

30.07.2019

Counsel for the appellant and Mr. Usman Ghani,
District Attorney for respondents present.

Written reply/comments have not been submitted by
the respondents. The learned District Attorney requests for
time to submit the same on the next date of hearing.

Adjourned to 23.08.2019 before S.B.



Chairman

23.08.2019

Counsel for the appellant and Addl. AG for
respondents present.

Learned counsel states that the appellant would be
at present satisfied if his case for promotion is considered
in future in accordance with his seniority. He, therefore,
requests for withdrawal of instant appeal with reservation
of right of the appellant to seek remedy in accordance with
law in case he is bypassed for the purpose of promotion.

Order accordingly. File be consigned to the record
room.


Chairman 

ANNOUNCED
23.08.2019

19.06.2019

Counsel for the appellant Muhammad Hakim present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was appointed as Naib Qasid vide order dated 26.08.2003. It was further contended ^{Post in} appointment of Junior Clerks have been created by the department and as per notification dated 02.08.2017 33% quota has been ordered for the appointment of junior clerks on the basis of promotion from Class-IV employees. It was further contended that as per seniority list available on the record, the appellant was on the top of seniority list of Class-IV employees of the district but the respondent-department is going to fill-up the said post through transfer. It was further contended that the appellant filed departmental appeal dated 10.04.2018 for this purpose but the respondent-department was not going to dispose the departmental appeal of the appellant therefore, the appellant filed Writ Petition for this purpose and the Writ Petition was disposed of by the worthy High Court vide judgment dated 19.03.2019 and the respondent-department was directed to decide the departmental appeal of the appellant within one month positively but despite the direction of the worthy High Court, the respondent-department has not disposed of the departmental appeal hence, the present service appeal. It was further contended that since the appellant being Class-IV employees since 2003 and on the top of seniority list therefore, the respondent-department is bound to make appointment of junior clerks through recruitment as well as through promotion from Class-IV employees as per notification dated 02.08.2017.

The contentions raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 30.07.2019 before S.B. Learned counsel for the appellant also submitted application for status-quo order. Notice of the same be also issued to the respondents for the date fixed.


(Muhammad Amin Khan Kundi)
Member



Appellant Deposited
Security & Process Fee
2/7/19

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 565/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge.
1	2	3
1-	02/05/2019	<p>The appeal of Mr. Muhammad Hakim resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 2/5/19</p>
2-	09/05/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/06/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Muhammad Hakim Naib Qasid Agency Headquarter Hospital at Khar District Bajaur received today i.e. on 29.04.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexures-D and F of the appeal are illegible which may be replaced by legible/better one.

No. 862 /S.T,

Dt. 30-4- /2019.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Note:

Sir,

All objections have been removed,
hence re-submitted today dated 03/5/2019.


2/5/2019.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO 565 /2019

MUHAMMAD HAKIM

VS

GOVT: OF KP & OTHERS

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 3.
2.	Stay application	4.
3.	Appointment order	A	5.
4.	Educational testimonials	B	6- 18.
6.	Seniority list	C	19.
7.	Notification	D	20- 21.
8.	List	E	22- 26.
9.	Departmental appeal	F	27- 28.
10.	Memo of writ petition	G	29- 33.
11.	Judgment	H	34- 35.
12.	Record	I	36- 41.
13.	Vakalat nama	42.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 565 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 672

Dated 29-4-2019

Mr. Muhammad Hakim, Naib Qasid (BPS-04),
Agency Headquarter Hospital at Khar, District Bajaur.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary Health Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director Health Services Merged Area, Warsak Road, Peshawar.
- 4- The District Health Officer, District Bajaur at Khar.
- 5- The Medical Superintendent District Headquarter Hospital, District Bajaur..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT-1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT PROMOTING THE APPELLANT TO THE POST OF JUNIOR CLERK (BPS-11) UNDER THE 33% QUOTA RESERVED FOR CLASS-IV EMPLOYEES AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

Filed to-day

Registrar

29/4/19

That on acceptance of this appeal the appellant may very kindly be promoted to the post of Junior Clerk (BPS-11) under the 33% quota reserved for class-IV employees. Any other remedy which this august Court deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACT:-

- 1- That the appellant was appointed as Naib Qasid (BPS-2) in the respondent Department vide order dated 26-8-2003. That after appointment till date the appellant performed his duty quite efficiently and upto the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure **A.**

Re-submitted to -day
and filed.

