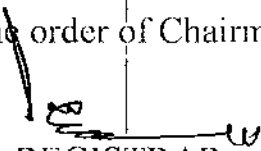


FORM OF ORDER SHEET

Court of _____

Case No.- 375 /2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/02/2023	<p>The appeal of Mr. Abdur Rehman resubmitted today by registered Post through Mr. Khalid Mehmood Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____. Notices be issued to the appellant and his counsel for the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Abdur Rehman C.T Pulmonology DHQ Hospital Wana received today i.e. on 16.02 2023 is incomplete on the following score which is returned to the counsel for the appellent for completion and resubmission within 15 days.

- 1- Addresses of respondents no. 5 to 7 are-incomplete which may be completed according to Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal are unattested.
- 3- Page nos. 15, 17, 18, 25 & 26 of the appeal are illegible which may be replaced by legible/better one.

No. 609 /S.T.

Dt. 17/2 /2023


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Khalid Mehmood Adv.
High Court D.I.Khan.

objections removed &

Return for N/A



Khalid Mahmood
AHC

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 375 of 2023

Abdur Rehman

Appellant

Versus


Government of K.P.K through
Secretary Health Department
and others

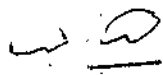
Respondents

INDEX

S. No.	Description of documents	Annexures	Page #
1	Grounds of Appeal		1-9
2	Affidavit		10
3	Copy of appointment order dated 09.7.1983	'A'	11
4	Copies of Notification dated 10.5.2006 and relevant page of seniority list of paramedics	'B & C'	12-16
5	Copy of Notification dated 09.5.2012	'D'	17-18
6	Copy of detail of Vacant posts Seniority list in BPS-16	'E'	19-24
7	Copy of Departmental appeal	'F'	25-26
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Dt. 8/2/2023


Yours humble Appellant
Through Counsel


Khalid Mehmood
Advocate High Court

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 375 of 2023

Abdur Rehman, posted at C.T Pulmonology (BPS-12),
DHQ Hospital Wana/SWID resided at Hashmi Town,
Grid Road, D.I.Khan.

Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Government of Khyber Pakhtunkhwa Health Department, Peshawar.
2. Secretary, Government of Khyber Pakhtunkhwa Health Department, Peshawar.
3. The Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
4. The Director General, Health Services, Khyber Pakhtunkhwa (erstwhile FATA) Peshawar.
5. The Agency Surgeon, SWTD.
6. Mr. Khalid Noor son of Said Manoor, presently posted as DHS, SWTD
7. Muhammad Shoaib son of Rahimullah, presently posted as LRH, Peshawar.

Alleged
2/2

Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 WITH THE PRAYER THAT INACTION OF
RESPONDENTS DEPRIVING THE APPELLANT
FROM PROMOTION/UP-GRADATION IN BPS-16,
BPS-17 & BPS-18 BEING MOST SENIOR AS
COMPARE TO OTHER PARAMEDICS MAY PLEASE

BE DECLARED AS ILLEGAL, INVALID, VOID AB
INITIO, CORUM NON IUDICE AND THE
VESTED/VALUABLE RIGHTS OF THE APPELLANT.

PRAYER IN APPEAL

On acceptance of this appeal, this Hon'ble Tribunal may kindly be pleased to direct the respondents to act in accordance with Law, Policy, Rules and principle of equity by directing the respondents to grant the appellant his due right of up-gradation retrospectively and in compliance to the actual seniority list, the appellant may please be up-graded as Chief Clinical Technician (Pulmonology) or Pulmonologist from the date when others (Mr. Khalid Noor and Muhammad Shoab, most junior to the petitioner) were given the same status/cadre and selected as regular Chief Clinical Technician with all back benefits and the very act of respondents not to award up-gradation in BPS-16, BPS-17 & BPS-18 to the appellant being most senior as compare to the other paramedics may be declared as illegal ab initio, corum non iudice and of no legal effects upon the rights of the petitioner. Any other relief as deemed appropriate in the circumstances of case not specifically asked for may also be granted to petitioner.

Note:- Addresses given above shall suffice the object of service

Respectfully Sheweth,

The appellant prefers the instant appeal on the grounds hereinafter submitted apropos the following facts:

Allegation
3/2/

1. That initially the appellant was appointed as T.B Assistant (BPS-5) vide appointment order dated 09.7.1983 after proper approval of Selection Committee and till now the appellant has been performing his services with due diligence and vehemence. Copy of the appointment order dated 09.7.1983 is enclosed as Annexure A.

2. That in view of Notification dated 10.5.2006, all the Paramedics were up-graded from BPS-5 to BPS-9 vide Notification dated 25.8.2006 and consequent upon it, the appellant was awarded BPS-9 accordingly. Similarly by virtue of Notification dated 11.8.2015, all the paramedics and Technician had granted BPS-12 including the appellant accordingly. Copies of Notification dated 10.5.2006 and relevant page of seniority list of paramedics/employees are enclosed herewith as Annexure B & C.

