

01.03.2023

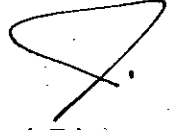
Clerk of learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Lawyers are on strike. To come up for arguments on 16.03.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

(Fareeha Paul)  
Member (E)

(Salah-ud-Din)  
Member (J)



16<sup>th</sup> Mar, 2023

Junior to learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

Former requested for adjournment as senior counsel for the appellant is not available being busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 17.05.2023 before D.B. PP given to the parties.

SCANNED  
KPST  
Peshawar

(Salah-Ud-Din)  
Member (J)

(Kalim Arshad Khan)  
Chairman




18.10.2022


Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 05.12.2022 before

D.B.

  
(Fareeha Paul)  
Member(E)


  
(Rozina Rehman)  
Member (J)


05<sup>th</sup> Dec. 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhef, Assistant Advocate General for the respondents present.

**SCANNED  
KPST  
Peshawar**

Former seeks adjournment due to engagement of learned senior counsel for the appellant in Honourable Peshawar High Court today. Last opportunity is granted. To come up for arguments on 01.03.2023 before the D.B.


  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

26<sup>th</sup> April, 2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Learned counsel for the appellant requested for adjournment in order to assist the Tribunal. Last opportunity is granted. To come up for arguments before the D.B on 06.06.2022.

  
(Fareeha Paul)  
Member (E)

  
Chairman

06.06.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

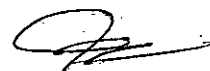
Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 18.08.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

18.8.22

*due to members vacation the case is adjourned to 18.10.22 for the same.*



P.S

22.06.2021

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

  
Chairman

02.11.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

The learned Member (Judicial) is on leave, therefore, case is adjourned. To come up for arguments on 07.02.2022 before the D.B.

  
Chairman

7-02-2022

Due to retirement of the Honorable Chairman the case is adjourned. To come up for the same as before on the 26-04-2022

  
Member

21.01.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.04.2021 before S.B.

Appellant Deposited  
Security & Process Fee  
25/1/21

(Rozina Rehman)  
Member (J)

19.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 10.06.2021 for the same as before.

10.06.2021

*Junior to Counsel*, and Mr. Farman Shah, Senior Auditor for respondent No. 3 and Gohar Ayub, Clinical Technician for respondent No. 5 alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present.

*Stipulated period has passed and replies has not been submitted.*

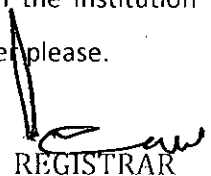

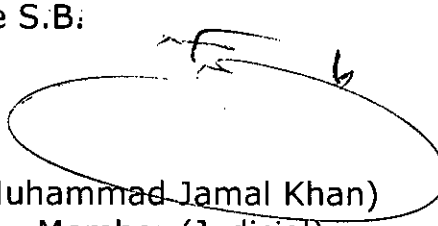
Written reply not submitted. Learned AAG is required to contact the respondents. The respondents are directed to submit written reply/comments in office within 10 days, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 02.11.2021 before the D.B.

Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No.- 11952 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2020	<p>The appeal of Dr. Waseem Ullah Jan resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/11/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
05.11.2020		<p>Junior counsel for appellant is present.</p> <p>Since the Members of the High Court as well as of the District Bar Association, Peshawar, are observing strike today, therefore, learned senior counsel for appellant is not available today.</p> <p>Adjourned to 21.01.2021 on which date to come up for preliminary hearing before S.B:</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

S. B.

Senior Counsel for appellant's present.

Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today, therefore learned senior counsel for appellant is not available today. Adjournd to 21.01.2021 on which date to come up for preliminary hearing before S.B.

(Muhammad Jamal Khan)  
Member (Judicial)

The appeal of Dr. Waseem Ullah Jan Medical Officer Civil Hospital Shakar Dara District Kohat received today i.e. on 24.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is unsigned.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 4- Appeal may be page marked according to the Index.
- 5- All the annexures of the appeal are illegible which may be replaced by legible/better one.

No. 2779 /S.T,

Dt. 25/09 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

*Note:*

*Sr, All objections have been removed,  
hence re-submitted today dated 13/10/2020.*

*nr*  
*13/10/2020*



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

APPEAL NO. \_\_\_\_\_/2020

DR. WASEEM ULLAH JAN

VS

HEALTH DEPTT:

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**APPELLANT**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

APPEAL NO. 11952 / 2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 10508

Dr. Waseem Ullah Jan, Medical Officer (BPS-17),  
Civil Hospital Shakar Dara, District Kohat.

Dated 24/9/2020

..... APPELLANT

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3- The Accountant General, Fort Road, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Account Officer, District Malakand.
- 5- The District Health Officer, District Malakand.

.....RESPONDENTS

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED LETTER DATED 18.6.2019 WHEREBY THE APPELLANT HAS BEEN RELIEVED WITHOUT ANY REASON AND INACTION OF THE RESPONDENTS BY NOT RELEASING THE MONTHLY SALARIES OF THE APPELLANT WITH EFFECT FROM 1<sup>ST</sup> MARCH, 2018 TILL DATE**

**PRAYERS:**

That on acceptance of this appeal the impugned letter dated 18.6.2019 may kindly be set aside and the respondents may kindly be directed to release the monthly-salaries of the appellant w.e.f. 1<sup>st</sup> March, 2018 till date with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

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

That appellant was initially appointed as Medical Officer (BPS-17) on Adhoc Basis after proper recommendation of Departmental Selection Committee and fulfilling of all the codal formalities required for the post and stood at Serial No. 37 of the appointment notification dated 12-01-2017. Copy of the appointment order is attached as annexure ..... A.

Filed to-day

Registrar  
24/9/2020

Re-submitted to day  
and filed.

Registrar  
13/10/2020

- 2- That the appellant was medically examined and was declared fit for government job by the concerned medical superintendent of Police & General Hospital Peshawar. Copy of medical certificate is attached as annexure ..... **B.**
- 3- That, the appellant submitted his arrival report dated 01-02-2017 before the respondent No.1 and in response the services of the appellant was placed at the disposal of the respondent no.5 vide notification dated 24-01-2017 and later was posted as MO at Civil Hospital Shakardara, Kohat. Copy of Arrival Report & Notification are attached as annexure ..... **C&D.**
- 4- That, in response to the Notification dated 24-01-2017 the appellant submitted Charge report dated 30-03-2017 at Civil Hospital Shakardara, Kohat which was properly notified by the respondents vide Notification dated 12-04-2017. Copies of the Charge report & Notification are attached as annexure ..... **E & F.**
- 5- That, all the education testimonials of the appellant were forwarded for verification from the concerned quarters/board according to clause-16 of the Terms & Condition of the appointment order vide letter dated 22-03-2017 which was received back and found correct/verified vide letter dated 23-07-2018. Copies of the letters are attached as annexure as annexure ..... **G & H.**
- 6- That, with the promulgation of the Khyber Pakhtunkhwa (Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. VII of 2017) the services of the appellant along with other colleagues were regularized in which the appellant stood at Serial No. 335 of the notification dated 09-05-2017. Copy of the regularization is attached as annexure ..... **I.**
- 7- That, right from the date of appointment the appellant performed his duty quite efficiently but the respondents stopped the salary of the appellant from 1<sup>st</sup> March, 2018 without any cogent reason assigned against which the appellant filed Department Appeal dated 07-05-2018 followed by writ petition No.4478-P/2018 before the Peshawar High Court Peshawar. That during the pendency of said writ petition the respondents vide impugned letter dated 18.6.2019 relieved the appellant from the post of medical officer, Civil Hospital shakardara, Kohat. Copies of the Departmental appeal, memo of writ petition and impugned letter are attached as annexure ..... **J, K & L.**

- 8- That after issuance of the said impugned letter dated 18.6.2019 the appellant filed Departmental appeal. That vide judgment dated 9.6.2020 the august High Court directed the respondent No.1 to decide the Departmental appeal of appellant within one month but till date the respondent No.1 is not willing to decide the Departmental appeal of appellant one way or the other. Copies of the Departmental Appeal & judgment are attached as annexure ..... **M & N.**
- 9- That appellant having no other remedy but to file the instant appeal on the following grounds amongst the others.

**GROUND:**

- A- That by issuing the impugned letter dated 18.6.2019 and by not releasing the salary of the appellant w.e.f. 1.3.2018 till date by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable in the eye of Law.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and malafide manner by stopping the salary of the appellant without any reason.
- D- That act of the respondent by stopping the salary of the appellant falls within the ambit of force labor, which is against Article-11 of the Constitution of Islamic Republic of Pakistan that have given protection against forced labor in the way that the appellant is still performing his duty without salary.
- E- That, act of the respondents by stopping the salary of the appellant is against the dictum of the apex Supreme Court of Pakistan which enshrines that "Work done must paid".
- F- That in light of section-17 of the Civil Servant Act, 1973 the appellant is fully entitled for his salaries w.e.f. 1st March, 2018 till date.
- G- That the impugned letter dated 18.6.2019 is violative of civil servant Act, 1973.
- H- That neither show cause notice nor chance of personal hearing has been provided to the appellant while issuing the impugned letter dated 18.6.2019.

I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

  
APPELLANT

**DR. WASEEM ULLAH JAN**

THROUGH:

  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATES, PESHAWAR

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

C.M NO. \_\_\_\_\_/2020

IN

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

**DR. WASEEM ULLAH JAN VS EDUCATION DEPTT:**

**APPLICATION FOR SUSPENSION OF OPERATION OF**  
**THE IMPUGNED ORDER DATED 18.06.2019 TILL THE**  
**DISPOSAL OF THE ABOVE MENTIONED APPEAL**

**R/SHEWETH:**

- 1- That the above mentioned appeal along with this application has been filed by the appellant before this august Service Tribunal in which no date is fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned letter dated 18.06.2019 whereby the appellant has been directed to stop working as Medical Officer and leave the hospital.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned order dated 18.06.2019 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned order dated 18.06.2019 may very kindly be suspended to the extent of appellant till the disposal of the above mentioned appeal.

**APPLICANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK**

**&**

**MIR ZAMAN SAFI**  
**ADVOCATES**

Better copy of annexure.....A

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**HEALTH DEPARTMENT**

Dated Peshawar the 12<sup>th</sup> January, 2017

**NOTIFICATION**

No. SO(E)H-II/3-18/2016/1000. On the recommendations of Departmental Selection Committee the Competent Authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to appoint the following doctors as Medical Officers (BS-17) on adhoc basis for a period of one year or till the arrival of selectees of Public Service Commission whichever is earlier with immediate effect.

