

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
<p>07.07.2017</p> <p><i>U. A. M.</i></p>		<p align="center">BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</p> <p align="center">Appeal No. 1455/2013</p> <p align="center">Date of Institution ... 11.10.2013 Date of Decision ... 07.07.2017</p> <p align="center">Akram Khan, Junior Clerk, Agency Surgeon Office, Orakzai at Tehsil and District Hangu.</p> <p align="center">Versus</p> <p>1. The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and others.</p> <p align="center"><u>JUDGMENT</u></p> <p><u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> - Appellant, learned counsel for the appellant and Mr. Usman Ghani, District Attorney on behalf of the respondents present.</p> <p>2. Appellant Akram Khan, who was appointed as Junior Clerk on 12.06.1994 in the office of Divisional Directorate Health Services Kohat has filed the present appeal under section-4 of the Khyber Pakhtunkhwa Service Tribunal wherein he has challenged the maintenance of separate seniority lists in respect of the Ministerial staff of the Directorate General Health Services (DGHS) Office Khyber Pakhtunkhwa, Peshawar and in respect of Ministerial staff/Junior Clerks of Sub-Cadre/Sub Ordinate Offices</p>

of Health Service in Khyber Pakhtunkhwa. The appellant has prayed for the maintenance of joint seniority list of all the employees working in the Health Department and for the cancellation of order dated 22.05.2013 of Director General Health Services Khyber Pakhtunkhwa, Peshawar whereby the junior clerks, whose names were mentioned in the separate seniority list of Junior Clerks of the DGHS Office Khyber Pakhtunkhwa, Peshawar, were promoted to the post of Senior Clerks.

3. The appellant has also annexed application for condonation of delay with the memo^{of}/present appeal on the ground that the appellant belongs to very sensitive locality i.e. Hangu and due to Curfew, and Blocked of roads due to law & order situation timely filing of present appeal was beyond his control. To meet the ends of justice and for the reasons mentioned in the application, the application for condonation of delay is accepted and as such delay in filing the present appeal his condoned.

4. Argument heard. File perused.

5. Learned counsel for appellant stated that the act of maintenance of separate seniority lists is illegal, discriminatory and as such the impugned promotion order has deprived senior employees of Sub Cadre/Sub Ordinate Departments from their vested right of promotion.

2/11/13

6. Conversely learned District Attorney opposed the contentions raised by learned counsel for the appellant mainly on the ground that separate methods have been notified for the recruitment, promotion and other conditions of service for the ministerial staff of the Health Directorate Peshawar and for the ministerial staff of Sub Cadre/Sub Ordinate Departments and therefore separate seniority lists have been maintained. The Learned District Attorney has also stated that notification dated Peshawar the 29th, March, 1982 governing the method of recruitment, qualification and other conditions of service applicable to the posts in the Health Directorate Peshawar and the notification dated Peshawar the 22nd, June, 1983 governing the method of recruitment, qualification and other conditions of service applicable to the posts of Ministerial service (Sub-Cadre) in the Health Department, are appended with the para wise comments of the official respondents.

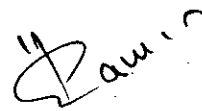
7. The learned counsel for the appellant has not denied the existence of separate methods of recruitment, promotion etc for the posts applicable to Health Directorate Peshawar and for the posts applicable to Ministerial Service (Sub-Cadre) in the Health Department and when confronted with the above separate methods, remained unable to justify the prayers made in the present appeal.

Handwritten mark: a circle with a diagonal line through it, followed by the word "awar" written vertically.

8. As a sequel to above, the present appeal is devoid of any substance and as such the same is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room after its completion.



(GUL ZEB KHAN)
MEMBER



(MUHAMMAD HAMID MUGHAL)
MEMBER

ANNOUNCED
07.07.2017


07.07.2017.

Learned counsel for the appellant and Mr. Usman Ghani, District Attorney on behalf of the official respondents present. Vide separate judgment of today of this Tribunal the present appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

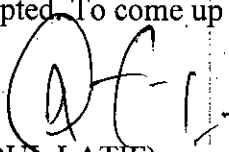
07.07.2017


(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

25.11.2016

Appellant in person and Assistant AG for the respondents present. Appellant requested for adjournment due to non-availability of his counsel. Request accepted. To come up for arguments on 6-3-2017 before D.B.


(ABDULLATIF)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

06.03.2017


Appellant in person and Asst: AG for respondents present. Arguments could not be heard due to General Strike of the Bar. To come up for arguments on 04.07.2017 before D.B.


(ASHFAQE TAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

19. 04.07.2017 Counsel for the appellant and Mr. Usman Ghani, District Attorney for the respondent present. Arguments heard. To come up for final order on 07.07.2017 before D.B.


(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

26.04.2016

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Rejoinder submitted. The learned Members Judicial & Executive are on official tour to D.I. Khan, therefore, case is adjourned for arguments to 16.06.2016 before D.B.


Chairman

16.06.2016

Appellant in person and Mr. Amjad Ali, Assistant alongwith Mr. Muhammad Jan, GP for official respondents present. Appellant stated that his learned counsel is not present today due to illness. He requested for adjournment. The same is granted. To come up for arguments on 4.10.16 before D.B.


MEMBER


MEMBER

04.10.2016

Appellant with counsel and Mr. Muhammad Jan, GP for official respondents present. Learned counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 25.11.16 before D.B.


(MUHAMMAD AAMIR NAZIR)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

11.03.2015

None present for appellant. Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply on 29.5.2015 before S.B.


Chairman

29.05.2015

Appellant in person and Mr. Sabir Khan, SO alongwith Assistant A.G for official respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity extended. Let the Secretary Health be issued a notice that his establishment is not taking due interest in the Court cases. To come up for written reply/comments on 13.8.2015 before S.B.


Chairman

13.08.2015

Appellant in person M/S Qibaz Khan, SO and Yar Gul, Senior Clerk alongwith Assistant A.G for respondents present. Para-wise comments on behalf of respondents No. 2, 4 & 5 submitted while learned Assistant A.G requested for further adjournment for submission of written reply on behalf of respondents No. 1, 3, and 6 on 10.11.2015 before S.B.


Chairman

10.11.2015

Counsel for the appellant and Mr. Yar Gul, Senior Clerk alongwith Addl: A.G for respondents present. The learned Addl: A.G relies on the written statement already submitted by other respondents on behalf of respondents No. 1, 3 and 6. The appeal is assigned to D.B for rejoinder and final hearing for 26.4.2016.


Chairman

01.07.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Sultan Shah, Assistant, Muhammad Mahaz Madni Assistant and Gulyar, Assistant for the official respondents present and requested for further time. None is available on behalf of private respondents nor their written reply received, hence placed ex-parte. To come up for written reply of official respondents on 24.09.2014.

MEMBER

MEMBER

24.09.2014

Appellant in person and Mr. Muhammad Jan, GP with Sheryar, Assistant for the official respondents present and requested for further time. To come up for written reply positively on 17.12.2014.

MEMBER.

17.12.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Sheryar, Assistant for the official respondents present. The Tribunal is incomplete. To come up for the same on 11.3.2015.

READER

10.01.2014

Appellant in person present and moved an application for adjournment, whereby the learned counsel for the appellant has gone to Islamabad in some family engagements. To come up for preliminary hearing on 07.02.2014.


Member

07.02.2014

Appellant with counsel present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the order dated 22.05.2013, he filed departmental appeal on 07.06.2013 which has not been responded within the statutory period of 90 days, hence the instant appeal on 11.10.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply on 29.04.2014.

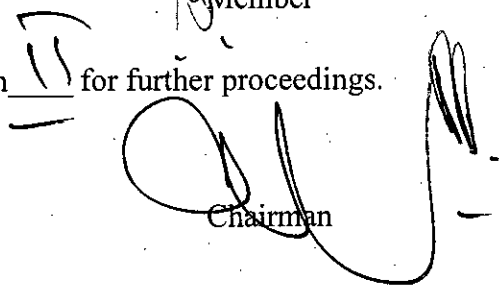
*Appellant deposited
of process fees security
Rs. 360/- Bonds Receipt
attached with file.*

1108-1


Member

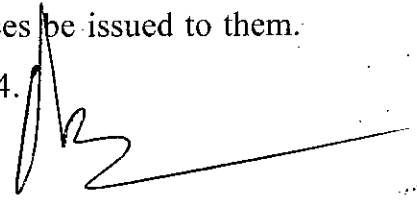
07.02.2014

This case be put before the Final Bench 11 for further proceedings.


Chairman

29.4.2014



Counsel for the appellant and Mr. Muhammad Jan, GP with Sultan Shah, Assistant, Muhammad Maaz Madni, Assistant and Gul Yar, Assistant for official respondents and private respondents No. 8, 10 and 12 in person present and requested for time. None is available on behalf of private respondents No. 7, 9, & 11. Fresh notices be issued to them. To come up for written reply on 1.7.2014.


MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1455/2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	30/10/2013	<p>The appeal of Mr. Akram Khan resubmitted today by Mr. Amanullah Khan Marwat Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	1-11-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>10-1-2014</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Akram Khan Junior Clerk received today i.e. on 11.10.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Addresses of respondent Nos. 7 to 12 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

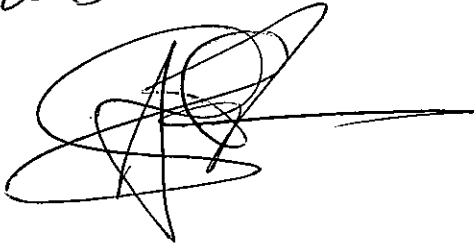
No. 1461 /S.T,

Dt. 11/10 /2013.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amanullah Marwat Adv. Pesh.

file received today
30/10/013

After removal of objection
Resubmitted


BEFORE THE K.P.K SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 1455/2013

Akram Khan Junior Clerk, Agency Surgeon Office, Orakzai at
Tehsil and District Hangu.....(Appellant)

VERSUS

Government of K.P.K through Chief Secretary K.P.K,
Peshawar and others.....(Respondents)

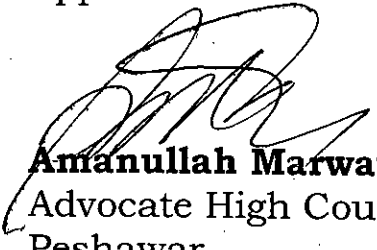
I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Application for Condonation of delay		6-7
3.	Addresses of the parties		8
4.	Copy of Impugned order dated 22/05/2013	A	9-10
5.	Copy of Final Seniority List	B	11-12
6.	Copy of Departmental Representation	C	13-14
7.	Wakalat Nama		15

Appellant

Through

Dated: 11/10/2013


Amanullah Marwat
Advocate High Court,
Peshawar.
Cell No. 0334-9054585

BEFORE THE K.P.K SERVICE TRIBUNAL, PESHAWAR.

