


FORM OF ORDER SHEET

Court of _____

Appeal No. 1965/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/10/2023	<p>The appeal of Mst. Rehmat Begum resubmitted today by Mr. Muhammad Ilyas Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 03/10/2023. Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Rehmat Begum d/o Ali Gul Charge Nurse Government PHS Hayatabad Peshawar received today i.e on 22.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Memorandum of appeal is not signed by the appellant.
- 5- Copies of seniority mentioned in para-3&4 of the memo of appeal are not attached with the appeal.
- 6- Copy of impugned seniority list and promotion paper mentioned in para-5 of the memo of appeal are not attached with the appeal be placed on it.
- 7- Nine more copies/sets of the appeal along annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3288 /S.T.

Dt. 25-9 /2023.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

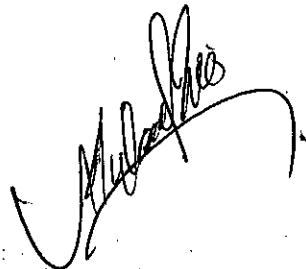
Mr. Muhammad Ilyas Adv.
High Court at Peshawar

R/42

objection has been
complied & appeal is
be - submitted please
date 27/9/2023

Re-submitted/plc.
on 2/10/2023.





BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1965/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

I N D E X

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Appellant

Through

(M. ILYAS)

Advocate

Supreme Court of Pakistan

&

Muhammad Zia

Advocate High Court,

Peshawar

Cell No. 0345-9035356

Dated:- 21-09-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No 1965/2023

Mst. Rehmat Begum, D/o Ali Gul, Charge Nurse (BPS-16)
Government Public Health School, Hayatabad, Phase-V,
Peshawar.....(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
2. Director General Health Services, Health Directorate, Warsak Road, Peshawar.
3. Director General Provincial Health Services, Douranpur, Peshawar.
4. Deputy Director Nursing, D.G Health Services Directorate, Warsak Road, Peshawar.
5. Principle Government Public Health School, Hayatabad, Phase-V, Peshawar.
6. Khyber Pakhtunkhwa Public Service Commission, through its Chairman, II-Fort Road, Peshawar Cantt.
7. Mst. Rifat D/o Saad Ullah, Charge Nurse (BPS-16) Government Public Health School, Hayatabad, Phase-V, Peshawar.....(Respondents)

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974, AGAINST THE
SENIORITY LIST DATED 01/01/2023
AND PROMOTION PAPER ISSUED BY
THE RESPONDENTS NO. 2 TO 4
WHEREBY THE APPELLANT (REGULAR
APPOINTEE OF 2005) BEEN PLACED
JUNIOR/BEHIND THE RESPONDENT
NO. 7 (APPOINTEE OF 2008)

Prayer in appeal:

On acceptance of the instant appeal the seniority list dated 01/01/2023 and promotion paper may kindly be set aside and the respondents No. 1 to 4 may kindly be directed to correct and maintain by rectifying the said illegal, unlawful seniority list and promotion paper as was on 15/06/2017 further stated that the process of promotion may kindly be suspended till the disposal of the instant appeal.

Respectfully Sheweth:

That the brief facts giving rise to the filing of the instant appeal are as under:

1. That the appellant is a peaceful law abiding citizen of Pakistan and working in the Khyber Pakhtunkhwa Health Department since, 2005 as a Charge Nurse (BPS-16) having 18 years service. Addresses of the parties mentioned above are true and correct for the services.
2. That the respondents No. 1 to 4 are responsible for keeping and maintaining correct and justified record in respect of seniority list of the employees of the Health Department (Nursing Cadre).
3. That as per the Seniority List issued on 15/06/2017 the appellant is at Serial No. 1086 whereas the respondent No. 7 is at Serial No. 1721

as per her selection by the Public Service Commission (respondent No. 6) in the year dated 11/05/2008. (Seniority List is attached).

4. That it is also necessary to mention that the real sister of the appellant namely Mst. Farhat Ali Gul D/o Ali Gul was also senior of respondent No. 6 who is at Serial No. 1097 as per 2017 Seniority List is now also behind the respondent No. 7.
5. That in the month of February, 2023 the Appellant came to know that the Respondents are promoting the employees of the Appellant cadre including the Appellant, so the Appellant is desired to know about her position in the seniority list/paper. Further stated when she found the paper for promotion, she was placed at serial No 237 and the Respondent No 7 is it at serial 193 and seniority list issued by the Respondent No 4 on 01/01/2023, the Appellant is it at serial No 1006 and the Respondent No 7 is it at serial No 917 i.e. the Appellant has been placed beyond the Respondent No 7, who was appointed by Respondent No 6 in the year 2018; which is totally against the law, facts, norms of justice against the fundamental rights of the Appellant. (Copies of Seniority List and promotion paper are attached).

