law Chamber,
Advocate High Court Peshawar
Mob: 033-0405501

(16)

JAVED IQBAL Gul Beta
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405591

			Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	10/02/1990 08.04.2010 02.08.2012					
13. 5	Jehanzeb		Lab Asst: BS 05 Lab Tech: S 09 Clinical Tech: B-12 Chief Tech: BS-16	19/10/1976 01/07/1990 08.04.2010 02.08.2012	KGN Teaching Hospital Bannu	Charsadda	28/04/1959	27/04/2019	
14.	Shoukat Ali		Lab Asst: BS 05 Lab Tech: B 09 Clinical Tech: B-12 Chief Tech: BS-16	29/10/1976 16/01/1991 08.04.2010 02.08.2012	KGN Teaching Hospital Bannu	Peshawar	25/10/1957	24/10/2017	
15.	Ali Gohar		Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	12/02/1979 01/03/1991 08.04.2010 02.08.2012	KTH Peshawar	Mardan	6/9/1957	05/09/2017	
16.	Muhammad Shah		Lab Asst: BS 05 Sr/H/Lab Asst B 6 Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	12/05/1979 01/07/1990 01/03/1991 08.04.2010 02.08.2012	KGN Teaching Hospital Bannu	Charsadda	15/05/1958	14/05/2018	
17. 6	Hakeem ullah		Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	12/05/1991 08.04.2010 02.08.2012	DHQ Hosp: Bannu	Bannu	2/1/1969	01/01/2029	
18. 7	Rafiullah		Lab Tech: BS 09 Clinical Tech: B-12	13/05/1991 08.04.2010	SGTH Swat		10/08/1959	09/08/2019	

R

R

R

17

4

R

			Chief Tech: BS-16	02.08.2012					
19. 8	Zaffar Islam	M. Sardar Jan	Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	14/05/1991 08.04.2010 02.08.2012	DHS FATA	NWA	25/04/1988	24/04/2028	
20. 9	Bazeed Khan	Shall khan	BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	11/11/1991 08.04.2010 02.08.2012	DHS FATA	SWA	6/11/1966	05/11/2026	
21.	Sardar Shah		Lab Tech: BS 09 Clinical Tech: B-12 Chief Tech: BS-16	04/02/1992 08.04.2010 02.08.2012	LRH Peshawar	Peshawar	6/6/1957	05/06/2017	
22. 9 10	Ihsanul Haq		BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	18/03/1992 08.04.2010 02.08.2012	SGTH Swat	—	—	—	
23. 11	Muhammad Hanif	Muhammad Younis	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	14/06/1981 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Peshawar	2/8/1960	01/08/2020	
24. 12	Karim Ullah	Saad Ullah	Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	23/07/1985 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Charsadda	24/05/1965	23/05/2025	
25. 13	Zafarullah		Lab Asst: BS 05 b) BBT BS 09 Clinical Tech: B-12 Chief Tech: BS-16	25/04/1988 18/07/1992 08.04.2010 02.08.2012	LRH Peshawar	Charsadda	10/9/1969	09/09/2029	

JAVED IQBAL Gul Beta
Daudkhel Law Chamber
Advocate High Court Peshawar
Mob: 0345-3405591

26. 14	Amir Shahbaz	Shatta Mir	BBT BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	18/07/19920 8.04.2010 02.08.2012	DHQ Hosp: Karak	Karak	18.02.1962	17.02.2042	Upgraded to BS-16 vide Notification No. SO(FR)/FD/7-3/2015/ dated 11-8-15
27. 15	Qazi Liaqat Hussain	Qazi Muhammad Akram	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	13/12/1989b 02/08/1992 08.04.2010 02.08.2012	KATH Mansehra	Mansehra	25/04/1966	24/04/2026	Upgraded to BS-16 vide Notification No. SO(FR)/FD/7-3/2015/ dated 11-8-15
28. R	Saifoor Badshah	Ali Badshah	Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	c)08/03/1993 08.04.2010 02.08.2012	DHO Hangu	Karak	4/5/1957	03/05/2017	Upgraded to BS-16 vide Notification No. SO(FR)/FD/7-3/2015/ dated 11-8-15
29. 16	Riaz Hussain		Lab Tech: B 09 Clinical Tech: B-12 Sr. Tech: BS-14	08/03/19930 8.04.2010 02.08.2012	AS Khyber Agency	K. Agency	5/2/1969	04/02/2029	Upgraded to BS-16 vide Notification No. SO(FR)/FD/7-3/2015/ dated 11-8-15

JAVED IQBAL Gul Bela
Law Chamber
High Court Peshawar
0745-9465501

17

HAYAT IQBAL Gulistan
 Judicial Law Chambers
 District High Court Peshawar
 Phone: 0345-9405507

30. 17	Izharullah		Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	31/12/19940 8.04.2010 02.08.2012	KTH Peshawar		05/12/1972	04/12/2032	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
31. 18	Niamatullah		Lab Asst: BS 05 BBT BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	21/04/1992 26/01/1995 08.04.2010 02.08.2012	SGTH Swat	Swat	5/9/1969	04/09/2029	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
32. 19	Khurshid Alam		BB Tech BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	22.03.1995 08.04.2010 02.08.2012	AS NWA Miranshah	ON.W A	10/5/1970	09/05/2030	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
33. 20	Nazir Taj	Faqir Khan	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	29/03/1987 26/10/19950 8.04.2010 02.08.2012	DHQ Hosp: Nowshera	Mardan	1/1/1970	31/12/2030	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
34. 21	Abdul Jalil		L/Tech: BPS 09 Sr. Tech: BS-14	26/10/1995 02.08.2012	DHQ Hosp: Karak	Karak	14/03/1973	13/03/2033	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated

1 Year ←
Junior in
Diploma.

20

7

									11-8-15
22	35. Siraj	Sher Afzal	Lab Asst: BS 05 Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	12/07/1989 02/11/1995 08.04.2010 02.08.2012	DHQ Hosp: Batkhela	Swat	1/1/1967	31/12/2026	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
23	36. Akhtar Ali		Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	18/06/1996 08.04.2010 02.08.2012	DHQ Hosp: Swabi	Karak	3/6/1967	02/06/2027	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
24	37. Syed Karim Shah	Syed Karim Sha	Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	01/10/1996 8.04.2010 02.08.2012	DHQ Hosp: Charsadda	Charsadda	18/05/1959	17/05/2019	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
25	38. Kiramat Shah		Lab Tech: BS 09 Clinical Tech: B-12 Sr. Tech: BS-14	01/10/1996 08.04.2010 02.08.2012	DHQ Hosp: Haripur	—	—	—	Upgraded to BS-16 vide Notification No. SO(FR)FD/7-3/2015/ dated 11-8-15
26	39. Fazli Hakeem	Fazli Hakeem	Lab Tech: BS.09	01/10/1996	HMC	Peshawar	13.06.1962	12.06.2022	Upgraded to BS-

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405504

(21)

8

			Clinical Tech: B-12 Sr. Tech: BS-14	08.04.2010 02.08.2012	Peshawar				16 vide Notification No. SO(FR)FD/7- 3/2015/ dated 11-8-15
40. 27	Ikramullah		L/ Tech: BPS 09 Clinical Tech: B-12 Sr. Tech: BS-14	01/10/1996 17.06.2011 02.08.2012	DHQ Hosp: Dir Lower	Charsadda	15/04/1966	14/04/2026	Upgraded to BS- 16 vide Notification No. SO(FR)FD/7- 3/2015/ dated 11-8-15
41. 28	Abdul Qadoos		BBT BS-09 Clinical Tech: B-12 Sr. Tech: BS-14	01/10/1996 17.06.2011 02.08.2012	DHQ Hosp: Mardan	Karak	1/12/1966	30/11/2026	Upgraded to BS- 16 vide Notification No. SO(FR)FD/7- 3/2015/ dated 11-8-15

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

28

Excluded seniority list

1.	Shaukat		b)BBT BS 09Clinical Tech: B-12Sr. Tech: BS-14	b)26/08/1 99308.04. 201002.08 .2012	DHQ Hosp: Abbottabad	A. Abad		3/3/1966	02/03/2026	Upgraded vide Notificatio n No. SO(FR)FD /7-3/2015/ dated 11- 8-15	Dead
----	---------	--	---	--	-------------------------	---------	--	----------	------------	---	------

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Daudzai High Court Peshawar
Advocate High Court Peshawar
Meh: 9445-944554

old - Seniority list - S.No- 67
New - SR list S.No- 36

B.P.S - 14
 S.R. Peshawar

Provisional Seniority List of Clinical Tech: (Pathology) BS-14 in Health Department Khyber Pakhtunkhwa

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 9945-094591

S. No.	Name	Father Name	a (Old Nomenclature With BPS) b. New Nomenclature after restructuring with BPS	Date of Entry in the Cadre	Date of 1st appointment	Present Posting	Domicile	Date of Birth	Date of Retirement
1	✓ Muhammad Raziq 16	Hamzullah	c) Lab Tech: BS 09 Clinical Tech: B-12	c) 01/10/1996 7.06.2011	c) 01/10/1996 7.06.2011	DHO Charsadda	Charsadda	02.02.1967	01.02.2027
2	✓ Bakht Ali Shah 16		b) BBT BS-09 Clinical Tech: B-12	b) 01/10/1996 17.06.2011	b) 01/10/1996 7.06.2011	KTH Peshawar	Charsadda	18/03/1967	17/03/2027
3	✓ Muhammad Rafiq	Muhammad Farooq	c) Lab Tech: BS 09 Clinical Tech: B-12) 01/10/1996 7.06.2011) 01/10/1996 17.06.2011	KMC Peshawar	Charsadda	01.03.1968	29.02.2028
4	✓ Mustajab Khan		a) L Asst: BS 05 b) BBT BS-09 Clinical Tech: B-12	a) 17/06/1991 b) 01/10/1996 08.04.2010	a) 17/06/1991 b) 01/10/1996 08.04.2010	Maternity Hospital Pesh:	Peshawar	15/04/1972	14/04/2032
5	✓ Hazrat Usman	Atta Muhammad	Lab. Tech; BPS-09 Clinical Tech: B-12	16/02/1999 08.04.2010	16/02/1999 08.04.2010	W&C Hosp: Kohat	Karak	10/9/1974	09/09/2034
6	✓ Amjad Ali	Zait Ullah	a) L Asst: BPS 05 b) BB Tech BS 09 Clinical Tech: BS-12	a) 28/03/1987 b) 04/03/1999 02.08.2012	a) 28/03/1987 b) 04/03/1999 02.08.2012	AHQ Hosp: Ghallanai Mohmand Agency	Charsadda	07.02.1969	06.02.2029
7	✓ Khan Nawab		a) L Asst: BPS 05 b) BB Tech: BS 09 Clinical Tech: BS-12	a) 27/12/1989 b) 04/03/1999 02.08.2012	a) 27/12/1989 b) 04/03/1999 02.08.2012	SGTH Swat	Swat	1/1/1964	31/12/2024

23
 16
 1
 2
 3
 4
 5
 6
 7

8	✓	Nazir Ahmad	Bashir Ahmad	L/Asst: BPS 05 Lab. Tech; BPS-09 Clinical Tech: BS-12	23/05/198704/03/199902.08.2012	23/05/198704/03/199902.08.2012	DHQ Hosp: Mardan	Charsadda	17/03/1967	16/03/2027
9	✓	Humayun	Muhammad Ghaus	a)L/Asst: BPS 05b) BBT BS-09 Clinical Tech: BS-12	a)24/01/1990 b)04/03/1999 02.08.2012	a)24/01/1990 b)04/03/199902.08.2012	LRH Peshawar	Charsadda	11/12/1967	10/12/2027
10	✓	Rizwan Ullah		a)L/Asst: BPS 05b) BBT BS-09 Clinical Tech: BS-12	a)29/01/1990 b)04/03/1999 02.08.2012	a)29/01/1990 b)04/03/199902.08.2012	Police & Services Hospital Peshawar	Charsadda	25/03/1970	24/03/2030
11	✓	Fazal Manan	Abdul Manan	c)Lab Tech: BS 09 Clinical Tech: BS-12	c)04/03/199902.08.2012	c)04/03/199902.08.2012	District Swat	Swat	1/4/1971	31/03/2017
12	✓	Sher Hassan	Habat Khan	a)L/Asst: BPS 05b) BBT BS-09 Clinical Tech: BS-12	a)16/03/1990 b)04/03/1999 02.08.2012	a)16/03/1990 b)04/03/199902.08.2012	City Hospital Kohat Rd: Peshawar.	Karak	3/11/1971	02/11/2031
13	✓	Ziarat Khan		a)L/Asst: BPS 05b) BBT BS-09 Clinical Tech: BS-12	a)02/05/1995 b)04/03/1999 02.08.2012	a)02/05/1995 b)04/03/199902.08.2012	DHQ Hosp: Batkhela	28/05/1973M. Agency	28/05/1973M. Agency	27/05/2033
14	✓	Muhammad Iqbal	Makhozai	BBT BS-09 Clinical Tech: BS-12	04.03.199902.08.2012	04.03.199902.08.2012	DHQ Hosp: Buner	Buner	20.02.1974	19.02.2034
15	✓	Muhammad Jalaluddin	Abdul Ghafoor	Lab: Asstt: B-05BB Tech: BS-09 Clinical Tech: BS-12	16.02.199906.03.199902.08.2012	16.02.199906.03.199902.08.2012	Maternity Hospital Peshawar	Charsadda	09.03.1973	08.03.2033
16	✓	Amjad Khan		b) BBT BS-09 Clinical Tech: BS-12	b)06/03/1999 02.08.2012	b)06/03/199902.08.2012	LRH Peshawar	Peshawar	12/3/1976	11/03/2036
17	✓	Niaz Ali		b) BBT BS-09 Clinical Tech: BS-12	b)06/03/1999 02.08.2012	b)06/03/199902.08.2012	Food Lab: Peshawar	Peshawar	5/4/1977	04/04/2037

