BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 243/2023

Versus

Index

S. No.	Description	Annexure	Pages No.
1	Comments		1-3
2	Office Order dated 20/05/2010	A	4-5
3	Applicant of the appellant	В	6
4	Notification dated 11/08/2015	C	7-10
5	Office Order dated 27/04/2021	D	11-17
6	Affidavit		18
7	Authority letter		19

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

Khyber Pickhinkhwa Service Tribunal

SERVICE APPEAL NO. 243 OF 2023

	1011	
Diary	No.65/6	

Versus

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 01 TO 04

Respectfully Sheweth:

Preliminary Objections:-

- 1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal.
- 2. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
- 3. That the appeal is not maintainable under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
- 4. That the appeal is barred by law and limitation.
- 5. That the Jurisdiction of the Honorable Tribunal has been barred by section 4b(I) of the Khyber Pakhtunkhwa Service Tribunal Act 1974.
- 6. That the appellant has not come to this Honorable Tribunal with clean hands.
- 7. That the instant appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
- 8. That the appellant is estopped by his own conduct to file the instant appeal.

ON FACTS:

- 1. No comments.
- 2. Pertains to record.
- 3. Correct to the extent of upgradation of the appellant from BPS-09 to BPS-12 vide Notification dated 11/08/2015, however, the appellant malafidely concealed the facts that the was earlier promoted from BPS-09 to BPS-12 vide order dated 20/05/2010 and was posted at Mardan Medical Complex Mardan (Annex-A), however, he forwent the promotion in order to avoid transfer to MMC Mardan (copy of the application of the appellant is Annex-B). The appellant also concealed

2

the material fact that after forgoing his promotion in the year 2010, he alongwith others who were in BPS-09 and BPS-12 were upgraded to BPS-14 and posted at LRH vide order dated 20/09/2012 already annexed as annexure C of the appeal, however, the appellant did not actualized the upgradation order which is evident from the service book of the appellant so he remained in BPS-09. Pertinent to mention that the private respondents upgraded vide order dated 02/08/2012 actualized the same, the fact is reflected at page 25 of the service book of the appellant. Furthermore, the provincial government vide Notification dated 11/08/2015 allowed upgradation of the post of CT cardiology from BPS-09 to BPS-12 with the conditioned that the initial recruitment in future will be made in BPS-12 instead of BPS-09 whereas the incumbents of BPS-12 & BPS-14 were allowed two steps upgradation respectively, with relaxation of condition of 10 years in the same grade as mentioned in the upgradation policy of the provincial government (Notification dated 11/08/2015 as Annex-C). The appellant was promoted from Clinical Technician Cardiology (BPS-12) to the post of Senior Clinical Technician Cardiology (BPS-12) to the post of Senior Clinical Technician Cardiology BPS-14 vide order dated 27/04/2021 with immediate effect. The above fact is mentioned from page 07 of the service book annexed by the appellant himself. (copy of promotion order dated 27/04/2021 as Annex-D). It is worth to mention that he was further promoted from BPS-14 to BPS-16 vide order dated 16/12/2022 which is evident from page 11 of the service book.

- 4. Correct to the extent of Notification dated 11/08/2015 however, it is worth to mention that at the time of issuance of the said Notification, the appellant was in BPS-09 therefore, as per para 01 of the Notification he was upgraded form BPS-09 to BPS-12. Therefore, the appellant was not granted two step upgradation even then if he was agg#rieved he would have challenged the same Notification before the High Court being proper forum.
- 5. Incorrect. As already in Para No. 3 & 4.
- 6. Incorrect. Already explained in Para No. 3 & 4 above, if the appellant was aggrieved from the office order dated 27/04/2021 he should have challenged the same before this Honorable Tribunal within time. Incorrect. The appellant has been promoted to BPs-16 on 16/12/2022.
- 7. Incorrect. As already explained in Para No. 3 & 4.
- 8. Incorrect. The appellant concealed the material fact from this Honorable Tribunal for an illegal gain. However, detail reply has been given in Para No. 3 & 4.
- 9. Incorrect. However, whenever, a post becomes vacant the Competent Authority will post a suitable incumbent against the post in accordance with law and rules.

