

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

SERVICE APPEAL NO. 243/2023

Shah Khisro Badshah.....**Appellant**

Versus

Government of Khyber Pakhtunkhwa & others**Respondents**

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BEFORE THE HONORABLE KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 243 OF 2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6516

Shah Khisro Badshah.....Appellant Dated 17/07/23

Versus

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

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 he 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

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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 aggrieved 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.

10. 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.

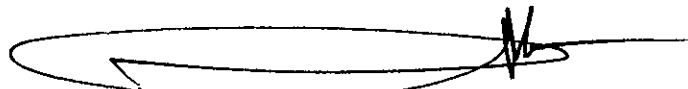
ON GROUNDS:


- 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

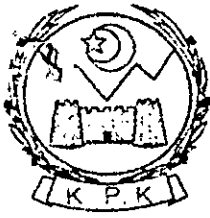

Director General Health Services Khyber
Pakhtunkhwa Peshawar
Respondent No. 03


Medical Superintendent DHQ Hospital
Batkhela Malakand
Respondent No. 04

DIRECTORATE GENERAL HEALTH SERVICES

KHYBER PAKHTUNKHWA

PESHAWAR



OFFICE ORDER

All-communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

E-Mail Address: K.P.Kdghs@yahoo.com

Office Ph# 091 - 9210269

Exchange# 091 - 9210187

Annex A

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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	LRH Peshawar
2.	Tajamul Hussan	LRH Peshawar
3.	Wisal Muhammad	DHQH: Charsadda
4.	Muhamamd Ali Baqir	KTH Peshawar
5.	Syed Aslam Shah	DHQH: ICDA Kohat
6.	Hukam Khan	DHQH: Dikhan
7. ✓	Shah Khesro	DHQH: Baidkella

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

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

Attested
[Signature]

NAME/F/NAME OFFICIAL	FROM	TO	REMARKS
1. Gulzar Muhammad	LRH Peshawar	LRH Peshawar	Against the vacant post
2. Tajamul Hussan	LRH Peshawar	LRH Peshawar	Do
3. Wisal Muhammad	DHQH: Charsadda	DHQH: Peshawar	Do
4. Muhamamd Ali Baqir	KTH Peshawar	KTH Peshawar	Do
5. Syed Aslam Shah	DHQH: KDA Kohat	DHQH: KDA Kohat	Do
6. Hukam Khan	DHQH: DI Khan	DHQH: DI Khan	Do
7. Shah Khesro	DHQH: Batkhella	DHQH: Batkhella	do

SD GENERAL DIRECTOR GENERAL HEALTH SERVICES KHYBER PAKHTUNKHA PESHAWAR

No 13003-15

/AE-VII

Dated 20/05/2020

Copy forwarded to the:

1. Chief Executive KTH/ LRH Peshawar.
 - 3 MS DHQH: KDA Kohat
 - 4 MS DHQH: DI Khan
 - 5 MS DHQH: Batkhella
 - 6 MSDHQH: Mardan.
 - 7 MSDHQH: Charsadda.
 - 8 P/S to Secretary to Govt of K.P.K Health Department, Peshawar
 - 9 PA to LGHS, K.P.K Peshawar.
 - 10 Director Health Services FATA.
 - 11 MSADHQH: NW Miranshan.
 - 12 ADP-II DGHS KPK Peshawar.
 - 13 Personnel file.
 - 14 Syed Faiz Ali Shah, i/c Paramedics promotion cell DGHS, K, Peshawar.
- For information & necessary action.

(Signature)
 DIRECTOR GENERAL HEALTH SERVICES
 KHYBER PAKHTUNKHA PESHAWAR

Attested
 (Signature)

18/05/2020

Ancum B 6
The Director General Health
Services Khyber Pakhtun
Peshawar

Through:

Proper channel

Subject:
R/Sir

Promotion of Jr. clinical
Technician (Cardiology)

Ref: order No. 13003-15/AE-
dated 20/05/10.

I have the honour to state
that I am willing to forego promotion and
request to remain in this hospital as due
to some unavoidable domestic problems.