Registrar

2/5/19

- 2- That appellant is serving the respondent Department as Naib Qasid since 2003 and has the qualification of B.A. That according to the seniority list of class-iv employees the appellant is at serial No.1 of the seniority list. That according to rules the appellant is entitle for promotion to the post of junior clerk under the 33% quota but the respondents are not willing to do the same. Copies of the Educational testimonials, seniority list and Notification are attached as Annexure **B, C & D.**
- 3- That appellant feeling aggrieved from the inaction of the respondents filed Departmental appeal before the appellate authority for promotion to the post of Junior clerk BPS-9 in the light of above mentioned 33% quota reserved for the class-iv employees but in response has been un-responded. Copies of the list & departmental appeal are attached as Annexure **E & F.**
- 4- That appellant having no other remedy filed writ petition No. 2749-P/2018 before the Peshawar High Court, Peshawar and the Honorable High Court issued directions vide judgment dated 19.03.2019 to the respondent Department to decide Departmental appeal of the appellant within the period of one month positively. That inspite of clear directions of the Honorable Peshawar High Court the respondent Department has not been decided the said Departmental appeal of the appellant. Copies of the memo of writ petition and judgment are attached as annexure.....**G & H.**
- 5- That there are four posts of junior clerk (BPS-11) lying vacant in the respondent Department but inspite of that the respondent Department is not willing to promote the appellant against the post of Junior Clerk (BPS-11) under the 33% quota reserved for Class-IV employees. Copy of record regarding vacant posts is attached as annexure.....**I.**
- 6- That feeling aggrieved and having no other remedy the appellant filed this appeal on the following grounds amongst the others.

GROUND:

- A- That not promoting the appellant to the post of junior clerk (BPS-09) by the respondents inspite of eligibility and seniority is against the law, facts and norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4

and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the respondent Department acted in arbitrary and malafide manner by not promoting the appellant to the post of junior clerk (BPS-9) despite of having eligibility and the seniority.
- D- That according to the service structure and promotion orders already issued by the respondent No.3 and the appellant is fully entitled to be promoted to the post of junior clerk (BPS-09).
- E- That appellant is at the top of the seniority list of class-4 employees working at the office of the respondent No.4, therefore, the appellant has the right to be promoted to the post of junior clerk (BPS-9) under the 33% quota reserved for class-iv employees.
- F- The appellant seeks the permission to advance other grounds and proofs at the time of hearing.

It is therefore humbly prayed that the writ petition of the appellant may be accepted as prayed for.

Dated: 24.04.2019.

APPELLANT

M. Hale

MUHAMMAD HAKIM

THROUGH:

A
NOOR MOHAMMAD KHATTAK

SHAHZULLAH YOUSAFZAI

&

M. Zaman Safi
**MIR ZAMAN SAFI
ADVOCATES**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL No. _____/2019

MUHAMMAD HAKIM

VS

HEALTH DEPTT:

APPLICATION FOR RESTRAINING THE RESPONDENTS
THAT NOT TO FILL UP THE VACANT POSTS OF JUNIOR
CLERK (BPS-11) TILL THE DISPOSAL OF THE ABOVE
MENTIONED APPEAL

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the inaction of the respondents by not promoting the appellant to the post of Junior Clerk (BPS-11) under the 33% quota reserved for Class-IV employees.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the inaction of the respondents by not promoting the appellant to the post of Junior Clerk (BPS-11) is utter violation of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the respondents may very kindly be restrained from filling the posts of Junior Clerk (BPS-11) till the disposal of the above mentioned service appeal.

Dated: 25.04.2019

APPLICANT



MUHAMMAD HAKIM

THROUGH:

NOOR MOHAMMAD KHATTAK


MIR ZAMAN SAFI
ADVOCATES

5
18

**OFFICE OF THE AGENCY SURGEON BAJAUR
AT KHAR**

Appointment letter

A-5

Consequent upon the approval of Departmental Selection Committee held on 7/7/2003 and 8/7/2003.