6. That the appellant submitted representation for the correction of the Seniority List/ promotion paper but in vain as the respondents wants to favour the blue eyed employees and till-date did not reply representation/departmental appeal dated 22-02-23 of the Appellant. (Representation and postal receipt are attached).
7. That it is pertinent to mention that how the appointee of 2008 because senior to the appellant who is the appointee of 2005 without any lawful justification, hence liable to be set aside.
8. That the appellant feeling aggrieved from the act and action of the respondents approached this Hon'ble Tribunal on the following grounds:

GROUND:

- A. That the seniority list and promotion paper issued in 2023 and under which the promotion process is underway is against the law, facts and against the fundamental rights of the appellant.
- B. That if the promotion have been made through this impugned illegal, unlawful seniority list the appellant will suffer irreparable loss and damage.

C. That it is the fundamental and constitutional right of the appellant to be treated according to law and rules.

9. That any other ground will be raised before the Hon'ble Tribunal at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant appeal the seniority list dated 01/01/2023 and promotion paper may kindly be set aside and the respondents No. 1 to 4 may kindly be directed to correct and maintain by rectifying the said illegal, unlawful seniority list and promotion paper as was on 15/06/2017 further stated that the process of promotion may kindly be suspended till the disposal of the instant appeal.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.

Appellant

Through


(M. ILYAS)

Advocate

Supreme Court of Pakistan

&


Muhammad Zia

Advocate High Court,

Peshawar.

Dated:-21-09-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

AFFIDAVIT

I, **Muhammad Zia** Advocate High Court, Peshawar, as per instructions of my client, do hereby solemnly affirm and declare that all the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Rehmat Begum D/o Ali Gul, Charge Nurse (BPS-16)
Government Public Health School, Hayatabad, Phase-V,
Peshawar.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Health, Civil Secretariat, Peshawar.
2. Director General Health Services, Health Directorate, Warsak Road, Peshawar.
3. Director General Provincial Health Services, Douranpur, Peshawar.
4. Deputy Director Nursing, D.G Health Services Directorate, Warsak Road, Peshawar.
5. Principle Government Public Health School, Hayatabad, Phase-V, Peshawar.
6. Khyber Pakhtunkhwa Public Service Commission, through its Chairman, II-Fort Road, Peshawar Cantt.
7. Mst. Rifat D/o Saad Ullah, Charge Nurse (BPS-16) Government Public Health School, Hayatabad, Phase-V, Peshawar.

Appellant

Through

(M. ILYAS)

Advocate

Supreme Court of Pakistan

&

Muhammad Zia

Advocate High Court,

Peshawar

Dated:-21-09-2023

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. No. _____/2023

In

Service Appeal No. _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

APPLICATION FOR SUSPENSION OF
OPERATION OF THE SENIORITY LIST
DATED 01/01/2023 ALONG WITH
PROMOTION PROCESS/ PAPER TILL THE
FINAL DECISION OF THE INSTANT
SERVICE APPEAL AND IN THE
MEANWHILE THE RESPONDENTS MAY
ALSO BE ABSTAINED FROM TAKING ANY
DEPARTMENTAL ACTION TO THE
SERVICE/CARRIES OF THE APPLICANT

Respectfully Sheweth:

The appellant submit as under:

1. That the above titled Service Appeal is being filed before this Hon'ble Tribunal, in which no date of hearing has yet been fixed so far.
2. That appellant has a good prima facie case and is sanguine about her success.
3. That balance of convenience also lies in favour of appellant.

4. That respondents are going to promote the respondent No. 6 on the basis of Seniority List dated 01/01/2023 along with promotion paper without any correction in it which is against the facts and law as well as rules and norms of justice.
5. That if the Seniority List dated 01/01/2023 along with promotion paper is not suspended, then the appellant will suffer irreparable loss and damage.
6. That this application may kindly be considered as part and parcel of the appeal.