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
MH: 885-985591

18	✓ Riaz Muhammad	Faqir Gul	a)L/Asst: BPS 05b) BBT BS-09Clinical Tech: BS- 12	a)01/03/1990 b)08/03/1999 02.08.2012	a)01/03/1990b)08/03/199902 .08.2012	DHQ Hosp: Nowshera	Nowshera	13/04/1966	12/04/2026
19	✓ Iftikhar Ahmad		b) BBT BS-09Clinical Tech: BS-12	b)09/03/1999 02.08.2012	b)09/03/19990 2.08.2012	KCD Peshawar	Peshawar	16/04/1977	15/04/2037
20	✓ Jamil Ahmad		c)Lab Tech: BS 09Clinical Tech: BS-12	c)09/07/19990 2.08.2012	c)09/07/19990 2.08.2012	District Swat	Swat	10/5/1977	09/05/2037
23	✓ Kausar Iqbal		a)L/Asst: BPS 05b)Sr/H/L/Asst:B06c)L ab Tech: BS 09Clinical Tech: BS-12	a)17/08/1976 b)22/10/1991c)07/10/19990 2.08.2012	a)17/08/1976b)22/10/1991c 07/10/199902. 08.2012	GMC D.I.Khan	D I Khan	1/3/1958	28/02/2018
24	✓ Muhammad Riaz		a)L/Asst: BPS 05b)Sr/H/L/Asst:B06c)L ab Tech: BS 09Clinical Tech: BS-12	a)11/04/1983 b)01/03/1991c)07/10/19990 2.08.2012	a)11/04/1983b)01/03/1991c 07/10/199902. 08.2012	DHQ Hosp: Abbottabad	Charsadda	18/04/1960	17/04/2020
25	✓ Fazal Hayat		a)L/Asst: BPS 05b)Sr/H/L/Asst:B06c)L ab Tech: BS 09Clinical Tech: BS-12	a)12/02/1983 b)01/03/1991c)07/10/19990 2.08.2012	a)12/02/1983b)01/03/1991c 07/10/199902. 08.2012	District Swabi	Charsadda	7/5/1961	06/05/2021
26	✓ Muhammad Farooq	Muhammad Nawaz Khan	a)Lab: Att: BS-01b)Lab: Asst: BS-05c)Lab: Tech BS-09Clinical Tech: BS- 12	a)10.08.1976 b)30.04.1977c)01.11.19990 2.08.2012	a)10.08.1976b)30.04.1977c 01.11.199902. 08.2012	DHQ Hosp: Bannu	Bannu	05.07.1958	04.07.2018
27	✓ Jamil-ud-Din	Sirajud Din	BBT BS-09Clinical Tech: BS-12	31/08/200002. 08.2012	31/08/200002. 08.2012	KGMC Peshawar	Kohat	27/12/1974	26/12/2034

28	Ihsanullah	Said Ali	Lab: Tech: BPS-09Clinical Tech: BS-12	27.10.200002.08.2012	27.10.200002.08.2012	NBH Kohat Road Pesh:	Karak	06.09.1971	05.09.2031
29	Abid Rehman	Fazlur Rehman	BBT BPS 09Clinical Tech: BS-12	02/03/200202.08.2012	02/03/200202.08.2012	DHQ Hosp: Swabi	Swabi	1/9/1978	30/08/2038
30	Saifur Rahman	Shah Nawaz Khan	BBT BPS 09Clinical Tech: BS-12	11.09.200202.08.2012	11.09.200202.08.2012	District D.I.Khan	D.I.Khan	27.02.1974	26.02.2034
31	Mahboob Sarwar	Haji Noor Sarwar	BB Tech: BPS-09Clinical Tech: BS-12	05.09.200302.08.2012	05.09.200302.08.2012	Maternity Hosp: Pesh:		10.09.1975	09.09.2035
32	Ramzan Ali	Hussain Asghar	BBT BPS 09Clinical Tech: BS-12	11/09/200302.08.2012	11/09/200302.08.2012	AS Kurram Agency		01/11/2033	19/06/2025
33	Zubair Shah	Muhammad Sabir	Lab Tech: BPS 09Clinical Tech: BS-12	30/11/200302.08.2012	30/11/200302.08.2012	District Haripur	Haripur	20/06/1965	19/06/2025
34	Sangeen Ullah	Amir Muhammad	Lab Tech: BPS 09Clinical Tech: BS-12	13/12/200302.08.2012	13/12/200302.08.2012	LRH Peshawar	Peshawar	10/07/1978 Peshawar	09/07/2038
35	Kifayatullah	Latif Khan	Lab: Tech: BS-09Clinical Tech: BS-12	08.01.200402.08.2012	08.01.200402.08.2012	DHQ Teaching Hosp: Bannu	Bannu	07.06.1978	06.06.2038
36	Abdul Rashid	Abdul Majeed	Lab: Tech: BS-09Clinical Tech: BS-12	08.04.200402.08.2012	08.04.200402.08.2012	ATH Abbottabad	Marwat	03.02.1981	02.02.2041
37	Mazhar Sultan	Anwar Sultan	L/Asst: BPS 05Lab: Tech: BS-09Clinical Tech: BS-12	08/01/199121.04.200402.08.2012	08/01/199121.04.200402.08.2012	ATH Abbottabad	Abbottabad	22/11/1968	21/11/2028
38	Amjad	Abdur Rehman	L/Asst: BPS 05BB Tech: BS-09Clinical Tech: BS-12	07.12.199521.04.200402.08.2012	07.12.199521.04.200402.08.2012	District Battagram	Abbottabad	02.03.1975	01.03.2035

(26)
Furnished by
Director
BPS-9-2002

5
6
7
8
9
10
Director

43712
no (18)

JAVED IQBAL Gul Bala
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345-9405501

39 13	Shamsul Haq	Mehmood	L/Asst: BPS 05Lab: Tech: BPS-09Clinical Tech: BS-12	06/02/199128. 04.200402.08. 2012	06/02/199128. 04.200402.08. 2012	KMC Peshawar	Battagram	29/04/1967	28/04/2027
40 14	Rambil Khan	Hassan Khan	L/Asst: BPS 05Lab Tech BPS-09Clinical Tech: BS-12	11/04/199029/ 04/200402.08. 2012	11/04/199029/ 04/200402.08. 2012	KMC Peshawar	Peshawar	10/12/1958	09/12/2018
41 15	Muhammad Gohar Ali	Akbar Sher	L/Asst: BPS 05Lab: Tech: BPS-09Clinical Tech: BS-12	24.09.199429. 04.200402.08. 2012	24.09.199429. 04.200402.08. 2012	KMC Peshawar	Peshawar	14.04.1961	13.04.2021
42 16	Saiful Islam <i>Mirza</i>	Abdul Latif	Lab: Tech: BPS- 09Clinical Tech: BS-12	12.04.200402. 08.2012	12.04.200402. 08.2012	DHQ Hosp: Mansehra	Battagram	07.04.1977	06.04.2037
43 17	Hassan Nabi	Mudassir Khan	BB Tech: BPS- 09Clinical Tech: BS-12	01.11.200402. 08.2012	01.11.200402. 08.2012	DHQ Hosp: Bannu	Battagram	22.01.1974	21.01.2034
44 18	Zafar Ahmad	Safiullah	Lab: Asstt: B-05Lab: Tech: B-09Clinical Tech: BS-12	27.04.200427. 01.200502.08. 2012	27.04.200427. 01.200502.08. 2012	LRH Peshawar	Bannu	15.03.1981	14.03.2041
45 19	Fazli Hanan	Muhammad Gul	L/Asst: BPS 05Lab. Tech; BPS-09Clinical Tech: BS-12	30/09/198928/ 03/200502.08. 2012	30/09/198928/ 03/200502.08. 2012	KMC Peshawar	Charsadda	2/5/1969	01/05/2029
46 20	Muhammad Ilyas <i>Dick</i>	Ghulam Yousaf	Lab. Tech: BPS- 09Clinical Tech: BS-12	28/03/200502. 08.2012	28/03/200502. 08.2012	KMC Peshawar	Mardan	25/04/1978	24/04/2038
47 21	Muhammad Shahid Nawaz	Haq Nawaz	Lab: Tech: BPS 09Clinical Tech: BS-12	08.03.200602. 08.2012	08.03.200602. 08.2012	District Tank	Marwat	06.01.1978	05.01.2038
48 22	Muhammad Sohail	Sher Muhammad	Lab: Tech: BPS 09Clinical Tech: BS-12	03.03.200602. 08.2012	03.03.200602. 08.2012	District Lakki Marwat	L/ Marwat	03.04.1980	02.04.2040
49 23	Abdur Rahim	Mehtar Yousaf	Mircroscopist B-6Clinical Tech: BS-12	01.10.198102. 08.2012	01.10.198102. 08.2012	District Lakki Marwat	Lakki	14.12.1961	13.12.2021

JAVED IQBAL
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 0345/5405501

51	24	Muhammad Basharin	Abdul Mutalib	Microscopist B-6Clinical Tech: BS-12	10.11.198202.08.2012	10.11.198202.08.2012	SGTH Swat	Swat	01.03.1963	28.02.2023
52	25	Ghaus ur Rahman	Aslam Khan	Microscopist B-6Clinical Tech: BS-12	12.01.198702.08.2012	12.01.198702.08.2012	District Dir Lower	Dir Lower	13.05.1967	12.05.2027
54	26	Ikramullah	Muhammad Feroz	Microscopist B-06Clinical Tech: BS-12	01.01.199502.08.2012	01.01.199502.08.2012	KGN Teaching Hos: Bannu	Bannu	05.02.1975	04.02.2035
55	27	Matloob Khan	Saifoor Khan	Microscopist B 06Clinical Tech: BS-12	30/03/199502.08.2012	30/03/199502.08.2012	AS Orakzai	Orakzai	11/2/1976	10/02/2036
56	28	Saifullah Khan	Mir Asar Khan	Microscopist B 06Clinical Tech: BS-12	01/07/199502.08.2012	01/07/199502.08.2012	KGN Teaching Hos: Bannu	Bannu	07.03.1975	06.03.2035
57	29	Habibur Rahman	Amir Azad Khan	Microscopist B 06Clinical Tech: BS-12	12.02.199602.08.2012	12.02.199602.08.2012	District D.I.Khan	Bannu	01.03.1971	28.02.2031
58	30	Zahoor Ahmad	Abdul Ghani	Microscopist B 06Clinical Tech: BS-12	14.06.200402.08.2012	14.06.200402.08.2012	District Shangla	Shangla	05.03.1977	04.03.2037
59		Zari Bahadar	M. Afzal Khan	Lab Asst: BPS-05H/ Lab. Asst B-06Clinical Tech: BS-12	01.12.198229/10/200402.08.2012	01.12.198229/10/200402.08.2012	LRH Peshawar	Mardan	10/04/1957	09/04/2017
60		Muhammad Dawood	Muhammad Qasim	L/Asst: BPS 05H/L/Asst BS 06Clinical Tech: BS-12	12/12/197830/10/200402.08.2012	12/12/197830/10/200402.08.2012	KMC Peshawar	Peshawar	17/02/1958	12/02/2018
61		Gohar Ali	Musali Khan	L/Asst: BPS 05H/L/Asst BPS 06Clinical Tech: BS-12	24/09/199430/10/200402.08.2012	24/09/199430/10/200402.08.2012	KTH Peshawar	Peshawar	17/04/1958	16/04/2018

