## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Civil Misc Application No	/ 2013
In Constitution of Service Appea	al No. 7413/2021
Dr. Mohammad Shoaib Khan S/o Ismail Khel Surrani, Tehsil and I	o Sher Nawaz Khan R/o Village Pal District Bannu
	Appellant
VEF	RSUS
	0.04

The Secretary Health Khyber Pakhtunkhwa Peshawar & Others.

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S.No.	Description of documents	Annexure	Pages
1.	CM and Affidavit		1-3
2.	Copy of Notification No 961/Estb/Promotion/BMC/2022 dated 28.11.2022	A	3
3.	Wakalat Nama		

Dated 22/05/2023

1

Appellant

Through (Israr Ul Haq)

Advocate High Court Bannu

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. [Kfryther Pakshtulkfry Service Endingman]

Civ	vil Misc Application No	/ 2013	27 from 10 10 546
In C	Constitution of Service Appeal No. 7413/	2021	Date: 22/5
Dr. Khe	. Mohammad Shoaib Khan S/o Sher Nawa nel Surrani, Tehsil and District Bannu	az Khan R/o`	
2. 3. 4.	VERSUS The Govt of Khyber Pakhtunkhwa throug Pakhtunkhwa Peshawar. The Secretary Health Department Khyber The Secretary Finance Department Khyb The Chairman Finance Department Khyb Dean Bannu Medical College, Bannu.	r Pakhtunkhv er Pakhtunkh oer Pakhtunk	wa Peshawar. nwa Peshawar. hwa Peshawar.
	·	R	lespondents

# SUBJECT: CIVIL MISSCELLASNEOUS APPLICATION WITH HUMBLY REQUEST NECESSARY AMENDMENTS IN PRAYER OF TRIBUNAL APPEAL 7413 OF 2021, INDISPENSIBLE FOR JUST DECISION OF THE CASE.

#### Respectfully Sheweth:-

- 1. That the appellant has instituted the above titled Tribunal Appeal before this Tribunal which is still pending adjudication.
- 2. That, after filling the instant appeal, the respondents No. 4 and 5 constituted a Departmental Promotion Committee (DPC) for promoting the deserving doctors and as such the appellant was promoted to the post of Associate Professor of Surgery (BPS-19) vide Notification No. 961/Estb/Promotion/BMC/2022 dated 28.11.2022.

- H-

(Copy of Notification No 961/Estb/Promotion/BMC/2022 dated 28.11.2022 is annexed "A).

Since grievance of appellant to the extent of "Prayer No. 1: of the appeal, has been addressed.

It is therefore, most humbly requested that the same may

kindly be considered deleted and obliged.

Dated 22/05/2023

Through

(Israr Ul Haq)

Advocate High Court Bannu

#### Certificate

This is to certify that no such petition has been filed earlier before any other forum and that the assertions of this petition are true and correct.

(Israr Ul Haq)
Advocate High Court Bannu

#### **AFFIDAVIT**

I, do hereby solemnly affirm and declare that contents of instant application are true and correct to the best of my knowledge and belief as conveyed to be my client and that nothing has been kept concealed from this Honourable Court.

Appellant

Through Counsel

(Israr Ul Haq)

Advocate High Court Bannu



#### OFFICE OF THE DEAN/CHIEF EXECUTIVE OFFICER BANNU MEDICAL COLLEGE MTI BANNU

Khyber Pakhtunkhwa, Pakistan

Phone: 0928-9270356, Fax: 0928-9270358



#### NOTIFICATION

Consequent upon the recommendations of Committee of MTI, Bannu in its meeting held on 16/11/2022 at BMC vide letter No. 927/Estb/Promotion /BMC/2022 dated 16/11/2022 and approval of the Chairman Board of Governors MTI, Bannu vide letter No. MTI, BXU)BOG/300-2022 dated 28/11/2022, the undersigned is pleased to promote the following Faculty members, (Civil Scrvants) of Bannu Medical College Bannu with immediate effect against the vacant posts.