①

Service Appeal No. 1455/2013

K.P.K. Province
Service Tribunal
Case No. 1466
Dated 11-10-13

Akram Khan Junior Clerk, Agency Surgeon Office, Orakzai at Tehsil and District Hangu.....(Appellant)

VERSUS

1. Government of K.P.K through Chief Secretary K.P.K, Peshawar.
2. Establishment Department through its Secretary, K.P.K, Peshawar.
3. Director Health Services (FATA), Peshawar.
4. Director General Health Services, K.P.K, Peshawar.
5. Health Department through its Secretary K.P.K, Peshawar.
6. Agency Surgeon Orakzai, at Tehsil and District Hangu. ✓
7. Muhammad Umar Daraz ^{s/c} /DGHS Office Peshawar.
8. Masom Khan ^{s/c} /DGHS Office, Peshawar.
9. Jehanzeb Khan ^{s/c} /KMC Peshawar.
10. Muhammad Zahir ^{s/c} /DGHS Office Peshawar.
11. Zahir Shah ^{s/c} /HMC Peshawar.
12. Muhammad Shahid Amin ^{s/c} / DGHS Office Peshawar.....(Respondents)

EX-PARTE
1-7-14

APPEAL U/S 4 OF THE SERVICES TRIBUNAL
ACT 1974, AGAINST OFFICE ORDER DATED
22/05/2013 PASSED BY RESPONDENT NO. 4
WHEREBY RESPONDENTS NO. 7 TO 12 WERE
PROMOTED ON THE BASIS OF SEPARATE
SENIORITY LIST MAINTAINED BY
RESPONDENTS ABOUT MINISTERIAL STAFF
WORKING IN THE OFFICE OF RESPONDENT NO.
4 AND SENIOR WERE DEPRIVED.

ac-submitted to-409
and filed.
30/10/13.

PRAYER:

②

That on acceptance of this service appeal, the impugned order dated 22/05/2013 be cancelled and respondents be directed to maintained joint seniority list of all employees who are working in Health Department. To declare to maintain separate seniority list by the respondent No. 4 and subsequent promotion thereon is highly illegal, against the rules and procedure of seniority.

Any other relief which may deem fit in the circumstances of the case may also be granted.

Respectfully Sheweth:

1. That appellant was appointed as Junior Clerk of BPS-05 by respondents on 12/06/1994 on the recommendation of Departmental Selection Committee held on 08/06/1994 in the Office of Divisional Directorate Health Services, Kohat.
2. That since his appointment, appellant is performing his duties up to the entire satisfaction superior and till date no complaint whatsoever has been made against him.
3. That presently appellant is performing his duty is Junior Clerk Agency Office Orakzai at Hangu and is waiting for promotion for long time.
4. That the respondents maintained a separate seniority list of Ministerial Staff who are working in the office of D.G

Health Services Peshawar and for the rest staff of subordinate offices a separate seniority list is being maintained.

5. That appellant seriously shocked due to separate seniority list and promotion thereon by which junior employees were promoted and appellant along with other senior employees were deprived from their vested right.
6. That appellant preferred Departmental Representation on 10/06/2013 through proper channel, which was put forward to respondent No. 4 on 14/06/2013 for further necessary action but till date the same remain un-responded.
7. That appellate authority failed to decide the departmental representation/appeal of the appellant within the request time i.e. 90 days, hence this service appeal inter alia of the following grounds:

GROUND:

- A. That the impugned order dated 22/05/2013 is illegal, unlawful, void without jurisdiction ineffective, hence liable to be set aside.
- B. That maintenance of two seniority lists in one department about the one and the same employees is illegal and discriminatory such in discriminate treatment meted out by the respondents towards the employees of subordinate offices i.e. DHOs, MS DHQ Hospitals, MS

AHQ Hospitals and Agency Surgeon Offices of K.P.K including appellant amounts to violation of Article 25 and 27 of Constitution of Islamic Republic of Pakistan.

- C. That a separate seniority list issued and maintained by respondents due to which junior clerks were promoted to the post of Senior Clerk, thus deprived senior employees including appellant were deprived from their vested right of promotion such action of respondent is highly illegal, without lawful authority and is not sustainable in the eyes of law.

- D. That to enjoy the protection of law and to be treated in accordance with law is in alienable rights of every citizen, so not to maintain seniority list by respondents according to seniority rules amounts to violation of Article 4 of the Constitution and Service Rules, hence, untenable.

- E. That the impugned order passed by the respondents on the basis of separate seniority list and promoted junior employees by depriving appellant and many other like them of their vested right of the seniority and promotion.

- F. That impugned order passed by respondents is violation of golden principle "no one should be condemned unheard" by preparing seniority list at the back of the parties such action of respondents is equivalent to exploitation, which is strictly prohibited by Article 3 of the Constitution.


G. That the impugned order passed by respondent No. 4 is highly illegal, arbitrary, whimsical and discriminatory to deserve to be set aside.

It is, therefore, respectfully prayed that on acceptance of this service appeal, the impugned order dated 22/05/2013 be cancelled and respondents be directed to maintained joint seniority list of all employees who are working in Health Department. To declare to maintain separate seniority list by the respondent No. 4 and subsequent promotion of thereon is highly illegal, against the rules and procedure of seniority.

Respondents may further be directed to fill all the vacancies on promotion which are lying vacant since long time.


Appellant

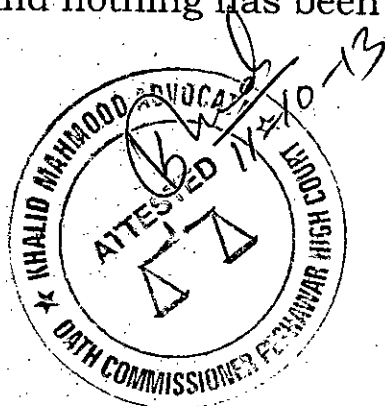
Through


Amanullah Marwat
Advocate High Court,
Peshawar.

Dated: 11/10/2013

AFFIDAVIT:

I, Akram Khan Junior Clerk, Agency Surgeon Office, Orakzai at Tehsil and District Hangu, do hereby solemnly affirm and declare that all the contents of the **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

6

BEFORE THE K.P.K SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. ____/2013

Akram Khan Junior Clerk, Agency Surgeon Office, Orakzai at
Tehsil and District Hangu.....(Appellant)

VERSUS

Government of K.P.K through Chief Secretary K.P.K,
Peshawar and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Akram Khan Junior Clerk, Agency Surgeon Office, Orakzai at
Tehsil and District Hangu

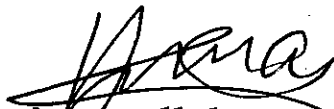
RESPONDENTS:

1. Government of K.P.K through Chief Secretary K.P.K,
Peshawar.
2. Establishment Department through its Secretary, K.P.K,
Peshawar.
3. Director Health Services (FATA), Peshawar.
4. Director General Health Services, K.P.K, Peshawar.
5. Health Department through its Secretary K.P.K, Peshawar.
6. Agency Surgeon Orakzai, at Tehsil and District Hangu.
7. Muhammad Umar Daraz^{s/e} DGHS Office Peshawar.
8. Masom Khan^{s/e} DGHS Office, Peshawar.
9. Jehanzeb Khan^{s/e} KMC Peshawar.
10. Muhammad Zahir^{s/e} DGHS Office Peshawar.
11. Zahir Shah^{s/e} HMC Peshawar.
12. Muhammad Shahid Amin^{s/e} DGHS Office Peshawar.

Appellant

Through

Dated: 11/10/2013


Amanullah Marwat
Advocate High Court,
Peshawar.

7

BEFORE THE SERVICE TRIBUNAL, KPK, PESHAWAR

In Re: Service Appeal

Akram Khan.....Applicant/ Appellant

V E R S U S

Govt of KPK and others.....Respondents

**APPLICATION FOR CONDONATION
OF DELAY, IF ANY.**

Respectfully Sheweth:

1. That the titled service appeal is pending adjudication before this Honourable Tribunal, in which no date of hearing has been fixed.
2. That applicant/ appellant preferred departmental appeal before respondent on 10.06.2013, which was put forward to the appellate authority on 14.06.2013 and remained un-responded, so, appeal filed by applicant/ appellant before Service Tribunal is well within time.
3. That the applicant/ appellant belongs to very sensitive locality i.e. Hangu and due to curfew imposed by Law & Enforcement Agencies and blockad of roads due to law and order situation, could not filed appeal before this Honourable Tribunal.
4. That firstly, appeal is not time-barred and if court is of the opinion that appeal is time-barred that

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would be due to above stated reasons, which is beyond the control of applicant/ appellant.

5. That delay in filing the titled service appeal is neither willful nor deliberate but due to reason mentioned above.
6. That law favours adjudication on merits rather than on technical grounds is held by the Apex Court in various judgments.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, in filing the above titled service appeal may kindly be condoned in the interest of justice.

Petitioner

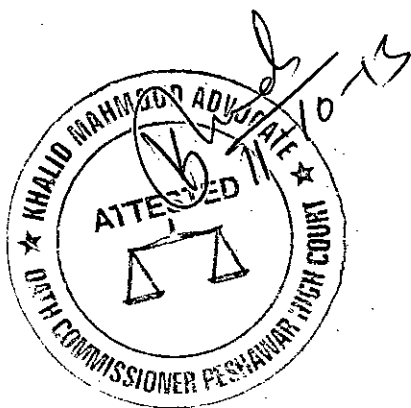
Through


Amanullah Marwat
Advocate, Peshawar

Date: 11/10/2013

AFFIDAVIT

I, Akram Khan (applicant/ appellant), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application for Condonation of Delay** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

(9)

OFFICE ORDER:-

Consequent upon approval accorded by the Departmental Promotion Committee meeting held on 08-05-2013 at 10:00 AM, the following Senior most Junior Clerks (BS-07) have been promoted to the post of Senior Clerk (BS-09):-

<u>S No</u>	<u>Name of official</u>	<u>Place Of Posting</u>
1.	Syed Farman Shah	KMC Peshawar
2.	Hashmat ullah Khan	DGHS, Office Peshawar
3.	Syed Liaq Shah	Govt. Naseerullah Khan Baber Memorial Hospital Peshawar
4.	Nasruminallah	Health Secretariat
5.	Muhammad Ishaq	DGHS, Office Peshawar
6.	Mukaram Khan	HMC, Peshawar
7.	Muhammad Umar Daraz	DGHS, Office Peshawar
8.	Masam Khan	DGHS, Office Peshawar
9.	Jehanzeb Khan	KMC, Peshawar
10.	Muhammad Zahir	DGHS, Office Peshawar
11.	Zahir Shah	HMC Peshawar
12.	Muhammad Shahid Amin	DGHS, Office Peshawar

On their promotion to the post of Senior Clerk (BS-09) the following posting/ transfer are hereby ordered in the interest of public service with immediate effect:-

<u>S.No</u>	<u>Name of official</u>	<u>From</u>	<u>To</u>	<u>Remarks</u>
1.	Syed Farman Shah	KMC Peshawar	DGHS, Office Peshawar	Against the vacant post
2.	Hashmat ullah Khan	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
3.	Syed Liaq Shah	Nasirullah Khan, Baber Memorial Hospital Peshawar	DHS FATA Peshawar	Against the vacant post
4.	Nasruminallah	Health Secretariat	DGHS, Office Peshawar	Against the vacant post
5.	Muhammad Ishaq	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post

C. T. C

6.	Mukaram Khan	HMC, Peshawar	DHS FATA Peshawar	Against the vacant post
7.	Muhammad Umar Daraz	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
8.	Masam Khan	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
9.	Jehanzeb Khan	KMC, Peshawar	DHS FATA Peshawar	Against the vacant post
10.	Muhammad Zahir	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
11.	Zahir Shah	HMC, Peshawar	DGHS, Office Peshawar	Against the vacant post
12.	Muhammad Shahid Amin	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post

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NB:- Arrival/Departure report should be submitted to this Directorate for record.

