

31st July, 2023

1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for official respondents present. Counsel for private respondent No. 4 & 5 present and requested for time to submit reply/comments.

2. Reply/comments on behalf of official respondents submitted which are placed on file. Copy of the same handed over to learned counsel for the appellant. To come up for written reply on behalf of private respondent as well arguments on 03.10.2023 before D.B. P.P given to parties.

SCA
Kaleem Ullah
Reshwar



(Rashida Bano)
Member (J)

24th May, 2023

1. Appellant in person present. Mr. Fazal Shah Mohmand, Additional Advocate General for official respondents present. Counsel for private respondents No. 4 & 5 present.

2. Written reply on behalf of respondents has not been submitted. Learned counsel for private respondents No. 4 & 5 seeks time for submission of written reply. Appellant is directed to deposit TCS expenses within 3 days for summoning respondents No. 3. Adjourned. To come up for written reply on behalf of official as well as private respondents on 26.06.2023 before S.B. P.P given to the parties.

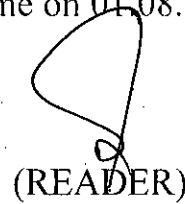


(Kalim Arshad Khan)
Chairman

Kaleem Ullah

26.06.2023

Learned Member (Executive) Mr. Muhammad Akbar Khan is on leave, therefore, to come up for the same on 01.08.2023.



(READER)


Expense for TCS
not submitted
App.
Mohmand

SCANNED
K7 ST
Peshawar

SCANNED
K7 ST
Peshawar

16.02.2023 Counsel for the appellant present. Muhammad Riaz Khan Painsdakhel learned Assistant Advocate General for respondents present.

Written reply/comments not submitted. Out of district respondents are required to be served through TCS, therefore, appellant is directed through counsel to do the needful and out of district respondents be summoned through TCS for submission reply. Adjourned. To come up for written reply/comments on 05.04.2023 before S.B.


(Rozina Rehman)
Member (J)

05th April, 2023

Counsel for the appellant present. Mr. Asad Ali Khan, Asstt. A.G alongwith Safiullah, Focal Person for the respondents present.

Reply/comments on behalf of the respondents not submitted. Learned AAG requested for further time. Another opportunity granted. To come up for written reply/comments on 24.05.2023 before the S.B. Parcha Peshi given to the parties.


(Farzha Paul)
Member(E)

SCANNED
K. P. T
Peshawar

SCANNED
K. P. T
Peshawar

28.11.2022

Counsel for the appellant present.

Security and process fee not deposited. Learned counsel for the appellant is directed to deposit security & process fee within 03 workings days, whereafter notices be issued to respondents for submission of written reply. To come up for written reply/comments on 05.01.2023 before S.B.



(Rozina Rehman)
Member (J)

Local respondent was put
out district on no bice wh/ku
on no bice wh/ku
SCANNED
KPST
Peshawar
Rs-100/-
Appellant Deposited
Security & Process Fee

A. M. J. I. H.
28/11/22

5th Jan, 2023

Learned counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Written reply on behalf of the respondents has not submitted. Respondents are directed through learned AAG to submit written reply/comments on the next date positively. Last chance is given to the respondents for written reply/comments. To come up for written reply/comments on 16.02.2023 before S.B.



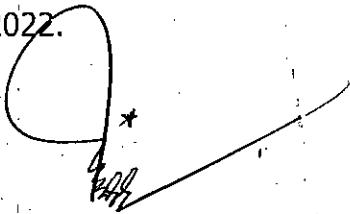
(Kalim Arshad Khan)
Chairman

SCANNED
KPST
Peshawar

18.08.2022

Mr. Farooq Malik, Advocate for the appellant present and submitted additional documents which is placed on file. Preliminary arguments heard.

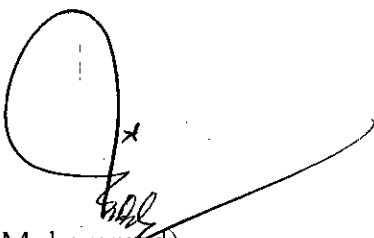
Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 06.10.2022.



(Mian Muhammad)
Member (E)

06.10.2022

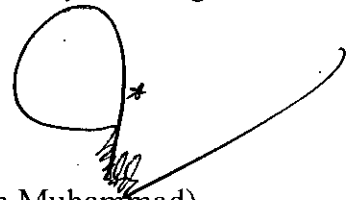
Counsel for the appellant present and submitted an application for extension of time to deposit security and process fee. Application is allowed. The appellant is directed to deposit security and process fee within three working days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 28.11.2022 before S.B.



(Mian Muhammad)
Member (E)

19.07.2022

Learned counsel for the appellant present and requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for preliminary hearing on 03.08.2022 before S.B.




(Mian Muhammad)
Member (E)

03.08.2022

Nobody present on behalf of appellant.

Notices be issued to appellant and his counsel for preliminary hearing on ~~25.08~~ 25.08.2022 before S.B.



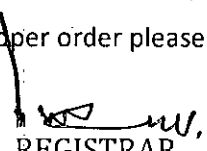


(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

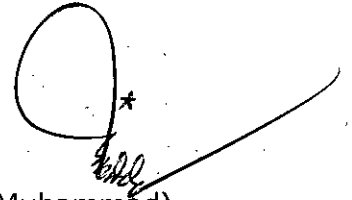
Case No.- _____ 50/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1-	2	3
1-	13/01/2022	<p>The appeal of Mr. Muhammad Tahir presented today by Mr. Muhammad Farooq Malik Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>28/02/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>28.02.2022</p> <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 26.05.2022 for the same as before.</p> <p style="text-align: right;"> Reader</p>

SCANNED
KPST
Peshawar

26.05.2022

Learned counsel for the appellant present and requested for adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing on 10.07.2022 before S.B.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

(Mian Muhammad)
Member (E)

(7)