3

Incorrect, as already explained in preceding paras. The appellant is not entitled for anti-dated promotion to the post of BPS-14 and BPS-16 w.e.f. 02/08/2012. The appellant failed to challenge the above mentioned promotion orders within the prescribed period of limitation under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974. It is further to clarify that the appellant in order to misguide the Honorable Tribunal as the appellant has not filed any departmental appeal before the appellant authority the so called departmental appeal annexed with the service

appeal has no diary dispatch number hence denied.

11. Needs no comments being formal.

ON GROUNDS:

A. Incorrect, as explained in Para No. 3 & 4 of the Facts. Furthermore, the respondents treated the appellant in accordance with law, rules and principle of nature justice.

B. Incorrect, as explained in preceding para.

C. Incorrect as in Para-A.

D. Incorrect as in preceding paras.

E. Incorrect as in Para-A.

F. Incorrect as in Para-A.

G. Answering respondents also seek prior permission of this Honorable Tribunal to

adduce additional grounds at the time of arguments.

PRAYER:

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

Secretary to Govt. of Khyber Pakhtunkhwa Health Department Respondent No. 01 & 02

Director General Health Services Khyber Pakhtunkhwa Peshawar

Respondent No. 03

Medical Superintendent DHQ Hospital

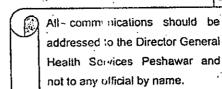
Batkhela Malakand Respondent No. 04

DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA



PESHAWAR



Office Ph#

091 - 9210269

Exchange# 091 - 9210187

OFFICE ORDER

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

S.NO.	NAME/F/NAME OFFICIAL		PRESENT PLACE OF POSTING.
1.	Gulzar Muhammad	1.	LRH l'eshawer
2.	Tajamul Hussan	- :	LRH Peshawar
3.	Wisal Muhammad		DHQH: Charsadda
4.	Muhamamd Ali Baqir		KTH Pesh avar
5.	Syed Aslam Shah		DHO# IcDA Kohat
6.	Hukam khan		DHQH: Di Khin
7.	Shah Khesro	<u>,</u>	PHQH: Bailchella

They will be on probation for a period of one year extendable in another period of one year.

On their promotion as Clinical Technician (Cardiology) BPS-12 following posting / transfer are hereby ordered with immediate effect.

1	, ,	NAME/F/NAME	FROM		
ik Ko	<u> </u>	OFFICIAL	TROM	10	REMARKS
	y di √	Gulzar Muhammad .	LRH Peshawar	LRH Pegloviers	Against the
4	2	. Tajamul Hussan			vacant post
1			LRH Peshawar	LISH Preshould 6	Do it
	3.	Wisal Muhammad	DHQH: Charsadda	DHOHO PIL	Do
	4.	Muhamamd Ali Baqir	KTH Peshawar	Mardan 10TEHJaeshanta	
	^ 5.	Syed Aslam Slash	DIIÇH: KDA Koljat		
-	6.	Hukam khan	DHQH: DI Khan	DHOHOS/KDA Kolest	Do
-	7	Shah Khesro		AHOHOPILA MINONSVOM	Do
		onan Knesio	DHQH: Batkhella	MMC Medob	do
				and the second s	j ₁₁

SD MANNAN DIRECTOR GLUERAL

KHYBER PAKITUN

THI SERVICES A PESHAWAR

10/3003-15

/AE-VII

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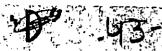
- Chief Executive KTH/ LRH Peshawar.
- MS DIIQII: KDA Kohat
- MS DIIQII: DI Khan
- 5 MS DHQII: Batkhella
- 6 MSDHQH; Mardan.
- MSDHQH: Charsadda.
- P/S to Secretary to Govt of K.P.K Health Departs
- 9 PA to LGHS, K.P.K Peshawar,
- 10 Director Health Services FATA.
- 11 MSAHQII: NW Miranshan.
- 12 ADP-II DOH'S KPK Peshawar.
- 13 Personnel file.
- 14 Syed Faiz Ali Shah,i/c Paramedics promotion cell DGH: For information & necessary action.