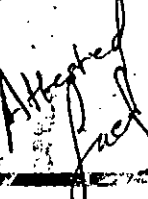
I hope that my this request
will be considered sympathetically.

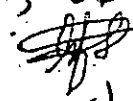
Thanks

Dated: 2-6-2010.

Forwarded to Director General
Health Services for necessary
action


Medical Superintendent
Hospital Batakela

Attested


Yours obedient

Shah Khisro
Jr. clinical Tech
(Cardiology)
DHQ Hospital
Batakela

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Copy

Medical
06/2010

Jive
Batakela
DHS KH

6

reference



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

Dated: Peshawar, 11-08-2015

Annex C

NOTIFICATION

NO. SO(FR)/FD/10/2015/Paramedics The competent authority has been pleased to upgrade all the Paramedics Staff appointed under Khyber Pakhtunkhwa Civil Servants 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 in 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 upgradation policy.
- iii. The Paramedics presently serving in BS-16 and BS-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 BS-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 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 no affection to the above employees.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Encl: No. & Date even.

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

1. PS to Additional Chief Secretary, FATA.
2. All Administrative Secretaries Government of Khyber Pakhtunkhwa.
3. Senior Member, Board of Revenue, Khyber Pakhtunkhwa Peshawar.
4. Accountant General, Khyber Pakhtunkhwa Peshawar.
5. Secretary to Governor, Khyber Pakhtunkhwa Peshawar.
6. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. Registrar, Peshawar High Court, Peshawar.
10. All Deputy Commissioners, Political Agents, District & Sessions Judges/Executive District Officers in Khyber Pakhtunkhwa.

Attested

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GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE 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 in 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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- 10. Chairman, Khyber Pakhtunkhwa, Public Service Commission, Peshawar.
- 11. Registrar, Service Tribunal Khyber Pakhtunkhwa.
- 12. Secretary to Govt. of Punjab, Sindh and Balochistan, Finance Department, Lahore, Karachi and Quetta.
- 13. The District Comptroller of Accounts, Peshawar, Mardan, Kohat, Bannu, Abbottabad, Swat and D.I-Khan.
- 14. The Senior District Accounts Officer, Nowshera, Swabi, Charsadda, Haripur, Mansehra and Dir Lower.
- 15. The Treasury Officer, Peshawar.
- 16. All District/Agency Accounts Officers in Khyber Pakhtunkhwa / FATA.
- 17. PSO to Senior Minister for Finance, Khyber Pakhtunkhwa.
- 18. PSO to Chief Secretary, Khyber Pakhtunkhwa.
- 19. Director Local Fund Audit, Khyber Pakhtunkhwa Peshawar.
- 20. PS to Finance Secretary.
- 21. PAs to All Additional Secretaries/ Deputy Secretaries in Finance Department.
- 22. All Section Officers/Budget Officers in Finance Department.
- 23. Mr. Siraj Burki, chairman, All Paramedics Association, Khyber Pakhtunkhwa, Peshawar.
- 24. Mr. Johar Ali, President, Provincial Paramedical Association, Khyber Pakhtunkhwa.

(Handwritten Signature)
 (MURAD AHMAD)
 SECTION OFFICER (FR)
 (0919212635)

(Handwritten Signature)
 Ahmed

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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)