**OPEN MERIT (213 Candidates)**

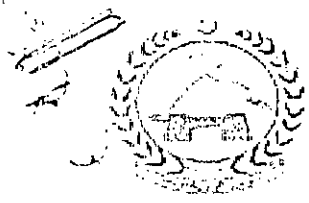
S#	Name & Father Name	District of Domicile	Zone	D.O.B
1.	Hussain Khan S/O Muhammad Shah	Swat	III	01.03.1979
487.	Waseem Ullah Jan S/O Faqir Shah	Peshawar	II	20.04.1978

**TERMS & CONDITIONS:-**

The appointment as subject to the following terms and conditions:-

1. The appointments will be purely on adhoc basis for a period of one year or till the arrival of the recommendees of Public Service Commission Khyber Pakhtunkhwa whichever is earlier.
2. The employees will be entitled to receive salary equal to the minimum of BS-17 in addition to other allowances as admissible to Civil Servants of the same scale.
3. On the expiry of one year or on arrival of the selectees from Public Service Commission whichever is earlier, the employees shall stand automatically dispensed with.
4. No extension will be granted on the expiry of Adhoc period.
5. The employees shall be entitled to medical treatment as admissible under the Khyber Pakhtunkhwa Government Servants Medical Attendance Rules, 2016.
6. The employees shall be entitled to two days casual leave on full pay for every month on duty rendered.
7. The employees shall not be entitled to undergo any kind of training inside the country of abroad.

SECRETARY HEALTH



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

*Annexure A*

Dated Peshawar the 12<sup>th</sup> January, 2017

**NOTIFICATION**

**No.SO(E)H-III/3-18/2016/1000** On the recommendations of Departmental Selection Committee, the Competent Authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to appoint the following doctors as Medical Officers (BS-17) on Adhoc basis for a period of one year or till the arrival of selectees of Public Service Commission whichever is earlier with immediate effect.

**OPEN MERIT (213 Candidates)**

S.No.	Name and Father Name	District of Competitor	Zone	D.O.B
1	Muham Khan S/O Muhammad Shan	Swat	III	01/03/1979
2	Muhammad Jawad S/O Jan Nasir	Charsadda	II	24/04/1951
3	Sandis Mawema D/O Mubtahir Ali Khan	Karak	IV	25/05/1959
4	Aama Zahir D/O Muhammad Zahir Khan	Chamanada	II	15/09/1950
5	Anwar Ali S/O Bahuga Khan	Swat	III	12/03/1961
6	Muhammad Saad S/O Abouhan Khan	Mardan	II	17/04/1977
7	Muhammad Iqbal S/O Fardun Khan	Serat	III	15/03/1954
8	Muhammad Nauman Zahir S/O Zahir Biag	FR Tank	I	31/05/1954
9	Syahr Ahmad S/O Muhammad Israr Khan	Charsadda	II	10/04/1957
10	Dr Alam Khan S/O Abdul Latif	Nowshera	II	07/11/1979
11	Muhammad Saifur S/O Muhammad Rafiq	Peshawar	II	10/02/1973
12	Ishaq Ur Rahman S/O Hidayat Ur Rehman	Dr Lower	III	04/03/1987
13	Sayad Gul S/O Hafiz Gul	Harguj	IV	13/04/1974
14	Shereza Shabeen D/O Muhammad Ishaq	Harguj	V	02/03/1995
15	Aneesa Fatima D/O Malik Muhammad Nasir	Manshera	V	15/04/1989
16	Asghar Warsah S/O Habib Khan	Bajaur Agency	I	15/02/1979
17	Dr Badshah S/O Faraz Ur Rahman	Bajaur Agency	I	01/12/1974
18	Khalid Jalil S/O Saib Jalal	Bara Khyber Agency	I	29/12/1978
19	Qamar Ali S/O Akbar Ali	Kusum Agency	I	25/02/1977
20	Syeda Hana Zulfqar D/O Syed Zulfqar Hussain Shan	Kusum Agency	I	27/11/1984
21	Arsalan Mubi S/O Faraz Ahmad Mubi	Peshawar	II	14/08/1992
22	Fahimullah S/O Amir Mustaan	Swat	III	01/02/1979
23	Muham Hussain S/O Inzar Gul	Swat	III	17/03/1982
24	Muhammad Azam Khan S/O Muhammad Ali Khan	Swat	III	05/04/1970
25	Muham Mube Khan S/O Jalal ud Din	Swat	III	07/04/1981
26	Shah Mubi S/O Muhammad Mumtaz Khan	Shangha	III	02/06/1970
27	Zakariyah S/O Abbas Khan	Dr Lower	III	15/04/1979
28	Abdullah S/O Abdul Rashid	Swat	III	31/03/1979
29	Wahid Waqas S/O Muhammad Mubshar	Dr Lower	III	06/02/1987
30	Amjad Ali S/O Zahir Khan	Mohmand Agency	I	15/03/1972
31	Fazil Lalah S/O Azim Khan	Khyber Agency	I	16/01/1980
32	Muhammad Asif Hussain S/O Haji Faqih Hussain	Bajaur Agency	I	01/07/1977
33	Muhammad Shah Jahang S/O Muhammad Gul	Khyber Agency	I	10/05/1978
34	Raja Mir S/O Zameer Khan	FR Peshawar	I	12/03/1974
35	Faisal Khan S/O Muhammad Saifur	Peshawar	II	25/02/1980
36	Dr Farid Khan S/O Gul Khatab Khan	Mardan	II	23/09/1972
37	Habib Ul Haq S/O Dr Am Ud Din	Mardan	II	23/01/1965
38	Hina D/O Ahsanullah Khan	Peshawar	II	13/05/1987
39	Muham Zahid D/O Syed Zahid Hussain Shah	Nowshera	II	10/06/1980
40	Muhammad Han S/O Muhammad Anif	Nowshera	II	18/04/1990
41	Muhammad Jawad S/O Qasim Jan	Peshawar	II	01/04/1980

*Signature*  
Chief Secretary  
Khyber Pakhtunkhwa

**ATTESTED**

*Signature*

*Signature*



S.No	NAME AND FATHER NAME OF CANDIDATE	Domicile	Zone	D.O.B
117	Halima Sumbal D/O Asar Sord	Mardan	B	15 10 1991
118	Ameer Zaid S/O Shah Jehan	Mardan	II	15 04 1993
119	Aysha Javed D/O Javed Iqbal	Peshawar	II	01 02 1992
120	Amina Sultan D/O Sultan Bahadar	Swabi	II	18 02 1990
121	Amya Tehseen D/O Shehwal Hussain	Peshawar	II	13 04 1990
122	Amya Aman D/O Sher Aman	Swabi	II	02 12 1992
123	Aziz Ur Rehman S/O Gul Khan	Peshawar	II	13 06 1992
124	Zabi Zuboob D/O Faza Suchan	Nowshera	II	03 06 1981
125	Zahid Iqbal S/O Noor Ayaz	Mardan	II	20 02 1992
126	Zahra Uman D/O Usman Khalid	Mardan	II	10 04 1999
127	Zareen Iqbal D/O Malik Muhammad Iqbal	Peshawar	II	24 08 1990
128	Zarad Ahmad Khan S/O Chakoor Khan Khattak	Peshawar	II	03 06 1990
129	Zareen Khan S/O Waqar Khan	Swabi	II	18 03 1990
130	Zehara Huma D/O Mahabat Khan	Charsadda	II	02 06 1984
131	Zeha Saeed D/O Saeed Elahi	Peshawar	II	07 10 1990
132	Zehra Tul Bahar D/O Muhammad Aslam	Peshawar	II	28 03 1997
133	Zehra Zain S/O Rashid Ahmad	Mardan	II	04 05 1997
134	Zehra Arooj D/O Javed Ahmad	Peshawar	II	23 11 1993
135	Zehra Youssuf D/O Muhammad Youssuf	Mardan	II	03 03 1991
136	Zehra Fatima D/O Tajamul Hussain	Peshawar	II	21 12 1993
137	Zehra Rehana D/O Sher Adam Khan	Swabi	II	02 01 1990
138	Zehra Rahman D/O Inayatullah Khan	Peshawar	II	27 12 1991
139	Zehra Khan S/O Shamroz Khan	Peshawar	II	30 03 1991
140	Zehra Khan D/O Ghulam Khan	Nowshera	II	14 12 1990
141	Zehra Mustafa Kamal S/O Khan Ayman Shah	Mardan	II	09 01 1990
142	Zehra Ali D/O Muslim Ali Khan	Mardan	II	15 10 1990
143	Zehra Afsar Jan S/O Saeed Ullah Jan	Charsadda	II	09 07 1990
144	Zehra Kashif Javed S/O Muhammad Javed	Peshawar	II	19 05 1993
145	Zehra Naveed Khan S/O Mr. Asif Khan	Mardan	II	03 03 1990
146	Zehra Sana Sultan S/O Rehmat Ali	Peshawar	II	17 10 1991
147	Zehra Shahab S/O Rashid Gul	Mardan	II	03 02 1992
148	Zehra Shah Ishtiaq S/O Muhammad Ishtiaq	Charsadda	II	01 04 1993
149	Zehra S/O Nurul Khan	Mardan	II	02 12 1990
150	Zehra S/O Nurul Khan	Mardan	II	11 04 1991
151	Zehra Tanveer Ahmad S/O Aslamuddin	Mardan	II	05 12 1993
152	Zehra Nazir D/O Malik Ahmad Khan	Mardan	II	23 03 1992
153	Zehra Razan S/O Noor Razan	Peshawar	II	10 03 1991
154	Zehra U Amin S/O Noor U Amin	Mardan	II	30 12 1990
155	Zehra Khalid S/O Abdul Halim	Charsadda	II	30 12 1990
156	Zehra Faisal S/O Mahmood Khan	Mardan	II	07 03 1991
157	Zehra Jehan S/O Abdul Ghaffar	Peshawar	II	02 11 1991
158	Zehra Feroz S/O Ali Bahadar	Mardan	II	15 08 1993
159	Zehra Iqbal S/O Noor Ullah	Peshawar	II	01 08 1993
160	Zehra Hayat S/O Gul Rehman	Peshawar	II	09 04 1997
161	Zehra S/O Muhammad Iqbal	Mardan	II	20 03 1997
162	Zehra Saeed S/O Hana Muhammad Saeed Ahmad	Peshawar	II	04 07 1994
163	Zehra S/O Usman Shah	Swabi	II	05 03 1991
164	Zehra Zohra An Shah S/O Syed Iqbal Ali Shah	Swabi	II	25 08 1990
165	Zehra Sama Bait D/O Syed Bait	Mardan	II	21 03 1990
166	Zehra Ahmad S/O Farooz Khan	Swabi	II	02 04 1990
167	Zehra Iqbal D/O Mian Iqbal Ud Din	Charsadda	II	28 04 1991
168	Zehra Saeed S/O Sajid Ahmad Saeed	Peshawar	II	16 03 1990
169	Zehra Farooz S/O Haseem Usman	Charsadda	II	10 04 1992
170	Zehra Amir Bait S/O Amir Ullah Bait	Nowshera	II	02 03 1997
171	Zehra Saeed S/O Lutfi Maqbool	Peshawar	II	01 03 1991
172	Zehra Saeed S/O Lutfi Maqbool	Charsadda	II	05 03 1990
173	Zehra Saeed S/O Fath Akbar	Nowshera	II	15 07 1993
174	Zehra Saeed D/O Israr Khan	Peshawar	II	27 03 1990
175	Zehra Kamal S/O Kamal Din	Peshawar	II	15 04 1991
176	Zehra Khan S/O Gul Nawaz Khan	Nowshera	II	15 09 1972
177	Zehra Amir S/O Amir Ali	Mardan	II	09 10 1990
178	Zehra S/O Faza Amin	Mardan	II	10 03 1995
179	Zehra Muhammad S/O Mahboob Chinn	Swabi	II	10 03 1995
180	Zehra Zaman D/O Khan Saeed Zaman	Nowshera	II	09 03 1997
181	Zehra Huma Huma Banoori S/O Syed Farid Hassan Banoori	Peshawar	II	20 08 1982
182	Zehra Ahmad Khan S/O Hussain Ahmad Khan	Peshawar	II	01 02 1993
183	Zehra Usman S/O Syed Mahmood	Mardan	II	10 04 1994
184	Zehra Hussain S/O Jamal-ud-Din	Mardan	II	03 01 1990
185	Zehra Khan S/O Sheraz Khan	Mardan	II	18 06 1997
186	Zehra Zahra D/O Muhammad Khalid Mahmood	Peshawar	II	03 04 1992
187	Zehra Ullah S/O Abdul Khaliq	Peshawar	II	07 12 1975
188	Zehra Sajid Khan S/O Saifuddin Khan	Mardan	II	30 05 1977
189	Zehra Saeed S/O Faza Shah	Peshawar	II	26 04 1979
190	Zehra Saeed S/O Heerat Khan	Peshawar	II	31 03 1991
191	Zehra Tahir S/O Aamir Bahadar	Swabi	II	23 03 1992

