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BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Next date 28-11-2023

In Re: Service Appeal No. 205 /2017

Jehanzeb Khan.....Petitioner

Versus

Government of KPK, through Chief Secretary and others.....Respondents

Application for Placement of certain documents on behalf of the Petitioner in the above titled Service Appeal

Respectfully Sheweth

9472
24-11-2023

Petitioner humbly prays this Honourable Tribunal as under :-

1. That above titled Service Appeal has been fixed for 28th November 2023 for Arguments.
2. That on previous date of hearing, this Honourable Tribunal ordered to place Seniority List in which names of the Petitioners are available.
3. That the Petitioner prays this Honourable Tribunal to allow permission for placement the aforesaid Seniority List of the various Technologists in which names of the Petitioners have already been reflected. (Enclosed as Annexure-A) . It is further added that the titled List of the various Technologists are also available in the remanded WP bearing no.182/P/2012 in original to this Honourable Tribunal.

Prayers:- It is therefore humbly prayed that the Petitioner may graciously be allowed to place the above titled documents in the Service Appeal bearing No. 205 /2017.

Jehanzeb
Petitioner

Through Anwar Shah
(Anwar Shah)
Advocate High Court

AFFIDAVIT

I Jehanzeb Khan (Petitioner) solemnly affirm and declare on oath that the contents of the instant Application are true and correct according to my knowledge and belief and that nothing has been concealed intentionally from this Honourable Tribunal.

Jehanzeb Khan
Deponent
24-11-23

Jehanzeb
Deponent

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GOVT OF KHYBER PAKHTUNKHWA HEALTH DEPARTMENT

No.SOH-111/10-4/IOIS. List of Clinical Technologist
Dated the Peshawar 27th August 2010

To

1. The Executive District Officer (H).
Peshawar, Abbottabad, Mansehra.
Bannu, Karak, Nowshera.
2. The Medical Superintendents.
HMC, KTH, LRH,
Govt. Maternity Hospital, Peshawar.
MMC, Mardan; I.D Children Peshawar.
DHQ; Hospital Nowshera.

Subject; PROVISIONAL, TENTATIVE SENIORITY LIST OF CLINICAL TECHNOLOGISTS (BPS-17) IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

I am directed to refer to the subject noted above and to enclose herewith a tentative seniority list of Medical Technologists (BPS-17) as it stood on 25.08.2010, prepared by DGHS. It is requested that the same may be circulated amongst all concerned officers and return duly signed indicating error/ omission. If any, for the purpose of rectification alongwith attested supporting documents direct to the DGHS immediate. In case of receipt of no response by the incumbent it would be considered that the same has been accepted as correct.

Section Officer (III)

Encl: As above

Copy to:-

1. The DGHS w/r to his No. 17.127/AE VII dated 29.06.2010 for information.
2. PS to Secretary Health Khyber Pakhtunkhwa.

Attested
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Advocate

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Section Office (III)

Annex

(A)
(3)

GOVT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

No. SOH-III/10-4/168 List of Clinical Technologist
Dated the Peshawar 27th August 2010

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- 1. The Executive District Officers (H),
Peshawar, Abbottabad, Mianwali,
Bannu, Karak, Nowshera.
- 2. The Medical Superintendents,
HMC, KTH, LRH,
Govt. Maternity Hospital, Peshawar,
MMC, Mardan, I.D Children Peshawar,
DHQ, Hospital Nowshera.

Annex B⁵
(26)

Subject: PROVISIONAL TENTATIVE SENIORITY LIST OF CLINICAL TECHNOLOGISTS (BPS-17) IN THE HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

I am directed to refer to the subject noted above and to enclose herewith a tentative seniority list of Medical Technologists (BPS-17) as it stood on 25.08.2010, prepared by DGHS. It is requested that the same may be circulated amongst all concerned officers and return duly signed indicating error/omission, if any, for the purpose of rectification alongwith attested supporting documents direct to the DGHS immediately. In case of receipt of no response by the incumbent it would be considered that the same has been accepted as correct.

Encl: As above.