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

In Re: Service Appeal No. 50 /2022

Muhammad Tahir.....Applicant/ Appellant

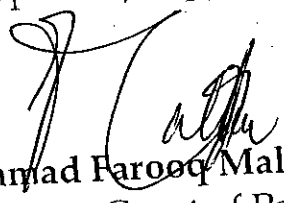
VERSUS

DG Health KPK and others.....Respondents

INDEX

S.No	Description of Documents	Pages
1.	Memo of application for additional documents	1-4
2.	Affidavit	"4-A"
3.	Copy of Initial Appointment	5-8
4.	Copy of Office Order dated 5-01-2017	9-
5.	Copy of Seniority List	10
6.	Copy of appointment orders of Private Respondents	
7.	Copy of Departmental Appeal	11-13
8.	Others Documents	14-17

Through Applicant/ Appellant


Muhammad Farooq Malik

Advocate Supreme Court of Pakistan

Date: ___/___/2022

(1)

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2022

Muhammad Tahir S/o Said Badshah R/o Ghandari Bala, Tehsil
Risalpura District Nowshera, currently posted as Ward Orderly in
District Health Quarter Hospital (DHQ) Nowshera
.....**Appellant**

VERSUS

1. Director General Health Services, KPK Peshawar
2. Secretary Health, Khyber Pakhtunkhwa, Civil Secretariat
Peshawar
3. M/S DHQ Hospital Nowshera.
4. Hazrat Hussain currently posted as Junior Clerk DHQ
Hospital Nowshera
5. Zulfiqar Junior Clerk *DHQ Hospital Nowshera*.....**Respondents**

**SERVICE APPEAL U/S 4 OF THE
SERVICES TRIBUNAL ACT, 1974
AGAINST THE APPOINTMENT OF
PRIVATE RESPONDENTS NO. 4 & 5
AGAINST THE RULES AND
REGULATIONS AND BY IGNORING
THE SENIORITY OF THE APPELLANT.**

Respectfully Sheweth:

1. That the appellant was initially appointed on contract basis
in the year of 2007 by the then Director General Health
Services NWFP, Peshawar vide office order dated 26-09-2007
(Copy of initial appointment order is attached as Annexure-

2. That later on appellant was regularized in the year 2016 alongwith other colleagues under Regularization Act 2016 promulgated by Govt of KPK in the 2016. (Copy of Office Order dated 05-01-2017 is attached as Annexure "B")
3. That later on seniority list of Class-IV for the post of Junior Clerk prepared by M/S DHG Hospital Nowshera wherein appellant was placed at Serial No. 4 while Private Respondents No. 4 & 5 were placed at Serial No. 1 & 9 of the Seniority List. (Copy of Seniority List is attached as Annexure "C")
4. That Competent Authority promoted Respondent No. 4 & 5 on 17-05-2021 by violating the Seniority List already prepared by M/S DHQ Hospital Nowshera. (Copy of appointment orders of Private Respondents are attached as Annexure "D")
5. That the appellant being aggrieved from the impugned seniority list by official respondents, filed Departmental Appeal to DG Health Services KPK but it was not decided within stipulated period of time. (Copy of Departmental Appeal is attached as Annexure "E")
6. That the appellant being aggrieved approach this Hon'ble Tribunal after passing of stipulated period of time inter-alia on the following grounds:

GROUND:

- a. That as a matter of fact department appointed Private Respondents No. 4 & 5 who are 3rd division matriculate, hence both were not eligible to be appointed on subject post.

(2)

- b. That act and action of respondents by not promoting appellant is illegal, unlawful and without lawful authority.
- c. That impugned promotion order is being passed against the Appellant by the authority by abusing and misusing its powers just to victimize the Appellant.
- d. That the appellant been discriminated in purview of Article 4 & 25 of Constitution of Islamic Republic of Pakistan.
- e. That the impugned action/orders/decision are without lawful authority, illegal, void ab-intio, malafide, with ulterior motive and of no legal effect.
- f. That the impugned promotion order against Appellant smacks arbitrariness, deviation from the normal procedure of law and even for disclosing no reason for passing impugned order without any legal justification.
- g. That the impugned promotion order against the Appellant on the face of record is void, unlawful and violative of Rule-21(2) r/w schedule-V of Rules of Business Khyber Pakhtunkhwa 1974.
- h. That the respondents have not acted in accordance with law in view of Article-4 of the constitution of Pakistan 1973 of r/w section 24-A of the General Clauses Act 1897 and thus the impugned promotion order passed is without merit and unsustainable in the eyes of law.

(4)

It is therefore, that on acceptance of this appeal , promotion orders of private respondents No. 4 & 5 may graciously be declared illegal, unlawful and without lawful authority and ineffective upon the rights of the appellant and consequently appellant may please be promoted as Junior Clerk as per approved Seniority List.

OR

Any other remedy deems fit and appropriate in the circumstances of this appeal.

Appellant

Through



Muhammad Farooq Malik
Advocate Supreme Court of Pakistan

Date: ___/___/2022

4-01

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

Appeal No. _____/2022

Muhammad Tahir

..... Appellant

Versus

D.G Health Service KPK and others

..... Respondents

AFFIDAVIT:

I, Muhammad Tahir S/o Said Badshah R/o Ghandari ala, Tehsil Risalpura District Nowshera, Currently posted as Ward Orderly in District Health Quarter Hospital (DHQ) Nowshera, do hereby affirm and declare on oath that the contents of instant Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

M-f Nur

Deponent

CNIC No. 17201-0811852-3

Cell No. 0309-8799518

Identified by:

Muhammad Farooq Malik

Muhammad Farooq Malik
Advocate Supreme Court of Pakistan

n.s. DHQ Hospital Ward Order

DIRECTORATE GENERAL HEALTH
SERVICES, N.W.F.P. PESHAWAR.