Sd/xxx

Director General Health Services
Khyber Pakhtunkhwa Peshawar

No. 2884-95/Personnel (Promotion)

dated Pesh the. 22/05/2013.

Copy forwarded to the:-

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar for information.
2. Director Health Services FATA Peshawar.
3. Principal Khyber Medical College, Peshawar.
4. Medical Superintendent HMC Peshawar.
5. Medical Superintendent Govt: Naseerullah Khan Baber Memorial Hospital Kohat Road Peshawar.
6. Accountant General Khyber Pakhtunkhwa Peshawar.
7. Section Officer (Drug) Health Secretariat Peshawar.
8. Accountant DGHS Office Peshawar.
9. PA to Director General Health Services, Peshawar.
10. PA to Director (Administration) DGHS, Office Peshawar.
11. Suptt: Promotion cell, DGHS, Office Peshawar
12. Officials concerned.

For information and necessary action.

Director General Health Services
Khyber Pakhtunkhwa Peshawar

[Handwritten Signature]
22/5

17/5/12

[Handwritten Signature]

FINAL SENIORITY LIST OF JUNIOR CLERKS OF DGHS. OFFICE.

(11)

S.No	Name of Junior Clerk.	Date of 1st Appointment	Place of Posting	Date of Birth Domicile	Date of Retirement
1.	Syed Farman Shah	22.12.1991	KMC KPK	17.04.1971/ Peshawar	16.04.2031
2.	Mubarak Shah	18.06.1992.	DGHS, office	08.08.1968/ Peshawar	07.08.2028
3.	Hashmat Ullah	12.11.1992.	DGHS, office.	12.12.1972/ Peshawar	11.12.2032.
4.	Laiq Shah	14.11.1992.	Nasrullah Baber Memorial Hospital	01.06.1969/ Peshawar	31.08.2029.
5.	Nasruminallah	22.08.1993.	Secretariat,	02.01.1969/ Peshawar	01.01.2029.
6.	Muhammad Ishaq	22.08.1993.	DGHS, office.	15.05.1969 Peshawar	14.05.2029.
7.	Mulkaram Khan	26.04.1994.	HMC Peshawar	08.07.1965 Peshawar	07.07.2025.
8.	M. Umar Daraz	23.11.1994.	DGHS, office	15.01.1974. Peshawar	14.01.2034.
9.	Masam Khan	30.01.1995.	DGHS, office	06.02.1975 / Peshawar	05.02.2035.
10.	Jehanzeb Khan	09.02.1995.	KMC Peshawar	08.02.1975/ Peshawar	07.02.2035.
11.	Muhammad Zahir	14.02.1995.	DGHS, office	03.03.1974/ Peshawar	02.03.2034.
12.	Zahir Shah	28.02.1996.	HMC Peshawar	20.10.1968/ Peshawar	19.10.2028
13.	Muhammad Shahid Amin	12.05.1996.	DGHS, office	02.09.1976/ Peshawar	01.09.2036.
14.	Jamal Nasir	17.09.1996.	DHS, FATA	03.04.1983/ Peshawar	05.04.2023.
15.	Wajid Shah	17.09.1996.	DHS, FATA	30.09.1983/ Khyber Agency.	29.09.2023.
16.	Nadeem Ullah	17.09.1996.	DHS, FATA	09.01.1972/ Peshawar	01.01.2032.
17.	Khalid Said	19.09.1996.	DHS, FATA ✓	19.09.1974/ Peshawar	14.09.2034.
18.	Muhammad Imran	14.06.1997.	DHS, FATA ✓	01.08.1975/ Peshawar	31.07.2035
19.	Nasim Ahmad	19.05.1997.	DGHS, office	01.06.1966/ Peshawar	31.05.2026.
20.	Fazl Muhammad	24.07.1997.	DGHS, office	12.09.1972/ Peshawar	11.09.2032.
21.	Muhammad Fayyaz	29.06.1998.	DHS, FATA ✓	02.05.1972/ Peshawar	01.05.2032
22.	Shaukat Ali	03.08.1994.	KTH, Peshawar	01.08.1971/ Peshawar	31.07.2031.
23.	Zulfqar Ali	20.03.2002.	DGHS, office	16.01.1966/ Peshawar	15.01.2026.
24.	Irfanullah S/O Naimat Ullah	20.03.2002	HMC PESHAWAR	16.03.1974/ Peshawar	14.03.2034.
25.	Mubashir Khan S/O Muhammad Ashraf	29.04.2005.	DGHS, Office	07.01.1978/ Peshawar	06.01.2038
26.	Muhammad Nadeem	29.04.2005	DGHS, Office	01.12.1984/ Peshawar	31.11.2044
27.	Mujahid Khan	02.12.2005	DHS, FATA ✓	01.06.1977/ Charsadda	31.05.2037
28.	Naved ur Rahman	06.07.2007	DHS, FATA ✓	10.04.1988/ Charsadda	09.04.2046

[Handwritten Signature]

12

30.	Shafiqat ullah Shah S/O Tiawat Shah	31.07.2007	DGHS, office	08.03.1988/ Charsadda	07.03.2048
31.	Noman Hadi S/O Shamsul Hadi	11.05.2009	DGHS, office	05.04.1983/ Bannu	04.04.2043
31.	Jeffer Shah	03.03.2010	DGHS, office	01.01.1962/ Peshawar	31.12.2021
32.	Sami-ul-Haq	03.03.2010	DGHS, office	01.01.1962/ Peshawar	31.12.2021
33.	Mumtaz Ali Shah	03.03.2010	DGHS, office	18.11.1968/ Charsadda	17.11.2026
34.	Fahad Khan S/O Khan Rose	22.03.2010	DGHS, office	01.02.1991/ Peshawar	31.01.2051
35.	Faisal Javed S/O Javed Iqbal	01.11.2010	Health Secretariat	05.11.1990/ Peshawar	04.11.2050
36.	Tahir Naqash S/O Abdul Qayum Khan	02.11.2010	DGHS, office	02.03.1982/ Peshawar	01.03.2042
37.	Asfandyar S/O Gul Afzal	02.11.2010	DGHS, office	18.12.1990/ Peshawar	17.12.2050
38.	Izhar Ullah S/O Muhammad Irshad	12.04.2011	DGHS, office	15.04.1989/ Peshawar	14.04.2049
39.	Noor ud din S/O Muhammad Jehangir	14.04.2011	DGHS, office	11.09.1980/ Peshawar	10.09.2040
40.	Muhammad Sharfzab Iqbal S/O Muhammad Iqbal	14.04.2011	DGHS, office	27.11.1985/ Peshawar	26.11.2045
41.	Muhammad Adil S/O Muhammad Iqbal	14.04.2011	DGHS, office	01.04.1966/ Peshawar	31.03.2046

SMA
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

27/8/12

FAHAD KHAN

[Handwritten signature]

18

To
The Secretary Health Govt: of
Khyber Pakhtunkhwa Peshawar.

Through: PROPER CHANNEL.

Subject:- DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST THE ORDER DATED 22.5.2013
PASSED BY DIRECTOR GENERAL, HEALTH SERVICES KPK, PESHAWAR, WHEREBY
JUNIORS WERE PROMOTED BY SUPERSEDING SENIORS.

Respected Sir,
I have the honour to state that the applicants are government servant and were appointed on 06.03.1993 & 12.06.1994. Since then we are performing over duties according to the entire satisfaction of over superior without any complaint against us on various position of Health Department.

2. The Director General Health Services being the provincial Head of all the Subordinate offices i.e DHOs, M.S DHQ Hospitals, M.S AHQ Hospitals and Agency Surgeons of K.P.K, is bond to treat all the civil servants working under his control equally, but it is astonishing to note that Ministerial staff working in the office of the Director General Health Services Peshawar have maintain separate seniority list of the staff working in Health Directorate, while the rest of the staff of subordinate offices are kept separate seniority list. hence the staff of subordinate offices are deprived from their vested rights, and also against the promotion criteria /Rules, as maintenance of two seniority lists in one Department is discriminatory treatment with the servants like undersigned.

3. We the applicants have rendered 20 years valuable service with Health Department but was not promoted so far to the post of Senior Clerk for the reasons mentioned above. On the other hands in the instant order junior most junior clerks have been promoted to the post of Senior Clerk by the Director General Health Services Peshawar by following separate seniority list of their own staff.

4. That to maintain separate list for the Director General employees and rest of the employees particularly those performing same duties in the same scale are highly illegal, against the rules and procedure of seniority.

It is therefore most humbly requested that on acceptance of this appeal / representation, the order dated, 22.05.2013 passed by Director General Health Services KPK Peshawar may please be cancelled and maintain joint seniority list as per procedure and practice so that no injustice whatsoever be done of any person, otherwise we will knock the door of justice.

Dated: 07/06/2013.

Regards.

1. Munawar Khan Jr/Clerk
Agency Surgeon Office Orakzai
at Hangu.
DO 1st Apptt: 06.03.1993.

2. Akram Khan Jr/Clerk
Agency Surgeon Office Orakzai
at Hangu.
DO 1st App: 12.06.1994

D.No: 4171
dt: 10/6/2013
DHS, FATA
Peshawar

**DIRECTORATE OF HEALTH & POPULATION WELFARE
FATA SECRETARIAT WARSAK ROAD PESHAWAR**



No. 9567

/DHS/FATA/Admn.

Dated. 14 / 6 / 2013

14

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

Subject:- DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE ORDER
DATED 22-05-2013 PASSED BY DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR, WHEREBY JUNIORS
WERE PROMOTED BY SUPERSEDING SENIORS.

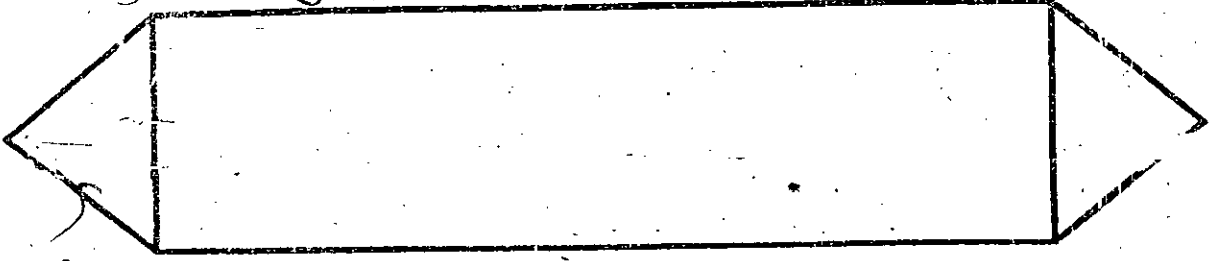
Memo:

Enclosed please find herewith a joint Departmental appeal of
Mr. Muawar Khan and Mr. Akram Khan, Junior Clerks attached to
Agency Surgeon Orakzai at Hangu for the subject purpose for favour
of further necessary action.