Mr/Miss. Mohammad Hakim S/O Noor Hakim Khan
Resident of: Shinkay Ali Zai Tehsil : Khar (Bajaur Agency)

Is hereby appointed as Naib. Qasid (BPS-01) plus usual allowances as admissible under the rules.

His/ Her appointment will be subject to the following terms and conditions:-

1. That your appointment is on contract basis for period of three years and your services are liable to be terminated at any time with out any notice or resign being assigned.
2. That you are declared medically fit for Govt. service.
3. The post is not transferable, and you must serve for three years on the said post.
4. That you will be governed by such and orders as may be issued by the government of NWFP, from time to time for the category of the Government servant to which he/she belong.
5. That if you wish to resign, at any time, your will resign in written within 30 days notice or you will be forfeit one month pay in lieu thereof and will continue to serve the government till the acceptance of your resignation by the competent authority.
6. That you will be posted any where in Bajaur agency.
7. That you will not be entitled to any TA/DA for Medical examination and joining the first appointment.
8. The offer is subject to the availability of vacant post.
9. If you accept the post on above terms and conditions you should report to the Office of Agency Surgeon Bajaur at Khar Within 15 days. The offer will be cancelled if you fail to report for duty.

Sd/.....
AGENCY SURGEON
BAJAUR AT KHAR

No. 3522-25/C-1/BJR

Dated. 26/8/2003

Copy forwarded to the:-

1. Political Agent Bajaur Chairman Departmental Selection Committee.
2. Deputy Director (Admin) Directorate Health Services PATA NWFP Peshawar
3. EMS ATIQ Hospital Khar.
4. Agency Account Officer Bajaur at Khar.
5. Official Concerned.

For information please

[Signature]

[Signature]
AGENCY SURGEON
BAJAUR AT KHAR

Attested



UNIVERSITY OF MALAKAND PAKISTAN

Serial No BA/PR/1422

*This Degree of
Bachelor of Arts
Is Awarded to*

ATTESTED

Mr/Ms MUHAMMAD HAKIM *Son/Daughter of* NOOR HAKIM KHAN

Student/Private candidate of BAJAUR AGENCY

Having passed the prescribed examination held in JULY-AUGUST, 2005

Session 2003-2005 *Registration No* 2003670058 *Roll No* 366509

Division SECOND

Examination was taken as a whole/part

Issuance Date MARCH 20, 2009

Countersigned

Signature
Controller of Examinations

Attested
MEDICAL OFFICER
AHC BAJAUR
Signature
Registrar

Signature
Vice-Chancellor

B-6

UNIVERSITY OF MALAKAND

PAKISTAN

S.No. 7 9730



Private Candidate Bajaur Agency

DETAILED MARKS CERTIFICATE

B.A Part-II Annual, 2005

Name MUHAMMAD HAKIM

Father's Name NOOR HAKIM KHAN

Registration No. 2003670058

Roll Number 366509

Subject Code	Subject Name	Total Marks	Marks Obtained	REMARKS
BA002	ISLAMIC STUDIES(E)	75	43	PASSED
BA003	PASHTO	75	49	PASSED
BA010	ENGLISH(C)	75	25	PASSED
G0003	PAK. STUDY	40	20	PASSED
ZBA003	BA PART-I MARKS	285	143	PASSED
		550	280	

Errors and Omissions are subject to subsequent rectification

Examination Held in July-August, 2005

Examination was taken as a whole/in parts

Result Declared on 15-Oct-2005

Date of Issue 28-Nov-2005

Attested

MEDICAL OFFICER
BAJOUR

Controller of Examinations
University of Malakand

ATTESTED

Board of Intermediate & Secondary Education
SAIDU SHARIF, SWAT.

DETAILED MARKS CERTIFICATE

Intermediate Examination (Humanities Group)
Session 2002 (Annual/Supplementary)



① ②

S. No. Sw. 13142 PART-II

Name Mohammad Hakim Khan Roll No. 226091

Tutor's Name Neel Hakim Khan

SUBJECTS	Marks allotted	Part I	Part II	MARKS OBTAINED	
				Total	
				In Figures	In Words
1. English	200			68	
2. Urdu	200			104	
3. Islamic Education	50			55	
4. Pakistan Studies	50			77	
5. DH	200			129	
6. SS	200			118	Mr
7. HPE	200				
Total	1100			551	C

Errors and omissions excepted.