7

Signature  
Secretary  
Mardan District Council

407  
ATTESTED

ATTESTED  
Signature

927	Ayeshah Anwar D/O Arif Jan Khan	Nowshera	II	27.01.1962
928	Chandahwar D/O Muhammad Aslam Khan	Swat	II	13.10.1972
929	Faqir Khan D/O Mochallah Khan	Peshawar	II	10.11.1959
930	Hushmata Humayun D/O Muhammad Hamayun	Charsadda	II	25.08.1993
931	Laila Masood D/O Masood Khan	Peshawar	II	13.04.1993
932	Noor Ul Sabah Shah D/O Marat Ali Shah	Peshawar	II	27.11.1988
933	Suzia D/O Ajab Khan	Mardan	II	02.11.1977
934	Suznata Hara D/O Anwar Shah	Peshawar	II	01.01.1984
935	Saba Gul D/O Farah Hakeem	Dr Lower	III	19.03.99
936	Laila Gul D/O Farah Anwar	Karak	IV	25.03.1989
937	Ayees Niaz Saleem D/O Malik Saleem Saib	Mingora	IV	12.02.1997
938	Bunyat Khalid D/O Dr. Abdul Khaliq	Peshawar	II	23.01.1991
939	Nesreen D/O Muhammad Akbar	Buner	III	01.03.1999
940	Sarosh Sarfraz D/O Saif Ullah	Charsadda	II	19.11.1974
941	Amna D/O Muhammad Saib Jafar	Dr Lower	III	25.03.1975
942	Nadia Zeb D/O Alam Zeb	Peshawar	II	25.03.1991
943	Sahar Fayaz D/O Fayaz Aslam	Peshawar	II	30.03.1990
944	Nadia Zeb D/O Alam Zeb	Peshawar	II	28.08.1991
945	Sahar Fayaz D/O Fayaz Aslam	Peshawar	II	30.03.1990
946	Mubashir Nowshad D/O Nowshad Khan	Swat	III	17.08.1995
947	Hilal Sadq D/O Saqar Sadq	Mardan	III	05.03.1998
948	Zahida Yousof D/O Muhammad Yousaf	Swat	III	00.11.1997
949	Nadia Sharbat D/O Saqar Ali Rahman	Karak	IV	30.03.1989
950	Ayeesha Nabeela D/O Hira Raees Khan	Dikhan	IV	29.03.1991

### MINORITY QUOTA (30 CANDIDATES)

S.NO	NAME AND FATHER NAME OF CANDIDATE	Domicile	Zone	D.O.B
951	Zahida Alameer Feroz S/O Saadul Feroz	Peshawar	II	03.03.1999
952	Nasim Pervez Ghosrani S/O Pervez Ghosrani	Charsadda	II	15.12.1987
953	Ayesha Khatun S/O Hamid Khan	Buner	III	06.01.1991
954	Dr. Anand S/O Farah Lal	Buner	III	16.03.1991

### DISABLED QUOTA (20 CANDIDATES)

S.NO	NAME AND FATHER NAME OF CANDIDATE	Domicile	Zone	D.O.B
955	Ikram ul Rahman S/O Sultan Muhammad	Dr Upper	III	18.04.1990
956	Lingal Rehman S/O Badshah Rehman	Mardan	III	25.03.1990
957	Muhammad Anas S/O Ahmad Noor	SW	I	28.02.1990
958	Ikram Ahmad S/O Gulsar Zaman	Agency	II	12.02.1992

### TERMS AND CONDITIONS:-

Their appointment is subject to the following terms and conditions:-

1. The appointment will be purely on Adhoc basis for a period of one year or till the arrival of the recommendees of Public Service Commission Khyber, Pakhtunkhwa whichever is earlier.
2. The employees will be entitled to receive salary equal to the minimum of BS-17 in addition to other allowances as admissible to Civil Servants of the same scale.
3. On the expiry of one year or on arrival of the selectees from Public Service Commission whichever is earlier, the employee shall stand automatically dispensed with.
4. No extension will be granted on the expiry of Adhoc period.
5. The employees shall be entitled to medical treatment as admissible under the Khyber Pakhtunkhwa Government Servants Medical Attendance Rules, 2016.
6. The employees shall be entitled to two days casual leave on full pay for every month on duty rendered.
7. The employee shall not be entitled to undergo any kind of training inside the country or abroad.

ATTESTED

*[Signature]*

ATTESTED

*[Signature]*

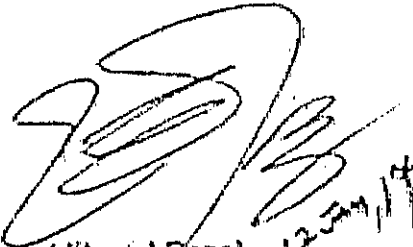
8. Absence from duty, for a single day, shall be considered as misconduct and violation of the agreement. In that case the Health Department is competent to terminate the agreement without any notice.
9. The employee shall not be required to contribute CP/GP Fund.
10. The Adhoc appointment is non-pensionable and is without gratuity.
11. The employee is not permitted to do private practice, open any clinic, private dispensary or have any interest in any such private facility.
12. Adhoc appointment shall be subject to medical fitness and verification of antecedents as well as testimonials.
13. In case the employee is found undergoing training in any Institution sponsored by any Health Project of the government or private sector either provincial or federal and in that regard signed any agreement with the project, his/her appointment shall stand terminated. Further if he/she intends to join the Adhoc appointment all expenses incurred on such training shall be refunded to the concerned project by the employee.
14. The respective controlling Officers shall be personally responsible for verification of documents /certificates/Degrees of Adhoc appointees/Doctor and his/her salary shall not be released till the verification of the academic documents/certificates/Degrees from the concerned Boards/Universities within fifteen days positively.
15. They will serve and be posted only in RHCs, BHUs and/or CDs anywhere in the Province.
16. Posting transfer will be carried out on merit basis i.e. the candidates higher in merit will be adjusted in their district of domicile subject to the availability of vacant position. In case of non availability such candidates will be posted in the adjoining districts of their domiciles. Preference would be given to the candidates selected against the general seats (merit seats). Furthermore candidates lower in the merit of zonal quota shall be posted anywhere in the province in RHCs, BHUs and CDs.
17. In case of any fake information, testimonial or any other documents, the Adhoc employees shall be responsible. FIR will be lodged against the defaulters.
18. If this offer of appointment order with the above terms and conditions is acceptable, the appointee shall execute an agreement with the Department on Judicial stamp paper containing all the terms and conditions.
19. The doctors concerned are required to report for duty within Fifteen days from the date of issuance of this notification failing which the appointment will stand automatically cancelled, in case of non-compliance in the stipulated period stated above.

SECRETARY HEALTH

Encl. No. & date given.

Copy to the

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Director, Health Services FATA Peshawar.
4. Deputy Director (IT), Health Department, Peshawar.
5. Coordinator, HSRU Health Department.
6. PS to Minister Health, Khyber Pakhtunkhwa.
7. PS to Chief Secretary Khyber Pakhtunkhwa.
8. PS to Special Secretary Health.
9. PA to Additional Secretary Health.
10. Doctors concerned.

  
 (Jibrael Raza) 12/24/17  
 Section Officer (E-II)  
 Dist. of Khyber Pakhtunkhwa  
 Health Department

ATTESTED  


ATTESTED  


# MEDICAL CERTIFICATE

Name of official Dr. Wasim Ullah Jan ✓ Annexure - (B)  
 Caste or race Khalil (C) (D)  
 Father's name Faqir Shah ✓  
 Residence village Achin, Payan p/o University of Pesh  
 Date of birth 26-04-1978 ✓  
 Exact height by measurement 5F-8"  
 Personal mark of identification cut wound on Rt. Thumb  
 Signature of the official [Signature]  
 Signature of head of office \_\_\_\_\_

Seal of office \_\_\_\_\_

I do hereby certify that I have examined Mr. Wasim Ullah Jan a candidate for employment in the Office of the Health Dept. and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except \_\_\_\_\_

I do not consider this as disqualification for employment in the office of the \_\_\_\_\_  
 His age according to his own statement 39 year and by appearance about thirty nine year.