Muawar Khan
14/6
Director General Health Services
FATA, Peshawar.

C. S. T.
[Signature]

بعدالت صائب سروس ٹریڈنگ پرائیویٹ لمیٹڈ



2 جناب مسابیل / منیجر

اکرم خان ہنام ٹریڈنگ پرائیویٹ لمیٹڈ

مورخہ 11/10/2012

مقدمہ

دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام 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 تفریق ثالث و فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
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 بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب با بند ہوں گے۔ کہ بیروی
مذکورہ کر رہے ہیں ہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

اکرم خان

Adv. Akram Khan

11/10/2012

اکتوبر

11

الرقوم

Accepted
کے لئے منظور ہے۔

بمقام

BEFORE THE SERVICE TRIBUNAL, PESHAWAR

Appeal No.1455/2013

Akram Khan.....Appellant

8/1/14

V E R S U S

Government of KPK Health Department.....Respondent


APPLICATION FOR ADJOURNMENT

Respectfully Sheweth:

1. That the titled case is pending adjudication before this Honourable Tribunal and is fixed for 10.01.2014.
2. That the counsel for the appellant has gone to Islamabad in connection of admission of his youngster brother and is unable to attend and assist this Honourable Tribunal on the date fixed.

It is, therefore, respectfully prayed that on acceptance of this application, the case may kindly be adjourned, to a short date which is convenient to this Honourable Tribunal.

Applicant



Aman Ullah Marwat
Advocate, High Court Peshawar

Dated: 08.01.2014

3/12
BEFORE SERVICE TRIBUNAL PESHAWAR.

Appeal No. 1455/2013.

Akram Khan, Junior Clerk.....**Appellant.**

Versus.

1. Establishment Department through its Secretary, Khyber Pakhtunkhwa Peshawar.
2. Secretary to Government of Khyber Pakhtunkhwa Health Department, Peshawar.
3. Director General Health Services Khyber Pakhtunkhwa Peshawar and Others.....**Respondents.**

Parawise comments on behalf of respondent No. 2, 4 & 5.

Preliminary Objections:-

1. That the appellant has neither cause of action nor locus standi.
2. That the appeal is not maintainable in its present form.
3. That the appellant has not come to the Tribunal with clean hand.
4. That the appeal is incompetent and not maintainable in its present form.
5. That the appeal is bad due to non-joinder and mis-joinder of necessary parties.
6. That the appeal is badly time barred

PARAWISE COMMENTS.

1. Pertains to record.
2. Subject to proof hence No comments.
3. Name of the appellant is at Serial No.82 of the Seniority list of Junior Clerk (BS-11) (Sub-Cadre) and will be promoted to the post of Senior Clerk (BS-14) on his turn as per approved Service Rules of sub-cadre at **(Annexure-1)** reproduced below:-

‘By promotion on the basis of seniority-cum-fitness from amongst Junior Clerk/ Store Keeper (BPS-5) with at least two years service as such’ (Now upgraded to BPS-11 vide F.D Notification No. FD/SO(CR)10-22/2014 dated 20.05.2014).

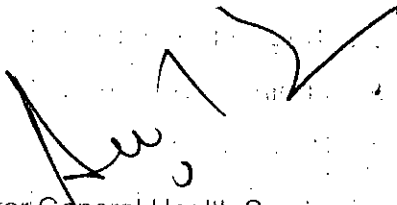
4. Two separate Seniority lists upto Senior Clerks BS-09 have been maintained in light of the separate approved Service Rules notified vide Govt. Notification No.SO(H)I/4-6/83 dated 22.06.1983 and Govt. Notification No.SO(H)IV-4-13/75.Pt.II dated 29.03.1982 vide **(Annexure-II and III)** and no deviation has been made in this regard.
5. Incorrect. As stated above, two separate Seniority List have been maintained in the light of approved service rules. No one is deprived of their right and them were treated according to law and rules in the subject.

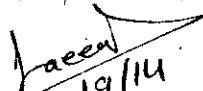
6. The appeal submitted to the Department was / is not covered under the Rules hence not considered.
7. The appellant has get no cause of action to file instant appeal.

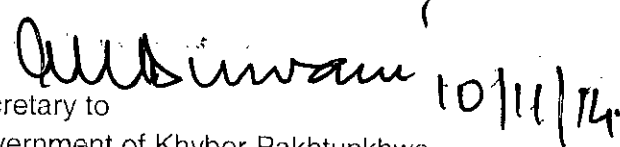
GROUND:-

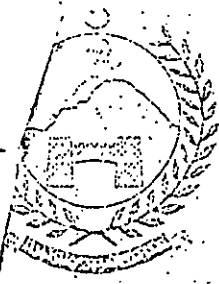
- A. Incorrect. The promotion order notified by the DGHS Vide Endorsement No. 2884-95/Personnel/Promotion dated 22.05.2013 is issued under the approved Service Rules at **(Annexure-IV)**. This is pertinent to mention here, that all the Junior Clerks Promoted to the post of Senior Clerks are born on the Directorate Cadre as per Approved Service Rules.
- B. Incorrect. As perusal of two different Service Rules would reveal that the post of Assistant is filled 75% by way of promotion and 25% by way of initial recruitment in the Directorate Cadre while the sub-cadre, the post is filled 100% by promotion. The Notifications of Service Rules have duly been notified by the Government in the years 1982. and 1983. The replying respondent acted according to law and rules and no one is discriminated.
- C. Incorrect. As replied in Para 4 and B.
- D. Incorrect. Both the Service Rules have been issued in accordance with the law and no article of constitution is violated.
- E. Not correct, as per clarification at Para-04 and Ground-A and B.
- F. Incorrect. The order has been issued in accordance with the approved Service Rules notified by the Government.
- G. Incorrect. As replied in ground "A".

Keeping in view of the above mentioned facts, it is humbly prayed that the instant appeal having no legal substance may please be dismissed with cost.


Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.04)


22/9/14


Secretary to
Government of Khyber Pakhtunkhwa
Health Department, Peshawar.
(Respondent No.05)



Anx 111

**DIRECTORATE GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA, PESHAWAR.**

No. 4053-153 /Personnel (Promotion).

Date: 29/5 /2014.

All Heads/M.Ss/Principals/Agency Surgeons of Health
Institutions/Hospitals/Medical Colleges/ Agencies /
Sub Offices of Provincial Health Services, Khyber Pakhtunkhwa.

Subject: FINAL SENIORITY LIST OF JUNIOR CLERKS (BS-07) OF PROVINCIAL HEALTH
INSTITUTIONS/ HOSPITAL/ MEDICAL COLLEGES/ SUB OFFICES
(SUB CADRE), KHYBER PAKHTUNKHWA.

Memo:

A Final seniority list of Junior Clerks (BS-07) of the Provincial Health Institutions/Hospitals/Medical Colleges/Sub Offices (Sub Cadre) prepared by this Directorate is sent herewith for their information.

[Signature]
23/07/2014
19/5/14

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 4154-55 /Personnel (Promotion).

Copy forwarded to the:-

1. Director Health FATA Khyber Pakhtunkhwa.
2. Director PHSA Khyber Pakhtunkhwa Peshawar

For similar necessary action.

[Signature]
23/07/2014
19/5/14

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR.

FINAL SENIORITY LIST OF JUNIOR CLERKS OF SUB-CADRE OF HEALTH SERVICES IN
KHYBER PAKHTUNKHWA PESHAWAR.
AS STOOD ON 15.05.2014.

S.No	Name of Official	Date of Appointment	Place of Posting	Date of Birth/Domicile	Date of Retirement	Remarks
1.	Zaffar Ali	04.12.1982	LRH Peshawar	16.03.1955/ Bannu	15.03.2015	
2.	Syed Anwar Shah S/O Kiramat Shah	19.12.1982	DHO Mardan	06.08.1963/ Mardan	05.08.2023	District Cadre
3.	Alamzeb	09.03.1986	TBC Swat	01.04.1957/ Swat	31.03.2017	
4.	Fardullah Shah	14.07.1986	KTH Peshawar	14.10.1961/ Peshawar	13.10.2021	
5.	Amjad Ali S/O Abdur Rasheed	21.12.1986	DHO Mardan	04.10.1969/ Mardan	03.10.2028	District Cadre
6.	Muhammad Iqbal	01.04.1987	LRH-Peshawar	24.11.1964/ Peshawar	23.11.2024	Forgone his promotion.
7.	Shakirullah	12.09.1987	KTH Peshawar	01.03.1967/ Peshawar	28.02.2027	
8.	Iftirz Gul	19.09.1987	DHQ Hosp: Mardan	25.04.1966/ Mardan	24.04.2026	District Cadre
9.	Ali Zaman S/O Gul Rekhan	20.08.1989	DHO Karak	02.08.1970	01.08.2030	District Cadre
10.	Mehmood Haroon	20.08.1989	DHO Kohat	01.06.1971 Kohat	31.05.2031	District Cadre
11.	Sana Ullah Jan	27.09.1989	Women & Children Hospital Bannu	14.05.1967/ Bannu	13.05.2027	
12.	Abdul Hamid Khan	01.10.1989	DHQT Hospital DI-Khan.	08.01.1967/ DI Khan	07.01.2027	
13.	Khan Muhammad	16.10.1989	AHQ Teaching H: Miran Shah	20.12.1969/ NWA	19.12.2029	
14.	Said Rahim S/O Muhibullah Khan	18.11.1989	DHO Dir Lower	10.04.1971/ Dir Lower	09.04.2031	District Cadre
15.	Rashid Ali S/O Noor-ul-Huda	20.11.1989	DHO Swat	14.04.1968 Swat	14.04.2028	District Cadre
16.	Abdul Malik S/O Sher Zaman Khan	20.11.1989	DHO Dir Lower	01.04.1970/ Dir Lower	31.03.2030	District Cadre
17.	Hidayatullah S/O Muhammad Arif Khan	07.01.1990	DHO Swat	01.12.1966 Swat	30.11.2026	District Cadre
18.	Abdur Rahim	14.01.1990	MMC Mardan	20.04.1962/ Mardan	19.04.2022	
19.	Muhammad javed S/O sultan Muhammad	20.01.1990	King Abdullah Teaching Hospital Mansehra	-----	-----	There is no more data pending for more information.
20.	Iqbal-ud-Din S/O Abdul Ghani	25.01.1990	DHO Dir Lower	06.02.1965/ Dir Lower	05.02.2025	District Cadre
21.	Muhammad Maqsood S/O Ali Hussain	29.01.1990	DHQ Hosp: Haripur	06.03.1967/ Abbottabad	07.03.2027	District Cadre
22.	Muhammad Riaz	14.02.1990	Govt: Mental & General Dadar	02.05.1969	01.05.2029	
23.	Saqib Khan	10.03.1990	LRH Peshawar	01.05.1965/ Mardan	30.04.2025	
24.	Anwar Iqbal S/O Qaimat Gul	10.03.1990	DHO Swat	19.04.1970 Swat	17.04.2030	District Cadre
25.	Haroon Ahmad S/O Ibni Amin Khan	10.03.1990	DHO Swat	17.02.1972 Swat	16.02.2032	District Cadre
26.	Zakir Hussain S/O Khan Gul	15.03.1990	DHO Kohat	03.01.1970/ Kohat	02.01.2030	District Cadre