62	Hawas Khan S/O Amir Ullah	Hawas Khan S/O Amir Ullah	L/Asst: BPS 05H/L/Asst: BPS 06Clinical Tech: BS- 12	01/06/198002/ 11/200402.08. 2012	01/06/198002/ 11/200402.08. 2012	KMC Peshawar	10/05/1959Pe shawar	10/05/1959Pe shawar	09/05/2019
65	S. Gohar Shah	Ghafoor Shah	L/Asst: BPS 05Clinical Tech: BS-12	01/11/198102. 08.2012	01/11/198102. 08.2012	DHQ Hosp: Mardan	Mardan	14/04/1965	13/04/2025
66	Nawaz Khan	Dedar Gul	L/Asst: BPS 05Clinical Tech: BS-12	25/04/198302. 08.2012	25/04/198302. 08.2012	LRH Peshawar	Peshawar	8/5/1959	07/05/2019
67	Jamal Shah	Hamesh Khan	L/Asst: BPS 05Clinical Tech: BS-12	16/02/198402. 08.2012	16/02/198402. 08.2012	KTH Peshawar	Charsadda	1/2/1960	30/01/2020 /
68	Imdad Ullah		L/Asst: BPS 05Clinical Tech: BS-12	18/02/198402. 08.2012	18/02/198402. 08.2012	KTH Peshawar	Charsadda	1/5/1965	30/04/2025
69	Sardar Ali		L/Asst: BPS 05Clinical Tech: BS-12	19/02/198402. 08.2012	19/02/198402. 08.2012	KTH Peshawar	Charsadda	2/1/1964	01/01/2024
70	Mukhtiar Ali Shah	Saeed Shah	L/Asst: BPS 05Clinical Tech: BS-12	21/07/198402. 08.2012	21/07/198402. 08.2012	District Dir Lower	Mardan	16/01/1965	15/01/2025
71	Muhammad Yousaf		L/Asst: BPS 05Clinical Tech: BS-12	22/09/198402. 08.2012	22/09/198402. 08.2012	District Shangla	Swat	10/2/1963	09/02/2023
72	Jehangir Khan	Muhammad Ashraf	L/Asst: BPS 05Clinical Tech: BS-12	17/11/198402. 08.2012	17/11/198402. 08.2012	KGMC Peshawar	Peshawar	8/11/1964	07/11/2024
73	Zahid Iqbal	Manzoor Ilahi	L/Asst: BS 05 Clinical Tech: BS-12	01/01/1985 02.08.2012	01/01/1985 02.08.2012	District Abbottabad	Abbottabad	1/4/1963	31/03/2023
74	Mukaram Khan		L/Asst: BPS 05Clinical Tech: BS-12	22/01/198502. 08.2012	22/01/198502. 08.2012	KTH Peshawar	Charsadda	1/11/1967	30/10/2027
75	Hafeezullah		L/Asst: BPS 05Clinical Tech: BS-12	27/01/198502. 08.2012	27/01/198502. 08.2012	DHQ Hosp: Nowshera	Charsadda	1/5/1962	30/04/2022
76	Ayaz Khan	Ihsan ud din	L/Asst: BPS 05Clinical Tech: BS-12	24/07/198502. 08.2012	24/07/198502. 08.2012	LRH Peshawar	Charsadda	14/01/1965	13/01/2025
77	Babar Tanveer		L/Asst: BPS 05Clinical Tech: BS-12	27/07/198502. 08.2012	27/07/198502. 08.2012	LRH Peshawar	Peshawar	12/6/1966	11/06/2026

JAVED IQBAL Gul Bela
 Daudzai Law Chamber
 Advocate High Court Peshawar
 Mob: 9945-9465594

29
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60
 61
 62
 63
 64
 65
 66
 67
 68
 69
 70
 71
 72
 73
 74
 75
 76
 77
 78
 79
 80
 81
 82
 83
 84
 85
 86
 87
 88
 89
 90
 91
 92
 93
 94
 95
 96
 97
 98
 99
 100

78	Muhammad Asmat Ullah		L/Asst: BPS 05Clinical Tech: BS-12	01/10/198502. 08.2012	01/10/198502. 08.2012	DHO. Swat	Swat	Swat	11/06/2020
79	Muhammad Dawood		L/Asst: BPS 05Clinical Tech: BS-12	24/10/1985 02.08.2012	24/10/198502. 08.2012	District Dir Upper	Swat	5/5/1964	04/05/2024
80	Wasiullah		L/Asst: BPS 05Clinical Tech: BS-12	30/10/198502. 08.2012	30/10/198502. 08.2012	Food Laboratory Pesh:	Karak	8/6/1960	07/06/2020
81	Sher Zada		L/Asst: BPS 05Clinical Tech: BS-12	30/10/198502. 08.2012	30/10/198502. 08.2012	DHQ Hosp: Abbottabad	Charsadda	2/10/1966	01/10/2026
82	Mushtaq Ahmad		L/Asst: BPS 05Clinical Tech: BS-12	01/07/198602. 08.2012	01/07/198602. 08.2012	District Chitral	Swat	15/04/1968	14/04/2028
83	Khurshid Iqbal		L/Asst: BPS 05Clinical Tech: BS-12	14/07/198602. 08.2012	14/07/198602. 08.2012	District Buner	Swat	1/1/1961	02/01/2021
84	Khair Ur Rehman		L/Asst: BPS 05Clinical Tech: BS-12	14/07/198602. 08.2012	14/07/198602. 08.2012	District Chitral	Swat	18/04/1965	17/04/2025
85	Usman Ali		L/Asst: BPS 05Clinical Tech: BS-12	10/09/198602. 08.2012	10/09/198602. 08.2012	DHQ Hosp: Charsadda	Charsadda	13/04/1969	12/04/2029
86	Said Zarin	Alam Zir	L/Asst: BPS 05Clinical Tech: BS-12	01/10/198602. 08.2012	01/10/198602. 08.2012	AHQ Hosp: Bajour	Bajour	1/1/1965	31/12/2024
87	Shaukat Ali	Abdul Malik	L/Asst: BPS 05Clinical Tech: BS-12	13/11/198602. 08.2012	13/11/198602. 08.2012	District Charsadda	Charsadda	15/02/1966	14/02/2026

Director General Health Services
Khyber Pakhtunkhwa Peshawar

JAVED IQBAL Gul Bela
Daudzai Law Chamber
Advocate High Court Peshawar
Mob: 9915-9405551

وکالت نامہ

بعدالت: پندرہ گواہ
 مقام: گوالیار نام: گورنمنٹ
 منجانب: امپلائز دعویٰ: S.A
 تاریخ: _____

پندرہ گواہ
 گوالیار
 امپلائز

باعت تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی رجسٹرڈ ہجرتی
 بمقام۔۔۔۔۔ کیلئے جاوید اقبال گل بیلہ ایڈووکیٹ ہاشمی کورٹ کو بدین شرط وکیل
 مقرر کیا ہے۔ کہ میں ہر پیشگی کا خود یا بزرگوار مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ مندرجہ
 صاحب موصوف کو اطلاع دے کر حاضر عدالت کرونگا، اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے
 کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر
 مقام پچھری کی کسی اور جگہ یا پچھری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے۔ اگر
 مقدمہ علاوہ صدر مقام پچھری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پچھری کے اوقات کے آگے پیچھے پیش ہونے پر
 من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی
 صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور
 صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و
 تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل
 کرنے اور ہر قسم کے بیان دینے اور سپرد و تالی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف
 کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا
 اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ
 مقرر کریں اور ایسے مشیر قانون کے ہر امر دہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کے صاحب موصوف کو حاصل
 ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو
 پوری فیس تاریخ پیشی سے پہلے ادا نہ کرونگا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سند رہے۔
 مورخہ۔۔۔۔۔ مضمون مختار نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

محمد شاہ
 گوالیار

BEFORE THE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR

Service Appeal No. 1124/2019

Jamal Shah (Senior Clinical Technician Pathology), S/O
Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil Tangi,
District Charsadda.

.....(Appellant).

VERSUS

Government of Khyber Pakhtunkhwa & Others

.....(Respondents).

Index

S.No	Description	Annexure	Pages No.
01	Comments		01-03
02	Affidavit		04
03	Authority letter		05
04	Annexure	04	06-09

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL, PESHAWAR

Service Appeal No. 1124/2019

Jamal Shah (Senior Clinical Technician Pathology), S/O
Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil Tangi,
District Charsadda.

.....(Appellant).

VERSUS

1. Secretary Health Government of KPK, Peshawar.
2. Director General Health Services, KPK Peshawar.
3. Medical Superintendent, Women & Children Hospital,
Rajjar Charsadda.
4. Nazir Taj Chief Clinical Technician R/O Main
Laboratory DHQ Nowshera.

.....(Respondents).

Subject: **PARAWISE COMMENTS ON BEHALF OF RESPONDENTS**
NO. 03.

Preliminary Objections:

1. That the appellant has got no cause of action against the
replying respondents.
2. That the appeal is barred by law.
3. That the appeal is bad for miss-joinder and non-joinder.

Respectfully Sheweth,

1. No comments.
2. Pertains to record of respondent No-2.
3. Pertains to record of respondent No-2.
4. Pertains to record of respondent No-2.

5. Pertains to record of respondent No-2.
6. Pertains to record of respondent No-2.
7. Pertains to record of respondent No-2. However, the appellant, remained on general duty at women & children hospital Rajjar Charsadda w.e.f 21-03-2019 to 20-08-2019 vide notification No. 2274-76/DHO Charsadda, dated: 15-03-2019. Because the said hospital was newly established and his services was required to fulfil the staff deficiency. However, he was immediately relieved to his parental station, when newly staff was recruited. Therefore all relevant record pertains to the appellants vest at the office of DHO Charsadda and DGHS Khyber Pakhtunkhwa Peshawar.
8. Pertains to record of respondent No-2.

Grounds:

- A. Correct, No comments.
- B. Pertains to record of respondent No-2.
- C. Pertains to record of respondent No-2.
- D. Pertains to record of respondent No-2.
- E. Pertains to record of respondent No-2.
- F. Pertain to record of respondent No-2.
- G. The respondent seek permission to raise additional grounds at the time of arguments.

It is pertinent to mention that Mr. Jamal Shah is currently working under the control of District Health Officer (DHO) Charsadda.

He was transferred to Women & Children Hospital Rajjar Charsadda on general duty vide DHO Charsadda notification No 2274-76/DHO Charsadda, dated 15-03-2019(Annex-I) and submitted his arrival

report at Women & Children Hospital Charsadda on dated: 21-03-2019 (Annex-II).

Hereafter, he was relieved from duty from women & children hospital Rajjar Charsadda, vide DHO notification No. 5966-71/DHO Charsadda, dated: 17-08-2019 (Annex-III) and duly endorsed by the office of undersign vide notification no. 2494-96/W&C Hospital CHD dated: 20-08-2019 (Annex-IV).

All record in the concern matter is present at the office of District Health Office (DHO) Charsadda. Therefore, office of DHO Charsadda alongwith Paramedic Section of DGHS Peshawar is the competent forum to submit the parawise reply in the subject case.



Medical Superintendent
Women & Children Hospital
Rajjar Charsadda
Respondent No. 03

4

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

Service Appeal No. 1124/2019

Jamal Shah (Senior Clinical Technician Pathology), S/O
Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil Tangi,
District Charsadda.

.....(Appellant).

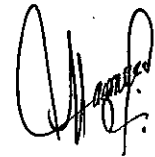
VERSUS

Government of Khyber Pakhtunkhwa & Others

.....(Respondents).

AFFIDAVIT

I, Dr. Mustaqeem Khan Durani (Litigation Officer), Office of
the Medical Superintendent Women & Children Hospital
Rajjar Charsadda, under the direction of the Competent
Authority, do hereby solemnly affirm and declare on oath that
the contents of the parawise comments on behalf of
Respondent No. 03 (MS Women & Children Hospital Rajjar
Charsadda) are true and correct to the best of my knowledge
and belief and nothing has been concealed from this Hon'ble
Court.



Deponent

Identified by

Addition Advocate General
Service Tribunal Peshawar



(S)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
WOMEN AND CHILDREN HOSPITAL CHARSAZZA**

AUTHORITY LETTER

Dr. Mustaqeem Khan Durani (Litigation Officer) attached to Women & Children Hospital Rajjar Charsadda is hereby authorized to attend/defend the court cases and prepare comments on behalf of the undersign before the Honorable Peshawar High Court, Peshawar and all its branches in the best public interest.

MEDICAL SUPERINTENDENT
Women & Children Hospital
Rajjar Charsadda

No. 193-97 /MS W&CH

Dated: 20 / 01 / 2020

Copy for forwarded to the:-

1. Advocate General Peshawar High Court Peshawar.
2. DMS (Admin) of this hospital.
3. Dr. Mustaqeem Khan Durani (Litigation Officer).
4. Accounts Section of this hospital.
5. Establishment Section of this hospital.

For information & compliance.

[Handwritten Signature]

MEDICAL SUPERINTENDENT
Women & Children Hospital
Rajjar Charsadda

6

Annex-1



**OFFICE OF THE
DISTRICT HEALTH OFFICER
CHARSADDA**

OFFICE ORDER

Partial modification vide this office letter No 2190-98/DHo Dated 12/03/2019 Mr Hidyat Ct pathologist Category D Hospital Jamal abad is hereby retained due to additional duty for TB Center and Mr Jamal Shah S.C.T pathology on general duty is hereby directed to report for duty in Woman & children hospital rajjar, With Immediate effect.

Note; Arrival/departure repot Should be submitted to this Office.

ed
District Health Officer
Charsadda

NO 2274-76 /DHO Charsadda

Dated 5 /03/2019

Copy to:

1. Medical Superintendent, Category "D" Hospital Jamal Abad
2. Medical Superintendent W&C Hospital Rajjar Charsadda
3. Official concerned

For information and compliance.

[Signature]
District Health Officer
Charsadda *ed*

*Received on 16/3/19
at 9.00 AM*

[Signature]
Attested

[Signature]
Medical Superintendent
Women & Children Hospital
Rajjar Charsadda

[Signature]

To

The Medical Superintendent
Women & Children Hospital Rajjar Charsadda

Subject: Arrival Report

For compliance to the notification/order
from the office of DHO Charsadda vide no. 2274-76/DHO
Charsadda dated 15/03/2019. I hereby request
to kindly accept my arrival against the
post CT pathology on general duty please.