Section Officer-(III)

Copy to:-

- 1. The DGHS w/r to his No. 17427/AE/VII dated 29.06.2010 for information.
- 2. PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-(III)

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PROVISIONAL JOINT SENIORITY LIST OF TECHNOLOGIST BPS-17 IN VARIOUS CADRES IN THE HEALTH DEPARTMENT K.P.K

SOH D-10-4-10
Dr 27/08/2010

why? ↓ ↓ ✓

S.No	Name of official with father's name	Old Nomenclature with BPS	Date of 1 st appoint	New Nomenclature with BPS	Date of Upgradation/ New Nomenclature	Place of Present Posting	Date of Birth/ Domicile	Date of Retirement
1.	Jahanzeb S/O Fazle Wadood	a. Medical Technologist BPS-16 b. Medical Technologist BPS -17	a.17/05/1979 b.01/01/1994	Technologist (Pathology) BPS-17	25/08/2006	HMC Peshawar	21/01/1953	20/01/2013
2.	Najma Parveen D/O Mohammad Haleem	a. Medical Technologist BPS-16 b. Medical Technologist BPS -17	a.03/03/1981 b.01/01/1994	Technologist (Pathology) BPS-17	25/08/2006	KTH Peshawar	31/08/1954	31/08/2014
3.	Abdul Munaf S/O Safiullah	a. Medical Technologist BPS-16 b. Medical Technologist BPS -17	a.01/08/1987 b.01/01/1994	Technologist (Pathology) BPS-17	25/08/2006	LRH Peshawar	14/02/1952 Mardan	13/02/2012
4.	Rafaq Ahmad S/O Bashirul Haq	Audiologist BPS -17	06/03/1994	Technologist (Ophthalmology/ Otorhinology) BPS -17	25/08/2006	LRH Peshawar	01/02/1965 Swabi	31/01/2025
5.	Mufariq Shah S/O Wahid Gul	Refractionist BPS -17	19/09/1995	Technologist (Ophthalmology/ Otorhinology) BPS -17	25/08/2006	HMC Peshawar	10/04/1967 Charsadda	09/04/2027

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✓ 6.	Mullah Mohammad S/O Manawar Khan	a.Lep Tech BPS-9 b. Lep Field Officer BPS-16 c.Provincial Leprosy Field Officer BPS-17	a.01/06/1970 b.15/10/1986 c.04/05/1998	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Peshawar	13/11/1951 Upper Dir	12/11/2011
7.	Niaz Mohammad S/O Nawaz Khan	a.Lab Tech BPS-9 b.Chief Lab Tech BPS-16 c.Medl Technologist BPS-17	a.20/10/1984 b.25/11/1990 c.04/01/2005	Technologist (Pathology) BPS-17	25/08/2006	LRH Peshawar	31/05/1956 Peshawar	30/05/2016
8.	Mohammad Riaz S/O Mir Saleem Khan	a.Lab Tech BPS9 b.Chief Lab Tech BPS16 c.Clinical Technologist BPS17	a.25/11/1986 b.28/09/1993 c.04/01/2005	Technologist (Pathology) BPS-17	25/08/2006	KTH Peshawar	15/03/1965 Karak	14/03/2025
9.	Awal Badshah S/O Sharbat Khan	a.Lab Tech BPS9 b.Med Technologist BPS17	a.21/07/1988 b.04/01/2005	Technologist (Pathology) BPS17	25/08/2006	HMC Peshawar	15/03/1960 Karak	13/10/2020
10.	Farmanullah S/O Zargul Khan	a.Lab Tech BPS9 b.Med Technologist BPS-17	a.15/05/1991 b.04/01/2005	Technologist (Pathology) BPS-17	25/08/2006	LRH Peshawar	01/05/1970 Bannu	30/04/2030
11.	Sanaullah S/O Habibullah	a.Lab Tech BPS-9 b.Medical Technologist BPS-17	a.15/05/1991 b.04/01/2005	Technologist (Pathology) BPS-17	25/08/2006	KTH Peshawar	01/10/1970 Upper Dir	30/09/2030
12.	Imtiaz Khan S/O Abdul Manan	a.BB Techician BPS-9 b.Med Technologist BPS-17	a.13/07/1992 b.04/01/2005	Technologist (Pathology) BPS-17	25/08/2006	Govt Maternity Hospital Peshawar	15/01/1966 Charsadda	15/01/2026