	Ataf Qadir S/O Haji Gul Bahadar Muhammad	28.03.1990	DHO Charsadda	30.01.1970/	29.04.2030	District Cadre
	Shoukat S/O Farid Muhammad	21.04.1990	King Abdullah Teaching Hospital Mansehra			There is no more data pending for more information.
29.	Syed Wejid Hussain	03.05.1990	General & Mental Hospital Dadar	07.01.1970/ Mansehra	06.01.2030	
30.	Aslam Noor	22.05.1990	Agency Surgeon Kurram Agency	03.01.1960/ Kurram Agency	02.01.2020	
31.	Nazeer Hussain	22.05.1990	Agency Surgeon Kurram Agency	13.04.1969/	12.04.2029	
32.	Alam Zeb	01.07.1990	LRH, Peshawar	15.04.1961/ Peshawar	14.04.2021	
33.	Hazrat Rahim	02.07.1990	LRH Peshawar	24.03.1962/ Charsadda	23.03.2022	
34.	Asfandyar	02.07.1990	LRH Peshawar	04.05.1972/ Charsadda	03.05.2032	
35.	Pervez Akhtar Afridi	18.07.1990	Women & Children Hospital Peshawar	01.01.1966/ Peshawar	31.12.2026	
36.	Feroz Khan	15.09.1990	DHO Mardan	01.04.1965/ Mardan	31.03.2025	District Cadre
37.	Zahidullah	17.09.1990	MMC Mardan	09.11.1965/ Mardan	08.11.2025	
38.	Amanullah	24.09.1990	Agency Surgeon Wana	11.03.1970/ NWA	10.03.2030	
39.	Sher Wali	29.09.1990	City Hospital Peshawar	15.08.1972/ Peshawar	14.08.2032	
40.	Muhammad Hamayun	19.07.1991	DHO Battagram	01.01.1958/ Mansehra	31.12.2017	District Cadre
41.	Fazal Amin S/O Khuna	03.02.1991	DHO Swat	03.01.1961/ Swat	02.01.2020	District Cadre
42.	Asad Parvaiz	18.02.1991	LRH Peshawar	15.09.1965/ Peshawar	24.01.2025	
43.	Rashid Ali	20.02.1991	SMC, Swat	03.03.1963/ Swat	02.03.2023	
44.	Gohar Ali S/O Noor Ul Huda	14.04.1991	STH Swat	05.11.1973/ Swat	04.11.2033	
45.	Laeequllah	30.05.1991	LRH Peshawar	02.05.1971/ Peshawar	01.05.2031	
46.	Muhammad Hamayoun S/O Hidayatullah	18.07.1991	DHO Battagram	01.01.1958/ Mansehra	31.12.2017	District Cadre
47.	Mukhtiar Ahmad	05.08.1991	DHO Mardan	18.03.1967/ Mardan	17.03.2027	District Cadre
48.	Firasat Hayat S/O Fazil Hakeem	31.08.1991	DHO Nowshera	20.01.1970/ Nowshera	19.01.2030	District Cadre
49.	Nawaz Ahmad	31.09.1991	LRH Peshawar	21.04.1971/ Peshawar	20.04.2031	
50.	Muhammad Irshad	21.11.1991	DHO Mardan	02.04.1970/ Mardan	01.04.2030	District Cadre
51.	Liaqat Ali	22.12.1991	SMC Swat	01.01.1970/ Swat	31.12.2030	
52.	Nisar Muhammad	01.03.1992	DGHS Office	12.03.1973/ Charsadda	11.03.2023	
53.	Hussain Ahmad S/O Sher Goli Khan	11.04.1992	DHO Chitral	12.02.1969/ Chitral	11.02.2029	District Cadre
54.	Riaz Khan	22.04.1992	City Hospital Peshawar	15.11.1970/ Peshawar	14.11.2030	
55.	Abdul Karim S/O Qalander	15.05.1992	STH Swat	01.03.1971/ Swat	28.02.2031	
56.	Aftabul Muks/O Nadir Shah Jahan	16.05.1992	DHO Chitral	10.02.1973/ Chitral	09.02.2033	District Cadre

	Muhammad Ajmal S/O Muhammad Akbar	21.06.1992	King Abdullah Teaching Hospital Manshra	-----	-----	There is no more data pending for more information.
58.	Imran Malik	26.07.1992	King Abdullah Teaching Hospital Manshra	-----	-----	There is no more data pending for more information.
59.	Muhammad Daud S/O Muhammad Yaqoob	01.08.1992	King Abdullah Teaching Hospital Manshra	-----	-----	There is no more data pending for more information.
60.	Nawab Khan	02.08.1992	LRH Peshawar	25.04.1972/ Peshawar	24.04.2032	
61.	Muhammad Shoaib	27.09.1992	Agency Surgeon Bajour Agency	01.01.1968/ Bajour Agency	31.12.2027	
62.	Muhammad Israr	14.11.1992	LRH Peshawar	01.02.1971/ Charsadda	31.01.2031	
63.	Mian Amjad Ali	18.10.1992	KTH Peshawar	03.03.1968/ Charsadda	02.03.2023	
64.	Said Ahmad	03.12.1992	Agency Surgeon Bajour Agency	08.02.1968/ Bajour Agency	07.02.2028	
65.	Muhammad Yousaf Jamal	06.12.1992	LRH Peshawar	15.08.1971/ Peshawar	14.08.2031	
66.	Raza Khan	24.01.1993	KTH Peshawar	14.01.1971/ Peshawar	13.01.2031	
67.	Khana Dan	01.03.1993	Agency Surgeon Landi Kotal	30.04.1970/ Khyber Agency	29.04.2030	
68.	Wali Khan	06.03.1993	Agency Surgeon Orakzai	03.12.1969/ Orakzai Agency	02.12.2029	
69.	Munawar Khan	06.03.1993	Agency Surgeon Orakzai	07.11.1974/ Orakzai Agency	06.11.2034	
70.	Nazar Ali	08.03.1993	AHQ Hospital Parachinar	01.04.1970/ Peshawar	31.03.2030	
71.	Fazli Rabbi	21.04.1993	Agency Surgeon Mohmand	15.02.1973/ Mohmand Agency	14.02.2033	
72.	Khurshed Ahmad S/O Abdul Karim	02.05.1993	DHO Swat	05.02.1961/ Swat	04.02.2020	District Cadre
73.	Muhammad Ayaz	02.05.1993	DGHS Office	22.01.1969/ Di Khan	21.01.2029	
74.	Muhammad Niaz	04.07.1993	LRH Peshawar	01.04.1971/ Peshawar	31.03.2031	
75.	Asmat Ali Khan	22.08.1993	Nursing College Peshawar	25.08.1961/ Peshawar	24.08.2021	
76.	Tariq Nasim	26.08.1993	LRH Peshawar	01.03.1971/ Peshawar	28.02.2031	
77.	Naeemullah	20.10.1993	DHO Mardan	01.01.1969/ Mardan	31.12.2028	District Cadre
78.	Fayaz Ahmad	23.10.1993	PGMI Peshawar	14.09.1972/ Peshawar	13.09.2032	
79.	Zahid Ali S/O Abbas Ali	18.11.1993	DHO Mardan	01.05.1970/ Mardan	30.04.2030	District Cadre
80.	Javed Maseh	29.11.1993	PGMI Peshawar	23.04.1961/ Peshawar	22.04.2021	
81.	Sami-ud-Din	14.05.1994	HMC Peshawar	02.03.1975/ Peshawar	01.03.2035	
82.	Akram Khan	12.06.1994	Agency Surgeon Orakzai	15.02.1976/ Orakzai Agency	14.02.2036	
83.	Nooran Zaib	15.09.1994	TBC Agency Surgeon Bajaur	25.10.1960/ Bajaur Agency	24.10.2020	

	Zeher ul Haq	22.09.1994	KMC Peshawar	20.10.1970/ Peshawar.	15.10.2030	
	Muhammad Azam S/O Muhammad Hitab	05.10.1994	DHO Chitral	01.02.1969/ Chitral	31.01.2029	District Cadre
6.	Muhy-ud-Din s/O Mujahid Din	06.10.1994	DHO Chitral	02.02.1974/ Chitral	01.02.2034	District Cadre
87.	Bakht Munir	12.10.1994	SMC Swat	06.01.1969/ Swat	05.01.2029	
88.	Muhammad Iltaf	12.10.1994	AHQH: Batkhela	20.01.1971/ Mohmand Agency	19.01.2031	
89.	Shabir Ahmad	23.10.1994	DHO Peshawar	01.01.1967/ Kurram Agency	31.12.2026	District Cadre
90.	Jamal Shah S/O Faqir Gul	03.11.1994	LRH Peshawar	21.02.1965/ Charsadda	20.02.2025	
91.	Sher Akbar S/O Rahim ullah	22.11.1994	DHO Charsadda	11.02.1971	10.02.2031	District Cadre
92.	Shaukat Hussain	22.11.1994	TBC Khyber Agency	25.03.1973/ Khyber Agency	24.03.2033	
93.	Muhammad Ayaz Khan	30.11.1994	Agency Surgeon Mohmand Agency	07.07.1972/ Mohmand Agency	06.07.2032	
94.	Abdul Jamil	01.12.1994	Khalifa Gul Nawaz Teaching Hosp: Bannu	01.04.1969/ FR.Bannu.	31.03.2028	
95.	Saleem Iqbal	04.12.1994	PGMI Peshawar	17.03.1967/ Peshawar.	16.03.2027	
96.	Niaz Muhammad	05.12.1994	PGMI Peshawar	24.09.1971/ Karak	23.09.2031	
97.	Mumtaz Ali Khan S/O Mir Zali Khan	07.12.1994	DHO Karak	07.09.1970	06.09.2030	District Cadre
98.	Muhammad Ilyas	24.12.1994	AHQH: Miranshah	01.04.1962/ NWA	31.03.2022	
99.	Ashiq Hussain S/O Sabir Hussain	28.12.1994	AHQ H: Parachinar	12.04.1968/ Kurram Agency	11.04.2028	
100.	Javed Hussain	28.12.1994	AHQ H: Parachinar	03.12.1968/ Kurram Agency	02.12.2028	
101.	Said Hamid Hussain S/O Sardar Hussain	29.12.1994	AHQ H: Parachinar	19.04.1970/ Kurram Agency	18.04.2030	
102.	Bakhtiar Ahmad	26.01.1995	PGMI/ HMC Peshawar	26.09.1974/ Peshawar.	25.09.2034	
103.	Inamullah	01.02.1995	KTH Peshawar	20.11.1972/ Charsadda	19.11.2032	
104.	Abdul Ali	11.02.1995	AHQ Hosp: Miranshah	10.12.1973/ NWA	09.12.2033	
105.	Saif ur Rahman	15.02.1995	AHQ Hosp: Miranshah	17.03.1967/ Orakzai	16.03.2027	
106.	Muhammad Ali	15.02.1995	AHQ Hosp: Miranshah	11.02.1974/ Charsadda	10.02.2034	
107.	Amjad Ali	27.02.1995	Agency Surgeon Orakzai	09.09.1972/ Orakzai Agency	08.09.2032	
108.	Muhammad Arif	28.02.1995	Agency Surgeon Orakzai	20.11.1965/ NWA	19.11.2025	
109.	Gul Banaf Shah	15.03.1995	Nursing School Bannu	16.04.1962/ Bannu	15.04.2022	
110.	Abad Shah	27.03.1995	Agency Surgeon Khyber Agency	10.02.1962/ Khyber Agency	09.02.2022	
111.	Hazrat Yousaf	20.04.1995	Agency Surgeon Bajaur Agency	01.07.1965/ Bajaur Agency	30.06.2025	
112.	Abdul Wadood	20.04.1995	Agency Surgeon Mohmand Agency	01.04.1969/ Mohmand Agency	31.03.2029	
113.	Gulab Khan	30.04.1995	Agency Surgeon Wana	14.04.1968/ SWA	13.04.2028	
114.	Umar Badshah	02.05.1995	LRH Pes:	01.02.1971/ Peshawar	31.01.2031	

