

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

**CM NO. \_\_\_\_\_/2023**

**IN RE:**

**SERVICE APPEAL NO. 1913/2023**

**Jamal Shah.....Applicant**

**Versus**

**Govt of KPK & others.....Respondents**

**I N D E X**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Application for place on file		1-2
2.	Affidavit		3
3.	Copy of Relevant Document	A	4



**Applicant / Appellant**

**Through**



**ZARTAJ ANWAR  
Advocate, Supreme Court  
Of Pakistan**

*01-24*

*01-11-23*

*Peshawar*

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

**CM NO. \_\_\_\_\_/2023**

**IN RE:**

**SERVICE APPEAL NO. 1913/2023**

Khyber Pakhtunkhwa  
Service Tribunal

Date No. 8426

Date 19-10-23

**Jamal Shah.....Applicant**

**Versus**

**Govt of KPK & others.....Respondents**

**APPLICATION FOR PLACING ON FILE**  
**NECESSARY AND IMPORTANT**  
**DOCUMENTS FOR JUST DECISION OF THE**  
**CASE, IN THE ABOVE NOTED CASE ON**  
**BEHALF OF APPELLANT.**

Respectfully Sheweth:

1. That the above noted case is pending adjudication before this Hon'ble Tribunal, which is fixed for 01.11.2023.
2. That during proceedings in the above mentioned case some important and necessary documents were not available in the case, which are necessary to be placed on file for just decision of the above mentioned case. **(Copy of relevant document is re attached as annexure A)**

3. That there is no legal bar to place on file the above mentioned document.

It is, therefore, most humbly prayed that on acceptance of this application the above mentioned documents may very kindly be placed on file.



**Applicant / Appellant**

**Through**



**ZARTAJ ANWAR**  
**Advocate, Supreme Court**  
**Of Pakistan**

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

**CM NO. \_\_\_\_\_/2023**

**IN RE:**

**SERVICE APPEAL NO. 1913/2023**

**Jamal Shah.....Applicant**

**Versus**

**Govt of KPK & others.....Respondents**

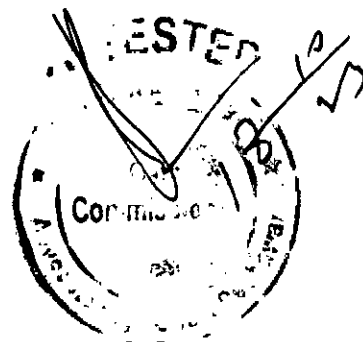
**AFFIDAVIT**

I, **Jamal Shah S/o Malik Wali Khan R/o GT Road, Gharhi Hakeem Khan, Pabbi, District Nowshera**, do hereby solemnly affirm and declare that the contents of the accompanying **Application** true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
**DEPONENT**

**Identified By:**

  
**ZARTAJ ANWAR**  
**ASC, Peshawar**



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Amirza A.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

149

7436  
18/09/23

NO. SOH(E-II)/1-1/2023/(Dr. Jamal Shah)  
Dated Peshawar, the 11<sup>th</sup> September, 2023

To

The Director General Health Services  
Khyber Pakhtunkhwa. *EI*

Subject:

DEPARTMENTAL APPEAL FOR ADDING UP TEMPORARY SERVICE  
TOWARDS REGULARIZATION FOR QUALIFYING SERVICE FOR  
PENSION.

I am directed to refer to your office letter No. 8161/E.1 dated 13.07.2023 on the subject noted above and to state that the request for adding up temporary service towards regularization for qualifying service for in respect of Dr. Jamal Shah S/O Malik Wali Khan, Medical Officer (BS-17), attached to BHU Wazir Garhi, District Nowshera has been regretted by the Competent Authority.

SECTION OFFICER (E-II)

Endst: No. & Date Even

Copy forwarded for information to the:

1. District Health Officer, Nowshera w/r to his letter No. 7300/DHO NSR dated 08.06.2023.
2. PS to Secretary Health, Khyber Pakhtunkhwa
3. PA to Special Secretary (E&A) Health Department.

*EI*  
*21/9*

SECTION OFFICER (E)

*[Signature]*  
**ATTESTED**