467-30-
DIRECTORATE GENERAL
HEALTH SERVICES, KHYBER
PAKHTUNKHWA, PESHAWAR

B Anwar D
S.No-1
S.No-36
47

OFFICE ORDER:-

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:-

S.No	Name	Place of Posting
1.	Shah Khisro Badshah S/O Muhammad Afzal	DHQ Hosp; Batakheh
2.	Syed Zarin Shah S/O Rahmat Shah	DHQ Hosp; Daggar Buner
3.	Raham Bacha S/O Khalsta	SGT Hosp; Swat
4.	Shah Nawaz S/O Badam Khan	LRH Peshawar
5.	Khalil-ur-Rehman S/O Habibullah	SGT Hosp; Swat
6.	Niaz Ali S/O Noorul Huda	SGT Hosp; Swat
7.	Gul Faraz S/O Muhammad Aslam	BBST Hosp; Abbottabad
8.	Dil 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 Ajmir Khan	AHQ Hosp; Bajaur
13.	M. Ajmal S/O Abdul Majeed Khan	Ayub TH Abbottabad
14.	Tasteem Iqbal S/O Muhammad Iqbal	Ayub TH Abbottabad
15.	Imtiaz 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.	Qaisar Anwar S/O Abdul Wahab Khatak	DHQ Hosp; Di Khan
19.	Rehmanullah S/O Badshah Khan	AHQ Hosp; Miranshah
20.	Ijaz Ali S/O Muhammad Zaman	KTH Peshawar
21.	Alam Zeb S/O Khalil ur Rehman	BBST Hosp; Abbottabad
22.	Nasrud Din S/O Muhammad Kabir	DHQ Hops; Chitral
23.	Ghani-ur-Rehman S/O Muhammad Rahman	DHQ Hosp; KDA Kohat
24.	Fida Hussain S/O Noor Gul	AHQ Hosp; Parachinar
25.	Asghar Khan S/O Muhammad Akbar Khan	SHPD Peshawar
26.	Muhammad Faheem Durrani S/O Hakim Khan	DHO Nowshera.

DIRECTOR GENERAL
HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Attested
[Signature]

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

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30.	Nisar Tabassum F/N Muhammad Yaqoob	BBST Hosp; Abbottabad
31.	Salah-ud-Din S/O Salim Khan	W&C Hosp; Karak
32.	Rashid Ahmad S/O Khalil-ur-Rehman	MMC Hosp; Mardan
33.	Syed Yahya Hussain S/O S. Israr Hussain	AHQ Hosp; Parachinar
34.	Habib Gul S/O Farid Gul	DHQ Hosp; Swabi
35.	Muhammad Islam S/O Bandar Khan	DHQ Hosp; Dir Lower
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 S/O Syed Abbas Ali Shah	DHQ Hosp; D.I.Khan
40.	Muhammad Sher Ali S/O Abdul Latif	DHO Swat
41.	Nabi Rahmat S/O Abdul Wali Khan	DHQ Hosp; Chitral
42.	Rashid Khan S/O Amanullah	AHQ Hosp; Miranshah
43.	Rahmatullah S/O Shalsta Khan	DHQ Hosp; Lakki Marwat
44.	Javed Hayat S/O Umar Hayat	DHQ Hosp; Swabi
45.	Gohar Zaman S/O Fazle Rahim	MASM Hosp; Peshawar
46.	Habibullah S/O Muhammad Ullah	LRH Peshawar
47.	Muhammad Ali Shah S/O Bakht Rawan	DHQ Hosp; Batkhela
48.	Nasir Khan S/O Sabir Khan	AHQ Hosp; Wana
49.	Muhammad Arif S/O Raham Din	DHQ Hosp; KDA Kohat
50.	Muhammad Abid S/O Muhammad Gul	HMC Peshawar
51.	Mussarat Shaheen D/O Muhammad Ayaz	SGT Hosp; Swat
52.	Ihsanullah S/O Zainullah	NBM Hosp; Peshawar