	29.06.1995	DHO Mardan	Kurram Agency	01.04.1966/ Mardan	31.03.2026	District Cadre
33	Hasinur Rahman	01.07.1995	LRH Peshawar	15.03.1971/ Peshawar	14.03.2031	
34	Abdul Hamid	01.07.1995	KTH Peshawar	01.09.1971/ Karak	31.08.2031	
35	Wajid Ali	01.07.1995	Agency Surgeon Kurram Agency	13.02.1973/ Kurram Agency	12.02.2033	
36	Fazle Qadir	16.07.1995	HMC Peshawar	13.05.1974/ Charsadda	12.05.2034	
37	Umar Gul Jan	27.07.1995	KTH Peshawar	15.02.1969/ Nowshera	14.02.2029	
38	Muhammad Riaz	28.07.1995	DHS FATA	14.03.1967/ Khyber Agency	13.03.2027	
39	Mushtaq Khan	29.07.1995	DHO Mardan	04.02.1971/ Mardan	03.02.2031	District Cadre
40	Fazli Akbar S/O Muhammad Fayyaz	30.07.1995	DHO Mardan	11.05.1969/ Mardan	10.05.2029	District Cadre
41	Amin Gul S/O Muhim Gul	15.08.1995	DHO Swat	05.05.1974/ Swat	04.05.2034	District Cadre
42	Abdullah S/O Faridoon	23.09.1995	SMC Swat	10.09.1969/ Swat	09.09.2029	
43	Anwar Ali S/O Ali Akbar	04.10.1995	DHO Swat	04.03.1969/ Swat	03.03.2029	District Cadre
44	Sadiqullah S/O Attaullah Khan	01.11.1995	DHO Karak	15.04.1969/ Karak	14.04.2029	District Cadre
45	Naib Zaman	10.12.1995	PGMI Peshawar	17.01.1971/ Peshawar	16.01.2031	
46	Saeed Badshah	14.12.1995	PGMI Peshawar	15.09.1970/ Karak	14.09.2030	
47	Ikramullah	07.01.1996	DGHS, Office	20.12.1974/ Charsadda	19.12.2034	
48	Javed Iqbal S/O Sher Azam Khan	24.01.1996	DHO Chitral	12.02.1973/ Chitral	11.02.2033	District Cadre
49	Ihsanullah	01.02.1996	KMC Peshawar	02.02.1975/ Peshawar	01.02.2035	
50	Asif ur Rehman S/O Nek Muhammad	29.02.1996	DHO Karak	11.05.1974/ Karak	10.05.2034	District Cadre
51	Ghulam Abbas	08.04.1996	GMC D. I. Khan	20.08.1970/ DI Khan	19.08.2030	
52	Taslim Bad Shah S/O Rang Bad Shah	24.04.1996	DHQ Hosp: Karak	26.03.1968/ Karak	25.03.2028	
53	Abdul Wadood S/O Fazal Wadood	02.05.1996	DHO Swat	13.05.1966/ Swat	12.05.2026	District Cadre
54	Nadeem ullah	07.09.1996	Nursing School Mardan	09.01.1972/ Mardan	08.01.2032	
55	Muhammad Yaar	01.01.1997	Agency Surgeon Bajour Agency	10.06.1964/ Bajaur Agency	09.06.2024	
56	Muhammad Riaz	31.03.1997	DHQT Hospital DI Khan	09.09.1972/ DI Khan	08.09.2032	
57	Muhammad Tariq	20.06.1998	Agency Surgeon Wana Agy	12.04.1967/ DI Khan	11.04.2027	
58	Ali Akber S/O Afzal Khan	25.01.1999	DHO Charsadda	01.01.1976	31.12.2035	District Cadre
59	Muhammad Arshad	16.02.1999	HMC Peshawar	06.11.1969/ Peshawar	05.11.2029	
60	Khalil ur Rehman	16.02.1999	HMC Peshawar	30.04.1970/ Peshawar	29.04.2030	
61	Muhammad Wasim	16.02.1999	PHS Hayatabad	01.03.1972/ Peshawar	31.07.2032	

	Muhammad Fayyaz	01.03.1999	KMC Peshawar	02.03.1974/ Peshawar	01.03.2034	
	Qadeem Khan	15.03.1999	Nursing School HMC Peshawar	14.04.1976/ Peshawar	13.04.2036	
148.	Fahim Khan S/O Mir Madad Khan	23.06.1999	DHO Bannu	20.06.1981/ Bannu	19.06.2041	District Cadre
149.	Abdul Wajid	15.10.1999	DHQ Hospital Bannu	16.07.1970/ Bannu	15.07.2030	
150.	Javed Akhter S/O Shah Jehan	13.02.2001	DHQ Charsadda	28.11.1973/ Charsadda	27.11.2033	District Cadre
151.	Arshad, Ali S/O Ehsar Ahmad Khan	06.11.2001	LRH Peshawar	29.09.1977/ Charsadda	28.09.2037	
152.	Javed Gul S/O Sardar Gul	10.11.2001	DHO Chitral	15.02.1974/ Chitral	14.02.2034	District Cadre
153.	Rahatullah S/O Mumtaz Khan	14.12.2001	DHO Dir Lower	09.04.1969/ Dir Lower	08.04.2029	District Cadre
154.	Abdul Qavi Khan S/O Abdul Mutalib Khan	12.02.2002	STH Swat	07.12.1974/ Swat	06.12.2034	
155.	Rehman Ali S/O Abdul Hakim	18.02.2002	DHO Swat	01.05.1972/ Swat	30.04.2032	District Cadre
156.	Niaz Muhammad S/O Dost Muhammad	20.02.2002	DHO Chitral	08.05.1965/ Chitral	07.05.2025	District Cadre
157.	Abdul Waris S/O Abdul Wasi	12.06.2002	DHO Chitral	08.04.1968/ Chitral	07.04.2028	District Cadre
158.	Nasir Ahmad S/O Abdul Wahid	07.08.2002	DHO Chitral	06.01.1972/ Chitral	05.01.2032	District Cadre
159.	Nabi Khan	20.10.2003	KMC Peshawar	01.12.1963	30.11.2023	
160.	Qaiser Khan S/O Muhammad Iqbal	13.03.2004	Foot Laboratory, Peshawar	20.04.1969/ Charsadda	19.04.2029	Surplus
161.	Syed Anwar Shah	02.04.2004	DHQ Hosp: Mardan	06.03.1963/ Mardan	05.08.2023	District Cadre
162.	Farman Ali	02.04.2004	DHO Mardan	05.06.1964/ Mardan	04.06.2024	District Cadre
163.	Shah Jahan S/O Abdul Mutlib	13.08.2004	GMC DI Khan	15.02.1963/ DI Khan	14.02.2043	
164.	Ghazanfar Hussain S/O Ghulam Saddat	12.08.2004	GMC DI Khan	14.04.1984/ DI Khan	13.04.2044	
165.	Muhammad Noman S/O Muhammad Iqbal	13.08.2004	GMC DI Khan	19.04.1984/ DI Khan	18.04.2044	
166.	Azmat Ali S/O Salar-e-Room	30.09.2004	STH Swat	01.05.1969/ Swat	30.04.2029	
167.	Muhammad Arshad S/O Gul Muhammad Khan	01.01.2005	DHQ Hosp: Battagram	31.03.1984/ Battagram	30.03.2044	District Cadre
168.	Zia-ur-Rehman S/O Samdo	28.01.2005	DHO Kohistan	12.05.1982/ Kohistan	11.05.2042	District Cadre
169.	Murtaza Khan S/O Marifat Shah	01.02.2005	DHO Charsadda	01.06.1966	31.05.2026	District Cadre
170.	Amir Zeb S/O Muhammad Afzal	24.02.2005	DHO Dir Lower	15.10.1966/ Dir Lower	14.10.2026	District Cadre
171.	Umar Khitab S/O Abdul Matin	22.03.2005	DHO Dir Lower	13.03.1981/ Dir Lower	12.03.2041	District Cadre
172.	Ikramullah S/O Muhammad Ramzan	01.07.2006	GMC DI Khan	10.03.1987/ DI Khan	09.03.2047	
173.	Fidat Ullah S/O Ghulam Daud Khan	13.01.2007	FR Bannu / Lakki	07.04.1952/ FR Bannu	07.04.2042	