[Signature]  
19/11/2017  
MEDICAL SUPERINTENDENT,  
CIVIL HOSPITAL \_\_\_\_\_  
District Hospital  
District Hospital  
District Hospital

ATTESTED

[Signature]

(Circular Stamp)

[Signature]  
District Hospital  
District Hospital  
District Hospital  
LEFT HAND THUMB AND FINGER IMPRESSIONS

To

Annexure - 2

Secy DHO (H),  
DISTRICT ROHAT K.P.K

(1)  
(2)  
(3)

Subject

ARRIVAL REPORTS

Sir, It is stated that vide your office order 503-9 dated 30/01/2017 it is informed that following doctors has submitted their arrival reports. The same are being forwarded for further usefull please

- ① Dr. Wasim-ullah
- ② Dr. M. Jawad
- ③ Dr. M. ~~Qazi~~ Aitezaz

Thanking you,

Date  
01/02/2017

Yours sincerely,  
*[Signature]*

Shk Hosp: 391/130

Dr. Qazi Naeem Shah  
Medical Superintendent  
Shakar Dara Hospital

Received *[Signature]* 01-2-2017  
Abdullah Khan, I/C  
DHO Office, Rohat

ATTESTED  
*[Signature]*

ATTESTED  
*[Signature]*

M. S.  
Civil Hospital,  
Shajran Dargah

~~(S)~~

Annexure - ~~(S)~~

~~(S)~~

(12)

✓

Sub. Arrival report.

Sir I Dr Wasim allal jafri Faqir shah  
is here to submit my arrival report.  
Please accept my arrival

Thank's

Dr. Wasim allal jafri

01/12/2014

*[Signature]*

ATTESTED

*[Signature]*

ATTESTED

*[Signature]*

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**HEALTH DEPARTMENT**

Dated Peshawar the 24<sup>th</sup> January, 2017**NOTIFICATION**

No. SO(E)H-II/3-18/2016/1000-7(A). On their 1<sup>st</sup> appointment as Medical Offices/Women Medical Officers (BS-17), on adhoc basis for a period of one year or till the arrival of selectees from Khyber Pakhtunkhwa Public Service Commission, Peshawar vide Health Department Notification of even number dated 12.01.2017, the following MOs/WMOs are hereby posted at the stations mentioned against their names with immediate effect in the public interest.

S#	Name & Father's Name	Place of Posting
1.	Hira D/O Attaullah Khan	At the disposal of DHO Peshawar
2.	Fatima D/O Aftab Hussain	At the disposal of DHO Peshawar
82.	Waseem Ullah Jan S/O Faqir Shah	At the disposal of DHO Kohat
83.	Abdul Qadir S/O Gulab Khan	At the disposal of DHO Battagram
84.	Muhammad Asif Hussain S/O Faqir Hussain	At the disposal of DHS FATA

SECRETARY HEALTH  
KHYBER PAKHTUNKHWA

13



GOVERNMENT OF KHIBER PAKHTUNKHWA  
HEALTH DEPARTMENT

Dated Faisalabad 24 January 2017

NOTIFICATION

REG. SOLE/HR/II/25-18/27026/11000-71A) On their 1<sup>st</sup> appointment as Medical Officers/Women Medical Officers (25-17), on adhoc basis for a period of one year or till the arrival of selectees from Khyber Pakhtunkhwa Public Service Commission, Faisalabad vide Health Department's notification of order number dated 12.01.2017, the following HOS/WMOs are hereby posted at the stations mentioned against their names with immediate effect in the public interest:

S.NO	NAME EMPLOYEES HAVE	PLACE OF POSTING
1.	MRS D/O ANJALIN KHAN	At the disposal of DHO Faisalabad
2.	FATMA QAM D/O JAVED QAM	At the disposal of DHO Faisalabad
3.	MADNA BINT D/O AMRAN HUSSAIN	At the disposal of DHO Faisalabad
4.	AMRAN HUSSAIN D/O HANAFI AHMAD	At the disposal of DHO Faisalabad
5.	SAYMA DURRAN D/O DR. SAJID UR RAHMAN	At the disposal of DHO Faisalabad
6.	ABIRAH KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
7.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
8.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
9.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
10.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
11.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
12.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
13.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
14.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
15.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
16.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
17.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
18.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
19.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad
20.	MADINA KHAN D/O M. ANWARUL KHAN	At the disposal of DHO Faisalabad

Annexure - 1

Serial No 58

Posting to dir.

ATTESTED

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71	Muhammad Huzaifa S/O Nazir Ur Rehman	At the disposal of DHO Kohat
72	Nasir Khan S/O Zahir Muhammad	At the disposal of DHO Kohat
73	Nasir Bakhtiar S/O Bakhtiar Ud Din	At the disposal of DHO Kohat
74	Atiq Ur Rehman S/O Ghani Rehman	At the disposal of DHO Kohat
75	Fakhr-e- Alam S/O Gul Akbar	At the disposal of DHO Kohat
76	Waseemullah Jan S/O Faqir Shah	At the disposal of DHO Kohat
77	Abdul Qadir S/O Gubb Khan	At the disposal of DHO Battagram
78	Muhammad Asif Hussain S/O Han Faqir Hussain	At the disposal of DHO FATA
79	Samreen Fair D/O Fazl Ur Rehman	At the disposal of DHO Swat
80	Saira Tul Montaha D/O Hafiz Jan	At the disposal of DHO Bannu
81	Noor Hamid Khan S/O Faqir Gul	At the disposal of DHO Dir Lower
82	Sadaf D/O Dr. Hasham Khan	At the disposal of DHO Dir
83	Zia Ur Rehman S/O Gul Bahadar Khan	At the disposal of DHO Dir Lower
84	Mahiq Noor S/O Sher Jan	At the disposal of DHO Dir Lower
85	Muhammad Ali S/O Bakhat Ali	At the disposal of DHO Shangha

in the o/p of DHO Kohat

ATTESTED



- They shall be governed by the Terms and conditions as mentioned in this Department Notification No. 42/2011 (DHO) dated 12.01.2012
- The concerned District Health Officers (DHOs) and Medical Superintendents (MSOs) are directed to verify the compliance of the terms and conditions of the Terms and Conditions of Tender Medical Officers (TMOs) and House Officers (HOs)
- In case of the above, the concerned DHO and MSO should intimate such matters to the undersigned for legal action
- Moreover, if the compliance of any Medical Officer are found to be deficient, the Department will take legal action against such individuals
- If the above terms and conditions are acceptable to the above mentioned applicants, then a bond of Rs. 50 daily attested by the District Commissioner may be submitted to the controlling officer as mentioned against each within Eight days of the issuance of this notification failing which the appointment will stand automatically cancelled.

SECRETARY HEALTH  
 KHYBER PAKHTUNKHWA

Encl: 1/1 (no number & date)

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. All Commissioners in Khyber Pakhtunkhwa
4. All Deputy Commissioners in Khyber Pakhtunkhwa.
5. All District Health Officers in Khyber Pakhtunkhwa with the request to fill the vacancies in Basic Health Units first then Rural Health Centers and Civil Dispensaries.
6. FSO to Chief Secretary Khyber Pakhtunkhwa.

ATTESTED





OFFICE OF THE  
DISTRICT HEALTH OFFICER

KOHAT

No \_\_\_\_\_/PF

Date 31/3/2017

*(Handwritten initials)*

*(Handwritten number 15)*

*(Handwritten letter E)*

To,

The Director General Health Services,  
Khyber Pakhtunkhwa Peshawar.

Subject:

TAKING OVER CHARGE REPORT

Dear Sir,

Reference Secretary to Government of KPK Health Department notification  
no SO (E) H-II/3-18/2016/1000, dated 24/1/2017.

I have the honour to submit herewith taking over charge report in respect of  
Dr. Wasim Ullah Jan newly appointed MO on Adhoc basis at Civil Hospital Shakardarra,  
Kohat for favor of further necessary action please.

*(Handwritten //)*  
DISTRICT HEALTH OFFICER  
KOHAT

No 1642-44 /PF, dated Kohat the 31/03/2017.

Copy along with the copy of charge report is forwarded to:-

1. The DAO, Kohat.
2. Accountant, DHO office Kohat.
3. Doctor concerned.

*(Handwritten signature)*  
DISTRICT HEALTH OFFICER  
KOHAT  
*(Handwritten P)*

ATTESTED  
*(Handwritten signature)*

ATTESTED  
*(Handwritten signature)*

DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to The Director General Health Services

Peshawar and not to any official by name

Office Ph. No. 92102691, Exchange No. 091-9210187, Fax No. 091-9210230

No. \_\_\_\_\_/E-1

Dated \_\_\_\_\_/04/2017



Annexure - (E) - 16

NOTIFICATION:

On his 1<sup>st</sup> Appointment as Medical Officer (BS-17) on adhoc basis vide Govt. Notification No. SO(E)H-II/3-18/2016/1000-7(A) dated 24-01-2017 in respect of Dr. Wasim Ullah Jan S/O Faqir Shah has assumed charge of his duties as Medical Officer at Civil Hospital Shakardarra District Kohat on 30-01-2017.

DEPUTY DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

The Manager,  
Govt. Printing Press Khyber Pakhtunkhwa Peshawar,  
For Publication in Govt. Gazette.

No. 7977-83/E-1 Dated the Pesh: 12/04/2017

Copy forwarded to the: -

1. Secretary to Govt. of Khyber Pakhtunkhwa, Health Department Peshawar.
2. District Health Officer Kohat.
3. District Account Officer Kohat. (In Original Health & Age Certificate attached).
4. DHIS Cell DGHS KPK Peshawar.
5. AE-IV DGHS Office Peshawar.
6. P.A to Director General Health Services Khyber Pakhtunkhwa Peshawar.
7. Doctor Concerned.

For information and necessary action.

DEPUTY DIRECTOR (HRM)  
DIRECTORATE GENERAL HEALTH  
SERVICES KHYBER PAKHTUNKHWA PESHAWAR

12.4.17

ATTESTED

ATTESTED

Web Site : www.pmdc.org.pk  
E-mail : pmdc@pmdc.org.pk



Call : 373-21-786

Fax : (021) 34106159

No. PF-3-H-2017 (Verification) 682688  
The Statutory Regulatory & Registration Authority for  
Medical & Dental Education and Practitioners

PAKISTAN  
MEDICAL & DENTAL COUNCIL  
G-10/4, Mauve Area,  
ISLAMABAD.

Dated 22<sup>nd</sup> March, 2017.

To,  
The District Health Officer  
Kohat

Annexure - G - 17

Subject; VERIFICATION OF PM&DC REGISTRATION

I am directed to refer your letter No 1231/PF dated 27th February 2017 regarding verification of PM&DC registration certificate in respect of the under mentioned doctor. As per PM&DC record their registration status is as under:-

S. No	Name	Father's Name	Reg. No	Remarks
1.	Waseem Ullah	Faqir Shah	14648-N	Valid

Thank you.