DIRECTOR GIP TERA! KHYBER PASSATUS

ALTH SERVICES

A PESHAWAR

The Director General Health Services Khyber Punkhtun Peshawar Proper channal Through: promotion of Jr. clinical Subject. R/Siv Technician (cordiology Ref: order No. 13003-15/AEdated 20/05/10 state
3 have The honour to state That I am willing to forego promotion and request to retain menthis hospital as due to some unavoidable d'antient mentre de la some unavoidable d'antient de la some una violent de la some u to some unavoidable domestic problems. I hope that my this request Will be considered Sympath ally' Thanks Datod. 2-6-2010. / Shah Khisyo 1. clinical Tech Cardio logy Harell Survey For new DHQ: Hospil Balkhela





FINANCE DEPARTMENT FINANCE DEPARTMENT (REGULATION WING)

Parco Postavar droll 108120 Salva

NOTIFICATION

upprade all the Paramedics Staff appointed under Khyhar Pakhiunkhwa Givil Servints Ac.

- All the incumbents Paramedies In DS 09 are upgraded to BS-12 In future that initial recruitments will be made in BS-12 Instead of DS-09 and the Administrative Department shall immediately amend the sorvice rules through SSRC accordingly.
- The incumbents presently serving to BS-12 & BS-14 are allowed 02 steps
 ungradation respectively with relaxation of condition of 10 years service in
 the same glade stipulated in the existing upgradation policy.
- The Paramedics presently serving in BS-16 and BS-17, shaving 05 years a service in the respective pay scales, are allowed an allowance at the rate of a fix ation of pay in next grade.
- fixation of pay in next grade.

 1V: The Administrative Department shall further streamline the service structure of BPS-16 and above through the mechanism of SSRC
- of BPS-16 and above through the mechanism of SSRC.

 V. Pay of existing incumbents of the posts shall be fixed in higher pay scales at a singu next above the pay in the lower pay scale.
- VI This department not lication bearing No. SOCRVFD/10-22/2015 dated 30-06-2015 will have no affection to the above employees

SECRETARY TO GOVE OF KHYBER PAKHTUNKHIVA

Endsi No. & Date even.

Convol the above is formerded for information and necessary action to the

- PS to Additional Chief Speculary FATA.
- All Administrative Sepretaries Government of Khyper Pakhtunkhoo
- 50 Sonfor Member, Board of Rovenue, Khybor Pakhtunkhwa Peshawar,
- Accountant Oaneral, Khyticr Pakhtunkhwa: Poshawar
- 3 " Secretary to Governor Khi ber Pakhtunkhwa, Leannewar
- 6. Principal Secretary to Chief Minister, Khyber Pakhlunkhwa
- T. Secretary Provincial Assembly Khyber Pakhunkhwa.
- 8 All Hands of Attached Doperments in Khyber bakhrank
- 9 : Registrar, Peshawar High Court, Peshawar,
- 10. All Deputy Commissioners, Political Agents, District & Sussions Judges / Executive District

Alfested

GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCPE DEPARTMENT (REGULATION WING)

Dated Peshawar, the 11.08.2015

NOTIFICATION

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

- i. All the incumbents Paramedics in BS-09 are upgraded to BS-12 in future the initial recruitment will be made in BS-12 instead of BS-09 and the Administrative Department shall immediately amend the service rules through SSRC accordingly.
- ii. The incumbents presently serving is BS-12 & BS-14 are allowed 02 steps upgradation respectively with relaxation of condition of 10 years service in the same grade stipulated in the existing up-gradation policy.
- iii. The paramedics presently serving in BPS-16 and BPS-17, having 05 years service in the respective pay scales are allowed an allowance at the rate of fixation of pay in next grade.
- iv. The Administrative Department shall further streamline the service structure of BPS-16 and above through the mechanism of SSRC.
- v. Pay of existing incumbents of the posts shall be fixed pay scales at a stage next above the pay in the lower pay scale.
- vi. This department notification bearing No.SO(FR)/FD/10-22/2015 dated 30.06.2015 will have to affection to the above employees.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

Endst No. & Date even:

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

- i. PS to additional Chief Secretary.
- ii. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
- iii. Senior Member, Board of Revenue, Khyber Pakhtunkhwa, Peshawar.