3. That under the one time up-gradation, notification dated 9.5.2012 all the paramedics employees were upgraded upto BPS-17 and pursuant to the Notification dated 09.5.2012, Mr. Khalid Noor and Muhammad Shoab who were appointed as T.B Assistant on the same date when the appellant was appointed as T.B Assistant in BPS-5, thereafter the said two paramedics/Technician were up-graded in BPS-16, whereas the appellant has been deprived from his due right of promotion/up-gradation. Copy of Notification dated 09.5.2012 and detail of vacant posts in BPS-16 are enclosed herewith as Annexure D & E.

4. That inaction of respondents not to up-grade/promote the appellant at his due/respective place in BPS-16, BPS-17 & BPS-18 being most senior and at par position, despite of same status, cadre and date of appointment of appellant as to Mr. Khalid Noor and Muhammad Shoab, have improperly exercised of their official duties and having no binding effect upon rights of the appellant under the law and policy of the provincial government. Thus, aggrieved from the inaction on the part of respondents, the appellant

Alpenia
3/22

filed a departmental appeal/representation with the Director General Health Services, Khyber Pakhtunkhwa, Peshawar against imperfect and partial act of respondents and that too in defiance of the Rules/principle of equity/ Policy of the government made and promulgated on the point but departmental appeal/representation of appellant was remained answerless. Copy of Departmental appeal of appellant is enclosed as (Annexure-F)

- 5. That disgruntled from the inaction of respondents by depriving the appellant from his due/respective place in BPS-16, BPS-17 & BPS-18 from the date when others (Mr. Khalid Noor and Muhammad Shoaib) were given the same status/cadre, the appellant approaches this Honourable Tribunal for redressal of his grievance on inter-alia the following grounds.

Appellant
3/

G R O U N D S

- a. **That** the inaction of respondents not to award up-gradation in BPS-16, BPS-17 & BPS-18 to the appellant being most senior as to the other paramedics/Technician, nevertheless repeated resorts of appellant, is based on mala-fide result of improper exercise of official and having no binding effect upon rights of the appellant.
- b. **That** it is essential to refer here that the appellant was appointed in the year 1983, meaning thereby he was senior to his newly upgraded colleagues and on this score too, the appellant claimed alike treatment which was afforded with others paramedics in BPS-16, BPS-17 & BPS-18.
- c. **That** the right to equality has been declared as a basic feature of the Constitution and that Article 25 ibid guarantees to everyone the equal protection of laws so that everyone, either any candidate of civil post or any other citizen of Pakistan, afforded equal protection and similar

treatment. Similarly, Article 4 of the Constitution provides for the protection of the rights of an individual to be treated in accordance with law. The Article 4 of the Constitution of Islamic Republic of Pakistan, 1973 is reproduced hereunder for sake of convenience.

4. *Right of individuals to be dealt with in accordance with law, etc.*-(1) To enjoy the protection of law and to be treated in accordance with law is the inalienable right of every citizen, wherever he may be and of every other person for the time being within Pakistan.

(2) In particular-

(a) no action detrimental to the life, liberty, body, reputation or property of any person shall be taken except in accordance with law;

(b) no person shall be prevented from or be hindered in doing that which is not prohibited by law; and

(c) no person shall be compelled to do that which the law does not require him to do.

Alleged
JP

Thus denial of the rights of appellant to be most senior and deserve at par treatment, like other employees of the Health Department in Khyber Pakhtunkhwa such like Mr. Khalid Noor and Muhammad Shoaib, is highly unjust, partial, based on discrimination and exploitation.

d. That needless to mention that even in the absence of violation of vested rights of appellant, this Tribunal may examine the vires of the respondents by assessing whether it can be just, fair and in accordance with law for the main reason that so long as the Courts/Tribunal exist, they shall continue to exercise powers and functions within the domain of their jurisdiction and shall also continue to exercise power of judicial review in respect of any discrimination or malafide which comes for examination before the Courts/Tribunal.


- e. That the appellant has been performing his duty upto the mark and satisfaction of his high-ups and there is no question over the performance of the appellant rather credibility of the appellant during service was remained unquestionable but the appellant was deprived from his due right of up-gradation in BPS-16, BPS-17 & BPS-18.
- f. That the appellant is aggrieved by the inaction of the respondents/department as they flatly denied him up-gradation. Indeed the appellant should be treated at par with their counterparts/juniors in the same department since they were all permanent government servants and the appellant should not be denied up-gradation in view of up-gradation policy in vogue by Government of Khyber Pakhtunkhwa.
- g. That it is very painful to note that despite elapse of sufficient period of the approval of the up-gradation of the posts of the paramedics by the respondents/Ministry of Health, the respondents are hesitant in implementing the decision of competent authority as to appellant for up-gradation in BPS-16, BPS-17 & BPS-18 being his due right of seniority.
- h. That it is abundantly clear that appellant is being dealt with in a discriminatory manner through pick and choose which course of action cannot be allowed to be undertaken being in conflict with the fundamental rights enshrined in the Constitution of Islamic Republic of Pakistan.
- i. That the appellant has vested and legal right and his due right of seniority accrued to him from 11.8.2015, therefore, he ought to have been upgraded in BPS-17 retrospectively when his most juniors were up-graded with all back benefits.