It is, therefore humbly prayed that on acceptance of this application, the operation of the Seniority List dated 01/01/2023 along with promotion paper may kindly be suspended and in the meanwhile the respondents may also be abstained from taking any departmental action to the service/carries of the applicant till the final disposal/decision of the main Service Appeal.

Applicant/Appellant

Through:


(M. ILYAS)

Advocate

Supreme Court of Pakistan

&


Muhammad Zia

Advocate High Court,
Peshawar

Dated: 21-09-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. No _____/2023

In

Service Appeal No _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

AFFIDAVIT

I, **Muhammad Zia** Advocate High Court, Peshawar, as per instructions of my client, do hereby solemnly affirm and declare that all the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. No. _____/2023

In

Service Appeal No _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

APPLICATION FOR CONDONATION
OF DELAY IN THE ABOVE NOTED
CASE/APPEAL

Respectfully Sheweth:

The appellant submit as under:

1. That the above titled Service Appeal is being filed before this Hon'ble Tribunal in which no date of hearing has yet been fixed so far.
2. That the applicant/appellant submitted the departmental representation after coming in knowlege of the impugned Seniority Lists on 18/02/2022 submitted departmental representation on 22/02/2023 to the respondent No. 2 against the Seniority Lists. (Copies of representation with posts receipt are already attached with the main appeal).
3. That after that the applicant/ appellant asked/ inquired from the respondents to whom the representation/ departmental appeal was submitted time and again about the applicant grievances in

response the respondents always replied that the respondents are going to address the applicant/ appellants grievances about the issue of Seniority Lists but till date telling the lies as are not interested in the submissions of applicant/ appellants to correct the seniority lists because the respondents have started work on the promotions of the applicant/ appellants cadre under the same seniority list under challenge disclosing their minds.

4. That being female the respondents give the applicant severe mental torture and vested the appellants time by delaying tactics/ practices.
5. That this Hon'ble Tribunal has got ample powers to condoned the delay "if any" in the filing of the instant Service Appeal for the large interest of justice.

It is, therefore, humbly prayed that on accepting this application, delay if any may kindly be condoned in the larger interest of justice.

Appellant

Through:


(M. ILYAS)

Advocate

Supreme Court of Pakistan

&


Muhammad Zia

Advocate High Court,

Peshawar

Dated:-21-09-2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

C.M. No. _____/2023

In

Service Appeal No. _____/2023

Mst. Rehmat Begum(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Health and others.....(Respondents)

AFFIDAVIT

I, **Muhammad Zia** Advocate High Court, Peshawar, as
per instructions of my client, do hereby solemnly affirm and
declare that all the contents of the accompanying **Application**
are true and correct to the best of my knowledge and belief
and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



DIRECTORATE GENERAL
KHYBER PAKHTUNKHWA PESHAWAR

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

Office: Ph. 091-9210299 Fax: 091-9210187, 091-9210190 Ph. 091-9210250

No. 5174-273/E.II Dated Pesh: the 15 / 06 / 2017.

To:

01. Director General PHSA, Khyber Pakhtunkhwa Peshawar.
02. All Hospital Directors, MTI / LRH, KTH, HMC Peshawar, ATH Abbottabad, Khalifa Gul Nawaz Teaching Hospital Bannu, Mufti Mehmood Memorial Hospital DIKhan, MMC Mardan, Nowshera Medical Complex, Nowshera, IKD Hayatabad Peshawar, KCD Peshawar, DHQ Hospital Bannu, DHQ Hospital DIKhan, Women & Children Hospital Bannu.
03. Director Health Services, (FATA) Peshawar.
04. All Medical Supdt. DHQ Hospitals i.e. Charsadda, Nowshera, Swabi, Mardan, Upper Dir, Timergara, Chitral, Buner, Batkhela, Shangla, Karak, Lakki Marwat, Tank, Kohat, Hangu, Battagram & Haripur.
05. Medical Supdt. SGTI, Swat.
06. Medical Supdt. King Abdullah Teaching Hospital Mansehra.
07. Medical Supdt. BBS Teaching Hospital Abbottabad.
08. Medical Supdt. Sarhad Hospital for Psychiatric Diseases Pesh.
09. Medical Supdt. Services Hospital Peshawar.
10. Medical Supdt. Sifwat Ghayur Memorial Hospital Peshawar.
11. Medical Supdt. Govt. Nascrullah Khan Babar Memorial Hospital Peshawar.
12. Medical Supdt. Moulvi Ameer Shah Memorial Hospital Peshawar.
13. Medical Supdt. Maternity Hospital Peshawar.
14. Medical Supdt. Govt. Mental & General Hospital Dadar Mansehra.
15. Medical Supdt. City Hospital Lakki Marwat.
16. Medical Supdt. Women & Children Hospital Kohat.
17. Medical Supdt. Women & Children Hospital Karak.
18. Medical Supdt. Mian Rashid Hussain Shaheed Memorial Hospital Fajfi Nowshera.
19. Medical Supdt. Bacha Khan Medical Complex, Swabi.
20. Principal, PGCN Hayatabad Peshawar.
21. All Principals, Public Health Schools, Hayatabad / Nishterabad Peshawar, DIKhan & Abbottabad in Khyber Pakhtunkhwa.
22. All District Health Officers i.e. Charsadda, Nowshera, Swabi, Mardan, Upper Dir, Lower Dir, Chitral, Buner, Malakand, Shangla, DIKhan, Bannu, Karak, Lakki Marwat, Tank, Kohat, Hangu, Battagram, Haripur, Abbottabad, Mansehra, Kohistan, Peshawar & Swat.
23. All Medical Supdt. AIQ Hospitals in FATA.
24. All Agency Surgeons in FATA.
25. All Vice Principal, School of Nursing i.e. LRH, KTH, HMC Peshawar, DIKhan, Bannu, Kohat, Mardan, Swat, DHQ Hospital Abbottabad & ATH Abbottabad.