174.	Zahir Rehman	24.02.2007	DHO Battagram	15.04.1982/ Battagram	14.04.2048	District Cadre
175.	Soheil Ahmad S/O Mir Dali Khan	31.05.2007	IKD Peshawar	02.09.1986/ Peshawar	01.09.2046	Autonomy Employees
176.	Syed Asad Shah S/O Syed Munewar Shah	05.06.2007	IKD Peshawar	01.04.1976/ Charsadda	31.03.2036	Autonomy Employees
177.	Akhtar Hussain S/O Gul Farosh	04.08.2007	SMC Swat	01.01.1972/ Swat	31.12.2031	
178.	Samiullah S/O Selati	04.08.2007	STH Swat	08.02.1978/ Swat	07.02.2038	
179.	Tariq Khan S/O Sabaz Ali Khan	04.08.2007	SMC Swat	04.04.1981/ Swat	03.01.2041	
180.	Anwar ul Haq	10.11.2007	DHO Mardan	23.01.1984/ Swabi	22.01.2044	District Cadre
181.	Shah Nawaz S/O Muhammad Ayaz	01.01.2008	DHO Kohistan	20.03.1987/ Kohistan	19.03.2047	District Cadre
182.	Lal Mer Khan S/O Sawar Khan	25.01.2008	DHO Karak	09.02.1966/ Karak	08.02.2026	District Cadre
183.	Sanaullah Khan Jhalandar S/O Ghazni Khel	09.04.2008	DHO Lakki Marwat	01.04.1987/ Lakki Marwat	31.03.2047	District Cadre
184.	Safdar Ali S/O Khuda Bakhsh	28.10.2008	STH Swat	01.03.1978/ Swat	28.02.2038	
185.	Hayat Muhammad	12.11.2008	DHO Mardan	01.11.1971/ Mardan	31.10.2031	District Cadre
186.	Ahmad Jan S/O Shahzada	01.12.2008	DHO Dir Lower	08.01.1968/ Dir Lower	07.01.2048	District Cadre
187.	Asad Khan S/O Zarin Shah	20.12.2008	DHO Mardan	04.02.1989/ Mardan	03.02.2049	District Cadre
188.	Haji Muhammad Zubair S/O Abdul Saeed	24.12.2008	GMC DI Khan	16.08.1984/ DI Khan	15.03.2044	
189.	Abdul Waheed S/O Abdul Latif	01.01.2009	GMC DI Khan	02.04.1981/ DI Khan	01.04.2041	
190.	Ali Bash Khan S/O Bawar Khan	24.01.2009	DHO Shangla	05.02.1975/ Shangla	04.02.2035	District Cadre
191.	Hidayatullah S/O Muhammad Shah	26.01.2009	DHO Shangla	03.03.1971/ Shangla	02.03.2031	District Cadre
192.	Ijaz Ahmad S/O Muhammad Qavi	30.01.2009	DHO Shangla	14.04.1989/ Shangla	13.04.2049	District Cadre
193.	Hussain Khan s/o Mutabar	31.01.2009	DHO Shangla	14.04.1982/ Shangla	13.04.2042	District Cadre
194.	Sher Rehman S/O Ali Muhammad	02.02.2009	DHO Shangla	30.03.1983/ Shangla	29.03.2043	District Cadre
195.	Hamidullah S/O Irfanullah	02.02.2009	DHO Shangla	01.03.1987/ Shangla	28.02.2047	District Cadre
196.	Gul -ur-Rehman S/O Gul Zaman	17.02.2009	DHO Kohistan	05.05.1980/ Kohistan	04.05.2040	District Cadre
197.	Wazir Zada S/O Malak Zada	24.03.2009	DHO Swat	15.02.1958/ Swat	14.02.2018	District Cadre
198.	Akhtar Munir S/O Muhammad Munir	27.06.2009	DHO Dir Lower	05.02.1978/ Dir Lower	04.02.2038	District Cadre
199.	Atif Khan S/O Faqir Hussain	27.06.2009	DHO Dir Lower	20.01.1984/ Dir Lower	19.01.2044	District Cadre
200.	Manzoor ul Haq S/O Habibul haq	27.06.2009	DHO Dir Lower	03.11.1986/ Dir Lower	02.11.2046	District Cadre
201.	Muhammad Abbas S/O Najeed Ullah Khan	22.08.2009	DHO Mardan	13.12.1988/ Mardan	17.12.2048	District Cadre
202.	Jan Muhammad S/O Gran	14.12.2009	DHO Dir Lower	13.02.1967/ Dir Lower	12.02.2028	District Cadre
203.	Naem Akbar	05.01.2010	DHO Mardan	23.03.1983/ Mardan	22.03.2048	District Cadre

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204.	Fazal Rabbi S/O Muhammad Hajab	01.04.2010	DHO Kohistan	12.12.1987/ Kohistan	11.12.2047	District Cadre
205.	Kamran Ahmad	05.05.2010	DHO Mardan	04.03.1986/ Swabi	03.03.2046	District cadre
206.	Ali Akbar S/O Muhammad Qaiser Shah	22.06.2010	DHS FATA Peshawar	24.08.1978/ Charsadda	23.08.2038	
207.	Sohail Rehman S/O Ghulam Rehman	19.07.2010	DHQ Hospital Bannu	25.09.1991 Bannu	24.09.2050	
208.	Muhammad Iqbal Khan	30.07.2010	DHQ Hospital, Bannu	21.05.1988/ Bannu	20.05.2028	
209.	Alamgir Khan S/O Mir Madad Khan	01.02.2011	DHO Bannu	08.02.1982/ Bannu	07.02.2042	District Cadre
210.	Muhammad Ishaq S/O Muhammad Rafique	19.03.2011	DHO Karak	18.05.1990/ Karak	17.05.2050	District Cadre
211.	Abdul Wahab S/O Muhammad Farooq	18.05.2011	DHQ Tor Ghar	14.08.1981/ Tor Ghar	13.08.2041	District Cadre
212.	Abdul Qadir Khan S/O Abdul Qadoos	27.05.2011	DHO Karak	30.08.1990/ Karak	29.08.2050	District Cadre
213.	Shafiqullah S/O Said Badshah	15.09.2011	KTH Peshawar	06.01.1991 Nowshera	05.01.2051	
214.	Wasim Khan S/O Umar Daraz Khan	10.03.2012	DHO Dir Lower	13.06.1987/ Dir Lower	12.06.2047	District Cadre
215.	Muhammad Rafiq S/O Muhammad Rashid	16.03.2012	DHO Dir Lower	07.04.1979/ Dir Lower	06.04.2039	District Cadre
216.	Syed Sarwar Ali Shah S/O Syed Haider Bacha	16.03.2012	DHO Dir Lower	13.11.1982/ Dir Lower	12.11.2042	District Cadre
217.	Niaz Muhammad S/O Muhammad Farash	28.03.2012	DHQ Hosp: Battagram	02.04.1984/ Battagram	01.04.2044	District Cadre
218.	Syed Maqbool Shah S/O Syed Mahummad Zahir Shah	28.03.2012	DHQ Hosp: Battagram	10.04.1988/ Battagram	09.04.2048	District Cadre
219.	Shahid Ali	26.03.2012	DHO Battagram	06.03.1987/ Battagram	05.03.2047	District Cadre
220.	Faheem Khan S/O Muhammad Bashir	28.03.2012	DHO Hosp: Battagram	14.04.1992/ Battagram	13.04.2052	District Cadre
221.	Shah Faisal	01.04.2012	DHO Battagram	08.03.1979/ Battagram	07.03.2039	District Cadre
222.	Shujaul Haq S/O Abdul Anad	03.04.2012	DHO Chitral	15.03.1991/ Chitral	14.03.2051	District Cadre
223.	Naeem Khan S/O Mir Madad Khan	30.08.2012	DHO Bannu	06.02.1983/ Bannu	05.02.2043	District Cadre
224.	Bakhti Rahman S/O Abdul Bais	07.11.2012	DHO Shangla	05.03.1972/ Shangla	04.03.2032	District Cadre
225.	Rahim Ullah Khan S/O Awal Jan Khan	12.12.2012	DHO Bannu	08.04.1978/ Bannu	07.04.2038	District Cadre
226.	Abdullah Shah S/O Purdum Shah	17.01.2013	DHO Chitral	05.04.1979/ Chitral	04.04.2038	District Cadre
227.	Waqar Azeem S/O Muhammad Haleem Jan	17.01.2013	DHO Chitral	20.10.1986/ Chitral	19.10.2046	District Cadre
228.	Yasirullah S/O Rehmat Nizar Shah	17.01.2013	DHO Chitral	11.03.1991/ Chitral	10.03.2051	District Cadre
229.	Nowsherawan S/O Shukar Said	17.05.2013	DHO Dir Lower	16.04.1983/ Dir Lower	15.04.2023	District Cadre

230.	Adnan Sharif S/O Sharifullah	05.07.2013	DHO Swat	01.11.1991/ Swat	31.10.2051	District Cadre
231.	Shahzad Khan S/O Izat Khan	23.09.2013	IKD Peshawar	23.03.1983/ Dir Lower	22.03.2043	Autonomy Employees
232.	Dilshad Khan s/O Abdul karim	23.09.2013	IKD Peshawar	25.03.1988/ Peshawar	24.03.2048	Autonomy Employees
233.	Raza Muhammad S/O Zari Dad Khan	11.11.2013	BMC Swabi	17.03.1987/ Swabi	16.03.2047	District Cadre

DIRECTOR GENERAL HEALTH SERVICES,
KHYBER PAKHTUNKHWA, PESHAWAR.

GOVERNMENT OF N.W.F.P.
HEALTH & SOCIAL WELFARE DEPARTMENT.

11-2-83
Annex 2

NOTIFICATION

Dated Peshawar the 22nd June, 1983.

No. SO(11)1/4-6/83. In pursuance of the provisions contained in sub rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, the Health and Social Welfare Department, in consultation with the Services & General Administration Department and Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts of Ministerial Service (Sub-Cadre) in the Health Department specified in column 2 of the said Appendix.

APPENDIX

Sl. No.	Nomenclature of the post with Grade	Minimum qualifications for initial recruitment	Age limit for initial recruitment.	Method of Recruitment
1.	Accountant (Grade-16)	Graduate from a recognized University with at least 5 years experience in Accounts or qualified S.A.S.	21 to 35 years	By initial recruitment or by transfer.
2.	Superintendent (Grade-16)			By promotion on the basis of seniority-cum-fitness from amongst Statistical Assistants/Assistants/Auditors/Senographers of Health Directorate and Assistant Stenographer/Senior Store Keepers Grade-11 of subordinate offices of the Health Directorate with at least five years service as such. Note:- A common seniority list of a ligible officials will be maintained for the purpose of promotion to the post of Superintendent.
3.	Assistant/Senior Store Keeper (Grade-11).			By promotion from amongst Senior Clerks/Store Keeper Grade-6 with at least three years service as such.
4.	Statistical Assistant (Grade-11).	Degree from a recognized University with mathematics or statistics as one of the subject.	20 to 25 years	By initial recruitment.
5.	Senior Clerk/Store Keeper (Grade-6).			By promotion on the basis of seniority-cum-fitness from amongst Junior Clerk/Store Keeper (Grade-5) with at least 2 years service as such.
6.	Junior Clerk/Store Keeper (Grade-5)	a) Matriculation from recognized Board, and b) A speed of 25 words per minute in typing.	18 to 25 years	By initial recruitment.

1	2	3	4	5
7.	Stenographer (Grade-12)	a) Matriculation from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.	18 to 25 years	By promotion on the basis of seniority-cum-fitness from amongst stenotypists with at least three years service as such, or if no suitable stenotypist is available for promotion then by initial recruitment.
8.	Stenotypist (Grade-8)	a) Matriculation from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in typing.	18 to 25 years	By initial recruitment.
9.	Restorer (Grade-2)	Middle pass.	18 to 25 years	By initial recruitment.
10.	Naib Qasid (Grade-1)	Preferably literate.	18 to 45 years	By initial recruitment.

ST Rules Health Annex 3

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GOVERNMENT OF N.W.F.P.
HEALTH & S. WELFARE DEPARTMENT.

Directorate

NOTIFICATION

Dated Peshawar the 29th March, 1982.

No. SO(11) IV-4-13/75.P.I.I. In pursuance of the provisions contained in sub rule (2) of rule 3 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, and in consultation with the Services and General Administration Department and the Finance Department, the Health Department hereby lays down the method of recruitment, qualification and other condition specified in columns 3 to 6 of the Appendix to this notification, which shall be applicable to posts in the Health Directorate specified in column 2 of said Appendix.