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T.P.A. Advocate

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13.	Mohammad Tayyab S/O Ghulam Sarwar	a.Lab Techninian BPS -09 b. Nuclear Tech (Cardiology) BPS-16 c.Medical Technologist (Cardiology) BPS17	a.09.09.1992 b.08/05/1994 c.04/01/2005	Technologist (Pathology) BPS17	25/08/2006	LRH Peshawar	26/01/1957	25/01/2017
14.	Sirajudin S/O Khewa Din	a.Dispenser BPS6 b.Dylasis BPS- 11 c.Chief Dialysis Technician BPS16 d.Clinical Technologist (Dylasis) BPS- 17	a.13/01/1981 b.10/10/1982 c.25/02/1990 d.23/02/2009	Technologist (Dialysis) BPS 17	25/08/2006	LRH Peshawar	01/08/1956 Peshawar	31/07/2016
15.	Ahsan Saeed S/O M Saeed Gul	a.Audiometrician BPS-16 b.Clinical Technologist BPS-17	a.23/05/1992 b.23/02/2009	Technologist (Ophthalmology/Ot orhinology) BPS-17	25/08/2006	KTH Peshawar	16/05/1966 Nowshera	15/05/2026
16.	Shiraz Khan S/O Nameedullah	a.Speech Therapist BPS-16 b.Clinical Technologist BPS-17	a.11/01/1994 b.23/02/2009	Technologist (Ophthalmology/Ot orhinology) BPS-17	25/08/2006	KMC Peshawar	15/03/1969 Charsadda	14/03/2029
17.	Raza Khan S/O Ali Akbar	a.OT Tech BPS-5 b.Chief OTT BPS-16 c.Technologist BPS -17	a.01/10/1976 b.08/09/1985 c.29/06/2009	Technologist (Surgical) BPS -17	25/08/2006	LRH Peshawar	21/01/1953 Peshawar	20/01/2013
18.	Khairul Bashir S/O Abdul Akbar	a.OTA BPS-5 b.Chief OTT BPS-16 c.Clinical Technologist BPS-17	a.01/10/1976 b.13/01/1991 c.29/06/2009	Technologist (Surgical) BPS -17	25/08/2006	KTH Peshawar	20/05/1953 Peshawar	09/05/2013

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19.	Waheed Ahmad S/O Atta Mohammad	a.OTA BPS-05 b.Chief OTT BPS-16 c.Clinical Technologist BPS-17	a.11/01/1977 b.13/01/1991 c.29/06/2009	Technologist (Surgical) BPS -17	25/08/2006	KTH Peshawar	13/02/1954 Peshawar	12/02/2014
20.	Sultan Gul S/O Khewa Gul	a.OTA BPS-5 b.Chief OTT BPS-16 c.Clinical Technologist BPS-17	a.01/02/1979 b. 12/08/1998 c.29/06/2009	Technologist (Surgical) BPS -17	25/08/2006	KTH Peshawar	01/12/1952 Peshawar	30/11/2012
21.	Pir Mohammad S/O H Mohammad Shah	a.Speech Therapist BPS-16 b.Clinical Technologist BPS-17	a.20/12/1995 b.02/09/2009	Technologist (Ophthalmology/Ot orhinology) BPS- 17	25/08/2006	MMC Mardan	02/03/1973 Swabi	01/03/2033
22.	Khairul Aman S/O	a.Audiometrician BPS-16 b.Clinical Technologist BPS-17	a.12/07/1999 b.02/09/2009	Technologist (Ophthalmology/Ot orhinology) BPS- 17	25/08/2006	MMC Mardan	02/04/1973 Swabi	01/04/2033
23.	Syed Kamal Shah S/O Habib shah	a. Chief PHC Tech (MP) BPS-16 b. Technologist PHC (MP) BPS-17	a.20/02/1991 b.15/03/2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Peshawar	07/01/1952 Peshawar	06/01/2012
24.	Mohammad Haroon S/O Mohammad Yaqoob	a. Chief PHC Tech (MP) BPS-16 b. Technologist PHC (MP) BPS-17	a.20.02.1991 b.15.03.2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Abbottaba d	23.05.1956 Abbottabad	22.05.2016
25.	Aurang Zeb S/O Muhammad Yousaf	a. Chief PHC Tech (MP) BPS-16 b. Technologist BPS- 17	a.20.02.1991 b.15.03.2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Mansehra	11.02.1951 Mansehra	10.02.2011