Subject: - PROVISIONAL SENIORITY LIST OF CHARGE NURSES BPS-16 IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA FOR THE YEAR 2017.

Memo:- Provisional Seniority list of Charge Nurses (BPS-16) serving in the Health Department, Khyber Pakhtunkhwa, prepared by this Directorate are sent herewith for the purpose of circulation amongst all concerned working under your control for their information and conurbation about accuracy of these lists. The lists are also available at official website of the Health Department www.healthkp.gov.pk. OR www.dhiskp.gov.pk. In case of any objection with regard to the contents of the seniority list, the same may please be communicated to this Directorate for reconsideration and rectification within 30 days after the receipt of this communication.

DEPUTY DIRECTOR (NURSING),
DGHIS KPK PESHAWAR

C.C

Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar for information

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1078.	Hafiz Syed Pir Maab Shah S/O Syed Wahid Shah	20.04.1979/ Mansehra	23-07-2005	Matric, Dip: Nursing	DHQ Hospital, Battagram
1079.	Wazir Ahmad S/O Sikandar Khan	15.06.1976/ Battagram	23-07-2005	Matric, Dip: Nursing	DHQ Hospital, Battagram
1080.	Hussan Nawab S/O Talu Haq	12.02.1969/ Battagram	23-07-2005	Matric, Dip: Nursing	DHQ Hospital, Battagram
1081.	Anwar Islam S/O Natif Khan	05.06.1976/ Lower Dir	23-07-2005	Matric, Dip: Nursing	DHQ Hospital, Battagram
1082.	Maryam Bahadar D/O Bahadar Khan	01.03.1976/ Malakand	23-07-2005	Matric, Dip: Nursing Dip: Midwifery	DHQH. Upper Dir
1083.	Samina Nazli D/O Sharif Khan	09.12.1976/ Bannu	12.08.2005	Matric Dip: Nursing Dip: Midwifery	Women & Children Hospital, Bannu.
1084.	Bass Begum D/O Abdur Rashid	15.03.1982/ Karak	03.09.2005	Matric Dip: Nursing Dip: Midwifery Ward Administration Dip: Teaching Administration	(Working against the post of English Teaching B-17 in School of Nursing Kohat)
1085.	Shahnaz Nazir D/O Nazir Hussain	03.03.1974/ Swat	24.09.2005	Matric Dip: Nursing Dip: Midwifery	SGTH Swat
1086.	Rehmat Begum D/O Ali Khan	01.04.1980/ Swat	24.09.2005	Matric Dip: Nursing Dip: Midwifery Dip: Spec. Gynae BSN Peshawar University	School of Nursing KTH Peshawar