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Chairman, Kliyher Paktitugethwa: Public Service Commission, Penhawai.

2 Behiston, Service Indiana Kayber takanantawa

Specialty to Gove of Punjab. Sindhingoff Specialization, Finance Department Labore, Karachi

and Quetta:

And Outton

The District Comptroller of Accounts Peshawar, Maidan, Kohal, Bannu Abbollabad, Spain

Officer Powshera, Swabl, Charseider, Hariper, Manschra and Dir Lowers

Officer Powshera, Swabl, Charseider, Hariper, Manschra and Dir Lowers

16 The Treasury Officer, Pestinwar, 17 All District/Agency, Accounts Officers in Khyber Pakhunkhwa / FAFA

PSO to Senior Minister for Finance, Chyber Pakhtunkliwk

19 PSO to Chief Societary, Khyber Pakhankhiva.

10. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.

721 PAs to All Additional Secretaries / Deputy Secretaries in Finance Department.

22 All Section Officers Budget Officers in Finance Department

23 All Section Officers Budget Officers in Finance Department

24 McSiral Burkl, chairman, All Paramedics Association, Khyber Pakhtunkhwa, Pushiasor.

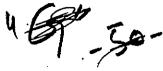
25 Mr. Johar Ali, President, Provincial Paramedical Association, Khyber Pakhtunkhwa.

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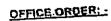
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- iv. Accountant General, Khyber Pakhtunkhwa, Peshawar
- v. Secretary to Governor, Khyber Pakhtunkhwa, Peshawar
- vi. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa
- vii. Secretary Provincial Assembly, Khyber Pakhtunkhwa
- viii. All Heads of Attached Departments in Khyber Pakhtunkhwa
- ix. Registrar, Peshawar High Court, Peshawar.
- x. All Deputy Commissioners, Political Agents, District & Sessions Judges/Executive District Officials in Khyber Pakhtunkhwa.
- xi. Chairman, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- xii. Registrar, Service Tribunal, Khyber Pakhtunkhwa, Peshawar
- xiii. Secretary to Govt: of Punjab, Sindh and Balochistan, Finance Department Lahore, Karachi and Quetta.
- xiv. The District Controller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I.Khan.
- xv. The Senior District Accounts Officer, Nowshera, Swabi, Charsadda, Haripur, Mansehra and Dir Lower.
- xvi. The Treasury Officer, Peshawar.
- xvii. All District/Agency Accounts Officers in Khyber Pakhtunkhwa/FATA
- xviii. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
- xix. PSO to Chief Secretary, Khyber Pakhtunkhwa
- xx. Director Local Fund Audit, Khyber Pakhtunkhwa, Peshawar
- xxi. PS to Finance Secretary.
- xxii. PAs to all Additional Secretaries/Deputy Secretaries in Finance Department
- xxiii. All Section Officers/Budget Officers in Finance Department
- xxiv. Mr. Siraj Burki, Chairman, All Paramedics Association, Khyber Pakhtunkhwa, Peshawar.
- xxv. Mr. Johar Ali, President, Provincial Association, Khyber Pakhtunkhwa.

(MURAD AHMAD)
SECTION OFFICER (FR)



HEALTH SERVICES, KHYBER PAKHTUNKHWA, PESHWAR



Consequent upon approval accorded by the Departmental Promotion Committee, the following Clinical Technicians Cardiology (BS-12) are hereby promoted to the post of Senior Clinical Technicians Cardiology (BS-14) with immediate effect:-