Alleged


- j. That the exercise of powers by the respondents not to consider the up-gradation of appellant in BPS-16; BPS-17 & BPS-18 is not tenable in the eye of law and the respondents have failed to rationalize and regulate their powers, the courts have to intervene where exercise of such powers appears to be arbitrary and capricious.
- k. Counsel of the appellant may please be allowed to raise additional grounds at the time of arguments.

Dated: ___/___/2023

It is therefore, most humbly prayed that Service Appeal may please be allowed as prayed in the prayers' clause of the instant Appeal.


Yours humble appellant
Through Counsel

Dated 8/12/2023


Khalid Mehmood
Advocate High Court

8

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ of 2023

Abdur Rehman

Appellant

Versus

Government of K.P.K through
Secretary Health Department
and others

Respondents

CERTIFICATE

Certified that this is first writ petition involving the instant subject matter and that the appellant has not filed any other petition earlier in this Honorable Tribunal regarding the above stated controversy.



Appellant
Through Counsel



Khalid Mehmood
Advocate High Court

9

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ of 2023

Abdur Rehman

Appellant

Versus

Government of K.P.K through
Secretary Health Department
and others

Respondents

MEMO OF ADDRESSES OF THE PARTIES

APPELLANT

Abdur Rehman, posted at C.T Pulmonology (BPS-12), DHQ
Hospital Wanna/SWTD resided at Hashmi Town, Grid Road,
D.I.Khan

RESPONDENTS

1. Government of Khyber Pakhtunkhwa through Secretary
Government of Khyber Pakhtunkhwa Health Department,
Peshawar.
2. Secretary, Government of Khyber Pakhtunkhwa Health
Department, Peshawar.
3. The Director General, Health Services, Khyber Pakhtunkhwa,
Peshawar.
4. The Director General, Health Services, Khyber Pakhtunkhwa
(erstwhile FATA) Peshawar.
5. The Agency Surgeon, SWTD.
6. Mr. Khalid Noor son of Said Manoor, presently posted as DHS,
SWTD
7. Muhammad Shoaib son of Rahimullah, presently posted as LRH,
Peshawar.

Dated:- 8/2/2023


Counsel for appellant

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____ of 2023

Abdur Rehman

.....

Appellant

Versus

Government of K.P.K through
Secretary Health Department
and others

.....

Respondents

AFFIDAVIT

I, **Abdur Rehman**, posted at C.T Pulmonology (BPS-12), DHQ Hospital Wanna/SWTD resided at Hashmi Town, Grid Road, D.I.Khan the appellant, do hereby solemnly affirm and declare on oath:-

1. **That** accompanying service appeal has been drafted by my Counsel following my instructions.
2. **That** all para wise contents of the service appeal are true and correct to the best of my knowledge, belief and information;
3. **That** nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

Dated:- 8/2/2023

[Handwritten signature]

Deponent

121010438448-3

[Large handwritten signature]
8/2/23

ANCA (A)

19

OFFICE ORDER

As requested by Mr. Abdul Rehman S/O.

Abdul Sattar in his application dated 21/5/1983 he is hereby appointed as T.B. Assistant against the existing vacancy at T.B.C.H., Wana with effect from 01/7/1983 in the National Pay Scale No. 5 i.e- 296-10-350/12-427-14-540 plus usual allowances as admissible under the rules. :-

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

- 1- Provided he is domiciled of N.W.F.P.
- 2- Provided he is declared Medically Fit for Government Service.
- 3- he will be governed by such rules and Orders relating to Leave, T.A, Medical Attendance and Pay etc, as may be issued by the Government from time to time for the category of Government Servant to which he belongs.
- 4- His services are purely on temporary basis and will be liable to termination at any time without assigning any reasons irrespective of the facts that he is recruited. ~~most other than to which he was originally~~
- 5- No T.A./D.A. will be admissible on joining first appointment.
- 6- He will be on probation for a period of Six months and if his work and conduct remain satisfactory, he will continue the job.

Sd/-
AGENCY SURGEON
SOUTH WAZIRISTAN, WANA.

No. 2131-33/ Dated Wana the 9/7/1983

A copy is forwarded to the :-

- 1- Mr. Abdul Rehman S/O Mr. Abdul Sattar Lower Camp, Wana.
- 2- Account Clerk, Agency Surgeon Office Wana.
- 3- Medical Officer I/C T.B. Civil Hospital, Wana.

for information and necessary action.

Wazir Ahmad.

Jahan
AGENCY SURGEON
SOUTH WAZIRISTAN, WANA.