(Syed Masood Hussain Shah)  
Verification Officer

ATTESTED

ATTESTED

18

"Say No To Corruption"

No.PF.4576-20-7-2018 (Verification)/

Web Site : www.pmdc.org.pk  
E-mail : pmdc@pmdc.org.pk



The Statutory Regulatory & Registration Authority for  
Medical & Dental Education and Practitioners



PAKISTAN  
MEDICAL & DENTAL COUNCIL  
G-10/4, Mauve Area,  
ISLAMABAD

Dated: 23 July, 2018

UAN : 111-321-785  
Tel : (92 51) 9106151-54  
Fax : (92 51) 9106159

To,  
The District Health Officer  
Kohat  
Ph: 09229260336

SUBJECT: VERIFICATION OF PM&DC REGISTRATION

Dear Sir,

I am directed to refer your letter No. 4576/PF dated 11<sup>th</sup> July, 2018 on the subject cited above. It is informed that the verification of PM&D Registration No. 14648-N of Dr. Waseem Ullah Jan S/O Faqir Shah is verified & found correct on the Register of Medical Practitioner of PM&DC, Islamabad.

*BKb  
for record  
1*

*27/7/18*

ATTESTED  
*[Signature]*

*[Signature]*  
Assistant Registrar  
FBQ Section

ATTESTED  
*[Signature]*





GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Dated Peshawar May 26, 2017



Annexure - (I) - 19

**NOTIFICATION**

NO. SO(E)H-III/3-18/2017(1): In pursuance of clause (a) of sub-section 1 Section 3of the Khyber Pakhtunkhwa (Regularization of Services) Act, 2017. (Khyber Pakhtunkhwa Act No. VII of 2017), the following Medical Officers BS-17, appointed on Adhoc basis, shall stand regularized with immediate effect against the posts which they are holding at the time of commencement of the Act ibid.

S.#	Name of doctor	Present posting
<b>Charsadda</b>		
1.	Syed Shaharyar Shah S/O Dr. Syed Roidar Shah	DHQH Charsadda
2.	Faiqa Khan D/O Mohibullah Khan	DHQH Charsadda
3.	Mahwish Khan D/O Himayat Ullah Khan	DHQH Charsadda
4.	Rariaz Begum D/o Nisar Ahmad	DHQH Charsadda
5.	Rabia Munir D/O Munir Ahmad	DHQH Charsadda
6.	Harfa Sabir D/O Sabir Elahi	DHQH Charsadda
7.	Shumaila Raza D/o Anwar Shah	DHQH Charsadda
8.	Sidra Irshad D/O Muhammad Irshad	DHQH Charsadda
9.	Bibi Sabila D/O Muhammad Saleem	DHQH Charsadda
10.	Maryam Javid D/O Karam Javid	DHQH Charsadda
11.	Shah-e- Zahra D/O Muhammad Khalid Nohmand	DHQH Charsadda
12.	Fatima D/O Khair Ul Bashar	DHQH Charsadda

ATTESTED

Scanned by CamScanner

ATTESTED

		Haripur
304.	Tahir Ahmad Khan s/o Hussain Ahmad Khan	Attached to DHO Haripur
305.	Syeda Alla Tariq Banuri D/O Syed Muhammad Tariq banuri	Attached to DHO Haripur
306.	Najma Ayub D/O Ayub Khan	Attached to DHO Haripur
<b>Kohat</b>		
307.	Dr. Yawar Abbas S/o Mohammad Yousaf	Attached to DHO Kohat
308.	Dr. Najmush Shakireen S/o Intisham Ul Haq	Attached to DHO Kohat
309.	Dr. Khalid Khan S/o Sharooz Khan	Attached to DHO Kohat
310.	Dr. Mohammad Arif Zaman S/o Jannat Gul	Attached to DHO Kohat
311.	Dr. Yasir Mohammad S/o Qamar Zaman	Attached to DHO Kohat
312.	Dr. Shahid Iqbal S/o Noor Ul Haq	Attached to DHO Kohat
313.	Dr. Majid Usman S/o Usman Gul	Attached to DHO Kohat
314.	Dr. Fawad Ahmed S/o Ghafoor Khan	Attached to DHO Kohat
315.	Dr. Shoukat Mehmood S/o Rafi Uddin	Attached to DHO Kohat
316.	Dr. Syeda Gulbahar D/o Syed Ghafoor Shah	Attached to DHO Kohat
317.	Dr. Arshad Khan S/o Gul Rehman	Attached to DHO Kohat

20

Govt of Khyber Pakhtunkhwa  
Health Department

ATTESTED

*[Signature]*

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*[Signature]*

318.	Dr. Zohaib Shaukat S/o Shaukat Alam	Attached to DHO Kohat
319.	Dr. Misbahullah S/o Ghulam Rasool	Attached to DHO Kohat
320.	Dr. Nouman Ahmed S/o Gohar Zaman	Attached to DHO Kohat
321.	Dr. Kamran Kamal S/o Kamal Din	Attached to DHO Kohat
322.	Dr. Hassan Gul S/o Nasim Gul	Attached to DHO Kohat
323.	Dr. Latif ur Rehman S/o Haji Abdul Rashid Khan	Attached to DHO Kohat
324.	Dr. Kamran Ilahi Siddiqi S/o Aman Ilahi	Attached to DHO Kohat
325.	Dr. Irfanullah S/o Mir Hakim Khan	Attached to DHO Kohat
326.	Dr. Fakhre-e-Alam S/o Gul Akbar	Attached to DHO Kohat
327.	Dr. Aziz ur Rehman S/o Haji Gul Khan	Attached to DHO Kohat
328.	Dr. Mohammad Huzafa S/o Niaz Ur Rehman	Attached to DHO Kohat
329.	Dr. Abdul Wahab S/o Abdullah Jan	Attached to DHO Kohat
330.	Dr. Tanveer Abbas S/o Mohammad Zikria Khan	Attached to DHO Kohat
331.	Dr. M. Rafique Afridi S/o Abdul Khanan	Attached to DHO Kohat
332.	Dr. Shaukat Hussain S/o Afzal Mohammad	Attached to DHO Kohat
333.	Dr. Said Malook S/o Latif Khan	Attached to DHO Kohat

Copy of the list of  
 District Health Officer  
 Kohat

ATTESTED

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		Kohat
334.	Dr. Mohammad Altezaz S/o Mohammad Saeed	Attached to DHO Kohat
335.	Dr. Wasim Ullah Jan S/o Faqeer Shah	Attached to DHO Kohat
336.	Dr. Mohammad Jawad S/o Qasim Jan	Attached to DHO Kohat
337.	Dr. Abdus Samad Khan S/o Abdul Salam	Attached to DHO Kohat
338.	Dr. Maaz Bin Altaf S/o Altaf Hussain	Attached to DHO Kohat
339.	Dr. Sikandar Hayat S/o Gul Rehman	Attached to DHO Kohat
340.	Dr. Irfan Ali Shah S/o Fazal Khaliq	Attached to DHO Kohat
341.	Dr. Iqtidar Hussain S/o Syed Tahir Hussain	Attached to DHO Kohat
342.	Dr. Basit Hussain S/o Sibtain Hussain	Attached to DHO Kohat
343.	Dr. Muhammad Tanveer S/o Mohammad Arif	Attached to DHO Kohat
344.	Dr. Asad Khan S/o Ajab Khan	Attached to DHO Kohat
345.	Dr. Shah Jehan S/o Abdul Ghafoor	Attached to DHO Kohat
346.	Dr. Komal Alam D/o Jan Alam	Attached to DHO Kohat
347.	Dr. Kauser D/o Haji Jehangir	Attached to DHO Kohat
348.	Dr. Juvaria Wali D/o Wali Mohammad	Attached to DHO Kohat

(28)

←

(28)

334 to 348  
 Health Department  
 Kohat

ATTACHED

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*[Handwritten signature]*

Note:

1. The inter-se seniority of the doctors will be determined and notified separately.
2. The above mentioned candidates will be on probation for initial period one year extendable upto another one year, if not terminated in writing as envisaged in Rule 15 on Appointment, Promotion and Transfer Rules, 1989.


(40)

(23)

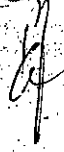
**SECRETARY HEALTH**

Endt No of even and date.

1. Accountant General, Khyber Pakhtunkhwa.
2. All Commissioners in Khyber Pakhtunkhwa.
3. Director General, Health Services, Khyber Pakhtunkhwa.
4. PSO to Chief Secretary, Khyber Pakhtunkhwa.
5. All Deputy Commissioners in Khyber Pakhtunkhwa.
6. All District Health Officers in Khyber Pakhtunkhwa.
7. All District Accounts Officers in Khyber Pakhtunkhwa.
8. All Medical Superintendent in Khyber Pakhtunkhwa.
9. Manager Printing Press, Khyber Pakhtunkhwa.
10. PS to Secretary Health, Khyber Pakhtunkhwa.

  
(Jibreel Raza)  
26.5.20  
Section Officer (E-II)  
Section Officer-II,  
Govt. of Khyber Pakhtunkhwa  
Health Department

ATTESTED



ATTESTED



To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject: APPLICATION FOR THE RELEASE OF SALARY OF JULY 2018

R/Sir,

Most respectfully it is stated that I have been appointed as Medical Office (BPS-17) in the year 2017 and presently working under the control of District Health office Kohat in Civil Hospital Sharkar Dara and since from the date of arrival I am perform my duties with full zeal. My service was regularized in 2017 through Regularization Act 2017. All of my whole document was verified from the concerned institution which was found correct. My salary has been stopped due to unknown reason from JULY 2018.

It is therefore, it is requested that my salary be release which has been stopped by the authorities for unknown reason. I shall be very thankful to you.

Date: 07-05-2018

Obediently Yours,

Dr. Wasim Ullah Jan  
Civil Hospital,  
o/o DHO, Kohat.

ATTESTED

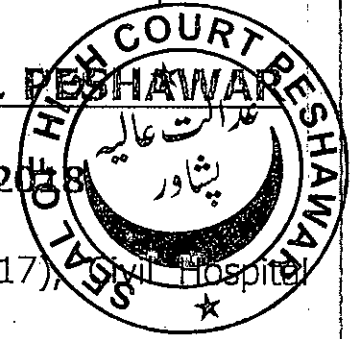
ATTESTED

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499 J-24  
Annexure - 24

**BEFORE THE PESHAWAR HIGH COURT, PESHAWAR**

WRIT PETITION NO. \_\_\_\_\_ /2018



1. Dr. Waseem Ullah Jan, Medical Officer (BPS-17), Civil Hospital Shakar Dara, District Kohat.
2. Dr. Tariq Khan, Medical Officer (BPS-17), Category-D Hospital, Agra, District Malakand.