Attested
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46.	Habibullah S/O Muhammad Ullah	LRH Peshawar
47.	Muhammad Ali Shah S/O Bakht Rawan	DHQ Hosp; Batkhela
48.	Nasir Khan S/O Sabir Khan	AHQ Hosp; Wana
49.	Muhammad Arif S/O Raham Din	DHQ Hosp; KDA Kohat
50.	Muhammad Abid S/O Muhammad Gul	HMC Peshawar
51.	Mussarat Shaheen D/O Muhammad Ayaz	SGT Hosp; Swat
52.	Ihsanullah S/O Zainullah	NBM Hosp; Peshawar
53.	Nasir Shah D/O Gul Shah	DHQ Hosp; Charsadda
54.	Syed Mukhtiar Hussain S/O S. Wazir Shah	NBM Hosp; Peshawar
55.	Muhammad Amin S/O Muhammad Ibrahim	DHQ Hosp; Mardan
56.	Salman Shezad S/O Inayat Ahmad	HMC Peshawar
57.	Inamullah S/O Shabuddin	SGT Hosp; Swat
58.	Shakoor Muhammad S/O Usman Ghani	HMC Peshawar
59.	Izaz Ali S/O Mumtaz Ahmad	Services Hosp; Peshawar
60.	Raziq Aslam S/O Muhammad Aslam	DHQ Kohat.
61.	Wahid Zaman S/O Ashraf Khan	BKMC, Swabi
62.	Wahid Ali Khan S/O Mehmood Khan	DHQ Hosp; Nowshera
63.	Munawar Ahmad Baig S/O Abdul Qayum Baig	DHQ Hosp; Chitral
64.	Iftikhar Ahmad S/O Khani Zaman	KAT Hosp; Mansehra
65.	Wajid Ali Shah S/O Israr Muhammad	MMC Hosp; Mardan
66.	Khadim Shah S/O Syed Ali Shah	HMC Peshawar.

DIRECTOR GENERAL
HEALTH SERVICES
MINISTRY OF HEALTH, PESHAWAR

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67.	Noor Sahib Khan S/O Mir Sahib Khan	AHQ Hosp: Miranshah
68.	Iqbal Hussain S/O Gul Hussain	AHQ Hosp; Parachinar
69.	Jangriz Khan S/O Hikmat Khan	NBM Hosp; Peshawar
70.	Zahid Iqbal S/O Ghulam Habib	W&C Hosp; Kohat
71.	Nihayat Sher S/O	AHQ Hosp: Ghallanai
72.	Raz Muhammad S/O Jalal Khan	AHQ Hosp: Mansehra
73.	Rehman Ullah S/O Nek Muhammad	KGNT Hosp; Bannu

Attested
[Signature]

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72.	Raz Muhammad S/O Jalal Khan	AHQ Hosp; Mansehra
73.	Rehman Ullah S/O Nek Muhammad	KGNT Hosp; Bannu

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:-

S.No	Name/F. Name of Officials	From	To	Remarks
1.	Shah Khisro Badshah S/O Muhammad Afzal	DHQ Hosp; Batkhela	DHQ Hosp; Batkhela	Against the vacant post
2	Syed Zarin Shah S/O Rahmat Shah	DHQ Hosp; Daggar Buner	DHQ Hosp; Daggar Buner	Do-
3.	Raham Bacha S/O Khaista	SGT Hosp; Swat	SGT Hosp; Swat	Do-
4.	Shah Nawaz S/O Badam Khan	LRH Peshawar	MASM Hosp; Peshawar	Do-
5.	Khalil-ur-Rehman S/O Habibullah	SGT Hosp; Swat	SGT Hosp; Swat	Do-
6.	Niaz Ali S/O Noorul Huda	SGT Hosp; Swat	SGT Hosp; Swat	Do-
7.	Gul Faraz S/O Muhammad Aslam	BBST Hosp; Abbottabad	DHQ Hosp; Battagram	Do-
8.	Dil Nawaz Khan S/O Gul Nawaz Khan	AS NWA Miranshah	DHO Lakk	Do-
9	Shamsur Rahman S/O Sharafat Khan	DHO Chitral	DHO Dir Lower	Do-
10.	Azirullah S/O Azim Khan	W&C Hosp; Kohat	DHO Karak	Do-
11	Sajjad Ahmad S/O Ghulam Musa	DHQ Hosp; Chitral	DHO Dir Upper	Do-
12.	Sadbar Khan S/O Ajmir Khan	AHQ Hosp; Bajaur	DHO Dir Upper	Do-
13.	M. Ajmal S/O Abdul Majeed Khan	Ayub TH Abbottabad	KAT Hosp; Mansehra	Do-
14	Tasneem Iqbal S/O Muhammad Iqbal	Ayub TH Abbottabad	KAT Hosp; Mansehra	Do-
15.	Imtiaz Awan S/O Muhammad Irfan	BBST Hosp; Abbottabad	BBST Hosp; Abbottabad	Do-
16	Muhammad Parvez S/O Mir Abdullah	Ayub TH Abbottabad	DHQ Hosp; Battagram	Do-
17.	Riaz Ahmad S/O Muhammad Rashid	HMC Peshawar	DHQ Hosp; Charsadda	Do-
18.	Qaiser Anwar S/O Abdul Wahab Khatak	DHQ Hosp; DI Khan	DHO D.I Khan	Do-
19.	Rehmanullah S/O Badshah Khan	AHQ Hosp; Miranshah	DHO Tank	Do-