OFFICE ORDER

(5)

ANNEXURE = A

Consequent upon approval of the Departmental Selection Committee, the following are hereby appointed as Ward Orderlies BPS-2(2530-85-5080) with usual allowances as admissible under the Rules as per terms and conditions mentioned below: -

S #	Name/Father Name	Place of posting	Mailing Address
1	Abdul Haseeb S/O Muhammad Idrees	DHQ: Hospital Abbottabad	Moh: Khizar Zai Mirpur Abbottabad
2.	Gul Nawaz S/O Gul Zaman	DHQ: Hospital Abbottabad	Moh: Darah Vill: & P.O. Bagh Teh: & Distt: Abbottabad
3.	Masood Khan S/O Zahir Khan	DHQ: Hospital Battagram	Vill: Ajmara Teh: & District Battagram
4	Zahirullah S/O Gul Samar	DHQ: Hospital Battagram	Vill: Hotal (Batkool) Teh: Allai District Battagram
5.	Amirzada S/O Rahim Dad	DHQ: Hospital Daggar Buner	Vill: & P.O. Daggar Qala Teh: Daggar District Buner
6	Sohail Ahmad Jan S/O Waqar Ahmad Jan	DHQ: Hospital Daggar Buner	Vill: & P.O. Chagalai District Buner
7	Javid Hussain S/O Noor Muhammad Khan	DHQ: Hospital Chitral	Vill: Golden Broze Teh: & Distt: Chitral
8.	Rahmat Aziz S/O Abdul Hafeez	DHQ: Hospital Chitral	Vill: Broze Guldah Teh: & Distt: Chitral
9	Inamullah S/O Faizur Rahman	DHQ: Hospital Timergara Dir Lower	Vill: Karzeena (Paito Dara) Teh: Timergara Distt: Dir Lower
10.	Zaheerud Din S/O Naqibullah	DHQ: Hospital Timergara Dir Lower	Vill: Bandagai (Paito Dara) Teh: Timergara District Dir Lower
11.	Amjid Islam S/O Sahib Zada Khwaja Saeed	DHQ: Hospital Dir Upper	C/O Sahibzada Medical Centre Bazar Dir District Dir Upper
12.	Imran Raees S/O Mutabar Khan	DHQ: Hospital Dir Upper	C/O Syed Chairaghud-Din EDO (Primary) School & Literacy Deptt: Dir Upper
13.	Muhammad Yaseen S/O Qaim Din	DHQ: Hospital Haripur	Vill: Malkiar Teh: & Distt: Haripur
14.	Shaheen Mehmood S/O Allah Dad	DHQ: Hospital Haripur	Vill: Muri-1, P.O. Changi Bandi Teh: & Distt: Haripur
15.	Muhammad Sadiq S/O Amir Alam	Civil Hospital Dassu District Kohistan	Dassu District Kohistan
16.	Gul Mohammad Faqir Muhammad	Civil Hospital Dassu District	Vill Shergarh Tehsil Oghi District

Attested

to be filled in

(6)

		Kohistan	Mansehra
17.	Rahim Dad Khan S/O Shah Zamin Khan	AHQ: Hospital Malakand Batkhela	Vill: & P.O. Dheri Julagram Moh: Ali Sheir Khel (Dheri) Malakand Agency
18.	Abdul Hameed S/O Amir	AHQ: Hospital Malakand Batkhela	Moh: Khatkai Batkhela Malakand Agency.
19	Muhammad Ayyaz S/O Abdur Razaq	DHQ: Hospital Mansehra	Vill: Bathu Bandi Teh: Oghi District Mansehra
20	Naseer Ahmad S/O Ghulam Sarwar	DHQ: Hospital Mansehra	Vill: Nimshehra Kudal P.O. Shergarh Teh: Oghi District Mansehra
21.	Muhammad Sajjad S/O Ajmal Khan	DHQ: Hospital Mardan	Vill: Momin Kali Shergarh Teh: Takht Bhai Distt: Mardan
22.	Mushtaq Ahmad S/O Salahud Din	DHQ: Hospital Mardan	Vill: Jamal Abad P.O. Hatayan Teh: Takht Bhai Distt: Mardan
23.	Mehboob Ali Khan S/O Sir Jehan Khan	Civil Hospital Alpuri Shangla	Vill: & P.O. Balkani Teh: Alpuri Distt: Shangla
24	Syed Rasool Shah S/O Ghaznavi	Civil Hospital Alpuri Shangla	Vill: Kozkana P.O. Shahpur Teh: Alpuri District Shangla
25.	Javed Ali S/O Ghulam Hussain	DHQ: Hospital Swabi	Vill: & P.O. Adina Teh: & Distt: Swabi
26	Muhammad Hammad S/O Shah Wali Khan	DHQ: Hospital Swabi	Vill: & P.O. Pung Pir Moh:Kamal Khel Teh: & Distt: Swabi
27.	Amir Akbar Khan S/O Abdul Hadi	Saidu Group of Hospital Saidu Sharif Swat.	Vill: Baidara Teh: Matta District Swat
28.	Said Karim Shah S/O Hazrat Umar	Saidu Group of Hospital Saidu Sharif Swat	Moh: Malook Abad Mingora Teh: Baboozy Distt: Swat
29.	Anwar Badshah S/O Pir Qadam Shah	DHQ: Hospital Bannu	Vill: & P.O. Amandi Gul Badan Shah The & Distt: Bannu:
30.	Zahoor Niaz S/O Nawab Khan	DHQ: Hospital Bannu	Kotka Ghulam Sadiq Karim Khan Bist Khel Teh: & District Bannu.
31.	Muhammad Ashiq Saleem S/O Muhammad Sadiq Saleem	DHQ: Hospital D.I.Khan	H # 1101/A (New,1993/A) Moh: Jamudan Walla Muslim Bazar D.I.Khan City.
32	Nazar Muhammad S/O Bashir ud Din	DHQ: Hospital D.I.Khan	H # 419/C, Ismail Street, Choota Baza Moh: Hazrat Bilal Distt: D.I.Khan
33	Khalid Mehmood S/O Nasir Khan	DHQ: Hospital Hangu	Gulshan Colony Teh: & Distt: Hangu
34	Muhammad Rahman S/O Muhammad Amin	DHQ: Hospital Hangu	Moh: Allah Yar Khan Thal Teh: &

