

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NO. 2052 OF 2023

Dr. Muhammad Zahid.....Petitioner

Versus

Govt. of Khyber Pakhtunkhwa through Chief Secretary and
others.....Respondents

**APPLICATION/ PETITION FOR PERMISSION TO FILE ADDITIONAL DOCUMENTS
ON BEHALF OF PETITIONER / RESPONDENT No. 03**

Respectfully Sheweth,

1. That the above noted case is pending before this honorable Tribunal for adjudication.
2. That the petitioner seeks permission of this Honorable Tribunal to file some important documents i.e Notification dated 10.07.2023 along with absence notice dated 15.10.2023 and letter dated 06.12.2023 which are important for adjudication of the subject matter of the main appeal. (Copies of the Notification dated 10.07.2023, Notice dated 15.10.2023 and letter dated 06.12.2023 are Annexure A,B &C)
3. That there is nothing which may prevent this honorable Tribunal to permit the petitioners for filling additional documents in the instant Service Appeal.

It is therefore humbly requested that the on acceptance of the instant petition, permission may kindly be granted for submission of additional documents.



(Dr. Shoukat Ali)

Director General Health Service
Khyber Pakhtunkhwa
(Petitioner / Respondent No. 03)



TO BE SUBSTITUTED WITH THE SAME NO. & DATED
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 10th July, 2023

NOTIFICATION

NO. SOH(E-V)/2-2/2023

The Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to order posting/ transfer of the following doctors, with immediate effect, in the best public interest:-


S.NO	NAME	FROM	TO
1.	Dr. Muhammad Shoaib, Management Cadre (BS-19)	Medical Superintendent, Cat-D Hospital Lachi, Kohat	Medical Superintendent (BS-20), DHQ Hospital, Charsadda in OPS. Vice S.No. 2
2.	Dr. Muhammad Zahid, General Cadre (BS-19)	Medical Superintendent (BS-20), DHQ Hospital, Charsadda in OPS	Report to Directorate General Health Services, Khyber Pakhtunkhwa
3.	Dr. Adil Khan, Specialist Cadre (BS-18)	District Specialist (ENT) BS-18, DHQ Hospital, Charsadda	Medical Superintendent (BS-19), Women & Children Hospital Rajar, Charsadda in OPS against the vacant post

SECRETARY HEALTH
GOVERNMENT OF KHYBER PAKHTUNKHWA

No. 9708-19 Endst. of even No. & Date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Kohat.
4. Medical Superintendent, DHQ Hospital, Charsadda.
5. Medical Superintendent, Women & Children Hospital Rajar, Charsadda
6. District Accounts Officer, Kohat & Charsadda.
7. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
8. PS to Minister for Health Department, Khyber Pakhtunkhwa.
9. PS to Secretary Health Department, Khyber Pakhtunkhwa.
10. All concerned doctors.


(FAZAL AMIN)
SECTION OFFICER (E-V)

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Affidavit

I Dr. **Shoukat Ali** Director General Health Services Khyber Pakhtunkhwa do hereby state on oath that contents of the implementation / progress report are correct to the best of my knowledge and belief.


Deponent