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				Dip: Midwifery Dip: Community Health BSN Post RN	
1097.	Farhat Ali Gul D/O Ali Gul	01.04.1983/ Swat	19.08.2006	Matric Dip: Nursing Dip: Midwifery BSN Post RN kmu	(Working against the post of Instructor B-17 In PGCN Pesh., DHO Hospital, Karak
1098.	Tausif Razi D/O Fakhr-ud-Din Shah	03.09.1984/ Karak	22.09.2006	Matric Dip: Nursing Dip: Midwifery	THQ Hospital, Besham (Shangla)
1099.	Naz Gul D/O Muntazir Khan	05.02.1981/ Shangla	14.11.2006	Matric Dip: Nursing Dip: Midwifery	DHO Hospital Haripur.
1100.	Alla Rahullah D/O Rahullah	01.10.1983 / Peshawar	15.11.2006	Matric Dip: Nursing Dip: Midwifery	MMC Mardan
1101.	Wasaf Begum D/O Faqr Khan	20.04.1975/ Mardan	16.11.2006	Matric Dip: Nursing Dip: Midwifery	AHQ Hospital, Ghalla nai (Mohmand Agency)
1102.	Salma Iqbal D/O Mohammad Iqbal	12.11.1975/ Nowshera	16.11.1975	Matric Dip: Nursing Dip: Midwifery	AHQ Hospital, Parachinar
1103.	Ali Begum D/O Ghulam Ali	13.03.1970/ Kurram	29.11.2006	Matric, FA Dip: Nursing	Type-D Hospital, Sarai Namat Khan (Haripur)
1104.	Ihsanullah S/O Dad Khan, Male Nurse	31.12.1979/ Peshawar	16.12.2006	Matric, FA Dip: Nursing	DHO Hospital, Timergara
1105.	Sohail Mohammad S/O Akbar Mohammad	04.04.1982/ Lower Dir	19.02.2007	Matric Dip: Nursing	

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1711.	Shahla Aziz D/O Aziz Tahir	Bannu			
1712.	Farzana Akhtar D/O Noor Zaman	08.02.1979/ Karak	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	Women & Children Hospital Bannu
1713.	Shazia D/O Akbar Shah	05.03.1979/ Mardan	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	Women & Children Hospital, Karak
1714.	Naila Shaheen D/O Malik Ghulam Sarwat	Haripur	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	MMC Mardan
1715.	Riffat Afroz D/O Abdul Feroz	Karak	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Haripur
1716.	Parveen D/O Muhammad Shah	04.01.1980/ Mardan	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat
1717.	Irshad Bibi D/O Ghufranulalh	08.01.1980/ Swabi	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Charsadda
1718.	Nizakat D/O Nisar Muhammad	02.02.1980/ Mardan	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	BMC Swabi
1719.	Kalsoom Bibi D/O Shah Muhammad	15.12.1980/ DIKhan	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	MMC Mardan
1720.	Romana Ghulam D/O Ghulam Muhammad	01.01.1981/ Kohat	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	Type-D Hospital, Paharpur (DIKhan)
1721.	Riffat D/O Saadatullah	11.02.1981/ Nowshera	31-05-2008	Matric, Dip: Nursing Dip: Midwifery	King Abdullah Teaching Hospital, Mansehra
					PGCN Hayatabad Peshawar

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HEALTH DEPARTMENT KHYBER PAKHTUNKIWA AS ON 01.01.2023.

No.	Name & Father's Name	Date of Birth / Domicile	Date of 1st Appolatment	Education Qualification	Place of Posting.
1.	Gulzar Bibi D/O Habibullah DHQH Battagram	01.04.1973/ Manshra	01-08-1994	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Post RN Deg: MSN	730 days EOL without pay Ex-Pakistan leave
2.	Kausar Sharif D/O Sharif	02.03.1969/ Mardan	16.09.1998	Matric, Dip: Nursing Dip: Midwifery	KTH Peshawar
3.	Safia Bibi D/O Mohammad Aslam Govt. Haseerullah Khan Babar Pesh	10.05.1973/ Kohat	20-04-2001	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital Battagram
4.	Parveen Akhtar D/O Ghulam Haider	03.03.1965/ Swat	31-07-2001	Matric, Dip: Nursing Dip: Midwifery	SGTH Swat
5.	Robina Ihsan D/O Ihsan ul Haq	04.11.1978/ Swat	31-07-2001	Matric, Dip: Nursing Dip: Midwifery	DHQ Pesh Nowshera
5.	Sajida D/O Fazal Maula	28.02.1980 / Swat	31-07-2001	Matric Dip: Nursing Dip: Midwifery	SGTH Swat
7.	Shakeela Naz D/O Anar Gul	02.02.1975/ Kohat	24-03-2003	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat
8.	Riffat Afroz D/O Abdul Feroz	10.04.1979/ Karak	24-03-2003	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat
9.	Saeeda Bano D/O Saeed Ahmad	25.04.1978/ Kohat	24-03-2003	Matric, Dip: Nursing Dip: Midwifery Dip: Community Health Nursing Deg: Post RN BSN Deg: MPH	DHQ Hospital, Kohat
10.	Gulshan Hameeda D/O Abdul Rauf	19.02.1981/ Karak	24-03-2003	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat