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Annex (B)

12

Dated Peshawar the 10th May, 2006

NOTIFICATION

NO SOH-III /8-60/05 (paramedics). In pursuance of the decision taken by the provincial cabinet in its meeting held on 27th December 2005, the Competent Authority is pleased to approve eight stage paramedics services structure of NWFP with effect from 27-12-2005. The salient features whereof shall be as under:-

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

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

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

3. The number of Posts in BPS-20, BPS-19, BPS-18, BPS-17, BPS-16, BPS-14, BPS-12 and BPS-9 shall be according to the proportionate ratio based on the total 8965 posts as mentioned in the provincial budget book for financial year 2005-2006. The proportionate ratio of 8 stage formula shall be as under:-

Admn. Officer
Genl. Medical Coll.
Peshawar
Ismail Khan

BPS	%	NO. OF POSTS
Post in BPS-9	80%	7172
Post in BPS-12	12%	1976
Post in BPS-14	3.5%	314
Post in BPS-16	2.5%	224
Post in BPS-17	1.86%	157
Post in BPS-18	0.09%	8
Post in BPS-19	0.04%	3
Post in BPS-20	0.01%	1

13

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

4. Seniority of the incumbents of the posts in the 14 cadres so merged shall be caused on the basis of scale wise seniority as well as date of regular appointment in the pay scale. (e.g. in joint seniority list of BPS-12, the official already in BPS-12 will be placed on the top of the list and the officials in the lower pay scale shall be accordingly placed step by step in the list, invariably keeping intact the inter-Sc-seniority of the incumbents in the same pay scales).
5. In the first instance, the higher posts in the re-structured 14 paramedics cadres as per annexure "C" shall be filled in by way of promotion, as one time exercise, where after the service rules duly prescribed as at annexure D shall be followed in subsequent promotion/initial recruitment.
6. Promotions in the post in BPS-18, 19 and BPS 20 shall be made on the basis of joint seniority list. The Joint seniority list of all the 14 cadres shall be caused at BPS-17 level keeping in view the principles laid down in section 8 of the NWFP civil servants (ACT), 1973 read with Rule-17 of the NWFP civil servants (appointment, promotion and transfer) rules, 1989.
7. The afore-said paramedics service structure into 14 cadres shall also be applicable mutatis-mutandis to the paramedics working in FATA and employees working in Districts, all autonomous, semi autonomous and corporate bodies.
8. There shall be a council of paramedics to be notified separately.
9. The approved implementation committee and anomaly committee shall also be notified separately.
10. This eight stage paramedics service structure will replace all existing categories, cadres, structures and nomenclatures and will cancel all such cadres/categories rules and regulations etc which are in contravention to the approved paramedics service structure. New posts in all type of Health Delivery System will be created in

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

Sd/xxx
(ABDUS SAMAD KHAN)
SECRETARY HEALTH

14

Endorsement No. & date as above

Copy forwarded to the:-

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

(Alanized Malik)
Section Officer Health - III

Admon: Officer
Genral Medical College
Dera Ismail Khan

ANS 4 (C) ~~ANS 4 (B)~~ ✓

15

Seniority List of Clinical Technicians (Pulmonology) BS-12 in the Health Department Khyber Pakhtunkhwa, 2019

S.No	Name/ Father's Name	a (Old Nomenclature With BPS) b New Nomenclature after restructuring with BPS	Date of Joining Govt. Service/ promotion/ up-gradation	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1	Abdul Rahman S/O Abdul Sanae	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	01.07.1983 10.05.2006 11-08-2015	AS SWA Wama	16.06.1965/ DI Khan	15.06.2015
2	Gul Zaman S/O Zai Khan	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	27.09.1981 10.05.2006 11-08-2015	City Hosp: Larki Marwat	15.01.1961 Tank	11.04.2015
3	Anwar Sohal S/O Haliullah	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	20.01.1998 10.05.2006 11-08-2015	DIQ Hosp: Bannu	21/09/1966 Bannu	20/09/2026 S.O.Sa. Verdon
4	Irfan Ullah S/O Shabbaz Khan	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	27.06.1998 10.05.2006 11-08-2015	AS Khyber	18.07.1978 Khyber Agency	17.07.2018
5	Mubeen Shah S/O Muzamil Shah	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	25.11.2000 10.05.2006 11-08-2015	AS Khyber	16.10.1976/ Khyber Agency	15.10.2016
6	Nour Ashraf Zaman S/O Akbar Zaman	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	01.11.2003 10.05.2006 11-08-2015	DIQ Hosp: Bannu	18/02/1969 Bannu	17.02.2019
7	Fahim Habib S/O Habib Khan	TB Asst: BS 05 JCT Pulmonology BS-09 C.T Pulmonology BS-12	01.01.2004 10.05.2006 11-08-2015	DIQ Hosp: DI Khan	12/04/1977 DI Khan	11/04/2017 S.O.Sa. Verdon
8	Syeda Lubna Hassan DO/ Syed Ali Hassan	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	11.02.2012 11-08-2015	DIQ Hosp: Charsadda	25.01.1992 Charsadda	24.01.2015
9	Syeda Iram Hassan DO/ Syed Ali Hassan	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	11.02.2012 11-08-2015	DIQ Hosp: Charsadda	13.05.1993 Charsadda	12.05.2015
10	Mehwish Bibi DO/ Muhammad Haroon	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	02.03.2012 11-08-2015	DIQ Hosp: Battagram	10.02.1992 Battagram	09.02.2015
11	Fozia Iqbal DO/ Muhammad Iqbal	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	14.03.2012 11-08-2015	SGH Hosp: Swat	22.09.1990 Abbottabad	21.09.2015
12	Ishrat Fatima DO/ Sardar Hussain	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	21.03.2012 11-08-2015	BKMC Swabi	21-02-1992 Swabi	20-02-2015
13	Sumaira DO/ Anur Zada	F JCT Pulmonology BS-09 F C.T Pulmonology BS-12	06.04.2012 11-08-2015	SGSM Hosp: Peshawar	01.07.1993 Mardan	03.04.2015
14	Abul Kalam S/O Muhammad Aslam Khan	C.T Pulmonology BS-12	03.12.2012	MIQ Mardan/ Swat	29.10.1985 SWA	19.10.2015
15	Fazal Mahmood S/O Fazli Rahman	JCT Pulmonology BS-09 C.T Pulmonology BS-12	29.12.2012 11-08-2015	DIQ Hosp: KDA Kohat	07.01.1982 Kohat	06.01.2017 S.O.Sa. Verdon
16	Sail Rehman S/O Zai Wab Khan	JCT Pulmonology BS-09 C.T Pulmonology BS-12	11.01.2013 11-08-2015	AS SWA	01.01.1991/ NWA	11.12.2015
17	Anwar Shah S/O Jamshed	C.T Pulmonology BS-12	22-06-2016	BKMC Swabi	10-01-1993 Swat	09-01-2015