DIRECTOR GENERAL
HEALTH SERVICES
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20.	Ijaz Ali S/O Muhammad Zaman	KTH Peshawar	DHO Haripur	Do-
21.	Alam Zeb S/O Khalil ur Rehman	BBST Hosp; Abbottabad	BBST Hosp; Abbottabad	Do-
22.	Nasirud Din S/O Muhammad Kabir	DHQ Hops; Chitral	DHQ Hosp; Chitral	Do-
23.	Ghani-ur-Rehman S/O Muhammad Rahman	DHQ Hosp; KDA Kohat	DHQ Hosp; Karak	Do-
24.	Fida Hussain S/O Noor Gul	AHQ Hosp; Parachinar	DHO Swat	Do-
25.	Asghar Khan S/O Muhammad Akbar Khan	SHPD Peshawar	Services Hosp; Peshawar	Do-
26.	Muhammad Faheem Durrani S/O Hakim Khan	DHO Nowshera.	DHQ Hosp; Nowshera	Do-
27.	Humaira Tabassum D/O Abdul-Wahid	SGT Hosp; Swat	SGT Hosp; Swat	Do-
28.	Zubnida Parveen	KTH Peshawar	SHPD Peshawar	Do-
29.	Ali Zaman Khan S/O Sher Ghani Khan	DHQ Hosp; Bannu	DHO Bannu	Do-
30.	Nisar Tabassum F/N Muhammad Yaqoob	BBST Hosp; Abbottabad	BBST Hosp; Abbottabad	Do-
31.	Salah-ud-Din S/O Salim Khan	W&C Hosp; Karak	DHO Karak	Do-
32.	Rashid Ahmad S/O Khalil-ur-Rehman	MMC Hosp; Mardan	DHQ Hosp; Mardan	Do-
33.	Syed Yahya Hussain S/O S. Israr Hussain	AHQ Hosp; Parachinar	DHO Shangha	Do-
34.	Habib Gul S/O Farid Gul	DHQ Hosp; Swabi	BKMC Swabi	Do-
35.	Muhammad Islam S/O Bandar Khan	DHQ Hosp; Dir Lower	DHQ Hosp; Dir Lower	Do-
36.	Muhammad Irfan S/O Khalil-ur- Rehman	DHQ Hosp; Balkhela	DHQ Hosp; Balkhela	Do-
37.	Mehmoodullah S/O Hamid Ullah	DHQ Hosp; Karak	DHQ Hosp; Karak	Do-
38.	Muhammad Rahim S/O Abdul Aziz	DHQ Hosp; Dir Lower	DHQ Hosp; Dir Lower	Do-
39.	Syed Nazakat Ali Shah S/O Syed Abbas Ali Shah	DHQ Hosp; D.I.Khan	DHO Lakki	Do-
40.	Muhammad Sher Ali S/O Abdul Latif	DHO Swat	DHO Swat	Do-
41.	Nabi Rahmat S/O Abdul Wali Khan	DHQ Hosp; Chitral	DHQ Hosp; Chitral	Do-
42.	Rashid Khan S/O Amanullah	AHQ Hosp; Miranshah	DHO Malakand	Do-
43.	Rahmatullah S/O Shalsta Khan	DHQ Hosp; Lakki Marwat	DHQ Hosp; Lakki Marwat	Do-
44.	Javed Hayat S/O Hamar Hayat	DHQ Hosp;	DHQ Hosp;	Do-