BETTER COPY

PROVINCIAL SENIORITY LIST OF REGISTERED NURSE OFFICER (BPS-16) IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA AS ON 01.01.2023

S.No	Name & Fathers Name	Date of Birth / Domicile	Date of First Appointment	Education Qualification	Place of Posting
1.	Gulzar Bibi D/o Habib Ullah DHQH Battagram	01-04-1973 / Mansehra	10-08-1994	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Post RN Deg: MSN	730 days EOL without pay Ex- Pakistan leave
2.	Kausar Sharif D/o Sharif	02.03.1969 / Mardan	16-09-1998	Matric Dip: Nursing Dip: Midwifery	KTH Peshawar
3.	Safia Bibi D/o Muhammad Aslam Govt. Naseerullah Khan Babar	10.05.1973 / Kohat	20-04-2001	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Battagram
4.	Parveen Akhtar D/o Ghulam Haider	03.03.1965 / Swat	31-07-2001	Matric Dip: Nursing Dip: Midwifery	SGTH Swat
5.	Robina Ihsan D/o Ihsan Ul Haq	04.11.1978 / Swat	31-07-2001	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Nowshera
6.	Sajida D/o Fazal Maula	28.02.1980 / Swat	31-07-2001	Matric Dip: Nursing Dip: Midwifery	SGTH, Swat
7.	Shakeela Naz D/o Anar Gul	02-02-1975 / Kohat	24-03-2003	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat
8.	Riffat Afroze D/o Abdul Feroz	10.04.1979 / Karak	24-03-2003	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat
9.	Saeeda Bano D/o Saeed Ahmad	25.04.1978 / Kohat	24-03-2003	Matric Dip: Nursing Dip: Midwifery Dip: Community Health Nursing. Deg: Post RN BSN Deg: MPH	DHQ Hospital, Kohat
10.	Gulshan Hammeda D/o Abdul Rauf	19.02.1981 Karak	24-03-2003	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Kohat

1000.	Farzana D/O Bacha Sher	03.03.1983/ Dir	23-07-2005	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Daggar (Buner)
1001.	Bait-ul-Haram D/O Taj Muhammad Khan	15.03.1983/ Dir	23-07-2005	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University	Category-D Hospital, Ziarat Talash Lower Dir
1002.	Robina Naz D/O Shakoore ullah	14.04.1984/ Bannu	23-07-2005	Matric Dip: Nursing Dip: Midwifery Dip: CCU Nursing Deg: BSc-Nursing Peshawar University	Women & Children Hospital, Bannu
1003.	Samina Nazli D/O Sharif Khan	09.12.1976/ Bannu	12-08-2005	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Bannu
1004.	Shahnaz Nazir D/O Nazir Hussain	03.03.1974/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Saidu Group Teaching Hospital, Swat
1005.	Nargas Rawan D/O Bakhti Rawan	20.11.1975/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Saidu Group Teaching Hospital, Swat
1006.	Rchmat Begum D/O Ali Gul	01.04.1980/ Swat	24-09-2005	Matric, MA Dip: Nursing Dip: Midwifery Dip: Post Midwifery Dip: BSc-Nursing Peshawar University Deg: BSc-Nursing Post RN	School of Nursing KTH Peshawar
1007.	Chand Bibi D/O Sultan Bakht	10.04.1980/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Molvi Ameer Shah Memorial Hospital Peshawar