..... PETITIONERS

**VERSUS**

- 1- The Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Accountant General, Fort Road, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Health Officer, District Kohat.
- 5- The District Health Officer, District Malakand.

.....RESPONDENTS

**WRIT PETITION UNDER ARTICLE-199 OF THE  
CONSTITUTION OF PAKISTAN 1973 AS  
AMENDED UP TO DATE**

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present writ petition are  
as under:-**

- 1- That petitioners were initially appointed as Medical Officers (BPS-17) on Adhoc Basis after proper recommendation of the Departmental Selection Committee and fulfilling of all the codal formalities required for the post vide notifications dated 12-01-2017 & 18-07-2016 respectively. Copies of the appointment orders are attached as annexure ..... **A & B.**

**ATTESTED**  
EXAMINER  
Peshawar High Court

- 2- That the petitioners were medically examined and were declared fit for Government job by the concerned medical superintendent of Police & General Hospital Peshawar. Copies of medical certificates are attached as annexure ..... **C & D.**

- 3- That petitioners submitted their arrival reports before the respondent No.1 in response to their appointment Notifications dated 12-01-2017 & 18-07-2016 and accordingly, the services of the petitioners were placed at the disposal of the respondent No.3&4 vide notifications dated 24-01-2017 and 29-07-2016

26

respectively and as such the petitioners submitted their arrivals before the respondent No.2&3. That subsequently the services of the petitioners were placed at the disposal of respondent No.3 & 4 respectively vide Notifications dated 01-02-2017 and 4.8.2016 respectively.

- 4- That later on the petitioner No.1 was posted at Civil Hospital Shakar Dara District Kohat while the petitioner No.2 was posted at Category-D Hospital Agra, District Malakand.
- 5- That, all the education testimonials of the petitioners were forwarded for verification from the concerned quarters/board according to Terms & Condition of the appointment which were received back and found correct/verified vide letters dated 22-03-2017, 23-07-2018, 23-09-2016, 18-10-2016 & 20-10-2016. Copy letters are attached as annexure as annexure ..... E & F.
- 6- That, with the promulgation of the Khyber Pakhtunkhwa (Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. VII of 2017) the services of the petitioners along with other colleagues were regularized vide notifications dated 26-05-2017 & 09-05-2017 respectively. Copies of the regularization Notifications are attached as annexure ..... G & H.
- 7- That, right from the date of initial appointment till date the petitioners performed their duties quite efficiently and up to the entire satisfaction of their superiors. That astonishingly the respondents stopped/withheld the salaries of the petitioner No.1 w.e.f. 1<sup>st</sup> July 2018 while that of the petitioner No.2 w.e.f. 1.4.2018 without any cogent reason.
- 8- That feeling aggrieved the petitioners filed Department Appeals for the release of their salaries but till date no response have been received so far. Copies of the Departmental Appeals are attached as annexure ..... I.
- 9- That petitioners having no other remedy but to file the instant petition on the following grounds amongst the others.

**GROUND:**

- A- That not releasing the monthly salaries of the petitioners by the respondents is against the law, facts and norms of natural justice.

**ATTESTED**  
EXAMINER  
Peshawar High Court

That, petitioners have not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the respondents acted in arbitrary and malafide manner by stopping the salaries of the petitioners without any reason and clear justification.
- D- That inaction of the respondents by not releasing the salaries of the petitioners clearly falls within the ambit of forced labour which is against the Article-11 of the Constitution of Islamic Republic of Pakistan 1973.
- E- That act of the respondents by stopping the salaries of the petitioners are against the dictum of the apex Supreme Court of Pakistan that enshrines that "Work done must be paid".
- F- That the petitioners have been discriminated by the respondents on the subject noted above and as such the inaction of the respondents by not releasing the monthly salaries of the petitioners is against the canons of justice.
- G- That all public powers are in the nature of a trust and public functionaries must act as repository to such trust. In the instant case, the respondents are under legal obligation to release the monthly salaries of the petitioners but inspite of that the respondents are not willing to do the same.
- H- That, petitioners seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this writ petitioner the inaction of the respondents by not releasing the monthly salaries of the petitioners may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondents may kindly be directed to released the monthly salaries of the petitioners w.e.f. 1.4.2018 till date. Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioners.

**Interim Relief:** That the respondents may kindly be directed that not to issue adverse order against the petitioners till the disposal of the instant writ petition.

PETITIONERS

*Waseem*  
Dr. Waseemullah Jan & Other

THROUGH:

*Noor*  
NOOR MOHAMMAD KHATTAK

**ATTESTED**  
EXAMINER  
Peshawar High Court

*Muhammad Maz Madni*  
MUHAMMAD MAZ MADNI  
ADVOCATES, PESHAWAR



**OFFICE OF THE  
DISTRICT HEALTH OFFICER  
KOHAT**

No. 2881 /PF,

Kohat dated the 18 /06/2019.

To,

Dr. Wasim Ullah Jan, MO.  
Civil Hospital Shakardara.

Subject: VERIFICATION OF PM & DC REGISTRATION.

MEMO:

Reference Director General, Health Services, Khyber Pakhtunkhwa, Peshawar letter No. 5209-21/E.1, dated 18/03/2019, on the subject noted above. Because of declaration of your PM & DC Registration No. 14648-N as fake, you are hereby directed to stop working as Medical Officer and leave the hospital immediately.

No. 2882-84 /PF,

Kohat dated the 18 /06/2019.

*[Signature]*  
District Health Officer  
KOHAT

*[Date]*  
18/6/2019

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Health Department, Peshawar for information & necessary action, please.
2. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar w/r to his No. referred to above.
3. The Medical Superintendent, Civil Hospital Shakardara with the direction for compliance vide letter under reference.

*[Signature]*  
District Health Officer  
KOHAT

*[Date]*  
18/6/2019

*attested*  
*[Signature]*

The Director General Health Services Department,  
Khyber Pakhtunkhwa, Peshawar

M-29

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED LETTER DATED 18.06.2019 WHEREBY THE APPELLANT HAS BEEN RELIEVED FROM THE POST OF MEDICAL OFFICER, CIVIL HOSPITAL SHAKARDAR, KOHAT WITHOUT ANY REASON AND THE AGAINST THE ILLEGAL STOPPAGE OF MONTHLY SALARIES W.E.F 1<sup>ST</sup> MARCH, 2018.**

Respected Sir,

That appellant is the employee of your good self-Department and is serving as Medical Officer efficiently. That during service the concerned authority withheld the monthly salaries of the appellant w.e.f 1<sup>st</sup> March, 2018 and the appellant preferred a Departmental appeal before your good self for the release of my salaries and subsequently filed writ petition No.4478-P/2018 before the Peshawar High Court, Peshawar. That during pendency of the above mentioned writ petition the appellant has been directed by the District Health Officer, District Kohat to stop working as Medical Officer and leave the hospital vide letter dated 18.06.2019 without any reason and clear justification. That the above mentioned writ petition of the appellant is still pending before the Peshawar High Court, Peshawar but the concerned DHO has been issued the above mentioned letter in violation of law and rules. That the appellant feeling aggrieved preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned letter dated 18.06.2019 may very kindly be set aside and the concerned authority be directed not to relieve the appellant from the post of Medical Officer, Civil Hospital Shakardara, District Kohat and the concerned authority be also directed to release the monthly salaries of the appellant w.e.f 1<sup>st</sup> March, 2018..

Dated: 09.07.2019.

APPELLANT

  
DR. WASEEM ULLAH JAN, M.O,  
Civil Hospital, Shakardar, District Kohat



Better copy of page-29

*JUDGMENT SHEET*

IN THE PESHAWAR HIGH COURT, PESHAWAR

JUDICIAL DEPARTMENT

Writ Petition No.44-P/2018 with LR with C.M NO.1592-P/2019

JUDGMENT

Date of hearing 09.06.2020

Petitioner (s) (Dr. Waseem Ullah Jan and Dr. Tariq Khan).

By Mr. Noor Mohammad Khattak, Advocate

ISHTIAQ IBRAHIM:- Dr. Waseemullah Jan and Dr. Tariq Khan, the petitioners have invoked the Constitutional Jurisdiction of this Court under Article-199 of the Constitution of Islamic Republic of Pakistan, 1973, praying for:

“It is therefore, most humbly prayed that on acceptance of this writ petition, the inaction of the respondents by not releasing the monthly salaries for the petitioners may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondents may kindly be directed to release the monthly salaries of the petitioners w.e.f. 01.04.2018 till date.

Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioners.

2. The grievance of the petitioners is that they have been appointed as Medical Officers vide Notifications dated 12.01.2007 and 18.07.2016 respectively; that on submitting their arrival reports, they joined their duties, that later on petitioner No.1 was posted at Civil Hospital Shakar Dara, District Kohat, while the petitioner No.2 was posted at category-D Hospital Agra, District Malakand, that respondents stopped/withheld their monthly salaries with effect from 01.04.2018 and 01.07.2018 respectively without any reason. That feeling aggrieved the petitioners filed departmental appeals before the competent authority for release of their salaries, but till date their appeals have not been decided by the competent authority.
3. The respondents were put on notice and they submitted their comments respectively.
4. Learned counsel for the petitioners argued the case at some length and it was brought into the notice of the Court that the petitioners have filed Departmental appeals before the director general health service Khyber Pakhtunkhwa Peshawar and that the same are still pending adjudication before the worthy secretary health.
5. The worthy AAG when confronted with the above situation he stated at the bar that the worthy secretary health, Khyber Pakhtunkhwa Peshawar will be decided the appeals of the petitioner within a fortnight positively, the learned counsel for the petitioner agreed with the statement of learned AAG rendered at the bar that departmental appeals of the petitioners be decided within one month positively.

6. keeping in view the above the writ petition disposed of with direction to the worthy secretary health department Khyber Pakhtunkhwa Peshawar to decided the departmental appeal s filed by the petitioners within one month positively.

Announced:

09-06-2020

JUDGMENT SHEET

IN THE PESHAWAR HIGH COURT, PESHAWAR.

JUDICIAL DEPARTMENT

Writ Petition No. 4172-P/2018 with I.R with C.M No. 1592-P/2018

JUDGMENT

Date of hearing 09-06-2020

Petitioner(s) Dr. Wasceemullah Jan and Dr. Tariq Khan  
By Mr. Noor Muhammad Khattak, Advocate

Respondent(s) Government of Khyber Pakhtunkhwa through Secretary  
Health Department, Peshawar and others.  
By Mr. Muzaffar V. Khan, AAG,  
C.M. No. 1592-P/2018 By Mr. Anwarul, Advocate.