ALISTED

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				Distt: Hangu
35	Ateeq-ur-Rahman S/O Mohammad Saddiq	DHQ: Karak	Hospital	
36	Qayyumullah S/O Gul Rauf Khan	DHQ: Karak	Hospital	Vill: Darabba Killa P.O. Tarkha Koi Teh: & Distt: Karak
37	Javed Khan S/O Asal Khan	DHQ: Kohat	Hospital	Vill: Jiarna Tehsil & Distt: Kohat
38	Noor Ahmad S/O Jehangir Khan	DHQ: Kohat	Hospital	Vill: Billijang Tehsil & Distt: Kohat
39	Muhammad Saeed Khan S/O Mir Qalam Khan	DHQ: Lakki Marwat	Hospital	Vill: Katka Shah Jehan Teh: Serai Naurang Lakki Marwat
40	Qasim Khan S/O Awal Khan	DHQ: Lakki Marwat	Hospital	Vill: Kachi Qamar Teh: & District Lakki Marwat
41	Liaqat Aziz S/O Abdul Aziz	DHQ: Tank	Hospital	Vill: Sheikh Utar Teh: & Distt: Tank
42	Saleem Ullah Khan S/O Mohammad Yaqoob Khan	DHQ: Tank	Hospital	Vill: & P.O. Shah Alam Teh: & District Tank
43	Naeem Jan S/O Mumtaz	DHQ: Charsadda	Hospital	Vill: & P.O. Utmanzai Moh: Chmrang Abad Teh: & Distt: Charsadda
44	Syed Yasir Shah S/O Syed Hussain Ahmad	DHQ: Charsadda	Hospital	Vill: Umarzai Moh: Tanda Kobi, Tehs: & Distt: Charsadda
45	Imran Khan S/O Mir Ahmad Khan	DHQ: Nowshera	Hospital	Moh: Al-Markaz-e- Islami Khat Kalay P.O. Nowshera Khur District Nowshera
46	Muhammad Tahir S/O Said Bad Shah	DHQ: Nowshera	Hospital	Moh: Sheikhan Gandheri Bala Risalpur District Nowshera
47	Mazhar Shah S/O Muhammad Zahir Shah	City Hospital Kohat Road Peshawar		Moh: Behlol Khel Vill: & P.O. Badaber Teh: & District Peshawar
48	Noor Ali S/O Mohammad Ali	City Hospital Kohat Road Peshawar		Vill: Thakkia Nahaqi Daudzai Teh: & Distt: Peshawar

1. Their appointments will be purely on contract basis for three years renewable on yearly basis till project life and subject to satisfactory performance of the officials.
2. Their services will be liable to termination at any time without assigning any reasons or giving any notice during the incumbency of the contract period.
3. If any official wish to quite his services he will have to submit resignation on prior notice in writing at least one month earlier, failing which one month pay will be forfeited and till such time he will continue to serve the Health Department.
4. On the expiry of contract period, they will not claim any right of pension or gratuity.
5. Their appointments will be subject to fitness certificate from Medical Board.
6. If the above conditions are accepted, they will have to join the project within 10 days of the issuance of this order on his own expenses.

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(8)

7. The candidate will execute agreement Deed on judicial stamp paper of Rs. 30/- to the head of the concerned Health institute of the District.

SD/-
DIRECTOR GENERAL HEALTH
SERVICES, NWFP, PESHAWAR

No. 2300-2444/Homeo/Tibb Dated Peshawar the 28 /09/2007.

Copy forwarded to: -

1. P.S. to Minister for Health.
2. P.S. to Secretary Health.
3. Accountant General NWFP Peshawar.
4. All District Coordination Officers in NWFP.
5. All District Accounts Officers in NWFP.
6. All Executive Districts Officers (Health) in NWFP.
7. All the Medical Superintendents DHQ: Hospitals in NWFP.
8. The Medical Superintendent City Hospital Kohat Road Peshawar.
9. The Assistant Director (Accounts) DGHS, NWFP Peshawar.
10. P.A. to Director General Health Services NWFP Peshawar.
11. Official concerned

DIRECTOR GENERAL HEALTH
SERVICES, NWFP, PESHAWAR

SD
26.09.2007

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9

ANNEXURE "B"

**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 Ph (091 - 9210262) Exchange Ph 091 - 9210187, 091 - 9210196 Fax P 091 - 9210230

OFFICE ORDER

The Competent Authority is pleased to regularize the services of the following officials Homoeo Ward Orderly and Tibb Ward Orderly working on Contract basis in this Directorate General Health Services Khyber Pakhtunkhwa Peshawar, under the Khyber Pakhtunkhwa Tibb and Homoeopathic Employees (Appointment) Act, 2016 vide Notification No.PA/Khyber Pakhtunkhwa/Bills/2016/10343 dated 14-10-2016, with effect from 14-10-2016.