Handwritten initials in a circle:

18.

Muhammad Shahzad
S/O Muhammad
Farooq

C.T Pulmonology BS-12

25-07-2016

BKMC Swabi

25-01-1994
Swabi

21-01-16

Prepared by: Syed Amdul Ah Shah Office Assistant, Syed Farman Ali Shah Sr. Clerk, Syed Mehmood Ah Shah I/C Cum C.O Itooh Ullah C.O Muhammad Anwar
I/C & Checked by Sheema Khan Deputy Director Paramedics DGHS.

Director General Health Services
Khyber Pakhtunkhwa, Peshawar

Annex (D)

17



GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated the Peshawar 09 May, 2012.

NOTIFICATION

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

- i) Initially the one time up-gradation/Promotion is to be implemented upto BPS-17.
- ii) A joint seniority is to be developed in BPS-17. Based on the final joint seniority list of BPS-17 further promotion to BPS-18, BPS-19 and BPS-20 will be carried out on the basis of seniority-cum-fitness from BPS-17 to BPS-18, from BPS-18 to BPS-19 and BPS-19 to BPS-20 on step by step basis.
- iii) Those who have been recruited after May, 2006 they will be placed at bottom of the seniority list of their respective cadre/service. However, an anomaly committee will look into all such anomalies arising in the course of implementation of the one time up-gradation/Promotion exercise.
- iv) The senior post BPS-18 to BPS-20 will be filled in accordance with the prescribed manner as laid down in the existing approved Service Rules.
- v) The revival of Notification Dated 10-5-2006 will have no retrospective effect and one time up-gradation/Promotion will be with immediate effect as laid down in the promotion policy of the Provincial Government.

Secretary to Govt. of Khyber Pakhtunkhwa
Health Department

Endorsement No. & date as above.

Copy forwarded to the:-

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

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

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

(67)

Amef (E)

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

S. No.	Name	Father Name	Nomenclature		Date of 1st appointment	Present Posting	Domicile	Date of Birth	Date of Retirement	Remark
			a) Old With BPS)	b) New Nomenclature after restructuring with BPS						
1	Sartaj Khan	Haji Faqir Gul	a) Nurs Att: BS-05 b) PFT Tech: BPS 09 Chief Tech: Pulmo. B-16	12/07/1992 29/06/1995 02.08.2012	LRH Peshawar	Nowshera	3/8/1972	2/8/2032		
2	Akhtar Ali	Habib-Ud-Din	Disp: BS-06 PFT Tech B-9 Chief Tech: Pulm. B-16	31/12/1994 01/03/1999 02.08.2012	LRH Peshawar	Charsadda	9/6/1969	8/6/2029	Upgraded to BS-16 vide Notification No. SC(FR)/FD/7-3/2015/ dated 11-8-15	
3	Muhammad Iqbal	Umar Bukhash	b) Bronchoscopy Tech: BPS 09 Sr. Clinical Tech: BS-14	25/03/1999 02.08.2012	LRH Peshawar	Peshawar	3/3/1968	2/3/2028	Upgraded to BS-16 vide Notification No. SC(FR)/FD/7-3/2015/ dated 11-8-15	
4	Khalid Noor	Said Manoor	a) TB Asst: BPS 05 Sr. Clinical Tech BS-14	01/10/1982 02.08.2012	DHS FATA	NWA	20/12/1963	19/12/2023	Upgraded to BS-16 vide Notification No. SC(FR)/FD/7-3/2015/ dated 11-8-15	
5	Muhammad Shoaib	Rahimullah	a) TB Asst: BPS 05 Sr. Clinical Tech: BS-14	01/11/1982 02.08.2012	LRH Peshawar	Mardan	3/6/1965	2/6/2025	Upgraded to BS-16 vide Notification No. SC(FR)/FD/7-3/2015/ dated 11-8-15	