MUHAMMAD BRAHMI-JR Dr. Wasceemullah Jan

That the petitioners mentioned, have come to this

constitutional jurisdiction of this Court under Article 199 of

the Constitution of Islamic Republic of Pakistan, 1973, praying

*That, therefore, most humbly prayed that on acceptance of  
this writ petition, the inaction of the respondents by not  
releasing the monthly salaries of the petitioners may be  
declared as illegal, unconstitutional and ineffective upon the  
rights of the petitioners. That the respondents may kindly be  
directed to release the monthly salaries of the petitioners  
from 01/04/2018 till date.*

*and other reliefs which this august Court deems  
fit and proper to be granted in favour of the petitioners.*

The substance of the petitioners is that they were being

deprived of their salaries. Officers vide Notifications dated

10/12/17 and 15/12/16 respectively that on various

ATTESTED

their arrival reports, they joined their duties; that later on petitioner No.1 was posted at Civil Hospital Shakar Dara, District Kohat, while petitioner No.2 was posted at category-D Hospital Agra, District Malakand; that respondents stopped/withheld their monthly salaries with effect from 01.04.2018 and 01.07.2018 respectively without any reason; that feeling aggrieved the petitioners filed Departmental Appeals before the competent authority for release of their salaries, but till date their appeals have not been decided by the competent authority.

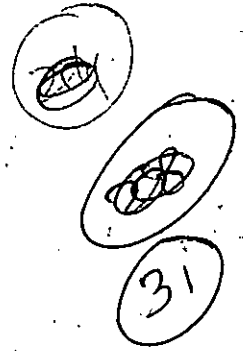
3. The respondents were put on notice and they submitted their comments respectively.

4. Learned counsel for the petitioners argued the case at some length and it was brought into the notice of the Court that the petitioners have filed Departmental Appeals before the Director- General Health Services, Khyber Pakhtunkhwa Peshawar and that the same are still pending adjudication before the worthy Secretary Health.

**ATTESTED**

**ATTESTED**

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5. The worthy AAG when confronted with the above situation, he stated at the bar that the worthy Secretary Health, Khyber Pakhtunkhwa, Peshawar, will decide the appeals of the petitioners within a fortnight positively. The learned counsel for the petitioners agreed with the statement of learned AAG rendered at the bar that the departmental appeals of the petitioners be decided within one month positively.

①  
②  
③  
32

6. Keeping in view the above, the writ petition is disposed of with direction to the worthy Secretary Health Department, Khyber Pakhtunkhwa, Peshawar, to decide the Departmental Appeals filed by the petitioners within one month positively.

Announced:  
Dated: 09.06.2020.

JUDGE  
JUDGE

(D.B)  
Hon'ble Mr. Justice Ishtiaq Ibrahim,  
Hon'ble Mr. Justice Muhammad Naeem Anwar.

(LAWYER)

*[Signature]*  
20-1  
SECTION  
15-11-2020

No. 37713  
Date of Filing  
Name of Applicant  
Caption  
Title  
Date of the  
Date of the  
Received by

TESTED

*[Signature]*

**VAKALATNAMA**

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

\_\_\_\_\_ OF 2020

Dr. Mussem Ullah Jan (APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Health Deptt (RESPONDENT)  
(DEFENDANT)

I/We Dr. Mussem Ullah Jan  
Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2020

Dr. Mussem Ullah Jan  
\_\_\_\_\_  
**CLIENT**

Noor Mohammad Khattak  
\_\_\_\_\_  
**ACCEPTED**  
**NOOR MOHAMMAD KHATTAK**

Kamran Khan  
\_\_\_\_\_  
**KAMRAN KHAN**

Mir Zaman Safi  
\_\_\_\_\_  
**MIR ZAMAN SAFI**

Afrasiab Khan Wazir  
\_\_\_\_\_  
**&**  
**AFRASIAB KHAN WAZIR**  
**ADVOCATES**

OFFICE:  
Flat No.4, 2<sup>nd</sup> Floor, Juma Khan  
Plaza, near FATA Secretariat,  
Warsak Road, Peshawar.  
Mobile No.0345-9383141

DBD 2/11

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

**SERVICE APPEAL NO. 11952/2020**

Dr. Waseem Ullah Jan.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa & others .....Respondents

**Index**

<b>S. No.</b>	<b>Description</b>	<b>Annexure</b>	<b>Pages No.</b>
1	Comments		1-3
2	PM&DC letter dated 17/09/2018	A	4-6
3	PM&DC certificate of full medical registration	B	5
4	Doctor Details	C	6

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

**SERVICE APPEAL NO. 11952/2020**


Dr. Waseem Ullah Jan.. ---- **Appellant**

**Versus**


Government of Khyber Pakhtunkhwa & others.... **Respondents.**


**Affidavit**

I, Jaffar Ali Assistant (Litigation Section), office of the Director General Health Services, Khyber Pakhtunkhwa, Peshawar, under the directions of the Competent Authority, do hereby solemnly affirm that the contents of the parawise Comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court.

  
**Deponent**

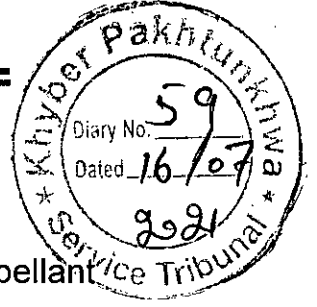
Identified by:

  
Addl: Advocate General  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

  
Additional Advocate General  
Khyber Pakhtunkhwa  
Service Tribunal Peshawar



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



**APPEAL NO. 11982 / 2020**

Dr. Waseem Ullah Jan.....Appellant

Versus

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

**PARA WISE COMMENTS ON BEHALF OF RESPONDENTS**

**Respectfully Sheweth;**

**Preliminary objections**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has got no locus standi to file the instant appeal.
3. That the appellant has not come to this Honorable Tribunal with clean hands and concealed the material facts before this Hon'ble Tribunal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has been estopped by his own conduct to file the instant appeal as he himself provided FAKE/BOGUS registration certificate at the time of apply for appointment.
6. That the appellant has got appointment on the basis of fake/bogus registration certificate, hence, does not create any right in favor of the appellant.
7. That the impugned order dated 06.03.2020 is not a final order hence the appeal is not maintainable under section-4 of the Khyber Pakhtunkhwa Tribunal Act 1974.
8. That the appeal is bad for non joinder of necessary parties and mis joinder of unnecessary parties.
9. That the appellant is not a Civil Servant, hence this Honorable Tribunal has got no jurisdiction.

**ON FACTS:**

1. Pertains to record.
2. Pertains to record.
3. Pertains to record.
4. Pertains to record.
5. Pertains to record. However, it is pertinent to mention here that:

- The qualification of all doctors appointed on Adhoc basis was sent to PMDC Authority Islamabad for verification vide letter No. SO(E)H-II/10-50/2018 dated 10.08.2018. In turn, the concerned authority submitted report vide letter dated 17.09.2018 wherein the PMDC Certificate of the appellant was marked as FAKE at S. No. 32 at **Annex-A**.
- Furthermore, at the time of appointment, the appellant submitted PMDC Certificate with registration No. 14648-N dated 25.08.2014 at **Annex-B**. When the said number was checked online, it was found that the registration No. 14648-N was issued to another doctor namely Asif Siddiqui s/o Muhammad Khalid on 12.23.2008 at **Annex-C**, which means the appellant misguided the department and got appointment on the basis of a fake/bogus certificate which leads forgery on part of the appellant.
- It is further added that as per report of PMDC Authority, the verification documents attached with the instant appeal stand fake/bogus.

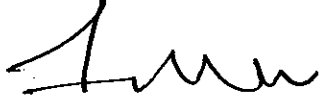
6. Pertains to record.
7. Pertains to record. However, it is stated that as per report of PMDC Authority, the PMDC Certificate of the appellant was marks as FAKE which can be seen at S. No. 32.
8. Pertains to record.
9. No comments being formal.

**ON GROUNDS:**


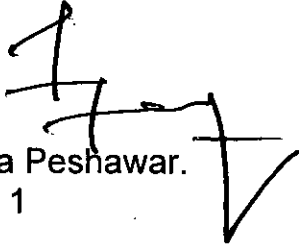
- A. Incorrect, as per rules, the salary is released after verification of documents. In this regard, the PMDC certificate of the appellant was sent to concerned authority for verification was marked as FAKE and committed forgery, therefore, as per law, he is not entitled for salary.
- B. Incorrect, the act of the Respondent is according to the prevailing law and rules as often the salary is issued after verification of documents. Hence, the appellant was treated as per prevailing rules.
- C. Incorrect, as explained in para-A & B above.
- D. Incorrect, the respondents have not violated the Article 11 of Constitution of Pakistan as the appellant was treated as per prevailing rules.
- E. Incorrect, as explained in para A & B above.
- F. Incorrect, on the basis of FAKE /BOGUS PMDC Certificate, the appellant is not entitled for salary.
- G. Incorrect, as explained in above paras.
- H. Pertains to record.
- I. No comments being formal.

**PRAYER**

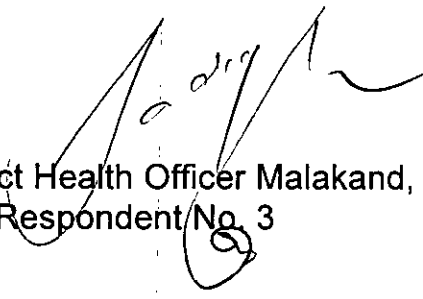
As the appeal is devoid of merits and has no legal footings, therefore, it is most humbly prayed that the instant appeal may please be dismissed with cost.



Secretary Health,  
Govt. of Khyber Pakhtunkhwa Peshawar.  
Respondent No. 1



Director General Health Services,  
Khyber Pakhtunkhwa Peshawar.  
Respondent No. 2



District Health Officer Malakand,  
Respondent No. 3

NO.PF.2-H-2018 (Verification)/3941

The Statutory Regulatory & Registration Authority for  
Medical & Dental Education and Practitioners

PAKISTAN  
MEDICAL & DENTAL COUNCIL

G-10/4, Mauve Area,  
ISLAMABAD.

Dated: 17<sup>th</sup> September, 2018.

321-796  
(1) 9138151-54  
(1) 9138159

Section Officer (E-II)  
Govt. Member Pakhtunkhwa  
Health Department  
Peshawar.

SUBJECT: VERIFICATION OF PM&DC.

Sir,

Reference to letter No. SO (E) H-11/10-50/2018 (PMDC Verification), dated 10-09-2018, regarding verification of the following persons details are as under.