S.NO	NAME AND FATHER'S NAME	DESIGNATION &BPS	PLACE OF POSTING
1	Gul Nawaz S/O Gul Zaman	Ward Orderly (Homoeo) BPS -04	BBST, Hospital Abbottabad.
2	Amirzada S/O Rahim Dad	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Buner
3	Javed Hussain S/O Noor Muhammad Khan	Ward Orderly (Tibb) BPS -04	DHQ Hospital Chitral
4	Rehmat Aziz S/O Abdul Hafeez	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Chitral
5	Inamullah S/O Faizur Rehman	Ward Orderly (Tibb) BPS -04	DHQ Hospital Timergara Dir Lower
6	Zaheerud Din S/O Naqibullah	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Timergara Dir Lower
7	Amjad Islam S/O Sahib Zada Khwaja Saeed	Ward Orderly (Tibb) BPS -04	DHQ, Hospital Dir Upper
8	Imran Raees S/O Mutabar Khan	Ward Orderly (Homoeo) BPS -04	DHQ, Hospital Dir Upper
9	Shaheen Mahmood S/O Allah Dad	Ward Orderly (Tibb) BPS -04	DHQ Hospital Haripur
10	Rahimdad S/O Shah Zamin Khan	Ward Orderly (Tibb) BPS -04	DHQ Hospital Batkhela
11	Muhammad Ayaz S/O Abdul Razaq	Ward Orderly (Homoeo) BPS -04	King Abdullah Teaching Hospital Mansehra.
12	Muhammad Sajad S/O Ajmal Khan	Ward Orderly (Tibb) BPS -04	DHQ Hospital Mardan
13	Mushtaq Ahmad S/O Salahud Din	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Mardan
14	Syed Yasir Shah S/O Syed Hussain Ahmad	Ward Orderly (Tibb) BPS -04	DHQ, Hospital Charsadda
15	Naeem Jan S/O Mumtaz	Ward Orderly (Homoeo) BPS -04	DHQ, Hospital Charsadda.
16	Muhammad Tahir S/O Said Badshah	Ward Orderly (Tibb) BPS -04	DHQ Hospital Nowshera
17	Imran S/O Mir Ahmad Khan	Ward Orderly (Homoeo) (BPS -04)	DHQ Hospital Nowshera
18	Said Karim Shah S/O Hazrat Umar	Ward Orderly (Homoeo) BPS -04	SGTH Swat.
19	Amir Akbar S/O Abdul Hadi	Ward Orderly (Tibb) BPS -04	SGTH Swat.
20	Muhammad Saeed S/O Mir Qalam Khan	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Lakki Marwat.
21	Qasim Khan S/O Awal Khan	Ward Orderly (Tibb) BPS -04	DHQ Hospital Lakki Marwat.
22	Mehboob Ali Khan S/O Sir Jehan Khan	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Alpuri Shangla
23	Saleem Ullah Khan S/O Muhammad Yaqoob	Ward Orderly (Homoeo) BPS -04	DHQ Hospital Tank.

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24	Liaqat Aziz S/O Abdul Aziz	Ward Orderly (Tibb) BPS -04	DHQ Hospital Tank
25	Javed Ahmad S/O Asal Khan	Ward Orderly (Homoeo) BPS -04	DHQ Teaching Hospital Kohat
26	Malik Noor Ahmad S/O Malik Jahangir Khan	Ward Orderly (Tibb) BPS -04	DHQ Teaching Hospital Kohat
27	Mazhar Shah S/O Zahir Shah	Ward Orderly (Homoeo) BPS -04	GNBMH Peshawar.
28	Noor Ali S/O Muhammad Ali	Ward Orderly (Tibb) BPS -04	GNBM Hospital Kohat Road Peshawar..
29	Qayum Ullah S/O Gul Rauf	Ward Orderly (Homoeo) (BPS -04)	DHQ Hospital Karak.
30	Atiq Ur Rehman S/O Mohammad Sadiq	Ward Orderly (Tibb) (BPS-04)	DHQ Hospital Karak.

Note:-The above staff shall strictly be governed under the Khyber PAKHTUNKHWA Tibb and Homoeopathic Employees (Appointment) Act, 2016. The seniority of so regularized staff shall be determined under the said Act. Moreover, in case of any fake information provided to this Directorate with regard to their qualification, absence, training or any misconduct before the regularization, their services shall be automatically terminated, without any assigning any reasons.

Sd/xxxxxxx
DIRECTOR GENERAL HEALTH SERVICES, KPK, PESHAWAR

No 90-101 /Personnel

Dated 05 01-2017

Copy forwarded to the:-

1. Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar for information w/r to his letter No: SOH-III/10-4/2005/Homoeo
2. P.S to Minister for Health Khyber Pakhtunkhwa.
3. Accountant General Khyber Pakhtunkhwa.
4. Medical Superintendent Govt. Naseerullah Khan Baber Memorial Hospital , Peshawar
5. Medical Suptt: BBST Hospital, Abbottabad, Charsadda, Battagram, Buner, Haripur, Malakand, Mansehra, Mardan, Alpuri Shangla, Bannu ,Dir Lower, Dir Upper, Lakki Marwat, Nowshera, Tank, Chitral, Swat, Tank , Kohat, and Karak.
6. DHO, Kohistan at Dassu.
7. DAO Distt; Accounts officer, Abbottabad, Charsadda, Battagram, Buner, Haripur, Malakand, Mansehra, Mardan, Alpuri Shangla, Bannu ,Dir Lower, Dir Upper, Lakki Marwat, Nowshera, Tank, Chitral, Swat, Tank , Kohat, and Karak
8. Assistant Director (Tibb/Homoeo) DGHS, Khyber Pakhtunkhwa.
9. PA to DGHS, Khyber Pakhtunkhwa Peshawar.
10. PA to Additional DG Health Services, Khyber Pakhtunkhwa Peshawar.
11. Officials Concerned.

For information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

03/11/2017

100

Seniority List of Class IV For the post of Junior Clerk DHQ Hospital Nowshera

S.No	Name	Father Name	Date of Birth	Matric Passing Year [✓] ₃₁	Date Of Appointment	Basic SS	
						1st	2nd
1	Hazrat Hussain	Sardar hussain	15-04-1966	1984	1994		
2	Naeem khan	Raheem khan	13-12-1975	1991	03-07-11		414
3	Ikram Jan	Muhammad saleem	04-10-73	1991	08-01-11		392
4	Muhammad Tahir	Syed Bad Shah	23-08-1977	1994	10-09-07		477
5	Muhammad ali	Murad Ali	02-02-76	1994	04-11-09		
6	Intehab Gul	Mamoor Gul	16-11-1976	1994			
7	Fayaz Muhammad	Fida Muhammad	17-02-1977	1995	20-07-2017		403
8	Meer Bashar Khan	Ajmeer khan	25-08-1981	1996			
9	Zulfiqar Ali	Abdus Sattar	14-09-1978	1998	15-02-2008		
10	Ijaz Ahmad khan	Haya Muhammad	26-08-1985	2002			393

Affair

23
Medical Superintendent
DHQ Hospital Nowshera

11

محکمہ صحت - ڈائریکٹر جنرل ہیلتھ سروسز اسلام آباد

Representation

29973
2718721

پہلے سال 2007 میں کثرت واردہ اردنی DHQ
لینا ہے۔ اس کے نتیجے میں ڈیڑھی پہاڑ ایم اے اے
سے انجام دی ہے