Yours sincerely
Jamal Shah

Accepted

For and Attested
21/3/19
Dr. Tech. Pathology

Medical Superintendent
Women & Children Hospital
Rajjar Charsadda

16-03-2019



**OFFICE OF THE
DISTRICT HEALTH OFFICER
CHARSADDA**

OFFICE ORDER

Consequent upon staff recruited by MS Women & Children Hospital Rajjar Charsadda, the following DHO staff working in Women & Children Hospital Charsadda on general duty are hereby directed to report back to their original place of posting forthwith in the best interest of public.

S.No	Name	Designation	Place of duty
1	Mr. Jamal Shah	CT Pathology	Category D Hospital Jamalabad
2	Mr. Tariq Jan	CT Pathology	Category C Hospital Tangi
3	Mr. Bilal Karim	Ward Orderly	BHU Sheikho
4	Mr. Zeeshan	Ward Orderly	Category C Hospital Tangi
5	Mr. Riaz	Ward Orderly	Category C Hospital Tangi
6	Mr. Waqar Yousaf	Sweeper	Category C Hospital Sshabqadar
7	Mr. Shah Zeb	Chowkidar	CD Agra
8	Mr. Amirzada	Porter	DHO office
9	Mr. Sher Ali	CT Pathology ^{SLP} Sanitary Helper	Category D Hospital Jamalabad
10	Mr. Fayaz	Naib Qasid	MNCH/DHO office
11	Ms. Nadi Robi	Sweeper	Category D Hospital Jamalabad
12	Ms. Yasmin	Dai	BHU Behlola

District Health Officer
Charsadda

Dated 17/08/2019

NO 5966-71 /DHO Charsadda

Copy to:

1. MS Women & Children Hospital Rajjar Charsadda
2. MS Category C Hospital Tangi to submit a copy of their arrival report
3. MS Category C Hospital Shabqadar to submit a copy of their arrival report
4. MS Category D Hospital Jamalabad to submit a copy of their arrival report
5. Accounts section of this office to stop their pay if they don't comply within one week.
6. Officials concerned.

For information and compliance.

[Signature]
**Medical Superintendent
Women & Children Hospital
Rajjar Charsadda**

[Signature]
District Health Officer
Charsadda

9

Annex-IV



GOVERNMENT OF KHYBER PAKHTUNKHWA
WOMEN AND CHILDREN HOSPITAL CHARSADDA

No. 2494-96 /W&C Hospital CHD

Dated: 20/08/2019

To

The District Health Officer,
District Charsadda.

Subject: RELIEVING OF DHO STAFF.

With reference to your office order No. 5966-71/DHO Charsadda dated 17/08/2019, the following DHO Staff posted at Women & Children Hospital Rajjar Charsadda on general duty till the recruitment of their own staff, have been relieved from duties and they are hereby directed to report to District Health Office with immediate effect.

S.No	Name	Designation	Place of Duty
01	Mr. Jamal Shah	CT Pathology	Category D Hospital Jamal Abad
02	Mr. Tariq Jan	CT Pathology	Category C Hospital Tangi
03	Mr. Zeeshan	Ward Orderly	Category C Hospital Tangi
04	Mr. Riaz	Ward Orderly	Category C Hospital Tangi
05	Mr. Shah Zeb	Chowkidar	CD Agra
06	Mr. Sher Ali	Sanitary Worker	Category D Hospital Jamal Abad
07	Mr. Fayaz	Naib Qasid	MNCH/DHO Office
08	Mr. Waqar Yousaf	Sweeper	Category C Hospital Shabqadar

Sd/

Medical Superintendent
Women & Children Hospital
Rajjar Charsadda

Copy to:

1. DMS (Admin) W&CH Charsadda.
2. Official concerned.

For information and compliance.

[Signature]
Medical Superintendent
Women & Children Hospital
Rajjar Charsadda

[Signature]
Medical Superintendent
Women & Children Hospital
Rajjar Charsadda

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

SERVICE APPEAL NO. 1124 OF 2019

Jamal 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 and hit by laches.
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 no comments.
2. Para No. 2 pertains to record, hence no comments.

- 2
3. Para No. 3 is incorrect. The diploma holder from the National Institute of Health Islamabad applied for the post / appointment as Laboratory Technician BPS-09 and appointed by the Departmental Selection Committee while the Appellant did not apply for appointment as Laboratory Technician.
 4. Para No. 4 is incorrect. The Respondent No. 4 was appointed as Laboratory Assistant (BPS-05) and after obtaining diploma from NIH Islamabad, he had appointed as Laboratory Technician BPS-09 on 01/11/1995 (as fresh appointment) as per rules (copy of Appointment Order of Respondent No. 4 Annex-A).
 5. Para No. 5 is incorrect, as already explained in preceding para.
 6. Para No. 6 is incorrect. The promotion from BPS-09 to BPS-12 and BPS-12 to BPS-14 were made on Seniority cum-fitness basis. The Appellant was in BPS-05 before the approval of the Service Structure of Paramedics. All the posts of BPS-05 to BPS-09 have been upgraded to BPS-09 and re-nomenclatured as Junior Clinical Technicians (Pathology). The seniority list was issued according to Para-IV of the Govt. Notification dated 10/05/2006 (Annex-B). The Appellant was Junior to respondent No. 04 as before approval of Service Structure of Paramedics he was in BPS-09 and the Appellant was in BPS-05. Therefore, promotion / up-gradation of the Respondent No. 4 is legal and according to rules.
 7. Para No. 7 is incorrect. His appeal was filed by the Competent Authority, being illegal.
 8. Para No. 8 is incorrect, as already explained in Para No. 6 above.

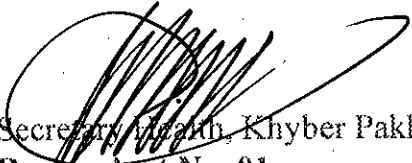
ON GROUNDS:


- A. Para-A no comments.
- B. Para-B is incorrect, as already explained in Para No. 6 of Facts.
- C. Para-C is incorrect. As already explained in Para No. 4 of Facts. It is further stated that the Appellant failed to challenge any order mentioned in this para.


- 3
- D. Para-D is incorrect. He had not applied for appointment as Laboratory Technician BPS-09 which the Respondent No. 4 was appointed as per rules.
 - E. Para-E is incorrect, as already explained in preceding para.
 - F. Para-F is incorrect, as already explained in Para No. 6 of Facts.
 - G. Para-G no comments being formal.

PRAYER:

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


Secretary, Health, Khyber Pakhtunkhwa.
Respondent No. 01


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


Medical Superintendent Women &
Children Hospital Rajjar Charsadda
Respondent No. 03

Annex (A)

Copy of Office Order No. 24433-39/E.I. dt. 26/10/1995, From D.G. Health Services, NWFP., Peshawar. To The Administrator, LRH, Peshawar and others.

Consequent upon the approval accorded by the Departmental Selection Committee held in this Directorate on 22-8-1995, the following are hereby appointed as Laboratory Technician BPS.9 i.e. Rs. 1605-97-3060 plus usual allowances as admissible under the rules and posted to the Hospitals noted against their names :-

SNo.	Name:	Domicile.	From:	To:	REMARKS.
1.	Mr. Siraj S/O Sher Afzal.	Swat.	Lab:Asstt: at SGG Hosp: Saidu Sharif Swat.	Lab:Tech: LRH, Pesh:	Against the vacant post.
2.	Mr. Nazir Taj S/O Faqir Khan.	Mardan.	Lab:Asstt: Govt. LRH. Peshawar.	Lab:Tech: Govt. LRH. Peshawar.	-do-

Their appointment in the Health Department will be subject to the following terms and conditions :-

- 1- They will be allowed to minimum of BPS.9.
- 2- They will abide by such Rules and orders applicable to other Government Servants.
- 3- They will be on probation initially for a period of two years extendable to by further one year.
- 4- Their services can be dispensed with during the probation period, if their work and conduct found un-satisfactory.
- 5- They will be liable to serve any where in NWFP including FATA.
- 6- They will join duty at their own expenses.
- 7- An undertaking has been obtained from them in writing that they will not request for transfer to any place of choice for atleast five years from the date of their posting.

If they accept their appointment as Lab:Technician BPS.9 on the above terms and conditions, they should report to the Hospital for duty noted against each within 14-days positively failing which their appointment will be considered as cancelled.

Sd/- Director General Health Services, NWFP., Peshawar.

OFFICE OF THE ADMINISTRATOR
GOVT. L.R.H. PESHAWAR.

NO. 20576-78/LRH; Dt. 01/11/95.

Copy to the:-

1. Incharge, Pathologist,
2. Accounts Officer,
3. Mr. Nazir Taj, Lab:Tech:
for information.

LRH, Peshawar.
-do-
-do-

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.

Annex-B
5

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Dated Peshawar the 10th May, 2006

NOTIFICATION

NO SOH-III /S-60/05 (paramedics). In pursuance of the decision taken by the provincial cabinet in its meeting held on 27th December 2005, the Competent Authority is pleased to approve eight stage paramedics services structure of NWFP with effect from 27-12-2005. The salient features whereof shall be as under:-

1. The existing 57 different categories of paramedics as mentioned in annexure A to this notification are restructured into 14 cadres as per annexure B.
2. In all the aforesaid cadres/specialties, the posts in various pay scales shall be integrated/categorized and re-nomenclatured as under:-

S.No.	Existing Posts	Re-structured posts
i)	Posts in BPS-5 to BPS-9 in all specialties.	Junior Technicians (BPS-9)
ii)	Posts in BPS-10 to BPS-12 in all specialties.	Technicians (BPS-12)
iii)	Posts in BPS-13 to BPS-14 in all specialties.	Senior Technicians (BPS-14)
iv)	Posts in BPS-15 to BPS-16 in all specialties.	Chief Technicians (BPS-16)
v)	Posts in BPS-17 in all specialties.	Technologist (BPS-17)
vi)	Posts in BPS-18 in all specialties.	Senior Technologist (BPS-18)
vii)	Posts in BPS-19 in all specialties.	Chief Technologist (BPS-19)
viii)	Posts in BPS-20 in all specialties.	Principal Technologists (BPS-20)

The words " clinical" shall be mentioned with the categories of posts meant for paramedics working in the hospitals and "Primary Health Care" with the paramedics working in the field alongwith mention of specific specialty (e.g. Junior Clinical Technician (Radiology) and Junior Primary Health Care Technician (Multi purpose).

3. The number of Posts in BPS-20, BPS-19, BPS-18, BPS-17, BPS-16, BPS-14, BPS-12 and BPS-9 shall be according to the proportionate ratio based on the total 8965 posts as mentioned in the provincial budget book for financial year 2005-2006. The

BPS	%	NO. OF POSTS
Post in BPS-9	80%	7172
Post in BPS-12	12%	1076
Post in BPS-14	3.5%	314
Post in BPS-16	2.5%	224
Post in BPS-17	1.86%	167
Post in BPS-18	0.09%	8
Post in BPS-19	0.04%	3
Post in BPS-20	0.01%	1

However additional posts shall be created for any of the left over personals of paramedics cadre (if any). Moreover, subsequent creation of posts in any of the 14 paramedics cadres in any scale shall also be included in the aforesaid proportionate ratio of posts in the 8 tiers formula. The proportionate ratios of posts in BPS-12 and above shall be modified accordingly as and when new creation of posts are made in BPS-9 in each of the 14 cadres subsequently.

4. Seniority of the incumbents of the posts in the 14 cadres so merged shall be caused on the basis of scale wise seniority as well as date of regular appointment in the pay scale. (e.g. in joint seniority list of BPS-12, the official already in BPS-12 will be placed on the top of the list and the officials in the lower pay scale shall be accordingly placed step by step in the list, invariably keeping intact the inter-Sc-seniority of the incumbents in the same pay scales).

5. A { In the first instance, the higher posts in the re-structured 14 paramedics cadres as per annexure "C" shall be filled in by way of promotion, as one time exercise, where after the service rules duly prescribed as at annexure 'D' shall be followed in subsequent promotion/initial recruitment.

6. Promotions in the post in BPS-18, 19 and BPS 20 shall be made on the basis of joint seniority list. The Joint seniority list of all the 14 cadres shall be caused at BPS-17 level, keeping in view the principles laid down in section 8 of the NWFP civil servants (ACT), 1973 read with Rule-17 of the NWFP civil servants (appointment, promotion and transfer) rules, 1989.

7. The afore-said paramedics service structure into 14 cadres shall also be applicable mutatis-mutandis to the paramedics working in FATA and employees working in Districts, all autonomous, semi autonomous and corporate bodies.

8. There shall be a council of paramedics to be notified separately.

9. The approved implementation committee and anomaly committee shall also be notified separately.

10. This eight stage paramedics service structure will replace all existing categories, cadres, structures and nomenclatures and will cancel all such cadres /categories rules and regulations etc which are in contravention to the approved paramedics service structure. New posts in all type of Health Delivery System will be created in

Endorsement
Copy forward

1. Secret
2. Secret
3. Secret
4. Secret
- the po
- be inc
5. All A
6. Acco
7. Direc
- to a
- comp
8. Insp
9. Direc
10. Direc
11. Dr.
- Con
12. The
- imp
13. The
- dir
- reg
14. Di
15. Al
16. Al
17. Al
18. Di
19. A
20. P
21. D
22. A
23. A
24. P
25. P
26. F
27. T

7

future in accordance with the frame work of this service structure.
Any new specialties will be added in the frame work of approved
paramedics service structure.