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6.	Niaz Bat Khan	Barakat Khan	a)TB Asst: BPS 05 Sr. Clinical Tech: BS-14	09/04/1983 02.08.2012	DHO Hosp: Dera Ismail Khan	Karak	11/12/1961	10/12/2021	Upgraded vide Notification No. SOF/RJ/FD/7- 3/2015/ dated 11-8-15
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Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

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073102 DISTRICT HEADQUARTER HOSPITALS

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
07 HEALTH					
073 HOSPITAL SERVICES					
0731 GENERAL HOSPITAL SERVICES					
073102 DISTRICT HEADQUARTER HOSPITALS					
KT4433 MS District Head Quarter Hospital Kohat					
A011-2 TOTAL PAY OF OTHER STAFF	299	299	67,351,000	52,604,000	70,746,000
A01151 Total Basic Pay Other Staff	299	299	67,341,000	52,599,000	70,735,000
S035 Senior Clerk (BPS-14)	1	1	331,000		348,000
S326 Senior Clinical Technician (Dental) (BPS-14)	3	3	848,000		891,000
S327 Senior Clinical Technician (Pharmacy) (BPS-14)	4	4	364,000		404,000
S328 Senior Clinical Technician (Radiology) (BPS-14)	3	3	848,000		891,000
S329 Senior Clinical Technician (Pathology) (BPS-14)	4	4	275,000		289,000
S330 Senior Clinical Technician (Anaesthesia) (BPS-14)	4	4	1,022,000		1,074,000
S331 Senior Clinical Technician (Cardiology) (BPS-14)	1	1	338,000		355,000
S332 Senior Clinical Technician (Surgical) (BPS-14)	4	4	221,000		233,000
S334 Senior Clinical Technician (Physiotherapy) (BPS-14)	2	2	675,000		709,000
S335 Senior Clinical Technician (Pulmonology) (BPS-14)	1	1	338,000		355,000
S337 Sr Clinical Technician (Ophthalmology/Otorhinology) (BPS-14)	1	1	338,000		355,000
B035 Blood Bank Technician (BPS-12)	2	2	320,000		336,000
C301 Clinical Technician (Cardiology) (BPS-12)	4	4	1,846,000		1,939,000
C302 Clinical Technician (Dental) (BPS-12)	4	4	2,270,000		2,384,000
C304 Clinical Technician (Pharmacy) (BPS-12)	30	30	11,298,000		11,863,000
C305 Clinical Technician (Ophthalmology/Otorhinology) (BPS-12)	3	3	1,049,000		1,102,000
C306 Clinical Technician (Pathology) (BPS-12)	3	3	1,720,000		1,806,000

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NC21017 (013)
HEALTH

073101 GENERAL HOSPITAL SERVICES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
07 HEALTH					
073 HOSPITAL SERVICES					
0731 GENERAL HOSPITAL SERVICES					
073101 GENERAL HOSPITAL SERVICES					
LK4734 District Health Officer City Hospital Lakki Marwat					
S328 Senior Clinical Technician (Radiology) (BPS-14)	2				560,000
S329 Senior Clinical Technician (Pathology) (BPS-14)	2				560,000
S330 Senior Clinical Technician (Anaesthesia) (BPS-14)	1				280,000
S331 Senior Clinical Technician (Cardiology) (BPS-14)	1				280,000
S332 Senior Clinical Technician (Surgical) (BPS-14)	2				560,000
S335 Senior Clinical Technician (Pulmonology) (BPS-14)	1				280,000
S338 Senior PHC Technician (MCH) (BPS-14)	1				280,000
C301 Clinical Technician (Cardiology) (BPS-12)	2				492,000
C302 Clinical Technician (Dental) (BPS-12)	2				492,000
C304 Clinical Technician (Pharmacy) (BPS-12)	8				1,966,000
C306 Clinical Technician (Pathology) (BPS-12)	3				738,000
C307 Clinical Technician (Radiology) (BPS-12)	3				738,000
C308 Clinical Technician (Anaesthesia) (BPS-12)	2				492,000
C309 Clinical Technician (Surgical) (BPS-12)	4				982,000
C310 Clinical Technician (Physiotherapy) (BPS-12)	1				246,000
C569 CLINICAL TECHNICIAN (OPHTHALMOLOGY/OTORHN) (BPS-12)	1				246,000
F230 FEMALE CLINICAL TECHNICIAN (BPS-12)	7				1,720,000
J013 Junior Clerk (BPS-11)	1				232,000
S127 Store Keeper (BPS-11)	2				464,000

