

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Civil Misc Application No _____ / 2013

In Constitution of Service Appeal No. 7413/2021

Dr. Mohammad Shoaib Khan S/o Sher Nawaz Khan R/o Village Pak
Ismail Khel Surrani, Tehsil and District Bannu

..... Appellant

VERSUS

The Secretary Health Khyber Pakhtunkhwa Peshawar & Others.

INDEX

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

Through


Appellant

(Israr Ul Haq)

Advocate High Court Bannu

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Civil Misc Application No _____ / 2013

Khyber Pakhtunkhwa
Service Tribunal

Case No. 5469

In Constitution of Service Appeal No. 7413/2021

Date: 22/5/2023

Dr. Mohammad Shoaib Khan S/o Sher Nawaz Khan R/o Village Pak Ismail
Khel Surrani, Tehsil and District Bannu

..... Appellant

VERSUS

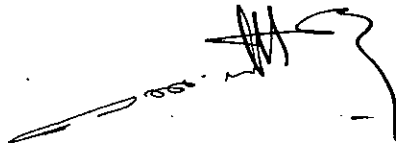
1. The Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Secretary Health Department Khyber Pakhtunkhwa Peshawar.
3. The Secretary Finance Department Khyber Pakhtunkhwa Peshawar.
4. The Chairman Finance Department Khyber Pakhtunkhwa Peshawar.
5. Dean Bannu Medical College, Bannu.

..... Respondents

SUBJECT: CIVIL MISCELLANEOUS 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.


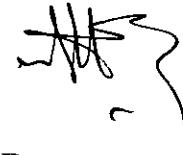


(Copy of Notification No 961/Estb/Promotion/BMC/2022 dated 28.11.2022 is annexed "A").

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

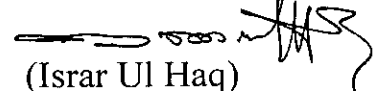
It is therefore, most humbly requested that the same may kindly be considered deleted and obliged.

Dated 22/05/2023

Through 
Appellant 
(Israr Ul Haq)
Advocate High Court Bannu


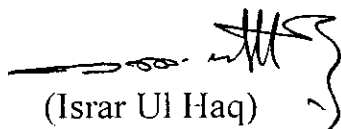
Certificate

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

Amir

A
3

NOTIFICATION

Consequent upon the recommendations of the Promotion 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 Servants) 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 Surgery BPS-20
5	Dr. Hidayatullah Mehsood	Associate Professor of Ophthalmology BPS-19	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.

Advo. Amir

Shahidi

Dean/Chief Executive Officer
Bannu Medical College
Bannu

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 Health 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