سال کے سروسز کو ختم کرنے سال 2016 میں
مجاہد قانون سنسٹر کر دیا۔ اور اس کے
ڈیڑھی سے انجام دینا ہے جو کہ DHQ ٹوکرہ میں ہے۔

صبا - 11/5 صید لیسل سروسز سنسٹر نے یہاں

میں جو جو (12000) واردہ اردنی کو سروسز
کی کٹ میں سال کو سروسز کے سروسز کے سروسز

حکم ہذا نے صید لیسل کو کثرت جو کہ سروسز

پہلے سروسز کے سروسز کے سروسز کے سروسز

سروسز کے سروسز کے سروسز کے سروسز

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(12)

گروہ سائنس کو مطالبہ کسٹ سٹیٹارٹی پر دعوت کر کے
کئی ممبروں نے سائنس کی استعداد کو تسلیم کیا۔
اور ممبروں نے سٹیٹارٹی کسٹ کو نظر انداز کر کے
مختار نظر افراد کو پر دعوت کیا جو کہ سر اسٹریٹ
حلف ورزی قانون ہے، اور سائنس کے حقوق
پر براہ راست اثر انداز ہے۔

کسٹارٹی کے ممبروں نے اسٹریٹ پر دعوت کر کے
کئی ممبروں نے سٹیٹارٹی کسٹ پر دعوت کر کے قانون
کی پاسداری کرے۔ اور سائنس کو اپنا قانونی حق
عطا کرے۔

سائنس

محمد طاہر ولد مسد بادشاہ
مستندہ تھیں بالادہ کھیلوں اور کھیلوں
میں کھیلوں اور کھیلوں



DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: nw/pdghs@yahoo.com office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 5655 /Personnel Dated: 14/9/2021

13

To:

The Medical Superintendent
DHQ Hospital Nowshera.

Subject: APPEAL.
Memo:

Enclosed please find herewith a copy of an appeal submitted by Mr. Muhammad Tahir S/O Said Badshah which is self explanatory for further necessary action with the remarks to furnish your detailed comments so as to proceed further.

[Handwritten signature]
DY: DIRECTOR (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P.K PESHAWAR.
[Handwritten date: 28/8/2021]

[Handwritten notes:]
forwarded to
Superintendent
DHQ Nowshera
21-09-2021

[Handwritten signature]
to be true copy

درخواستیں مطلوب ہیں

زیر درجہ کی کوئٹہ وچیل خالی آسامیوں کو مستقل بنیاد پر مقرر کرنے کیلئے ضلع نوشہرہ کے اڈیسیاں کے حامل امیدواروں سے درخواستیں مطلوب ہیں۔ اگر ضلع نوشہرہ کے امیدوار میسر نہ ہوں تو قریبی اضلاع سے بھی درخواست دہندگان کی تعیناتی زیر غور لائی جا سکتی ہے۔

نمبر شمار	نام آسامی	BPS	تعداد آسامی	عمر کی حد	تعلیمی قابلیت
1	کلینکل ٹیچنگ (کارڈیالوجی)	12	2	30 تا 18 سال	سیکنڈری سکول سرٹیفکیٹ (کم از کم سیکنڈ ڈویژن سائنس) متعلقہ ٹیکنالوجی میں دو سالہ پلوس میں بیکل ٹیکنی غیر ہنوز خواست اس شدہ اور ریجول کرائی ہو۔
2	کلینکل ٹیچنگ (پتھالوجی)	12	2	ایسا	ایسا
3	کلینکل ٹیچنگ (فاریسی)	12	3	ایسا	ایسا
4	کلینکل ٹیچنگ (ڈیٹیل)	12	3	ایسا	ایسا
5	کلینکل ٹیچنگ (آپتھالوجی)	12	1	ایسا	ایسا
6	کلینکل ٹیچنگ (نوزیفری)	12	2	ایسا	ایسا
7	کلینکل ٹیچنگ (ریڈیالوجی)	12	2	ایسا	ایسا
8	جوئیر فلک	11	4	ایسا	میٹرک (سیکنڈ ڈویژن) ٹاپنگ سپر 30 الفاظی منٹ
9	ایکٹرو میڈیکل ٹیچنگ	11	2	ایسا	میٹرک بمعہ متعلقہ فیلڈ میں 3 سالہ پلوس میں بیکل بورڈ غیر ہنوز خواست منظور شدہ ہو۔
10	سول ایم ایڈ آر ٹیچنگ	09	4	ایسا	میٹرک بمعہ متعلقہ فیلڈ میں 1 سالہ پلوس میں بیکل بورڈ غیر ہنوز خواست منظور شدہ ہو۔
11	سٹور کپر	07	1	32 تا 18 سال	میٹرک سائنس متعلقہ فیلڈ میں تجربہ ترجیحاً کاروباری ٹیچنگ