S. No	Name and Father Name of Person	Registration Status	Remarks
1.	Muhammad Aqub S/o Muhammad Anwar	Fake	Not issued by PM&DC. The Copy of registration certificate attached with your letter is fake/Bogus.
2.	Wajid.Ali Shah S/o Feroz Shah	Fake	Not issued by PM&DC. The Copy of registration certificate attached with your letter is fake/Bogus.
3.	Muhammad Haroon Khan S/o Muhammad Aqub	Fake	PM&DC has already informed the concerned DHO, Haripur vide PM&DC letter No. PF.2-H-2017(Verification)/448 dated 20 <sup>th</sup> July, 2017, M.S. DHQ Hospital, Charsadda vide PM&DC letter No. PF.2-H-2017(Verification)/2903 dated 07 <sup>th</sup> May, 2018, informed to Deputy Director (HRM), Director General Health Services, KPK, Peshawar vide PM&DC letter No. PF.2-H-2017(Verification)/3250 dated 12 <sup>th</sup> June, 2018, Deputy Director (HRM), Director General Health Services, KPK, Peshawar vide PM&DC letter No. PF.2-H-2017(Verification)/3337 dated 28 <sup>th</sup> June, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.

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18/9/18

Page 1 of 5

18/9/18

Page 7

15/1/10

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<p>Issued by PM&amp;DC and after that PM&amp;DC canceled his registration certificate wide PM&amp;DC letter No. F.1-1/2010(Reg. Off)/161448 dated 14<sup>th</sup> April, 2010 (Copy enclosed). PM&amp;DC letter No. F.1-1/2010(Reg. Sec.)/173713 dated 18<sup>th</sup> June, 2010 (Copy enclosed). Furthermore he applied for recognition of his postgraduate qualification and his postgraduate qualification is rejected based on verification PM&amp;DC letter No. (FBO)-August, 2018 (Copy enclosed).</p> <p>Issued by PM&amp;DC and Valid upto 31-12-2019</p>	<p>6000-N Fate P.C</p>	<p>5. Sajjad Ali S/o Muhammad Khan Subhan Ullah S/o Amir Sher</p>	<p>PM&amp;DC has already informed the concerned DHO, Swabi wide PM&amp;DC letter No. PF-2-H-2017(Verification)/3446 dated 10<sup>th</sup> July, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.</p>	<p>Fake</p>	<p>6. Muhammad Khan S/o Amir Sher</p>
<p>PM&amp;DC has already informed to the concerned DHO, Swabi wide PM&amp;DC letter No. PF-2-H-2017(Verification)/3446 dated 10<sup>th</sup> July, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.</p>	<p>Fake</p>	<p>7. Faz Ahmad S/o Shams Khan</p>	<p>PM&amp;DC has already informed to the concerned DHO, Swabi wide PM&amp;DC letter No. PF-2-H-2017(Verification)/3446 dated 10<sup>th</sup> July, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.</p>	<p>Fake</p>	<p>8. Ashraf Ahmad S/o Shams Khan</p>
<p>PM&amp;DC has already informed to the concerned DHO, Lower Dir wide PM&amp;DC letter No. PF-2-H-2017(Verification)/446 dated 20<sup>th</sup> July, 2017, DHO District Swat at Gulakada wide PM&amp;DC letter No. PF-2-H-2017(Verification)/2902 dated 07<sup>th</sup> May, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.</p>	<p>Fake</p>	<p>9. Aqsa Ashraf S/o Chaudary Muhammad Ashraf</p>	<p>PM&amp;DC has already informed to the concerned DHO, District Swat at Gulakada wide PM&amp;DC letter No. PF-2-H-2017(Verification)/2902 dated 07<sup>th</sup> May, 2018 (Copy enclosed). The Copy of registration certificate attached with your letter is fake/Bogus.</p>	<p>Fake</p>	<p>10. Wager Ahmad S/o Aziz Ahmad</p>
<p>PM&amp;DC has already informed to the concerned DHO, District Swat at Gulakada wide PM&amp;DC letter No. PF-2-H-2017(Verification)/2892 dated 04<sup>th</sup> May, 2018, DHO, District Swat at Gulakada wide PM&amp;DC letter No. PF-2-H-</p>	<p>Fake</p>	<p>11. Mehar Khan S/o Sher Badar Khan</p>			

Headmaster  
Haji Wajid

and Ahmad

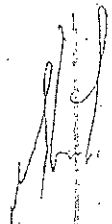

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Muhammad Rizaz S/o Mir Ahmad	Genuine	Issued by PM&DC and Valid upto 31-12-2020.
Mian Said Zada S/o Faqr Said	Genuine	Issued by PM&DC. The registration of Dr. Mian Said Zada is not valid at present and to practice Medicine & Dentistry without a valid PM&DC registration is not legal. He may be requested to get his PM&DC registration renewed immediately.
32. Waseem Gh. S/o Faqr Shah	Fake	Not issued by PM&DC. The Copy of registration certificate attached with your letter is fake/Bogus.
33. Muhammad S/o Abdul Jalil	Fake	Not issued by PM&DC. The Copy of registration certificate attached with your letter is Bogus/Fictitious/Fabricated.

Page 6 of 6

Furthermore, the record available at PM&DC was check and it is confirmed that the names mentioned in S.No. 1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33 are not registered as medical practitioner in PM&DC and their names are not exist in the database of PM&DC neither PM&DC has issued any registration certificate to them.

You are requested to take action accordingly.  
This is issued with the approval of Acting Registrar.

  
(Syed Masood Hussain Shah)  
Verification Officer  


Cc:

1. Health Care Commission, Deans Trade Center Ff-01, Peshawar Saddar KPK, Peshawar
2. P.S. to Registrar PM&DC.
3. NEB Section PM&DC.
4. Legal Section PM&DC.

# PAKISTAN MEDICAL & DENTAL COUNCIL

G-10/4, Malive Area, Islamabad.  
Website : www.pmdc.org.pk



## CERTIFICATE OF FULL MEDICAL REGISTRATION

Registration Number : 14648-N  
 Name : WASIM ULLAH  
 Father Name : FAQIR SHAH  
 Present Address : ACHEENI PAYAN POST OFFICE, UNIVERSITY PESHAWAR  
 Permanent Address : ACHEENI PAYAN POST OFFICE, UNIVERSITY PESHAWAR  
 Registration Date : 25-08-2014 Name Retained Upto 24-08-2024



<b>Qualification &amp; Date</b>	<b>Institute/University</b>	<b>Year</b>
1.M.D (BASIC MEDICAL QUALIFICATION)	KYRGYZ REPUBLIC	2006

\*\*\*\*\*

### Remarks

*Handwritten signature*  
 is equivalent to MBBS (PAK) but should not write MBBS (PAK) with his name in any form.

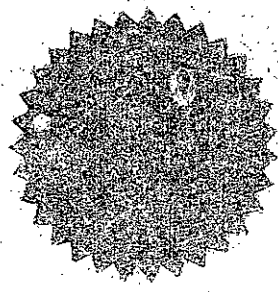
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**Engr. FAKHRI ALAM**  
 Assistant Director Irrigation Deptt.  
 Khyber Pakhtunkhwa, Peshawar.

**It is hereby certified** that the above is a true copy of the entries in the Register of Medical Practitioners (Part-A) in respect of the medical practitioner specified therein. He/she is authorised to practice Basic Medicine, Surgery, Obstetrics & Gynaecology, Ophthalmology and Otorhinolaryngology and will be considered a specialist of the level mentioned and in the field of which any additional postgraduate qualification is registered herein.

### IMPORTANT NOTICE:

- The Registered Medical Practitioner should apply for revalidation of this certificate/retention of his/her name on the medical register three months before the date of retention expires.
- Every Registered Medical Practitioner should be careful to send to the Registrar immediate notice within 30 days of any change in his/her address and also to answer enquiries that may be sent to him/her by the Registrar in regard thereto in order that his/her correct address may be duly inserted otherwise such practitioner is liable to have his/her name removed from the Register.
- PM&DC shall maintain your name in the register of medical practitioners only till the date of retention mentioned on this certificate. Further retention will only be possible on payment of prescribed fee.
- A copy of this certificate has to be displayed prominently in the place of practice.
- The issuing Authority reserves the right to recall, correct or cancel this certificate.



*Handwritten signature*  
**REGISTRAR**

SEARCH AGAIN

Passion**Doctor Details**

**Registration No.** 14648-N  
**Full Name** ASIF SIDDIQUE  
**Father Name** MUHAMMAD KHALID  
**Registration Type** PROVISIONAL  
**Status** SUSPENDED  
**Issue Date** 12/23/2008  
**License Valid Upto** 12/22/2010

**Qualification**

Sr No	Qualification	Speciality	University	Passing Year
1	M.D.	BASIC MEDICAL QUALIFICATION	KYRGYZ REPUBLIC	2006

Note: In case of any incorrect information please contact at [info@pmc.gov.pk](mailto:info@pmc.gov.pk)

**IMPORTANT EMAILS**

For General Queries

Email: [info@pmc.gov.pk](mailto:info@pmc.gov.pk)

For Credentials Verification Correspondence with GMC UK and Other Regulators, ECFMG, EPIC, Data Flow,

Email: [credentialing@pmc.gov.pk](mailto:credentialing@pmc.gov.pk)

For Credentials Verification within Pakistan

Email: [verification@pmc.gov.pk](mailto:verification@pmc.gov.pk)

For Questions Regarding manual Licensing Applications

Email: [licensing@pmc.gov.pk](mailto:licensing@pmc.gov.pk)

For Questions Regarding Online Licensing Applications



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO .11952/2020

Dr.Waseem Ullah Jan.....Appellant.

V/S

Government of Khyber Pakhtunkhwa, through Secretary,  
Health, Peshawar & others.....Respondents.

(Reply on behalf of respondent No. 3)

**Respectfully Sheweth:-**

**Para :- 1 to 9**

Being an administrative matter, the issue relates to other Respondents. And they are in a better position to redress the grievances of the Appellant. Besides the Appellant has raised no grievances against Respondent No.03.

It is Pertinent to mention here that the appellant was appointed and is working in District Kohat as mentioned in Para 3 & 4 of the instant appeal. Hence the name of Respondent No.4 i.e District Accounts Officer Malakand is incorrect.

It is further Pertinent to mention here that the letter No.2281/PF, dated: 18/06/2019 issued by the District Health officer kohat addressed to the appellant is very much clear and needs no interference under the rules.

Keeping in view the above mentioned facts it is, humbly prayed that the appellant is required to approach to DHO Kohat for the satisfaction of his grievances and appeal in hand having no merits may be dismissed with cost.

  
ACCOUNTANT GENERAL  
KHYBER PAKHTUNKHWA