DIRECTOR GENERAL
HEALTH SERVICES
HYDERABAD PAKISTAN

Attested
Javed

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46	Habibullah S/O Muhammad Ullah	LRH Peshawar	DHO Nowshera	Do-
47	Muhammad Ali Shah S/O Bakht Rawan	DHQ Hosp; Batkhele	DHO Malakand	Do-
48	Nasir Khan S/O Sabir Khan	AHQ Hosp; Wana	DHQ Hosp; Shangla	Do-
49	Muhammad Arif S/O Raham Din	DHQ Hosp; KDA Kohat	DHQ Hosp; KDA Kohat	Do-
50	Muhammad Abid S/O Muhammad Gul	HMC Peshawar	Services Hosp; Peshawar	Do-
51	Mussarat Shaheen D/O Muhammad Ayaz	SGT Hosp; Swat	DHO Swat	Do-
52	Ihsanullah S/O Zainullah	NBM Hosp; Peshawar	NBM Hosp; Peshawar	Do-
53	Nasir Shah D/O Gul Shah	DHQ Hosp; Charsadda	DHQ Hosp; Charsadda	Do-
54	Muhammad Amin S/O Muhammad Ibrahim	DHQ Hosp; Mardan	DHQ Hosp; Mardan	Do-
55	Salman Shezad S/O Inayat Ahmad	HMC Peshawar	Retained at HMC Peshawar	Do-
56	Inamullah S/O Shabuddin	SGT Hosp; Swat	DHO Swat	Do-
57	Shakoor Muhammad S/O Usman Ghani	HMC Peshawar	DHQ Hosp; Shangla	Do-
58	Izaz Ali S/O Mumtaz Ahmad	Services Hosp; Peshawar	Services Hosp; Peshawar	Do-
59	Raziq Aslam S/O Muhammad Aslam	DHO Kohat	DHQ Hosp; Karat	Do-
60	Wahid Zaman S/O Ashraf Khan	BKMC, Swabi	BKMC, Swabi	Do-
61	Wahid Ali Khan S/O Mehmood Khan	DHQ Hosp; Nowshera	DHQ Hosp; Nowshera	Do-
62	Munawar Ahmad Baig S/O Abdul Qayum Baig	DHQ Hosp; Chitral	DHQ Hosp; Dir Upper	Do-
63	Iftikhar Ahmad S/O Khani Zaman	KAT Hosp; Mansehra	KAT Hosp; Mansehra	Do-
64	Wajid Ali Shah S/O Israr Muhammad	MMC Hosp; Mardan	DHO Mardan	Do-
65	Khadim Shah S/O Syed Ali Shah	HMC Peshawar	NSX Hosp; Swat	Do-
66	Noor Sahib Khan S/O Mir Sahib Khan	AHQ Hosp; Miranshah	M&G Hosp; Dader	Do-
67	Iqbal Hussain S/O Gul Hussain	AHQ Hosp; Parachinar	DHO Mardan	Do-
68	Jangriz Khan S/O Hikmat Khan	NBM Hosp; Peshawar	NBM Hosp; Peshawar	Do-
69	Zahid Iqbal S/O Ghulam Habib	W&C Hosp; Kohat	DHO Lakk	Do-

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HEALTH SERVICES
HYDERABAD PESHAWAR

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71.	Raz Muhammad S/O Jalal Khan	AHQ Hosp; Mansehra	DHQ Hosp; Mansehra	Do-
72.	Rehman Ullah S/O Nek Muhammad	KGNT Hosp; Bannu	DHO Lakki	Do-

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

Sd/xxxxx
Director General Health Services,
Khyber Pakhtunkhwa Peshawar

No. 2156-2299 (Promotion Cell) Dated Peshawar the 27/04/2021
Copy forwarded to the:-

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

For information and necessary action.

Attested

Directorate General Health Services,
Khyber Pakhtunkhwa Peshawar.

Medical Superintendent
Central Hospital Peshawar
[Signature]

Attested
[Signature]

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

SERVICE APPEAL NO. 243/2023

Shah Khisro Badshah.....Appellant

Versus

Government of Khyber Pakhtunkhwa & others Respondents.

Affidavit

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.

J. Javed
Deponent



ATTESTED
17/7/2023



**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.**