Sd/xxxx

(ABDUS SAMAD KHAN)
SECRETARY HEALTH

Endorsement No. & date as above

Copy forwarded to the:-

1. Secretary to Governor, NWFP.
2. Secretary to Chief Minister, NWFP.
3. Secretary (FATA) Governor's Sectt (FATA), Peshawar.
4. Secretary to Govt of NWFP, Finance Deptt, with the request to notify all the post duly re-structured and renamed accordingly so that the same may be included in the budget book 2006-07
5. All Administrative Secretaries to Govt of NWFP.
6. Accountant General, NWFP.
7. Director General, Health Services, NWFP with direction to communicate to all concerned and initiate implementation of service structure completing all promotions by 30th June 2006.
8. Inspector General of Prisons, NWFP.
9. Director General, Social Security, NWFP.
10. Director, PHSA, NWFP.
11. Dr. Mahmood Alam, Chairman, Paramedics Service Structure Committee, PHSA, NWFP.
12. The Chief HSRRU for information with the direction to ensure implementation of service structure in future ADP and regular program.
13. The Chief Planning Officer Health Department for information with the direction to ensure implementation of service structure in future ADP and regular program.
14. Director Health Services (FATA), Peshawar.
15. All Chief Executives in Teaching Hospitals in NWFP.
16. All Medical Superintendents in DHQ Hospital in NWFP.
17. All Executive District Officers (Health) in NWFP.
18. Director of Information, NWFP.
19. All Agency Surgeons in FATA.
20. Principal KMC/KCD, Peshawar.
21. Dean, P.G.M.I, Peshawar.
22. All District Accounts Officers in NWFP.
23. All Agency Accounts Officers in FATA.
24. PS to Chief Secretary, NWFP.
25. PS to Minister for Health, NWFP.
26. President, Provincial Paramedical Association, NWFP, Peshawar.
27. The Manager Govt Printing Press, NWFP.

(Alamzeb Malik)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.1124/2019

Jamal Shah

VS

Health Department

**REPLY ON BEHALF OF THE PRIVATE RESPONDENTS
No. 4 (NAZIR TAJ) IN RESPONSE TO THE MENTIONED
APPEAL SUBMITTED BY THE APPELLANT**

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action or locus standi to file the instant appeal.
2. That the appeal in hand is not maintainable in its present form and liable to dismissed.
3. That the appellant has misinterpreted the rules and law, and drawn up the meaning according to his own sweet well, besides concealing the important facts and not came to this Honourable Court with cleaned hands.
4. That the appeal is based on mala fide intention and concealed material facts from this august Tribunal.
6. That this Hon'ble Tribunal has no jurisdiction to entertain the appeal in its present form.
7. That the appellant is estopped by his own conduct to file the instant appeal.

**ON FACTS PARAWISE COMMENTS / REPLY ON BEHALF OF THE
PRIVATE RESPONDENTS No. 4.**

- Para-1. No comments as this Para pertains to the personal information of the appellant.
- Para-2 & 3. No need to comment as this Para is with regard to the service record of the appellant.
- Para-4. Incorrect and misconceived. That the replying respondent was initially appointed as Laboratory Assistant in (BPS-05) in PGMI/Lady Reading Hospital, Peshawar and during service the replying private respondent No. 4 acquired Diploma in Medical Laboratory Technology from National Institute of Health Islamabad in the year 1993. Furthermore, on the basis of Diploma in Medical Laboratory Technology the replying respondent No.4 was appointed as Laboratory Technician (BPS-09) vide order dated 01.11.1995. That vide order dated 20.05.2010 the replying respondent

No.4 was promoted to the post Clinical Technician BPS-12. That vide Notification dated 09.05.2012 the post of the appellant was upgraded to (BPS-12) while the post of replying respondent i.e. Clinical Technician up graded to Senior Clinical Technician (BPS-14) and subsequently through Notification dated 11.08.2015 further up gradation was allowed to the appellant in (BPS-14) while the post of replying respondent was upgraded to the Chief Clinical Technician (BPS-16). **Copies of the service book, diploma, appointment order dated 01.11.1995, promotion order and Notifications are attached as annexure.....A, B, C, D & E.**

Para-4. Incorrect and misconceived. That the replying respondent No.4 acquired diploma of Medical Laboratory Technology in the year 1993 and on the basis of such diploma the replying respondent No.4 appointed against the post of Laboratory Technician in (BPS-09) on 01.11.1995.

Para-5. Admitted correct to the extent of up gradation of the appellant and of the private respondent No.4 while the rest of para is incorrect and baseless. That according to Section-08 of Civil Servant Act, 1993 read with rule-17 of Civil Servants Appointment, Promotion and Transfer Rules, 1989 seniority shall be reckoned from the dated of initial appointment. That it is pertinent to mention here that the appellant was appointed as Laboratory Assistant (BPS-05) while the replying respondent was appointed as Laboratory Technician (BPS-09), therefore, as per Section-8(2) of the Civil Servant Act, 1973, seniority shall be reckoned in relation to other civil servants belonging to the same cadre whether serving in the same department. Furthermore, both the appellant and private respondent No.4 have been enlisted against their correct seniority position in the seniority lists in their own cadres.

Para-6. No Comments.

Para-7. Incorrect. That as per section-4 of the Service Tribunal Act, 1974 no any final or appellate order has been challenged by the appellant in the service appeal, therefore, the same is not maintainable before this august tribunal.

GROUND:

All the grounds of main appeal are incorrect, baseless and not in accordance with law and rules.

Incorrect. That the Department correctly treated the appellant in accordance with law and rules and as such authorities have not been violated any rule or law.

- B)- Incorrect and misconceived. The appellant challenged the provisional seniority list before this august tribunal and as per law and rules the same only can challenge through objection petition.
- C)- Incorrect and misconceived. The instant ground of the appellant replied by the replying respondent No.4 in Para-4.
- D)- Needs no comments.
- E)- Incorrect hence needs no comments.

It is therefore, most humbly prayed that on acceptance of this reply the appeal of appellant may kindly be dismissed with cost.

P/RESPONDENTSNO. 4


NAZIR TAJ

THROUGH:


NOOR MOHAMMAD KHATTAK

&


MIR ZAMAN SAFI
ADVOCATES

1. Name:- *Majir Taji*
2. Designation:- *Lady Asst H.*
3. Existing Basic Pay Scale:- *520-18-880*
4. Revised Basic Pay Scale:- *700-25-1200*
5. Pay on 30.6.1987:- *Rs 520/- ✓*
6. No of increments availed in the existing B.P.S.:- *— ✓*
7. Minimum of the corresponding B.P.S.:- *Rs 700/- ✓*
8. Number of the increments allowed, in the corresponding B.P.S.:- *— ✓*
9. Total:- *Rs 700/- ✓*
10. Advance increments allowed on higher qualification:- *— ✓*
11. Pay fixed on 1.7.1987:- *Rs 700/- ✓*
12. Date of next increments allowed:- *1/12/87 ✓*

A-4

[Signature]
12/11/87

[Signature]

[Signature]

Note:—The entries in this page should be renewed or re-attested, at least every five years and the signature to lines 9 and 10 should be dated.

1. Name

Nazer Taj

(8)

2. Race

Muslim (Pakistani)

3. Residence

Village Azim Kali P.O. Saro
Sheh. Tehsil & Distt. Mardan.

4. Father's name and residence

Fazir Khan
(As above)

5. Date of birth by Christian era as nearly as can be ascertained

1-1-1970

6. Exact height by measurement

5-2

7. Personal marks for identification

Scar on the upper side nose

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.

Ring Finger

Middle Finger.

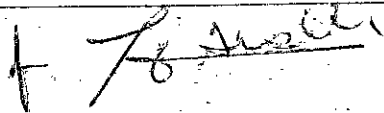
Fore Finger

Thumb.

9. Signature of Government servant.



10. Signature and designation of the Head of the Office, or other Attesting Officer.



1	2	3	4	5	6	7	
Name of post	Whether substantive or officiating and whether permanent or temporary	if officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	P. y in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government Serv
520-18-880 BPS-5 Labr: Assst. DGM/ LRA Peshawar				Pay Rs. 527.10	25-3-89		
700-25-1200 (BPS-5) Labr: Assst.				Pay Rs. 700/-			
DGM/ LRA				Pay Rs. 700/-			
				Pay Rs. 700/-			
711				Pay Rs. 775/-		11-8-89	

Serial No.....0194

Roll No.....1071.....

N.-W.F.P. MEDICAL FACULTY,
PESHAWAR.



B - (7)

PROVISIONAL CERTIFICATE.

Session.....1987.....

This is to CERTIFY THAT.....(MR) NAZIR TAJ.....
Son/Daughter of.....(MR) FAQIR KHAN (FAQIR KHAN).....
Address.....VILL: AZEEM KHAN KALAY P.O: SARASHA,
.....DISTT: MARDAN.....

and a candidate of.....LABORATORY ASSISTANT.....
has passed the said Examination from the NWFP Medical Faculty, Peshawar held
in 1987 .

He/She obtained 1321 ..Marks out of 200...and has been placed in Grade ()

His/her Date of birth according to admission form is.....1-1-1970.....

One Thousand nine hundred and.....SEVENTY ONLY.....

Prepared by.....*[Signature]*.....

Checked by.....*[Signature]*.....

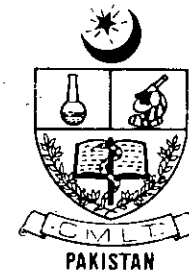
Date of Issue.....11-3-1987.....

[Signature]
SECRETARY,
NWFP, Medical Faculty,
Peshawar.

Serial No. 0043-D

Reg. No. 940

8



NATIONAL INSTITUTE OF HEALTH ISLAMABAD

COLLEGE OF MEDICAL LABORATORY TECHNOLOGY

DIPLOMA

This is to certify that NAZIR TAJ Son / ~~Daughter~~ of

FAQIR KHAN

of Batch No. 29th

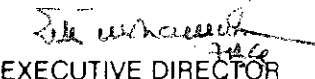
Roll No. 43

has duly passed the certificate in *F.Sc. Medical Laboratory Technology*

Annual / ~~Supplementary~~ Examination obtaining XXXXX 629 XXXXX Marks

out of 1100 Marks, held in September/October, 1993.


PRINCIPAL
College of Medical Lab. Technology
N.I.H. Islamabad


EXECUTIVE DIRECTOR
National Institute of Health
Islamabad

COLLEGE OF MEDICAL LABORATORY TECHNOLOGY
NATIONAL INSTITUTE OF HEALTH
ISLAMABAD

MARK SHEET INTERMEDIATE SCIENCE MEDICAL LABORATORY
TECHNOLOGY COURSE PRELIMINARY EXAMINATION

NAME NAZIR TAJ FATHER'S NAME FAQIR KHAN
ROLL NO. 43 BATCH NO. 29 SESSION 1991 - 1993
ANNUAL/SUPPLEMENTARY

S. NO.	SUBJECT	MARKS				TOTAL	
		THEORY		PRACTICAL		TOTAL	OBTAINED
		TOTAL	OBTAINED	TOTAL	OBTAINED		
1	ELEMENTARY CHEMISTRY & CHEMICAL PATHOLOGY	50	39	50	39	100	77
2	HAEMATOLOGY AND BLOOD BANKING	50	36	50	38	100	74
3	MICROBIOLOGY I	50	32	50	28	100	60
4	MICROBIOLOGY II	50	32	50	31	100	63
5	ELEMENTARY ANATOMY & MICRO TECHNIQUE	50	36	50	32	100	68
6	CLINICAL PATHOLOGY AND SEROLOGY	50	36	50	38	100	69
7	ENGLISH	200	73	--	--	200	73
8	ISLAMIAT	50	41	--	--	50	41
9	PAK. STUDIES	50	23	--	--	50	23
10	URDU/PAK. CULTURE	200	81	--	--	200	81
		800	429	300	200	1100	629

PREPARED BY (SH. ARSHAD AZIZ)

CHECKED BY (ZAHID SAHEED MALIK)

PRINCIPAL
COLLEGE OF MED. LAB. TECHNOLOGY
NATIONAL INSTITUTE OF HEALTH
ISLAMABAD-PAKISTAN

Copy of Office Order No. 24433-39/E.I. dt. 26/10/1995, From D.C. Health Services, NWFP., Peshawar. To The Administrator, LRH, Peshawar and other

Consequent upon the approval accorded by the Department Selection Committee held in this Directorate on 22-8-1995, the following are hereby (appointed) as Laboratory Technician BPS.9 i.e. R. 1605-97-3060 plus usual allowances as admissible under the rules and posted to the Hospitals noted against their names :-

SNo.	Name:	Domicile.	From:	To:	REMARKS.
1.	Mr. Siraj S/O Sher Afzal.	Swat.	Lab:Asstt: at SGG Hosp: Saidu Sharif Swat.	Lab:Tech: LRH. Pesh:	Against the vacant post
2.	Mr. Nazir Taj S/O Faqir Khan.	Mardan.	Lab:Asstt: Govt. LRH. Peshawar.	Lab:Tech: Govt. LRH. Peshawar.	-do-

Their appointment in the Health Department will be subject to the following terms and conditions :-

- 1- They will be allowed to minimum of BPS.9.
- 2- They will abide by such Rules and orders applicable to other Government Servants.
- 3- They will be on probation initially for a period of two years extendable to by further one year.
- 4- Their services can be dispensed with during the probation period, if their work and conduct found un-satisfactory.
- 5- They will be liable to serve any where in NWFP including FATA.
- 6- They will join duty at their own expenses.
- 7- An undertaking has been obtained from them in writing that they will not request for transfer to any place of choice for atleast five years from the date of their posting.