نوٹ: (1) خواہشمند امیدوار اس اشتہار کے شائع ہونے کے بعد 15 دن کے اندر متعلقہ ہسپتال آفیسر (Medical Superintendent D.H.Q) کے پاس اپنی درخواست سادہ کاند پر بمبئی وی، کیمپلر تو قومی شناختی کارڈ کا پی، تعلیمی اسناد کی مصدقہ نقل اور 3 عدد تازہ تصاویر کے ساتھ جمع کریں۔ (2) 100% کوڈ فوٹ شدہ ملازمین کے بچوں کیلئے 25% کوڈ ریٹائرڈ کلاس فور ملازمین کے بچوں کیلئے 20% کوڈ مضد افراد کیلئے جبکہ 10% کوڈ خواتین کیلئے اور 30% کوڈ ایتھتوں کیلئے مختص کیا جائے گا۔ (3) صرف شارٹ لسٹ امیدواروں کو لسٹ اور انٹرویو کیلئے بلاایا جائے گا۔ (4) تجربہ کار سرٹیفکیٹ سرکاری ادارے سے اور مطلوبہ تعلیمی قابلیت کے بعد قبول ہوگا۔ (5) تقرری صوبائی حکومت کے مجوزہ قواعد ضوابط کے تحت عمل میں لائی جائے گی۔ (6) خواہشمند سرکاری ملازمین اپنے ادارے کے توسط سے درخواستیں ارسال کریں۔ (7) آسامیوں کی تعداد میں کمی بیشی ہو سکتی ہے۔ (8) کھل اور در سے آنے والی درخواستوں پر غور نہیں کیا جائیگا۔ (9) شارٹ لسٹنگ کے بعد موزوں امیدواروں کی لسٹ ہمارا اقتاری کے دفتر میں آویزاں کی جائے گی۔ (10) امیدوار انٹرویو کے موقع پر اپنی اصل دستاویزات ساتھ لائیں گے۔ (11) Age Relaxation یا عمر میں رعایت موزوں امیدواروں کے لئے کی صورت میں قانونی طور پر Age Relaxation سرٹیفکیٹ کے بعد تعیناتی پر غور ہو سکتا ہے۔ (12) منتخب ہونے کی صورت میں کافتات کی تصدیقی متعلقہ اداروں سے (Board, University, Faculty) کی جائے گی۔ (13) ٹیسٹ و انٹرویو کیلئے کوئی فی اے ڈی اے نہیں دیا جائے گا۔ (14) ہمارا آفیسر نہیں کوئی وجہ بتائے تمام کیڈریز کسی ایک کیڈری کا انٹرویو کو منسوخ کر سکتا ہے۔ (15) کسی بھی قسم کی جعلی اسناد جمع کرنے والے امیدوار کے خلاف قانونی چارہ جوئی کی جائے گی۔ (16) ہمارا آفیسر کوئی وجہ بتائے بلیر ٹیسٹ انٹرویو کنسل کر سکتا ہے۔

INF(P)2249/19

اشہرہ میڈیکل ہسپتال ڈی ای ایچ کیمپل ہسپتال نوشہرہ

26 May 2019
to be true copy

Sc. No 448069

(15)

**Board of Intermediate & Secondary Education
PESHAWAR**

**DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)**

Dh.

Session 19 *84* (Annual/Supplementary)

Name Muhammad Tahir

Father's Name Sayed Badshah Roll No. 15748

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	100	57	
2. Urdu	150	90	
3. Islamiyat Comp.	75	54	
4. Pakistan Studies	75	41	
5. Mathematics	100	58	
6. Physics	100	67	
7. Chemistry	100	55	
8. Biology	100	55	
Total	850	477	<i>Four hundred 77</i>

This certificate is issued errors and omissions excepted.

Prepared by 2

Checked by 2

Date 18/3/1985

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Attest
7
to be true copy



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
MARDAN N.W.F.P. PAKISTAN

16

S.No. MB 016214

Roll No: 60649

Reg No: 5128-B/MP-2008

PROVISIONAL AND DETAILED MARKS CERTIFICATE
INTERMEDIATE (ANNUAL) EXAMINATION 2009

HUMANITIES (Part-II)

MUHAMMAD TAHIR Son/Daughter of SAYED BADSHAH

of Institution/District NOWSHERA

has secured the marks shown against each subject in the Higher Secondary School Examination held in the month of APRIL/MAY as PRIVATE Candidate

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	33	—	35	—	68	Sixty-Eight
Urdu	200	69	—	64	—	133	One Hundred Thirty-Three
Islamic Education	50	26	—	—	—	26	Twenty-Six
Pakistan Studies	50	—	—	21	—	21	Twenty-One
Islamic History	200	64	—	49	—	113	One Hundred Thirteen
Civics	200	35	—	49	—	84	Eighty-Four
Islamic Studies	200	63	—	74	—	137	One Hundred Thirty-Seven
Total : 1100						582-C	Five Hundred Eighty-Two Only
Remarks :							

Prepared by :

Checked by :

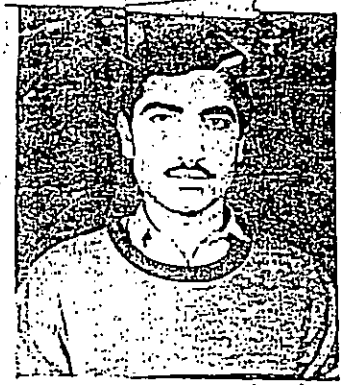
Date of Declaration of Result: 21-JUL-09

Date of Issue: 21-JUL-09

Note: Errors/Omissions are excepted. Any mistake in above particulars must be intimated within 30 days after declaration of result.

Controller of Examinations
BISE, Mardan

ALL COPY
to be true copy



DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P. having been born in this Province.

I was born at Village/Mohallah GANDARI BALA

Taluk Nowsheera District NOWSHEERA

M. Lal
Signature of the applicant

20-09-92

Reference to the declaration dated GANDARI BALA

Ward No. MR. M. Tabix side of Sayed Badshah
of Village Gandari Mohallah Shahkora

Committed to N.W.F.P. It is, hereby, certified that the said Mr. M. Tabix parents are permanent residents of the N.W.F.P. having been born in it

I have satisfied myself from ^{over leaf} ~~personally~~ own knowledge/verification that the above declaration is true and correct accordingly

Given under my hand and the seal of the Court

On 14 day of Jan 1992

MAGISTRATE 1ST CLASS

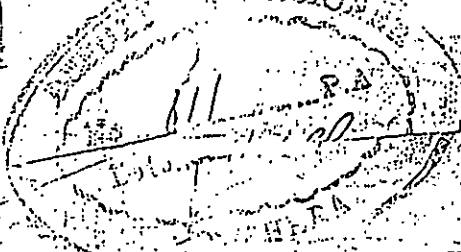
M. Lal
Special Traffic Magistrate
Nowsheera

COUNTERSIGNED BY

Dean
DEPUTY COMMISSIONER
NSR

Attested

to be true copy



سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ
 1/2 منہل ہائے پانی کے لیے ایک سے زائد گھر بنائے گئے ہیں
 سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ

Nikah Registrar
 ZULFIQAR ALI ZULFI
 Union Council of Village
 Gandiri Ward No. 1 & 2

سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ
 سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ
 سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ
 سندھ کے ایک آبادی میں بیان کیے گئے ہیں کہ

29/12/98
 Attested
 12/1/98

Attested

(Seal)
 11/1/98

(Signature)

(Signature)

وکالت نامہ

بعدالت صاحب سروس ریسٹنول ساج صاحب سٹار

محمد طاہر گورنمنٹ آف ایف ایف او

منجانب دعویٰ اجرم

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی وجوہات ہی بمقام

محمد فاروق ملک ایڈووکیٹ ہائی کورٹ کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص

رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر

من مظهر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ

دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشہری کے کسی اور جگہ یا پشہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل

بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام پشہری کے کسی اور جگہ سماعت ہونے یا بزور تعطیل یا پشہری کے

اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا

مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود

منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دادی اور درخواست اجرائے ڈگری و نظر ثانی اپیل ونگرانی ہر قسم کی

درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے

اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہاشی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور

بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط

ادائیگی علیحدہ مختار نامہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو

کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹرو کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے

مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو

کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا

تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے

برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سند ہے مورخہ 6/1/2022

مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED Muhammad Farooq Malik Advocate Peshawar.

محمد طاہر

M. Farooq 17201-0821852-3

بعدالت جہاں پیرس میں سرور کی سرپرستی کے لئے



Res no 45

کیس نمبر 2 منجانب

بنام Health etc

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

کیلئے کبیر اللہ صاحب روبرو

جہاں مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

20

ماہ اپریل

5

المرقوم

العبد د گ د العبد

Handwritten signatures and names at the bottom of the page.

قیمت
50 روپے

79835



ایڈویکٹ: Sidda Rehman

بار کونسل/ایسوسی ایشن نمبر: BC 202477

رابطہ نمبر: 0311. 9920328

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سر جسٹس سید علی حسرت خان

مخانب: <u>ایڈووکیٹ</u>	دعویٰ: <u>اس کی</u>
	علت نمبر: <u>7</u>
	مورخہ: <u>7</u>
	جرم: <u>7</u>
	تھانہ: <u>7</u>

عمر طالبہ بنام حکومتی

باعث تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام پشاور کیلئے سدرہ رحمان کو وکیل مقرر
کرنے کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخیت منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سدرہ ہے

01-8-2023ION
PESHAWAR BAR ASSOCIATION
KHYBER PAKHTUNKHWA
پشاور

مقام
Peshawar
Accepted
کے لیے منظور ہے

نوٹ: اس وکالت نامہ کی نوٹ کو کاپی ناقابل قبول ہوگی۔



BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2022

Muhammad Tahir Appellant

VERSUS

DG Health Services, KPK & Others Respondents

APPLICATION FOR PLACING ON RECORD ADDITIONAL DOCUMENTS

Respectfully Sheweth

1. That above titled Case is fixed before this Hon'able Court for 25-08-2022.
2. That, the attached, documents are necessary for the due appreciation of the issue involved in the above referred Writ Petition. (Copies of documents are attached as Annexure "A")

It is therefore, prayed that on acceptance of this application additional documents may kindly be placed on file.

Petitioner

Through

Muhammad Farooq Malik,
Advocate,
Supreme Court of Pakistan



(2)

**OFFICE OF THE MEDICAL SUPERINTENDENT,
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera13066@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 10-15-2021, **ZULFIQAR ALI KHAN S/O SATTAR KHAN** is hereby appointed as Junior Clerk BPS-11 (33% Reserved Quota for Class IV) with pay protection plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sd _____
Medical Superintendent,
DHQ Hospital, Nowshera

Date: 17/05/2021

No. 003-011 MS/DHQH-NSR

Copy forwarded to the

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Zulfiqar Ali Khan S/O Sattar Khan Resident of Flat No. 2, DHQ Hospital Nowshera.
5. Office Record.

Medical Superintendent,
DHQ Hospital, Nowshera



(3)

**OFFICE OF THE MEDICAL SUPERINTENDENT,
DHQ HOSPITAL NOWSHERA**

Phone & Fax: 0923-9220023

E-Mail: dhqnowshera4306@gmail.com

OFFICE ORDER

Consequent upon approval / recommendation accorded by the Departmental Selection / Appointment Committee constituted for the purpose on 10-05-2021, MR. HAZRAT HUSSAIN S/O SARDAR HUSSAIN is hereby appointed as Junior Clerk 3PS-11 (33% Reserved Quota for Class IV) plus usual allowances against the vacant post of Junior Clerk BPS-11 (33% Reserved Quota for Class IV) at DHQ Hospital Nowshera with immediate effect, with the following term & conditions.

1. The appointment shall be subject to the Medical Fitness and initially on probation for a period of 02-years.
2. The service can be dispensed with during the probation period on un-satisfactory performance.
3. You will not entitle to any TA/DA for Medical Examination and joining the first appointment.
4. In case of any of the documents submitted by you, with your application is found forged / fake, your service shall be liable to terminate without any notice and will also be liable to further legal proceeding.
5. The appointment will be governed by such rules and order issued by the Govt. from time to time.
6. If you wish to resign from service, you will have to submit resignation in writing one month in advance OR deposit one month pay in the Govt. treasury.
7. If the above terms & conditions are acceptable to you then you should report to DHQ Hospital Nowshera within 07-days after the receipt of this appointment order.

Sa _____
*Medical Superintendent,
DHQ Hospital, Nowshera*

No. 002-006/MS/DHQH-NSR

Date: 17/05/2021

Copy forwarded to the:

1. Director General Health Services Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Nowshera.
3. Accounts Section DHQ Hospital Nowshera.
4. Mr. Hāzrat Hussain S/O Sardar Hussain Resident of Kabal River, Tehsil & District Nowshera.
5. Office Record.

2
*Medical Superintendent,
DHQ Hospital, Nowshera*

0923-9220023