APPENDIX

Sl. No	Nomenclature of Post	Minimum qualification for appointment by initial recruitment or by transfer	Minimum qualification prescribed for appointment by promotion.	Age limit for initial recruitment	Method of Recruitment
1	2	3	4	5	6
1.	Administrative Officer.	By selection on merit, with due regard to seniority, from amongst Superintendents.
2.	Superintendent	By promotion, on the basis of seniority-cum-fitness, from amongst: a., Statistical Assistants/Assistants/Auditors/ Stenographers of the Health Directorate, and b. Head Clerk and Stenographers of the offices Sub-ordinate to Health Directorate with at least 5 years service as such. Note:- A common seniority list of eligible officials shall be maintained for the purposes of Superintendents.
3.	Statistical Assistant.	Degree from a recognized University with Mathematics/Statistics as one of the subjects.	...	20 years to 25 years	By initial recruitment.
4.	Assistant.	Degree from a recognized University.	...	20 years to 25 years	i) 75% by promotion on the basis of seniority-cum-fitness from amongst Senior Clerk,

1	2	3	4	5	6
5. Auditor.		with at least 3 years service as such; and ii) 25% by initial recruitment. By selection from amongst Assistants.
6. Senior Clerks.		By promotion on the basis of seniority-cum-fitness from amongst Junior Clerks with at least 2 years service as such.
7. Junior Clerks.		a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 25 words per minute in typing.	...	18 years to 25 years	By initial recruitment.
8. Stenographers.		a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 100 words per minute in shorthand in English and 40 words per minute in typing.	...	18 years to 25 years	i) By promotion on the basis of seniority-cum-fitness from amongst Stenotypists with at least 3 years as such; or ii) If no suitable Stenotypist is available for promotion, then by initial recruitment.
9. Stenotypist.		a) Matriculation or equivalent qualification from a recognized Board; and b) A speed of 80 words per minute in shorthand in English and 35 words per minute in shorthand in English.	...	18 years to 25 years	By initial recruitment.

11.	Machine Operator.	Preferably literate.	18 years to 45 years	By initial recruitment.
12.	Naib Qasid.	Preferably literate.	18 years to 45 years	By initial recruitment.
13.	Chowkidar.	Preferably ex-Serviceman	18 years to 45 years	By initial recruitment.
14.	Bhishti/Sweeper/Mali.	Preferably literate.	18 years to 45 years	By initial recruitment.

Amendment:- made vide S&GAD Notification No. SOR-II (S&GAD)5-2/80, DATED 27-10-1981. 10 per cent vacancies to be filled by initial recruitment is to be reserved for ex-serviceman.

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

In Re: Service Appeal No. 1455 of 2013

Akram Khan.....Appellant

V E R S U S

Govt of KPK and others.....Respondents

REJOINDER ON BEHALF OF APPELLANT
IN THE CAPTIONED SERVICE APPEAL

Respectfully Sheweth:

Reply on objections:

1. That the appellant has got the cause of action and locus standi to file instant service appeal.
2. That the instant appeal is maintainable in its present form.
3. That appellant has come to this Honourable Tribunal with clean hands.
4. That the instant is competent and is maintainable in its present form.
5. That the instant service appeal is not bad due to mis-joinder and non-joinder of necessary parties.
6. That the instant appeal is not barred by time.

Reply on Facts:

1. Para No.1 needs no reply.
2. Para No.2 needs no reply.
3. Para No.3 is incorrect, hence denied. The seniority list maintained by respondents is discriminatory in nature. So, such seniority list is violative of the fundamental rights granted by Constitution of Pakistan, 1973.
4. Para No.4 is incorrect, hence denied. Respondents have maintaining two seniority lists of the same nature employees. One seniority list maintained by respondent for ministerial staff, who are working in Directorate Office while another seniority list of the same nature employees, who are working in medical colleges/teaching hospitals, DHQs, Agency Surgeons and DHOs. Hence, there are meager chances of promotion of the ministerial staff working in the said institutions & hospitals etc. Therefore, such stand taken by respondents in parawise comments is not sustainable in the eyes of law. Furthermore, it is submitted that notifications referred to in parawise comments not clearly laid down that respondents might maintain two seniority lists. Any notification which is discriminative in nature cannot be sustained by any law.
5. Para No.5 is incorrect, hence denied. The law under which separate list is maintained by respondents, is violative of fundamental rights.

6. Para No.6 is incorrect, hence denied. The instant service appeal has properly been filed in accordance with rules.
7. Para No.7 is incorrect, hence denied. The appellant has got cause of action to file the instant appeal against discriminative treatment of respondents.

Reply on grounds:

- A. Ground "A" of parawise comments is incorrect. The so-called seniority list maintained by respondents of the same nature employees, is discriminatory and there would be no chance/hope for those employees, who are working for the same nature jobs and other than Directorate employees, moreover, respondents have promoted those employees, who were appointed lateron than the appellant. The respondents always promoted employees, who are nears & dears to them, therefore, such action of respondents is not supported by any rule.
- B. Ground "B" is incorrect, hence denied. The two notifications referred by respondents in parawise comments is highly discriminative and is liable to be set aside.
- C. Ground "C" is incorrect, hence denied. The detail reply has already been given in above paras.

- D. Ground "D" is incorrect, hence denied. The reply given in ground "A" & "B" above, is to be read as reply to ground "D".
- E. Ground "E" is incorrect, hence denied. The detail reply has already been given in above paras.
- F. Ground "F" is incorrect, hence denied. The detail reply has already been given in above paras.
- G. Ground "G" is incorrect, hence denied. The detail reply has already been given in above paras.

It is, therefore, respectfully prayed that on acceptance of rejoinder, the titled service appeal may please be allowed, as prayed for.

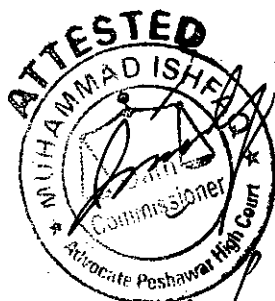
Appellant
Through


Amanullah Marwat
Advocate, Peshawar

Date: 26.04.2016

AFFIDAVIT

I, Akram Khan (appellant), do hereby solemnly affirm and declare on oath that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




DEPONENT

26/04/16

Ann: 4

(9)

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

OFFICE ORDER:-

Consequent upon approval accorded by the Departmental Promotion Committee meeting held on 08-05-2013 at 10:00 AM, the following Senior most Junior Clerks (BS-07) have been promoted to the post of Senior Clerk (BS-09):-

<u>S.No</u>	<u>Name of official</u>	<u>Place Of Posting</u>
1.	Syed Farman Shah	KMC Peshawar
2.	Hashmat ullah Khan	DGHS, Office Peshawar
3.	Syed Liaq Shah	Govt: Naseerullah Khan Baber Memorial Hospital Peshawar
4.	Nasruminallah	Health Secretariat
5.	Muhammad Ishaq	DGHS, Office Peshawar
6.	Mukaram Khan	HMC, Peshawar
7.	Muhammad Umar Daraz	DGHS, Office Peshawar
8.	Masam Khan	DGHS, Office Peshawar
9.	Jehanzeb Khan	KMC, Peshawar
10.	Muhammad Zahir	DGHS, Office Peshawar
11.	Zahir Shah	HMC Peshawar
12.	Muhammad Shahid Amin	DGHS, Office Peshawar

On their promotion to the post of Senior Clerk (BS-09) the following posting/ transfer are hereby ordered in the interest of public service with immediate effect:

<u>S.No</u>	<u>Name of official</u>	<u>From</u>	<u>To</u>	<u>Remarks</u>
1.	Syed Farman Shah	KMC Peshawar	DGHS, Office Peshawar	Against the vacant post
2.	Hashmat ullah Khan	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
3.	Syed Liaq Shah	Nasrullah Khan Baber Memorial Hospital Peshawar	DHS FATA Peshawar	Against the vacant post
4.	Nasruminallah	Health Secretariat	DGHS, Office Peshawar	Against the vacant post
5.	Muhammad Ishaq	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post

C. I. C

6.	Mukaram Khan	HMC, Peshawar	DHS FATA Peshawar	Against the vacant post
7.	Muhammad Umar Daraz	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
8.	Masam Khan	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
9.	Jehanzeb Khan	KMC, Peshawar	DHS FATA Peshawar	Against the vacant post
10.	Muhammad Zahir	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post
11.	Zahir Shah	HMC, Peshawar	DGHS, Office Peshawar	Against the vacant post
12.	Muhammad Shahid Amin	DGHS, Office Peshawar	DGHS, Office Peshawar	Against the vacant post

NB:- Arrival/Departure report should be submitted to this Directorate for record.

Sd/xxx

Director General Health Services
Khyber Pakhtunkhwa Peshawar
dated Pesh tue. 22/05/2013.

No. 2884-95/Personnel (Promotion)

Copy forwarded to the:-

1. PS to Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar for information.
2. Director Health Services FATA Peshawar.
3. Principal Khyber Medical College, Peshawar.
4. Medical Superintendent HMC Peshawar.
5. Medical Superintendent Govt: Naseerullah Khan Baber Memorial Hospital Kohat Road Peshawar.
6. Accountant General Khyber Pakhtunkhwa Peshawar.
7. Section Officer (Drug) Health Secretariat Peshawar.
8. Accountant DGHS Office Peshawar.
9. PA to Director General Health Services, Peshawar.
10. PA to Director (Administration) DGHS, Office Peshawar.
11. Suptt: Promotion cell, DGHS, Office Peshawar
12. Officials concerned.

For information and necessary action.

Director General Health Services
Khyber Pakhtunkhwa Peshawar

17/5/13

OFFICE ORDER.

As recommended by the Departmental Selection Committee held on 08/6/1994 in Office of the Divisional Director Health Services, Kohat Division, Kohat, Vide Divisional Director Health Services, Kohat Divn, Kohat Officer-order No. 4302-05 dt: 09/6/94.

Mr. Akram Khan S/O Misal Khan, of Orakzai Agency is hereby offered a post of Junior Clerk BPS-5 (No. 1035-49-1770) plus usual allowances sanctioned by the Government from time to time, Terms and conditions of his appointment will be as under:-

1. He is domiciled of Kohat Division/N.W.P.P.
2. Declared Medically fit for the Govt: services.
3. He will be Governed by the such Rules Orders/Regulation as may be issued by the Government for category of Govt. service to which he belong to.
4. His appointment is purely on temporary basis and can be terminated any time without notice, but in case he resigns the post of Junior Clerk he will serve the Heal Deptt; with 15 days notice or deposits/forfitted 15 day pay in lieu of 15 notice period.
5. He will serve anywhere in Kohat Division/NWPP.
6. No TA/DA will be paid to resume his duty place on first appointment.

If he accept this Offer, he should report for duty to the Office of the undersigned against the vacant post of Junior Clerk within 10 days from the receipt of this offer, failing which this order will be treated as CANCELLED.

Sd/-

No. 952-54 /M-4, Dt. 12/6/94. Agency Surgeon,
Orakzai at Hangu.

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

1. The Agency Accounts Officer Orakzai at Hangu.
2. The Divisional Director Health Services, Kohat Divn, Kohat with reference to his office order no. cited as above.
3. Mr. Akram Khan S/O Misal Khan, Section Mani Khel sub-section Subzi Khel, Orakzai Agency.

A. Khan
Agency Surgeon,
Orakzai at Hangu.