If they accept their appointment as Lab:Technician BPS.9 on the above terms and conditions, they should report to the Hospital for duty noted against each within 14-days positively failing which their appointment will be considered as cancelled.

Sd/-Director General Health Services, NWFP., Peshawar.

OFFICE OF THE ADMINISTRATOR
GOVT. L.R.H. PESHAWAR.

NO. 20576-78/LRH; Dt. 01/11/95.

Copy to the:-

1. Incharge, Pathologist,
2. Accounts Officer,
3. Mr. Nazir Taj, Lab:Tech:
for information.

LRH. Peshawar.
-do-
-do-

ADMINISTRATOR
GOVT. LADY READING HOSPITAL
PESHAWAR.



GOVERNMENT OF KHYBER PAKHTUN KHWA
PESHAWAR

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

E-Mail Address: nwfpdghs@yahoo.com

Office Ph# 091 - 9210269

Exchange# 091 - 9210187

OFFICE ORDER

Consequent upon approval accorded by the Departmental Promotion Committee, the following JCT Technicians (Pathology) BPS-09 are hereby promoted as Clinical Technicians (Pathology) BPS-12 with immediate effect.

S.NO.	NAME/F/NAME OFFICIAL	PLACE OF POSTING
1.	Rahat Ullah	KTH Peshawar
2.	Irshad Ali	KTH Peshawar
3.	Muslim Jan S/o Muhammad Sharif	DHQ H Mardan
4.	Qamis Ali	ID Children Hospital
5.	Farman Ullah	ESH Pabbi
6.	Inam Jan	THQ H Tangi
7.	Khushdil Khan	LRH Peshawar
8.	Syed Ismail Shah	LRH Peshawar
9.	Shah Jehan	KTH Peshawar
10.	Latif ur Rehman	DHQ H Abbottabad
11.	Gul Zamin S/o Haji Abdul Haleem	LRH Peshawar
12.	Shafi ud Din	EDO H Charsadda
13.	Abdur Rashid	Govt Mental Hospital Peshawar

14	Farhad Ali	KTH Peshawar
15	Ikram Ullah	KMC Peshawar
16	Hidayat Ullah	KTH Peshawar
17	Jehan Zeb	DHQ H Charsadda
18	Sami Ullah	KTH Peshawar
19	Shukat Ali	KTH Peshawar
20	Muhammad Shah	LRH Peshawar
21	Ali Gohar	KTH Peshawar
22	Rafi Ullah	SGHS Swat
23	Hakeem Ullah S/o Aman Ullah Khan	Govt W&C Hospital Bannu
24	Zafar Islam s/o M, Sardar Jan	GMC DI Khan
25	Bazid Khan S/O	SW Wana
26	Sardar Shah Sawar Shah	KCD Peshawar
27	Ihsan ul Haq	Civil Surgeon Dir
28	Muhammad Hanif	KTH Peshawar
29	Karimullah S/O	LRH Peshawar
30	Zafar Ullah	HMC Peshawar
31	Amir Shahbaz	DHQ H Kwatke
32	Q. Liaqat Hussain	DHQ H Mpt Selra
33	Nasrullah	KTH Peshawar
		LRH Peshawar
35	Izhar Ullah	HMC Peshawar
36	Izhar Ullah	HMC Peshawar

13

39

(14)

37.	Niamat Ullah	THQ (H) Swat
38.	Siraj S/o Sher Afzal	SMC Swat
39.	Akhtar Ali	DHQ H Swab
40.	Nazir Taj	DHQ H Nowshera
41.	Kiramat Shah	City Hospital Peshawar
42.	Syed Karim Shah	KTH Peshawar
43.	Fazli Hakeem	HMC Peshawar

They will be on probation for a period of one year extendable for another period of one year. On their promotion as Clinical Technician (Pathology) BPS-12 the following posting / transfer are hereby ordered with immediate effect.

S.NO.	NAME / I / NAME OFFICIAL	FROM	TO	REMARKS
1.	Rahat Ullah	KTH Peshawar	KTH Peshawar	Against the vacant post
2.	Irsahd Ali	KTH Peshawar	KCD, Peshawar	-- do --
3.	Muslim Jan S/o Muhammad Sharif	DHQ H Mardan	DHQ Hospital Mardan	-- do --
4.	Camis Ali	Govt ID Children Hospital	Maternity Hospital Peshawar	-- do --
5.	Farman Ullah	ESH Pabbi	DHQ Hospital Nowshera	-- do --
6.	Inam Jan	THQ H Tangi	DHQ Hospital Charsadda	-- do --
7.	Khushdil Khan	LRH Peshawar	LRH Peshawar	-- do --
8.	Syed Ismail Shah	LRH Peshawar	LRH Peshawar	-- do --
9.	Shah Jehan	KTH Peshawar	KTH Peshawar	-- do --
10.	Latif ur Rehman	DHQ H Abbottabad	DHQ Hospital Abbottabad	-- do --
11.	Gul Zamin	LRH Peshawar	LRH Peshawar	-- do --
12.	Shafi ud Din	EDO H Charsadda	EDO H Charsadda	-- do --

15

13	Abdur Rashid	Govt Food Analysis Laboratory Pesh:	Govt Food Analysis Lab. Peshawar	-- do --
14	Farhad Ali	KTH Peshawar	KCD Peshawar	-- do --
15	Ikram Ullah	KMC Peshawar	KMC Peshawar	-- do --
16	Hidayat Ullah	KTH Peshawar	KTH Peshawar	-- do --
17	Jehan Zeb	DHO H Charsadda	DHO Hospital Charsadda	-- do --
18	Sami Ullah	KTH Peshawar	KTH Peshawar	-- do --
19	Shukat Ali	KTH Peshawar	KTH Peshawar	-- do --
20	Muhammad Shah	LRH Peshawar	LRH Peshawar	-- do --
21	Ali Gohar	KTH Peshawar	KTH Peshawar	-- do --
22	Rafi Ullah	SGHS Swat	At the disposal of ED OH Swat	-- do --
23	Hakeem Ullah S/o Aman Ullah Khan	Govt W&C Hospital Bannu	DHO Hospital Bannu	-- do --
24	Zafar Islam	NWA Miranshah	AHQ Hospital Miranshah	-- do --
25	Bazid Khan	AHQ H SW Wana	AHQ H SW Wana	-- do --
26	Sardar Shah	KCD Peshawar	KCD Peshawar	-- do --
27	Ihsan ul Haq	DHO II Dir, Lower	DHO II Dir, Lower	-- do --
28	Muhammad Hanif	KTH Peshawar	KMC Peshawar	-- do --
29	Karimullah	LRH Peshawar	LRH Peshawar	-- do --
30	Zafar Ullah	HMC Peshawar	LRH Peshawar	-- do --
31	Amir Shahbaz	DHO II Karak	DHO II Karak	-- do --
32	Qazi Liaquat Hussain	DHO II Manshera	DHO Hospital Manshera	-- do --
33	Nasrullah	KTH Peshawar	LRH Peshawar	-- do --
34	Zardad Khan	LRH Peshawar	LRH Peshawar	-- do --
35	Inam Ullah	Services Hospital Peshawar	Services Hospital Peshawar	-- do --

16

43

36	Izhar Ullah	HMC Peshawar	KMC Peshawar	-- do --
37	Niamat Ullah	EDO (H) Swat	At the disposal of EDO (H) Shangla	-- do --
38	Siraj S/o Sher Afzal	EDO (H) Swat	SGTH Saidu Sharif Swat	Against the vacant post of SCT (Pathology)
39	Akhtar Ali	DHQ H Swabi	DHQ H Swabi	--do--
40	Nazir Taj	DHQ II Nowshera	DHQ Hospital Nowshera	-- do --
41	Kiramat Shah	City Hospital Peshawar	City Hospital Peshawar	--do--
42	Syed Karim Shah	KTH Peshawar	KTH Peshawar	-- do --
	Mr. Nawaz Iqbal	Maternity Hospital	Maternity Hospital	-- do --
	Mr. Nawaz Iqbal JCT Path: BPS-09	Maternity Hospital Peshawar	DH Children Hospital Peshawar	Vice No.4 above

SD XXXXXXXXXXXX
 DIRECTOR GENERAL HEALTH SERVICES
 KHYBER PAKHTUNKHWA, PESHAWAR

968-86

/AE-II

Dated 20/05/2010

Copy forwarded to the:
 Chief Executive LRH/ KTH/ HMC Peshawar.
 Principal EMC/ KCD Peshawar/ SMC Swat.
 EDO (H) Charsadda
 EDO (H) Nowshera.
 EDO (H) Swat.
 EDO (H) Bannu.
 EDO (H) Shangla.
 Medical Superintendents DHQ Hospitals Swabi, MHA, Bannu, Lower
 Dir, Harok, Manshera, Swat, Nowshera, Women's Children Hospital Bannu, City
 Hospital Kohat Road Peshawar, Police/Services Hospital Peshawar.
 DHO, ATFA Peshawar.
 Medical Superintendents AIQ Hospitals SW Wana, M Miranshah.
 Accountant General Khyber Pakhtunkhwa.

17

- 25. District Accounts Officer Swabi, Abbottabad, Charsada, Peshawar, Lower Dir, Karak, Manshra, Swat, Nowshera.
 - 34. Agency Accounts Officers SW Wana, NW Wana.
 - 36. Public Analyst Public Health Food Analysis Laboratory Hayat Peshawar
 - 37. P/S to Secretary to Govt of NWFP Health Department, Peshawar
 - 38. PA to DGHS, NWFP Peshawar
 - 39. Assistant Director (P-II) DGHS NWFP Peshawar
 - 40. Personal files
 - 41. Syed Faiz Ali Shah I/c ACR/Paramedics Promotion Cell DGHS NWFP Peshawar
- u2 9/11/2010 Gouta Health Unit Hospital, Peshawar
For information & necessary action.

Fazal
(Dr. Fazal Mahmood)

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

Job
18/12/10



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 09 May, 2012.

SSP-2
10/5/12

E-18

NOTIFICATION.

No. SOH-III/8-60/05 (Paramedics) The Competent Authority is pleased to withdraw this Department Notification of even No. Dated 25-08-2006 and restore this Department Notification of even No. Dated 10-05-2006 with immediate effect with the following additions:-

- i) Initially the one time up-gradation/Promotion is to be implemented upto BPS-17.
- ii) A joint seniority is to be developed in BPS-17. Based on the final joint seniority list of BPS-17 further promotion to BPS-18, BPS-19 and BPS-20 will be carried out on the basis of seniority-cum-fitness from BPS-17 to BPS-18, from BPS-18 to BPS-19 and BPS-19 to BPS-20 on step by step basis.
- iii) Those who have been recruited after May, 2006 they will be placed at bottom of the seniority list of their respective cadre/service. However, an anomaly committee will look into all such anomalies arising in the course of implementation of the one time up-gradation/Promotion exercise.

The senior post BPS-18 to BPS-20 will be filled in accordance with the prescribed manner as laid down in the existing approved Service Rules.

The revival of Notification Dated 10-5-2006 will have no retrospective effect and one time up-gradation/Promotion will be with immediate effect as laid down in the promotion policy of the Provincial Government.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endorsement No. & date as above.

Copy forwarded to the:-

1. The Additional Chief Secretary (FATA) Khyber Pakhtunkhwa.
2. The Secretary to Governor, Khyber Pakhtunkhwa.
3. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.

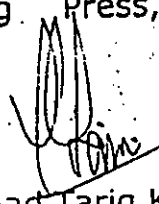
AD(P II)

10/5/12

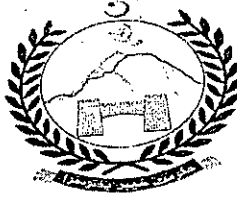
v)

10/5/12

- 19
4. The Secretary FATA, Governor's Secretariat Peshawar.
 5. All Administrative Secretaries to Govt of Khyber Pakhtunkhwa.
 6. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
 - ✓ 7. The Director General, Health Services, Khyber Pakhtunkhwa.
 8. The Inspector General of Prisons, Khyber Pakhtunkhwa.
 9. The Director General, Social Security, Khyber Pakhtunkhwa.
 10. The Director, PHSA, Khyber Pakhtunkhwa.
 11. The Chief HSRRU.
 12. The Chief Planning Officer Health Department.
 13. Director Health Services FATA, Peshawar.
 14. All Chief Executives of Teaching Hospitals in Khyber Pakhtunkhwa.
 15. All Medical Superintendents of DHQ Hospitals in Khyber Pakhtunkhwa.
 16. All Executive District Officers (Health) of Khyber Pakhtunkhwa.
 17. The Director of Information, Khyber Pakhtunkhwa.
 18. All Agency Surgeons/MS of FATA.
 19. All Principals of Medical Colleges in Khyber Pakhtunkhwa.
 20. The Dean, P.G.M.I, Peshawar.
 21. All District Accounts Officers in Khyber Pakhtunkhwa.
 22. All Agency Accounts Officers in Khyber Pakhtunkhwa.
 23. The Section Officer (Budget) Health Department.
 24. PS to Chief Secretary Khyber Pakhtunkhwa.
 25. PS to Minister for Health, Khyber Pakhtunkhwa.
 26. President, Provincial Paramedical Association, Khyber Pakhtunkhwa, Peshawar.
 27. The Manager Govt. Printing Press, Khyber Pakhtunkhwa.