917.	Riffat D/O Saadatullah	11.02.1981/ Nowshera	30-08-2004	Matric. BA Dip: Nursing Dip: Midwifery Dip: CCU Nursing BSc- Nursing Peshawar University Deg: BSc-Nursing Post RN KMU	Public Health School, Hayatabad Peshawar
918.	Wazir Ahmad S/O Sikandar Khan	15.06.1976/ Battagram	13-10-2004	Matric. Dip: Nursing Dip: Psychiatric Nursing Deg: BSc-Nursing Post RN	DHQ Hospital, Battagram
919.	Gulshan Ara D/O Naimatullah	08.04.1977/ Swabi	14-02-2005	Matric. Dip: Nursing Dip: Midwifery	Bacha Khan Medical Complex, Swabi
920.	Samiat D/O Jabir Khan	18.05.1977/ Swabi	14-02-2005	Matric. Dip: Nursing Dip: Midwifery	DHQ Hospital, Swabi
921.	Naseema Shaheen D/O Syed Azam	01.01.1978/ Swabi	07-03-2005	Matric. Dip: Nursing Dip: Midwifery	Type-D Hospital, Kalu Khan Swabi
922.	Islam Zada D/O Noor Wali Khan	14.04.1979/ Bannu	08-04-2005	Matric Dip: Nursing Dip: Midwifery	Khalifa Gul Nawaz Teaching Hospital, Bannu
923.	Samina Naz D/O Shakoorullah	15.02.1983/ Bannu	08-04-2005	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University Dip: Mental Health Nursing	DHQ Hospital Bannu

185.	Farzana D/O Ghulam Habib	12.11.1982/ Swat	16-08-2004	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Daggar (Buner)
186.	Farzana D/O Bacha Sher	03.03.1983/ Dir	16-08-2004	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Daggar (Buner)
187.	Akhtar Jehan D/O Mukamhil Shahi	10.04.1983/ Bunlr	16-08-2004	Matric, Dip: Nursing Dip: Midwifery	DHQ Hospital, Daggar (Buner)
188.	Rukhsana Bibi D/O Raham Sherin	15.03.1980/ Malakand	17-08-2004	Matric, Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University	Type-D Hospital, Totakan (Malakand)
189.	Nizakat D/O Nisar Muhammad	02.02.1980/ Mardan	24.08.2004	Matric, FA Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University	MMC Mardan
190.	Bibi Amina D/O Haji Murad Shah	10.08.1982/ Chitral	24.08.2004	Matric, Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Post RN Deg: MPH	DHQ Hospital, Chitral
191.	Zaib un Nisa D/O Muhammad Sarbaz	10.04.1982/ Charsadda	28-08-2004	Matric, MA (Islamiyat) Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University	DHQ Hospital, Charsadda
192.	Shabana Gul D/O Nasrullah	12.05.1982/ Charsadda	28-08-2004	Matric, MA Dip: Nursing Dip: Midwifery Deg: BSc Nursing Peshawar University	DHQ Hospital, Charsadda
193.	Riffat D/O Saadatullah	11.02.1981 / Nowshera	30-08-2004	Matric, BA Dip: Nursing Dip: Midwifery Dip: CCU Nursing Deg: BSc-Nursing Peshawar University Deg: BSc-Nursing Post RN KMU Degree MPH	Public Health School, Hayatabad, Peshawar
194.	Gul Zari D/O Chulata Mohammad	01.09.1977/ Mardan	06-09-2004	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Mardan
195.	Sanobar D/O Muhammad Qasim	15.09.1976 / Bannu	30.09.2004	Matric Dip: Nursing Dip: Midwifery	DHQ Hospital, Hangu

234.	Iftikhar Alam S/O Khan Badshah DIIQ Hospital, Timergara	01.05.1981/ Lower Dir	23-07-2005	Matric Dip: Nursing Dcg: BSc-Nursing Peshawar University	Absent from duty w.e.from 25.01.2022
235.	Shahnaz Nazir D/O Nazir Hussain	03.03.1974/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery Dip: LHV	Saidu Group Teaching Hospital, Swat
236.	Nargis Rawan D/O Bakhti Rawan	20.11.1975/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	SGTH Swat
237.	Rehmat Begum D/O Ali Gul	01.04.1980/ Swat	24-09-2005	Matric, MA Dip: Nursing Dip: Midwifery Dip: Post Midwifery Dip: BSc-Nursing Peshawar University Deg: BSc-Nursing Post RN Deg: MPH	Public Health School, Hayatabad Peshawar
238.	Chand Bibi D/O Sultan Bakht	10.04.1980/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Molvi Anwar Shah Memorial Hospital Peshawar
239.	Zahida Begum D/O Sayed Ahmad Khan	26.04.1980/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Category-C Hospital, Matte Swat
240.	Asia Habib D/O Habib Khan	20.03.1981/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Peshawar University	SGTH Swat
241.	Saira D/O Sultan Ahmad	01.07.1981/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Saidu Group Teaching Hospital, Swat
242.	Neelum D/O Muhammad Ameen	01.01.1982/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery Deg: BSc-Nursing Post RN	Saidu Group Teaching Hospital, Swat
243.	Nusrat-Wahab D/O Abdul Wahab	12.03.1982/ Swat	24-09-2005	Matric Dip: Nursing Dip: Midwifery	Saidu Group Teaching Hospital, Swat