i.Ho	N	Place of Posting
1.	Nanic Shah Khisro Badshah S/O Muhammad	DHQ Hosp: Batkhelp
2.	Afzal Syed Zarin Shah S/O Rahmat Shah	DHQ Hosp: Daggar Buner
3.	Raham Bacha S/O Khaista	SGT Hosp; Swat
4.	Shah Nawaz S/O Badam Khan	LRH Peshawar
5.	Khalil-ur-Rehman S/O Habibullah	SGT Hosp; Swat
8.	Niaz Ali S/O Noorul Huda	SGT Hosp; Swat
7.	Gul Faraz 5 /O Muhammad Aslam -	BBST Hosp: Abbottabad .
8.	Dii Nawaz Khan S/O Gul Nawaz Khan	AS NWA Miranshah
9.	Shamsur Rahman S/O Sharafat Khan	DHO Chitral
10.	Azizullah S/O Azim Khan	W&C Hosp; Kohat
11.	Sajjad Ahmad S/O Ghulam Musa	; DHQ Hosp: Chitral
12.	Sadbar Khan S/O Almir Khan	AHQ Hosp; Bajaur
13.	M. Almai S/O Abdul Majeed Khan	Ayub TH Abbottabad F
14	Tasteem Iqbal S/O Muhammad Iqbai	bedestoddd HT duya
15.	Imiliaz Awan S/O Muhammad Irfan	BBST Hosp; Abbottabad
16.	Muhammad Parvez S/O Mir Abdullah	Ayub TH Abbottabad
17.	Riaz Ahmad S/O Muhammad Rashid	HMC Peshawar
18.	Qalsar Anwar S/O Abdul Wahab Khal	lak DHQ Hosp; DI Khan
19.	Rehmanullah 5/O Badshafi Khan	AHQ Hosp; Miranshah
	ijaz Ali S/O Muhammad Zaman	KTH Peshawar
20.	Alam Zeb S/O Khalil ur Rehman	i BBST Hosp; Abbortabad
21.	Alam 200 3/0 Kitali Sana Kabir	DHQ Hops; Chitral
122.	Naskrud Din S/O Muhammad Kabir Ghani-ur-Rehman S/O Muhammad	DHQ Hosp: KDA Kohat .
23.	пармап	
24.	Fida Hussair S/O Noor Gul	AHQ Hosp; Parachinar
25.	Asghar Khan S/O Muhammad Akha	SHPD Peshawar
26.	Khan Muhammad Faheem Durrani 5/O	
	Hakim Khan	

	Nasirud Din S/O Muhammad Kabir	DHQ Hops: Chitral
22. 23.	Ghani-ur-Rehman S/O Muhammad	DHQ Hosp; KDA Kohal
20.	Rahman	AHQ Hosp: Parachinar
24.	Fida Hussain S/O Noor Gul Asghar Khan S/O Muhammad Akbar	SHPD Peshawar
25.	Khan Muhammad Faheem Durrani S/O	DHO Nowshera
26.	Hakim Khan Humaira Tabassum D/O Abdul Wahid	SGT Hosp; Swat
27.	The same of the sa	KTH Peshawar
28.	Zobalda Parveen Ali Zaman Khan S/O Sher Ghani Khan	DHQ Hosp: Bannu
29.	All Calling Kilon Si	 .