(Muhammad Tariq Khan)
Additional Secretary (Establishment)
Health Department

09/5/2012



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar: 02nd August, 2012

20

ORDER

No. SOH-III/8-60/2005(Paramedics). The Competent Authority is pleased to upgrade the following Clinical Tech: (Pathology) BS-12 to the post of Senior Clinical Tech: (Pathology) BS-14 with immediate effect:-

S. No	Name/Father's Name	Designation With BS	Place of Present Posting
1.	Amir Shahbaz	Clinical Tech: (Pathology) BS-12	DHQ H. Karak
2.	Q. Liaqat Hussain	-do-	DHQ H. Manshira
3.	Nasrullah	-do-	LRH Peshawar
4.	Saifoor Badshah S/O Ali Badshah	-do-	EDO (H) Hangu
5.	Riaz Hussain	-do-	AHQH: Parachinar.
6.	Shaukat	-do-	DHQ H. A. Abad
7.	Zardad Khan	-do-	LRH Peshawar
8.	Inamullah	-do-	Police H. Peshawar
9.	Izharullah	-do-	HMC Peshawar
10.	Niamatullah	-do-	SMC Swat
11.	Khurshid Alam	-do-	AHQH Miranshah
12.	Nazir Taj S/O Faqir Khan	-do-	MMC Mardan
13.	Abdul Jalil	-do-	EDO (H) Karak
14.	Siraj S/O Sher Aziz	-do-	PMT Swat
15.	Akhtar Ali	-do-	DHQ Swabi
16.	Syed Karim Shah	-do-	KTH Peshawar
17.	Kiramat Shah	-do-	City Hosp: Peshawar
18.	Fazli Hakeem	-do-	HMC Peshawar
19.	Ikramullah	-do-	HMC Peshawar
20.	Abdul Qadoos	-do-	Maternity Hos: Pesh:

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endst: No. of even No and Date.

Copy forwarded to the:-

1. The Director General Health Services Khyber Pakhtunkhwa Peshawar w/r to his letter 19938/AE-VII dated 16.07.2012 for necessary action.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Director Health Services FATA, Khyber Pakhtunkhwa.
4. All the Chief Executives, of Teaching Hospitals in Khyber Pakhtunkhwa.
5. All the Principals of Medical Colleges in Khyber Pakhtunkhwa.
6. All the Medical Superintendents, of DHQ Hospitals in Khyber Pakhtunkhwa.

Agency Accounts Officers in Khyber



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

Dated Peshawar, the 11-08-2015

31/7/15

22

NOTIFICATION

NO. SO(FR)FD/7-3/2015/Paramedics. The competent authority has been pleased to upgrade all the Paramedics Staff appointed under Khyber Pakhtunkhwa Civil Servants Act 1973, with immediate effect:

- I. All the incumbents Paramedics in BS-09 are upgraded to BS-12. In future the initial recruitment will be made in BS-12 instead of BS-09 and the Administrative Department shall immediately amend the service rules through SSRC accordingly.
- II. The incumbents presently serving in BS-12 & BS-14 are allowed 02 steps upgradation respectively with relaxation of condition of 10 years service in the same grade stipulated in the existing upgradation policy.
- III. The Paramedics presently serving in BS-16 and BS-17, having 05 years service in the respective pay scales, are allowed an allowance at the rate of fixation of pay in next grade.
- IV. The Administrative Department shall further streamline the service structure of BPS-16 and above through the mechanism of SSRC.
- V. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a stage next above the pay in the lower pay scale.
- VI. This department notification bearing No. SO(FR)FD/10-22/2015 dated 30-06-2015 will have no affection to the above employees.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Endst No. & Date even.

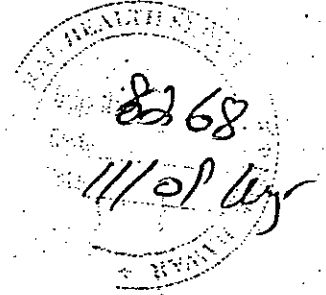
Copy of the above is forwarded for information and necessary action to the: -

1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar.
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges / Executive District Officers in Khyber Pakhtunkhwa.

P.70

Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
Registrar, Service Tribunal Khyber Pakhtunkhwa.
Secretary to Govt; of Punjab, Sindh and Baluchistan, Finance Department, Lahore, Karachi
and Quetta.

14. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I. Khan.
15. The Senior District Accounts Officer Nowshera, Swabi, Charsadda, Haripur, Manshera and Dir Lower.
16. The Treasury Officer, Peshawar.
17. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
18. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
19. PSO to Chief Secretary, Khyber Pakhtunkhwa.
20. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
21. PS to Finance Secretary.
22. PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
23. All Section Officers/Budget Officers in Finance Department.
24. Mr. Siraj Burki, chairman, All Paramedics Association, Khyber Pakhtunkhwa, Peshawar.
25. Mr. Johar Ali, President, Provincial Paramedical Association, Khyber Pakhtunkhwa.



(MURAD AHMAD)
SECTION OFFICER (FR)
(0919212635)

OFFICE OF THE SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT.

Ends. No.SOH-III/8-60/2014

Dated. 11 /09/2015

Copy forwarded for information and necessary action to:-

1. The AGPR sub Office Peshawar
2. The Director General Health Services Khyber Pakhtunkhwa
3. The Director General Social Security Khyber Pakhtunkhwa
4. The Director PHSA Khyber Pakhtunkhwa
5. The Registrar Khyber Medical University Peshawar
6. The Director Health Services FATA (Peshawar) to ensure reflection of the up-gradation / re- designation of posts in the Budget Book of 2016-17.
7. All Hospital Director /Medical Director of Autonomous Institutions in Khyber Pakhtunkhwa.
8. All Medical Superintendent DHQ Hospitals/AHQs of Khyber Pakhtunkhwa.
9. All District Officers (Health Khyber Pakhtunkhwa
10. All Agency Surgeons/M.S in (FATA) Khyber Pakhtunkhwa.
11. All District Nazim in Khyber Pakhtunkhwa
12. The Director Information Khyber Pakhtunkhwa
13. All Principals of Medical Colleges in Khyber Pakhtunkhwa.
14. The Dean PGMI Peshawar
15. The Principal ZAB Postgraduate Paramedical Institute Peshawar Khyber Pakhtunkhwa.
16. All Principals PIMTs Swat, Abbottabad and D.I.Khan.
17. All Principals Public Health Schools/Nursing School in Pakhtunkhwa.
18. The Manager Govt. Printing Press Peshawar Khyber Pakhtunkhwa.
19. Mr. Johar Ali, President Paramedical Association Khyber Pakhtunkhwa
20. Mr. Siraj Ud Din Burki Chairman Paramedical Association Khyber Pakhtunkhwa

(MUH
SECT.



23 131 B

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No. 9736 /AE-VII
Dated 15 /10 /2015

To,

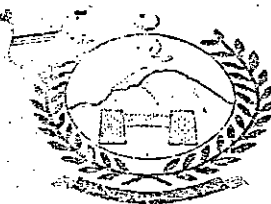
1. The AGPR sub office Peshawar.
2. The Director General Social Security Khyber Pakhtunkhwa, Peshawar
3. The Director PHSA, Khyber Pakhtunkhwa, Peshawar
4. The Registrar Khyber Medical University Peshawar.
5. All Chief Executives of Teaching Hospitals in Khyber Pakhtunkhwa
6. All Hospital Directors / Medical Directors of Autonomous Institutions in Khyber Pakhtunkhwa
7. The Director Health Services, FATA Peshawar. To ensure reflection of the Upgradation/re-designation of posts in the Budget Book of 2016-17
8. Dean PGMI, Peshawar
9. All Principals, Medical Collages in Khyber Pakhtunkhwa
10. The Secretary Medical Faculty Khyber Pakhtunkhwa, Peshawar
11. Principal ZAB, Post graduate paramedical institute Peshawar Khyber Pakhtunkhwa
12. All Medical Superintendents of, Sifat Ghayoor Memorial / Molvi Amir Shah Memorial Hospital / Maternity Hospital / Nasir Ullah Khan Babar Hospital / Services Hospital / Sarhad Hospital for Psychiatric Diseases, Peshawar, General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendents, DHQ/ AHQ Hospital in KPK/FATA.
14. All Agency Surgeons in FATA/ FRs.
15. All District Health Officers in Khyber Pakhtunkhwa
16. All District Nazim in Khyber Pakhtunkhwa
17. Director information Khyber Pakhtunkhwa
18. All principals PMITs Swat, Abbottabad and DI, KHAN
19. All principals Public Health Schools / Nursing School in Khyber Pakhtunkhwa
20. The Manager Govt. Printing Press, Khyber Pakhtunkhwa, Peshawar
21. Budget Officer-VI, Finance Department, Khyber Pakhtunkhwa, Peshawar
22. PA to Director General Health Services, Khyber Pakhtunkhwa, Peshawar
23. Mr Johar Ali President Paramedical, Association Khyber Pakhtunkhwa
24. Mr. Siraj-ud-Din Burki Chairman, Paramedical, Association Khyber Pakhtunkhwa

Subject: **UPGRADATION NOTIFICATION.**

Kindly refer to above noted subject and enclosed please find a copy of Finance Department Notification NO. SO(FR) FD/7-3/2015/ Paramedics. Dated 11-08-2015, duly endorsed by Health Department bearing No. SOH-III/860/2014 dated 11-09-2015, for information and immediate necessary action.

ASSISTANT DIRECTOR (P-III)
DIRECTORATE GENERAL HEALTH
SERVICES KPK, PESHAWAR.

15/10/15



24 13/11

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No. 9736 /AE-VII
Dated 11 /10 /2015

To,

1. The AGPR sub office Peshawar.
2. The Director General Social Security Khyber Pakhtunkhwa, Peshawar
3. The Director PHSA, Khyber Pakhtunkhwa, Peshawar
4. The Registrar Khyber Medical University Peshawar.
5. All Chief Executives of Teaching Hospitals in Khyber Pakhtunkhwa
6. All Hospital Directors / Medical Directors of Autonomous Institutions in Khyber Pakhtunkhwa
7. The Director Health Services, FATA Peshawar. To ensure reflection of the Upgradation/re-designation of posts in the Budget Book of 2016-17
8. Dean PGMI, Peshawar
9. All Principals, Medical Collages in Khyber Pakhtunkhwa
10. The Secretary Medical Faculty Khyber Pakhtunkhwa, Peshawar
11. Principal ZAB, Post graduate paramedical institute Peshawar Khyber Pakhtunkhwa
12. All Medical Superintendents of, Sifat Ghayoor Memorial / Molvi Amir Shah Memorial Hospital / Maternity Hospital / Nasir Ullah Khan Babar Hospital / Services Hospital / Sarhad Hospital for Psychiatric Diseases, Peshawar, General & Mental Hospital Dadar, Mansehra.
13. All Medical Superintendents, DHQ/ AHQ Hospital in KPK/FATA.
14. All Agency Surgeons in FATA/ FRs.
15. All District Health Officers in Khyber Pakhtunkhwa
16. All District Nazim in Khyber Pakhtunkhwa
17. Director information Khyber Pakhtunkhwa
18. All principals PMITs Swat, Abbottabad and DI, KHAN
19. All principals Public Health Schools / Nursing School in Khyber Pakhtunkhwa
20. The Manager Govt. Printing Press, Khyber Pakhtunkhwa, Peshawar
21. Budget Officer-VI, Finance Department, Khyber Pakhtunkhwa, Peshawar
22. PA to Director General Health Services, Khyber Pakhtunkhwa, Peshawar
23. Mr Johar Ali President Paramedical, Association Khyber Pakhtunkhwa
24. Mr. Siraj-ud-Din Burki Chairman, Paramedical, Association Khyber Pakhtunkhwa

Subject: UPGRADATION NOTIFICATION.

Kindly refer to above noted subject and enclosed please find a copy of Finance Department Notification NO. SO(FR) FD/7-3/2015/ Paramedics. Dated 11-08-2015, duly endorsed by Health Department bearing No. SOH-III/860/2014 dated 11-09-2015, for information and immediate necessary action.

ASSISTANT DIRECTOR (P-III)
DIRECTORATE GENERAL HEALTH
SERVICES KPK, PESHAWAR.