To,

The Director General
Health services KPK Peshawar

Subject : Representation against the provisional Seniority list
issued dated 17-02-2023

Respected Sir ,

I wish to raise objection through this representation against the above mentioned seniority list on the following grounds:

1. That I am serving in the Health department as charge nurse and am regular employ from the year 2005 presently serving at public health school Hayatabad Peshawar in BPS-16 .
2. That I am at serial no 237 in the present seneiritory list .
3. That the person / employee at serial no 193 of is inducted through public service commission in the year 2008 but has been placed above me for the reason unknown and need to be probe by your good office in light of this representation / objection that how she has become senior to me if she has the selection of 2008 in the nursing cadre.

I therefore humbly request that on acceptance of this representation your good office will positively and seriously probe in this matter that how the employee at serial no 193 became senior to me. I will be very thankful and obliged.

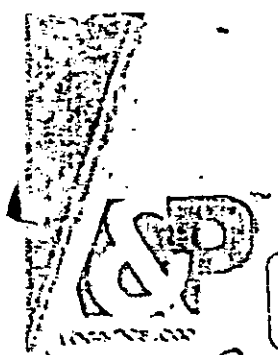
Dated: 22/02/2023

Yours Truly

Rehmat Begum

Rehmat Begum D/O Ali Gul

23



Sales Tax Invoice | **DOMESTIC**

Shipper's Account # _____ Consignment # **PEW** Origin **PE** Destination **PEW** Pieces **1** Weight **0.5**

1910 02924515

Shipper's Information

Name: **Kellie**

Address: **1200 W. ...**

9346444380

Consignee Information

Name: **Dixie**

Address: **101 ...**

Tel: **0919210269**

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Second Day

Same Day

Sunday/Holiday

Other _____

This is a non-negotiable consignment note subject to the terms and conditions set forth on the reverse of shipper's copy in tendering this shipment. Shipper agrees M&P shall not be liable for special incident for consequential delays or damages arising from carriage hereof. M&P disclaims all warranties expressed or implied respect to this shipment. The shipment under this consignment note if not insured by the shipper, will be treated "on shipper's risk" alone.

Insurance: Do You Require Coverage? YES NO Ins. Premium: _____

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I confirm & affirm that I have understood and agrees on all the rates, notes and terms and conditions stated hereinafter and that all details given herein are true and correct

Shipper's Signature _____

Consignment Note - Non Negotiable

Collection by: **1695** Date: **22-2**

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CASH

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Charged Rates _____

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Taxes **160**

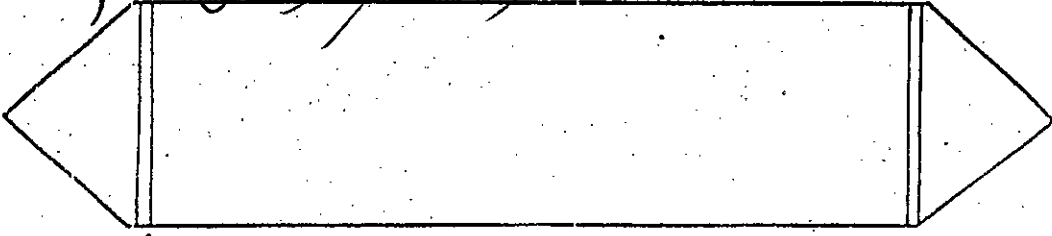
Total Amount _____

Customer Care: +(92-21) 111 202 202 | contact@mulphileg.com

24.

(25)

بعدالت صفا سندرس (مبتدع) د



موزعہ 21-9-2023

مقدمہ

دعویٰ

جرم

2 مجانبہ
کاہ لکت ہنم بنام سندرس
صفا سندرس

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ~~سندرس~~ ~~محمد رضا~~ ~~محمد شریف~~
مقرر کر 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 ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی 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 اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ نیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندرس ہے۔

المرقوم 21 ماہ 23 20

بمقام کے لئے منظور ہے۔