Atta
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Advocate
To
Advocate

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26.	Mohammad Qasim Jan S/O H. Hafiz gul	a. Chief Dispenser BPS-16 b. Technologist (Pharmacy) BPS-17	a.26.05.1992 b.15.03.2010	Technologist (Pharmacy) BPS-17	25/08/2006	ID Children Hospital Peshawar	26.01.1952 Charsadda	25.01.2012
27.	Hamidullah S/O GulDar Ali shah	a. Chief PHC Tech (MP) BPS-16 b. Technologist PHC (MP) BPS-17	a.20.02.1994 b.15.03.2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Bannu	03.12.1951 Bannu	02.12.2010
28.	Sher Bahadur S/O Niaz Muhammad	a. Chief PHC Tech (MP) BPS-16 b. Technologist PHC (MP) BPS-17	a.07.01.1995 b.15.03.2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Karak	10.01.1951 Karak	09.01.2011
29.	Fazal Haq S/O Abdullah jan	a. Chief Technician (Cardiac) BPS-16 b. Technologist (Cardiac) BPS-17	a.16.01.1995 b.15.03.2010	Technologist (Cardiac) BPS-17	25/08/2006	LRH Peshawar	06.08.1958 Peshawar	05.08.2018
30.	Didar Muhammad S/o Abdul Hanan	a. Chief Dispenser BPS-16 b. Technologist (Pharmacy) BPS-17	a.11.08.1998 b.15.03.2010	Technologist (Pharmacy) BPS-17	25/08/2006	DHQH Nowshera	15.09.1954 Peshawar	14.09.2014
31.	Fasi ud din S/O Inwanudin	a. Chief Dispenser BPS-16 b. Technologist (Pharmacy) BPS-17	a.11.08.1998 b.15.03.2010	Technologist (Pharmacy) BPS-17	25/08/2006	KTH Peshawar	01.05.1956 Peshawar	30.04.2016
32.	Mukhtair Ahmad S/o Dildar khan	a. Chief Dispenser BPS-16 b. Technologist (Pharmacy) BPS-17	a.11.08.1998 b.15.03.2010	Technologist (Pharmacy) BPS-17	25/08/2006	LRH Peshawar	18.02.1953 Peshawar	17.02.2013

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33.	Jahan Zeb S/O Muhammad Azam	a. Chief Dispenser BPS-16 b. Technologist (Pharmacy) BPS -17	a.11.08.1998 b.15.03.2010	Technologist(Pharmacy) BPS-17	25/08/2006	HMC Peshawar	12.01.1952 Peshawar	11.01.2012
34.	Akbar Ali S/O	a. Chief Clinical Tech (Ophthalmology/Otor hinology) BPS-16 b. Clinical Technologist (Ophthalmology/Otor hinology) BPS-17	a.16/03/1999 15/03/2010	Technologist (Ophthalmology/Ot orhinology) BPS-17	25/08/2006	KTH Peshawar	02/04/1973 Charsadda	01/04/2033
35.	Abdul Feroz S/O Abdur Rab	a. Chief Dispenser BPS16 b. Technologist PHC (MP) BPS -17	a.03.09.1999 b.15.03.2010	Technologist PHC (MP) BPS-17	25/08/2006	EDO H Karak	01.03.1952 Karak	28.02.2012

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