15/11/15

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A # 1124/2019

Jamal Shah

Versus

Government of Khyber Pakhtunkhwa and Others


INDEX

S#	Description of documents	Page No
1	Rejoinder	1-3
2	Affidavit	4

Dated: 29/07/2021


Appellant

Through


Javed Iqbal Gulbela
Advocate, Supreme Court of
Pakistan

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

In S.A # 1124/2019

Jamal Shah

Versus

Government of Khyber Pakhtunkhwa and Others

**REJOINDER ON BEHALF OF THE
APPELLANT TO THE COMMENTS FILED
BY THE RESPONDENTS.**

Respectfully Sheweth,

Reply to Preliminary objections:-

Para No. 1 to 9:

All the preliminary objections raised by the respondents are incorrect, false, frivolous, concocted, and are sternly denied. The Appellant has got a good prima facie case and has rightly approached this Hon'ble Tribunal. The Appellant remained sincere & devoted fellow and has always performed his duties with full zest and devotion. The Appellant have never ever pressurized the Respondents but has only approached this August Tribunal for his due rights. This Hon'ble Tribunal has got ample jurisdiction to adjudicate upon the matter. Moreover as far as the matter of limitation is concerned, the instant Service Appeal has been moved well in time. Even the Departmental Appeal of the Appellant was simply shelved by the Respondents and no order whatsoever upon the Departmental Appeal of the Appellant was given by the Appellate Authority, hence the Appellant rightly approached to this Hon'ble Tribunal.

On Facts:-

1. Para No. 1 needs no comments.
2. Para No. 2 needs no comments.

3. Para No. 3 of the Reply is incorrect, false, fabricated, concocted, hypocritical, hence sternly denied. The Appellant completed two years training course i.e., FSc Medical Laboratory Technology (M.L.T) Diploma back in the year 1993 and as per rules, the Appellant was entitled to be appointed as Laboratory Technician (BPS-9). The stance taken by the Respondents in their reply is totally false and fabricated, that the Respondent No.4 applied for the appointment as Laboratory Technician (BPS-9) because nothing as such has been annexed with the reply.
4. Para No. 4 of the Reply is incorrect and wrong, hence sternly denied. The Appellant completed Diploma from NIH Islamabad back in the year 1993, whereas the Respondent No.4 completed the said diploma in the year 1995 but even then has been placed ahead of the Appellant in an illegal and void manner. Moreover no rules have been mentioned or annexed with the reply of the respondents, that from where and how the Respondent No.4 was appointed as Laboratory Technician (BPS-9) as a fresh appointee, usurping the Appellant.
5. Para No.5 of the Reply is incorrect and wrong. True and detailed picture has been portrayed in the preceding paras.
6. Para No.6 of the Reply is false and fabricated, hence denied, while that of the main Appeal is true and correct.
7. Para No.7 of the Reply is totally wrong, false and fabricated, hence denied. The Departmental Appeal of the Appellant was processed through proper channel, but even then the Respondents have shelved the same and even after lapse of statutory period, no response or no action has been taken up upon the Departmental Appeal of the Appellant.
8. Para No.8 of the Reply is false and fabricated. True picture has already been detailed above.

On Grounds:

- A. Para A of the Reply needs no comments.
- B. Para B of the Reply is incorrect as already explained in the main Appeal.
- C. Para C of the Reply is incorrect, hence denied. Moreover the Seniority List issued by the Respondents gives a fresh cause of action to the Appellant to approach this Hon'ble Tribunal and in accordance of the same, the Appellant has challenged the impugned seniority list.
- D. Para D of the Reply is incorrect, false and fabricated, hence denied. Proper reply has been detailed above.
- E. Para E of the Reply is incorrect and denied.
- F. Para F of the Reply is incorrect & denied, while that of the main Appeal is correct.
- G. Para G needs no comments.

It is, therefore, most humbly prayed that on acceptance of instant rejoinder, the Appeal of the Appellant may graciously be allowed, as prayed for therein.

Through
Appellant
Javed Iqbal Gulbela
Advocate, Supreme Court of
Pakistan

Saghir Iqbal Gulbela
&
Ahsan Sardar
Advocates High Court
Peshawar

Dated: 29/07/2021

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A # 1124/2019

Jamal Shah

Versus

Government of Khyber Pakhtunkhwa and Others


AFFIDAVIT

I, Jamal Shah (Senior Clinical Technician Pathology)
S/o Hamesh Khan R/o Safo Bariband, Mandani, Tehsil
Tangi, District Charsadda, do hereby solemnly affirm and
declare on oath that contents of the Rejoinder are true and
correct to the best of my knowledge and belief and nothing
has been concealed from this Hon'ble court.


Deponent

CNIC: 17101-0337081-9

Identified By:-


Javed Iqbal Gulbela
Advocate Supreme Court of
Pakistan



22-7-2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

CM. NO. _____/2021

IN

APPEAL NO. 1124/2019

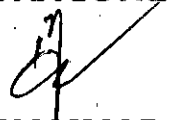
JAMAL SHAH
V/S
HEALTH DEPARTMENT

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Application	1 - 2
2.	Affidavit	3
3.	Order sheet	A	4- 5
4.	Vakalatnama	6

PETITIONER

THROUGH:

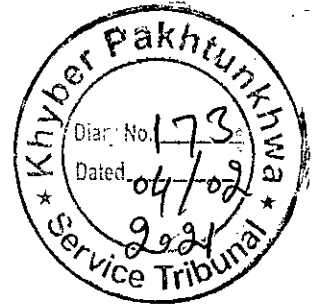

NOOR MOHAMMAD KHATTAK
ADVOCATE
HIGH COURT, PESHAWAR
Flat No. 4, 2nd Floor,
Juma Khan Plaza Warsak Road,
Peshawar
0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

CM. NO. _____ /2021

IN

1124/2019



Put up to the court with relevant app.

4/12/2021

JAMAL SHAH

V/S

HEALTH DEPARTMENT

APPLICATION FOR SETTING ASIDE THE EX-
PARTE PROCEEDINGS INITIATED AGAINST THE
PRIVATE RESPONDENT NO. 4 (NAZIR TAJ) ON
24.08.2020

R/SHEWETH:

That the above title Service Appeal is pending adjudication before this august Tribunal which is fixed for hearing on 14.03.2021,

- 2- That the appellant filled above titled Service Appeal against the impugned seniority list.
- 3- That the above mentioned appeal was fixed for submission of reply/comments on 24.08.2020 but the private respondent No. 4 was unaware about the aforementioned date, due to which the private respondent No. 4 could not appear before this august Tribunal.
- 4- That due to non-appearance on the date mentioned above ex-parte proceedings initiated against the private respondent No. 4 vide order dated 24.08.2020. Copy of the order sheet is attached as annexure.....**A**.
- 5- That the non-appearance of the private respondent No. 4 was neither deliberate nor intentional but caused due to the above mentioned reason.
- 6- That, valuable rights of the private respondent No. 4 is involved in the instant case and the case has also got finality as being fixed in arguments stage.
- 7- That if the opportunity isn't granted to the private respondent No. 4 will face irreparable loss.

Notice of instant application is given to the appellant as well as other respondents for the date fixed to hear the Applicant to bear the cost of service.

9/12/21

It is therefore, most humbly prayed that on acceptance of this application the ex-parte proceedings initiated against the private respondent No.4 may very kindly be set aside and the private respondent No.4 be allowed to contest the aforementioned service appeal.

Dated: 04.02.2021

APPLICANT

NAZIR TAJ

Through:


**NOOR MUHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

CM. NO. _____/2021

IN
1124/2021

JAMAL SHAH

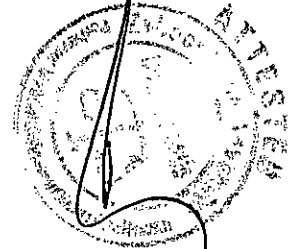
V/S

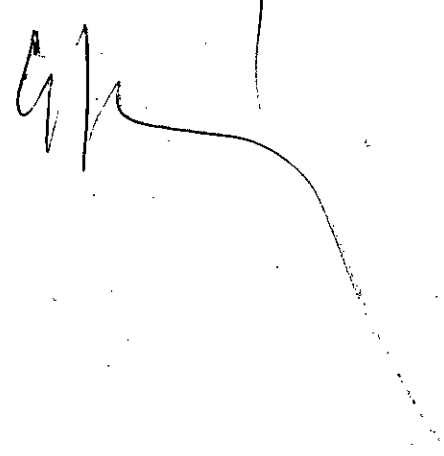
HEALTH DEPARTMENT

AFFIDAVIT

I Noor Mohammad Khattak, Advocate, on the instructions and on behalf of my client, do hereby solemnly and affirmed that the contents of this **application restoration** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.


NOOR MOHAMMAD KHATTAK
ADVOCATE







**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1215

Dated 30/8/2019

In Re S.A. 1124 /2018

Jamal Shah (Senior Clinical Technician Pathology), S/o
Hamesh Khan, R/O Safo Bariband, Mandani, Tehsil
Tangi, District Charsada.

------(Appellant)

VERSUS

1. Secretary Health Government of Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
- ✓ 3. Medical Superintendent Women and Children Hospital, Rajjar, Charsadda.
4. Nazir Taj Chief Clinical Technician, R/O Main Laboratory, DHQ, Nowshera.

------(Respondents).

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED SENIORITY
LIST WHEREBY THE APPELLANT HAS
ILLEGALLY BEEN ENLISTED
JUNIOR THAN RECONDENT NO.4
ALONGWITH DEPRIEVEMENT OF THE
APPELLANT FROM THE POST OF
TECHNICIAN SINCE 1993 IN A CURSORY
AND WHIMSICAL MANNER.**

Filed to-day

Registrar

30/8/19


Submitted to-day
and filed.

Registrar

4/9/2019

Respectfully Sheweth,

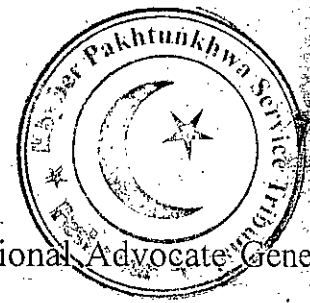
Certified to be true copy


Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

1. That the Appellant is a naturally born bonafide citizen of the Islamic Republic of Pakistan & hails from respectable family of District Charsadda.

01.07.2020

Counsel for the appellant present.



Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Salim Javid Litigation Officer for respondents No.1 & 2 present. None present on behalf of respondents No.3 & 4. Notice be issued to respondents No.3 & 4.

Again, a request for submission of comments on behalf of respondents No.1 & 2 was made which is allowed on cost of Rs.2000/-. It is worth mentioning that reply on behalf of respondent No.3 has already been furnished and has been placed on file. To come up for attendance of respondent No.4 and comments on behalf of respondents No.1, 2 and 4, on 24.08.2020 before S.B.

Member (J)

24.08.2020

Appellant present in person.

Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Hazrat Shah Superintendent, Dr. Saliim Javid Litigation Officer and Mustaqim Litigation Officer for official respondents #.1 to 3 present.

Representatives of respondents #. 1 and 2 furnished written reply alongwith cost of Rs. 2000/- which was received by appellant and in this regard his signature was obtained on the margin of order sheet.

Comments on behalf of respondent #.3 has already been filed.

None present on behalf of private respondent #.4 hence placed ex-parte. To come up for rejoinder, if any and arguments on 27.10.2020 before D.B.

Certified to be true copy

DEAN
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Member (J)

Received & reviewed
24/08/20
22/08/20
21/08/20

Date of Presentation of Application	24/8/20
Number of Words	252
Copying Fee	Rs. 2000/-
Urgent	Yes
Total	Rs. 2000/-
Name of Applicant	
Date of Completion of Copy	22/08/20
Date of Delivery of Copy	21/08/20

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

*put up to the court with
relevant appeal.*

C.M. No. _____/2021

IN

APPEAL No.1124/2019



Reader
4/2/2021.
JAMAL SHAH

VS

HEALTH DEPTT:

APPLICATION FOR REQUISITIONING THE
ABOVE MENTIONED APPEAL FOR EARLY
HEARING

*shall remain
posted to the date
already fixed in
the appeal.*

Sheweth:

- 1- That the above mentioned appeal is pending adjudication before this Honorable Tribunal which is fixed for hearing on 14.03.2021.
- 2- That the appellant filed the above mentioned appeal against the seniority list and the applicant has been arrayed as private respondent No. 4 in the title appeal.
- 3- That the applicant/private respondent No. 4 was unaware about the date of hearing in the above title appeal, due to which ex-parte proceedings were initiated against the applicant/private respondent No. 4 vide order dated 24.08.2020.
- 4- That when it came into the knowledge of applicant/private respondent No. 4, the applicant applied for attested copy 27.01.2021 and the same has been delivered on 02.02.2021.
- 5- That valuable rights of the applicant/private respondent in the above mentioned service appeal, hence the same is liable to be heard on an earlier date.
- 1- That the interest of justice demands that such like matter be heard as early as possible to meet the ends of justice and also to meet the principles of access to justice.

It is therefore, most humbly prayed that on acceptance of this application the above titled appeal may kindly be fixed for an early convenient date.

APPLICANT/PRIVATE RESP: NO.4
Through:

[Signature]
NOOR MOHAMMAD KHATTAK
ADVOCATE