073101 GENERAL HOSPITAL SERVICES

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
07 HEALTH			Rs	Rs	Rs
073 HOSPITAL SERVICES					
0731 GENERAL HOSPITAL SERVICES					
073101 GENERAL HOSPITAL SERVICES					
BM4331 District Health Officer (Other Health Facilities) Battagram					
A01 TOTAL EMPLOYEES RELATED EXPENSES.					<u>9,541,000</u>
A011 TOTAL PAY		14			<u>3,497,000</u>
A011-1 TOTAL PAY OF OFFICERS		2			<u>2,096,000</u>
A01101 Total Basic Pay Of Officer		2			<u>2,096,000</u>
S978 SENIOR PHC TECHNOLOGIST (MULTI PURPOSEL) (BPS-18)		1			460,000
H032 Head Nurse (BPS-17)		1			364,000
S700 SPECIALIST NURSE (BPS-17)		1			364,000
C327 Chief Clinical Technician (Pulmonology) (BPS-16)		2			454,000
R364 REGISTERED NURSE OFFICER (BPS-16)		2			454,000
A011-2 TOTAL PAY OF OTHER STAFF		2			<u>1,401,000</u>
A01151 Total Basic Pay Other Staff		2			<u>1,401,000</u>
C306 Clinical Technician (Pathology) (BPS-12)		1			246,000
C311 Clinical Technician (Pulmonology) (BPS-12)		1			246,000
S177 Sanitary Petrol (BPS-04)		2			366,000
W004 Ward Orderli (BPS-04)		2			366,000
S177 Sanitary Petrol (BPS-03)		1			177,000
A012 TOTAL ALLOWANCES					<u>6,044,000</u>
A012-1 TOTAL REGULAR ALLOWANCES					<u>6,042,000</u>
A01202 House Rent Allowance					1,280,000
A01203 Conveyance Allowance					840,000
A01207 Washing Allowance					168,000
A01208 Dress Allowance					254,000
A0120D Integrated Allowance					101,000

NC21017 (013)
HEALTH

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073102 DISTRICT HEADQUARTER HOSPITALS

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHEME	NUMBER OF POSTS		BUDGET ESTIMATES	REVISED ESTIMATES	BUDGET ESTIMATES
	2021-2022	2022-2023	2021-2022	2021-2022	2022-2023
			Rs	Rs	Rs
07 HEALTH					
073 HOSPITAL SERVICES					
0731 GENERAL HOSPITAL SERVICES					
073102 DISTRICT HEADQUARTER HOSPITALS					
DA4328 MS District Head Quarter Hospital Dir Lower					
E049 Eye Specialist (BPS-18)	1	1	609,000		640,000
M091 Medical Officer (Male & Female) (BPS-18)	2	2	863,000		907,000
N014 Neuro Surgeon (BPS-18)	1	1	415,000		436,000
N021 Nursing Superintendent (BPS-18)		1			376,000
N035 Nephrologist (BPS-18)	1	1	389,000		409,000
N044 Neuro Physician (BPS-18)	1	1	383,000		403,000
O026 Orthopaedic Surgeon (BPS-18)	1	1	455,000		478,000
P264 Pulmonologist (BPS-18)	1	1	508,000		534,000
P275 Paediatric Surgeon (BPS-18)	1	1	378,000		397,000
P392 Plastic Surgeon (BPS-18)	1	1	487,000		512,000
S086 Skin Specialist (BPS-18)	1	1	613,000		644,000
S156 Surgeon (BPS-18)	1	1	383,000		403,000
S213 Senior Medical Officer (BPS-18)	23	23	11,792,000		12,382,000
S340 Senior Clinical Technologist (Pharmacy) (BPS-18)	1	1	449,000		472,000
S521 Senior Gynaecologist (BPS-18)	2	2	884,000		929,000
S523 Senior ENT Specialist (BPS-18)	1	1	383,000		403,000
S705 SENIOR SPECIALIST NURSE (BPS-18)		15			5,640,000
S706 SENIOR CLINICAL NURSING INSTRUCTOR (BPS-18)		2			752,000
S708 SENIOR HEAD NURSE/NURSE MANAGER (BPS-18)		15			5,640,000
T100 Trauma Surgeon (BPS-18)	1	1	441,000		464,000
U010 Urologist (BPS-18)	1	1	376,000		395,000
A007 Accounts Officer (BPS-17)	1	1	366,000		385,000
B034 Blood Bank Officer (BPS-17)	1	1	488,000		513,000
C286 Clinical Technologist (Radiology) (BPS-17)	2	2	102,000		108,000
C287 Clinical Technologist (Pathology) (BPS-17)	2	2	102,000		108,000

ڈائریٹر جنرل صحت و کھانسی اور جھڑکوں اور ناک کا علاج اور دوا

Amex (F)

ایمل بریک پیرو فارماسیوشل (25)