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30.	Yannah .	BBST Hosp: Abbattabad				
31.	Salah-ud-Din S/O Salim Khan	W&C Hosp: Karak				
32.	Rashid Ahmad 5/O Khalil-ur-Rehman	MMC Hosp; Mardan				
33.	Syed Yahya Hussain S/O S. Israr	AHQ Hosp; Parachinar				
34.,	Hussain : Habib Gui S/O Farid Gui	DHQ Hosp; Swabi	1			
35.	Muhammad Islam S/O Bandar Khan	DHQ Hosp; Dir Lawer	4			
·36.	Muhammad Irfan S/O Khalil-ur- Rehman	DHQ Hosp: Batkhela	-			
37.	Mehmoodullah S/O Hamid Ullah	DHQ Hosp; Karak	_			
38.	Muhammad Rahim-S/O Abdul Aziz	DHQ Hosp; Dir Lower				
39.	Syed Nazakat Ali Shah 5/0 Syed Abbas Ali Shah	DHQ Hosp; D.I.Khan	_			
40.	Muhammad Sher All S/O Abdul Latil	DHO Swat	_			
41.	Nabi Rahmat S/Q Abdul Wali Khan	DHQ Hosp; Chitral	_			
42.	Rashid Khan s/O Amanullah	AHQ Hosp: Miranshah				
43.	Rahmatullah S/O Shaista Khan	DHQ Hosp; Lakki Marwat	4			
44.	laved Hayat S/O Umar Hayat	DHQ Hosp; Swabi				
45.	Gohar Zaman S/O Fazle Rahim	MASM Hosp: Peshawar	_			
46.	Habibullah 5/Q Muhammad Ullah (LRH'Peshawar	_			
47.	Muhammad Ali Shah S/o Bakht Rawar	n DHQ Hosp; Batkhela	_			
48.	Nasir Khan S/O Sabir Khan	AHQ Hosp: Wana				
49.	Muhammad Arif S/o Raham Din	DHQ Hosp; KDA Kohal				
. 50.	Muhammad Abid S/D Muhammad G	ul HMC Peshawar	_			
51.	Mussarat Shaheen D/O Muhammad	SGT Hasp; Swat	5			
52.	Ayaz Ihsanullah S/O Zalnullah	NBM Hosp; Peshawar	1			

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	delli)	FBH b	eshawar				
46.	Habibullah S/O Muhammad Ullah	DHQ Hosp: Batkhela					
47.	Muhammad Ali Shah S/o Bakht Rawan		Hosp; Wana				
48.	Nasir Khan S/O Sabir Khan	AHU	Hospi von Kohat				
	Muhammad Arif Sijo Raham Din	·	Hosp: KDA Kohat				
49.	Muhammad Abid S/O Muhammad Gul	HMC	C Peshawar .				
50.	Muhammad Abid 3/O Muhammad Mussarat Shaheen D/O Muhammad	SGT	Hosp: Swat				
51.		1					
	ihsanullah S/O Zalnullah		M Hosp: Peshawar				
52.	thsanulan 3/0 can	DH	M Hosp: Charsadda AM Hosp: Peshawar				
53.	Nasir Shah D/O Gul Shah	915	NBM Hosp: Peshawar				
54.	Syed Mukhtiar Hussain S/O S. Wazir	IAL	WBM				
	Shah Muhammad Amin S/O Muhammad	a	HQ Hosp: Mardan				
55.		l					
	Salman Shezad S/D Inayat Ahmad	\ H	IMC Peshawar				
56.	Salman Snezau 3/P	75	SGT Hosp: Swat				
57.	Inamullah S/O Shabuddin	ani HMC Peshawar					
58.	Shakoor Muhammad 5/0 Usman Gh		Services Hosp; Peshawar				
1	Ahmad	Ahmad Services Hosp					
59.		n \	DHO Kôhat.				
60.	Raziq Aslam S/O Wallet		BKMC, Swabi				
61	Wahid Zaman S/O Ashraf Khan		DHQ Hosp; Nowshera				
62	Wahid Ali Khan S/O Mehmood Kha	an .					
	- About		DHQ Hosp: Chitral				
63	Oavum Baig		KAT Hosp: Mansehra				
64							
i	Market Contract Charles To Contract Contrac	nad	MMC Hosp; Mardan				
•	5. Walld All Shah 3/O Israr Witham.		HMC Peshawar.				
6	6. Khadim Shah S/Q Syed Ali Shah	Scanned b					

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	and all Cabib Khan	AHQ Hosp: Miranshah		
	oor Sahib Khan S/O Mir Sahib Khan	AHQ Hosp; Parachinar		
8. 10	bal Hussaln S/D.Gul Hussain			
	angriz Khan 5/O Hikmat Khan	NBM Hosp: Peshawar		
		W&C Hosp: Kohat AHQ Hosp: Ghallanal		
70.	ahid lqbal S/O Ghulam Habib			
71.	Nihayat Sher S/O	AHQ Hosp: Mansehra KGNT Hosp: Bannu		
	Raz Muhammad S/O Jalal Khan			
12.	Kaz Monanida a sa			
73.	Rehman Ullah 5/O Nek Muhammad			