S.No	Name	From	To
1	Dr. Abdul Ghafoor Khan	Associate Professor of Surgery BPS-19	Professor of Surgery BPS-20
2	Dr. Muhammad Sajjad	Associate Professor of Pathology BPS-19	Professor of Pathology BPS-20
3	Dr. Muhammad Akram	Associate Professor of Community Medicine BPS-19	Professor of Community Medicine BPS-20
4	Dr. Anwar Shah	Associate Professor of Neuro Surgery BPS-19	Professor of Neuro
5	Dr. Hidayatullah Mehsood	Associate Professor of Ophthalmology BPS-19	Surgery BPS-20 Professor of Ophthalmology BPS- 20
6	Dr. Dost Muhammad Khan	Associate Professor of Anatomy BPS-19	Professor of Anatomy BPS-20
7	Dr. Naimatullah	Assistant Professor of Dermatology BPS-18	Associate Professor of Dermatology BPS-19
8	Dr. Muhammad Shoaib Khan	Assistant Professor of Surgery BPS-18	Associate Professor of Surgery BPS-19

They will be on probation for a period of one year from the date of charge

assumption.

Dean/Chief Executive Officer

Bannu Medical College

Dated 28/11/2022

No. 961/Estb/Promotion/BMC/2022

#### Copy forwarded to the:

- Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar Chairman Policy Board MTIs Khyber Pakhtunkhwa Peshawar
- Chairman Board of Governors MTI Bannu
- All the Members of Board of Governors MTI, Bannu
- Chairman Promotion Committee of MTI Bannu
- Hospital Director, MTI Bannu
- Medical Director MTI, Bannu
- Director Finance MTI, Bannu
- Additional Hospital Directors DHQTH/W&CTH MTI, Bannu
- P.S to Minister Heath Govt. of Khyber Pakhtunkhwa Peshawar
- Secretary to BOG, MTI Bannu
- Deputy Director HR, MTI Bannu
- Accounts Officer, BMC MTI Bannu
- Office File

Dean/Chief Executive Officer

Bannu Medical College Bannu

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### باعث تحربرة نكه

مقدمہ مندرجہ بالاعنوان بالا میں اپی طرف سے بسلسلہ پیروی ، جواب وہی وکل کاروائی متعلقان مقام ۔۔۔۔۔۔ کے لئے اسر ارالحق ایڈ ووکیٹ ہائی کورٹ مقرر کرکے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کائل اختیار ہوگا۔ نیز وکس صاحب کو راضی نامہ ، مقرر خالث وفیصلہ برحلف جواب وہی اور اقبال دعویٰ اور بصورت وگری اجراء، وصولی چیک روپیداوردوی و دو رفواست برحم کی تصدیق زر پر و خظ کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا وگری کی طرفہ یا برآ مدگی ایبل اور منسوقی وائر کرنے ایبل گرانی و نظر جانی اور پیروی کرنے کا اختیار حاصل ہوگا۔ بصورت ضرورت مقدمہ فیکورہ کی کل یا برزوی کا روائی کے واسطے کسی اور وکیل یا مختیار قانونی کو اینے ہمراہ اپنی جگہ تقر رکا اختیار ہوگا ور دوران مقدمہ میں جو اور فیکورہ بالا اختیارات حاصل ہوئے۔ اور اس کا ساختہ پرواختہ بھی منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجاندالتوائے مقدمہ کے سبب ہوتو و کیل صاحب ہیروی مقدمہ فیکورہ کے بابند خرچہ و ہرجاندالتوائے مقدمہ فیکورہ کی بابند و بیروی مقدمہ فیکورہ کے بابند بردی سے مقدمہ فیکورہ کی بابند و بیروی مقدمہ فیکورہ کی بابند ہوئے اور اور اور اللہ و نظیرہ کی بناء پروی مقدمہ فیکورہ کے بابند ہوئے اور اور اور اس کی وہ اپنی کو بیٹ کے مقدم نے اس کے اور اور اس کی وہ اپنی کو اتھیں کو بیانی فیس کی واپسی کا نقاضا نہیں کریگے۔مقدمون و کالت نامہ من اور سمجھ کر کھ دیا ہے تا کے سند رہے۔ بیروی مقدمہ فیس کی واپسی کا نقاضا نہیں کریگے۔مقدمون و کالت نامہ من اور سمجھ کر کھ دیا ہے تا کے سند رہے۔ المرقوم ماہ

اسرارالحق ایدووکیٹ ہائی کورٹ



#### KHYBER PAKHTUNKHWA BAR COUNCIL

ISRAR-UL-HAQ

Advocate bc-09-0197 Date of issue: Januar

Date of issue: January 2020 Valid upto: January 2023





العبد گواه شد دالمرع شهباعال ) بیسری

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