حاصل

تاریخ سے کہ حاصل شدہ ڈیل گرانٹ شریک

بکہ سٹائل آرڈر نمبر 33-2131 مورم 9/7/1983 کے تحت
لغوز Assistant TB لکڑیا ہوا۔ لغوزی آرڈر مورم 9/7/1983
لغ Anex A ہے

یہ کم لغوزی مورم 2006/10/5 کے تحت ڈسٹری بیوٹڈ ہے۔
تک کے پیرا میڈیسیکل اور سٹائل دیا گیا۔ پیرا میڈی (9) سٹائل
لغوزی طرح نوٹیفیکیشن مورم 11/8/2015 کے تحت تمام پیرا میڈی
BPS-12 (نوٹیفیکیشن) دیا گیا۔ اور لغوزی سٹائل BPS-12 مورم ہے
لغ Anex B ہے

یہ کم سٹائل کے ساتھ BPS-09 مورم TB Assistant (لغوزی) ہے۔
آجیٹا سٹائل کے لئے حال لغوزی وار سید منور سٹائل

لغوزی سٹائل وار لغوزی مورم 11/8/2015 کے تحت BPS-12
سٹائل سٹائل سٹائل سٹائل سٹائل سٹائل سٹائل سٹائل
BPS-12 ہے

یہ سب سے پہلے ایئر ریفریجریٹر کے سپرائڈز ہیں BPS-19
پروڈیجٹ ہوئے ہیں۔ لیکن سائل جو کم 1983 سے تیار
ہیں تھے۔ انہی کو BPS-12 میں آئے ہیں کم سائل کے
Documentation سے

6- یہ کم انہی بھی مختلف ذرات (الون) میں Pulmonology میں پورے ہیں

پورے ہیں BPS-14, BPS-16, BPS-18 حالی پورے ہیں
لیکچر ٹیٹ لف D, E, F, G

7- یہ کم درگزرہ حقائق کو درپور آتے ہوئے ہیں۔ سائل کے

09 BPS میں Balchman جو BPS-16, BPS-17, BPS-18

میں پورے ہیں۔ سائل کو لکھی ہیں، سائل کو لکھی ہیں

BPS-16, BPS-17, BPS-18 میں پورے ہیں
گدا دات

11/10/2022

محمد طارق

عبدالرحمن خان، ڈاکٹر عبدالرحمن خان، Pulmonology

(BPS-12) DHQ

سائل میں، یا سائل، سائل، سائل، سائل، سائل

0344 935 1664

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KHALID MEHMOOD

Advocate

bc-15-5415

Date of issue: November 2022

Valid upto: November 2025

Secretary
KP Bar Council



ADVOCATE

وکالت نامہ

27

کورٹ
فیس

بعد ازاں عدالت صاحبہ نے جسٹس خیر نواز کوٹہ اور جسٹس شکیل احمد کے فیصلے کو منظور کیا ہے۔

مخائب
عبدالرحمن
سورج بیل

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

بانتی تحریر آنکھ
حاضر اسعد علی
حالیہ طور پر ایڈووکیٹ صاحبہ کو کورٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشگی پر خود یا اپنے ذریعہ رو برو عدالت حاضر ہوتا ہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشگی پر مطلع نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحبہ صرف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا بیچے یا بروز تعطیل
بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا بیچے پیش ہونے
پر ملاحظہ کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی صاحبہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحبہ موصوف ذمہ دار نہ ہوں گے مجھ
کو کئی ساختہ پر وادختہ صاحبہ موصوف مثل کردہ ذات خود منظور ہو گا اور صاحبہ موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسانے ڈگری
نظر ثانی اپیل گمرانی اور ہر قسم درخواست ہر قسم کے بیان دینے اور پر نظر یا رضی نامہ و فیصلہ برطرف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے
تاریخ پیشی مقدمہ ہرگز بیرون از پکھری صدر بیرونی مقدمہ مقرر نظر نہ اپیل و گمرانی و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ یا درخواست حکم اقسائی یا قرقی
یا گرفتاری مثل از فیصلہ اجراء ڈگری بھی صاحبہ موصوف کو ہرگز وائٹلی کیلئے مقرر اختیار ہو گا اور تمام ساختہ پروادختہ صاحبہ موصوف مثل کردہ
از خود منظور و قبول ہو گا اور بصورت ضرورت صاحبہ موصوف کو بھی اختیار ہو گا کہ مقدمہ مقررہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی
اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا ہیر منڈی سے اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دینے
اختیارات حاصل ہوں گے جیسے، صاحبہ موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب التواء پڑے گا وہ صاحبہ موصوف کا حق ہو گا مگر
صاحبہ موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کرے اور صاحبہ موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت
میں میرا کوئی مطالبہ کسی قسم کا صاحبہ موصوف کے برخلاف نہیں ہے

لہذا وکالت نامہ زیادہ ہے تاکہ سند رہے

مورخہ 8 ماہ فروری 2023

مضمون وکالت نامہ زیادہ ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted
03364330001

ایکٹ
عبدالرحمن
03449351664
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