Alterted

-53-

ť	72.	And Muhammad S/O Jaidt Milett	AHQ Hosp; Mansehra
1		Naz Wildrich	KGNT Hosp: Bannu
	73.	Rehman Ullah S/O Nek Muhammad	100 441

On their promotion as Senior Clinical Technicians Cardiology (BS-14) the following posting/ transfer are hereby ordered in the interest of public service with immediate effect:-

			To	1	Remarks	1	
S.No	Name/F. Name of	From				.	
	Officials Shah Khisro Badshah S/O	DHQ Hosp;	DHQ H		Against the vaca	nt	
\ \	Muhammad Afzal	Batkhela	<u> </u>				
2	Syed Zarin Shah 5/0	DHQ Hosp:	DHOH		Do-		
- 1	Rahmat Shah	Daggar Buner	1	Buner	00-		•
3.	Raham Bacha S/O	SGT Hosp:	SGT H	osp.	, 1		
•	Khaista	Swat		A Hosp:	. Do-		
A.	Shah Nawa45/0	LRH Peshawar	Peshi	,			
. 1	Badam Khan	<u> </u>		10sp:	50-		•
5.	Khalil-ur-Rehman	SWat	Swat	i			4
1	S/O Habibullah		SGT	Hose;	Do-		a
6.	Niaz Ali S/O Noorul	Swat	Sw3	l [*]	Do-		
	Huda (O	BBST Hosp;	DHC	Hosp:	00-		, K
7.	Gul Faraz S /O Muhammad Aslam]]]	Batt	ağı sın	Do-		
	Dil Nawaz Khan S/	ASNWA	ДН	o Lakki	•		,
8.	Gul Nawaz Khan	Miranshah			 		
9	Shamsur Rahman	DHO Chitral	(G Dir Ner	Do-	3/	W. C.C.
) 3	S/O Sharafat Khan		10	Ner	00-	-+1/0	istigation and
10.	Azizuliah S/O Azim	M&C Hosp;	. DH	(O Karak		A CONTRACTOR OF THE PARTY OF TH	SE WINK
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59	Izaz Ali S/O Mumtz		Hosp;	Do.
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59.	Razig Aslam S/O		DHQ Hosp:	Do-
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72. Renman Omnad Nek Muhammad	Bannu	ni-storate i	for record.

N.B: Arrival/ Departure should be submitted to this Directorate for record.

Sd/xxxxx Director General Health Services, Khyber Pakhtunkhwa Peshawar

((Promotion Cell) Dated Peshawar the 27/04/2021 No.2156-7199 Copy forwarded to the:-

- All Sub-offices of Health Services in Khyber Pakhtunkhwa.
- 1.
- All Hospital Directors (MTIs) in Khyber Pakhtunkhwa. All Deans/ Principal of Medical Colleges in Khyber Pakhtunkhwa Peshawar 2.
- Accountant General Khyber Pakhtunkhwa Peshawar. 3.
- All District Account Officers in Khyber Pakhtunkhwa 4
- Deputy Director (Paramedics), DGHS, KPK, Peshawar. 5.
- PA to DG Health Services Khyber Pakhtunkhwa Peshawar. 6. 7.
- Official Concerned.
- Suptt: Promotion Cell, DGHS, KPK, Peshawar. 8. 9.
- Personal Files. 10.

For Information and necessary action.

Directorate General Health Services, Khyber Pakhtunkhwa Peshawar.

Maddadabhan

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 243/2023

Versus

<u>Affidavit</u>

I, Laeeq Ahmad, Focal Person (Litigation) 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 on behalf of Respondent are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'able Court. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off / costs.

Deponent



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 # 091-9210269 Fax # 091-9210230

AUTHORITY LETTER

Mr. Laeeq Ahmad Focal Person (Litigation) Directorate General Health Services, Khyber Pakhtunkhwa, is hereby authorized to submit parawise comments in case Service Appeal No. 243/2023 titled Shah Khisro Badshah VS Govt. of Khyber Pakhtunkhwa & others on behalf of the undersigned.

Director General Health Services Khyber Pakhtunkhwa, Peshawar.