Date _____

Prepared by _____

Checked by _____

Five hundred & Fifty one

Controller of Examination

Board of Intermediate & Secondary Education
SAIDU SHARIF, SWAT.

Attested

MEDICAL OFFICER
AKHUN KAPAR BAJAUR

ATTESTED

S. No:08154

Roll No. 9

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif Swat N.W.F.P. Pakistan

INTERMEDIATE EXAMINATION

HUMANITIES

SESSION 1902 (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT

Son / Daughter of

and a student of

Registered No.

the Board of Intermediate & Secondary Education, Saidu Sharif, Swat, held in

1902 as a Regular/private candidate, He / She obtained

Marks out of 1100 and has been placed in Grade

Internal Grade

The Examination was taken as a whole / in parts

Assit. Supt.

Asstt. Secretary

Attested

MENSAL DEECER AHQI KHAR & JALIB

Secretary

This certificate is issued without alteration or erasure.

S. No. 0025693

Roll No. 33459

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

10

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Saidu Sharif, Swat N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 19 99 (ANNUAL/SUPPLEMENTARY)

THIS IS TO CERTIFY THAT MUHAMMAD HAKIM

Son/Daughter of NOOR HAKIM KHAN

and a student of BAJAUR AGENCY

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Saidu Sharif, Swat held in _____ 19 _____ as a Regular/Private candidate. He/She obtained 362 Marks out of 850 and has been placed in Grade D Representing FAIR

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|--------------|------------|
| 1. English | 3. Islamiyat | 5. MATHS | 7. PHYSICS |
| 2. Urdu | 4. Pakistan Studies | 6. CHEMISTRY | 8. BIOLOGY |

Internal Grade

Date of birth according to admission form is ELEVENTH JUNE one thousand nine hundred and EIGHTY TWO (11-06-1982)

Asstt. Secretary

Attested

This certificate is issued without all other documents.

MEDICAL OFFICER
BAJAUR

Secretary

Handwritten signature and initials at the bottom right.

Board Of Intermediate & Secondary Education

SAIDU SHARIF, SWAT.

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination

(SCIENCE GROUP)

Session 1999 (Annual/Supplementary)



⑤
⑪

REVISED

S.No. Sw.

1649

Name

Muhammad Hakim

Father's Name

Noor Hakim Khan

Roll No.

33459

SUBJECTS	Total number of marks allotted						
	Theory	Practical	Total Marks	Theory	Practical	Total in Figures	In words
1. English	150		150			59	/
2. Urdu	150		150			72	
3. Islamiat Comp.	75		75			52	
4. Pak. Studies	75		75			30	
5. Mathematics	100		100			33	
6. Physics	75	25	100	29	12	41	
7. Chemistry	75	25	100			37	
8. Biology	75	25	100			38	
Total	775	75	850			362	(Three Ht. & sixty two)

Errors/omissions excepted

Prepared by

[Signature]

Checked by

Date

10/12/2015

Controllet of Examinations

Board of intermediate & Secondary Education

Saidu Sharif, Swat.

Attested

[Signature]
MEDICAL OFFICER
AHCH KHAR BAJAUR

ATTENDED

S.No.

002898

Roll No. A-17358

12

NWFP BOARD OF TECHNICAL EDUCATION PESHAWAR



Diploma in Information Technology

Session 1st Term, 2005

This is to certify that

MOHAMMAD HAKIM

NOOR HAKIM KHAN

Registration No. GOMT/SC/EC/COMMERCE & MGT/SC/ENG/SC/INFORMATION TECHNOLOGY/KHAR-15/DT/76-02/2004-08

Mr. *Son*

of *Daughter of Mr.*

Registration No. *GOMT/SC/EC/COMMERCE & MGT/SC/ENG/SC/INFORMATION TECHNOLOGY/KHAR-15/DT/76-02/2004-08*

of *GOMT/SC/EC/COMMERCE & MGT/SC/ENG/SC/INFORMATION TECHNOLOGY/KHAR-15/DT/76-02/2004-08*

satisfactorily completed the one year duration of the course titled

Examination held by the

Peshawar in the month of

He/She secured

Grade

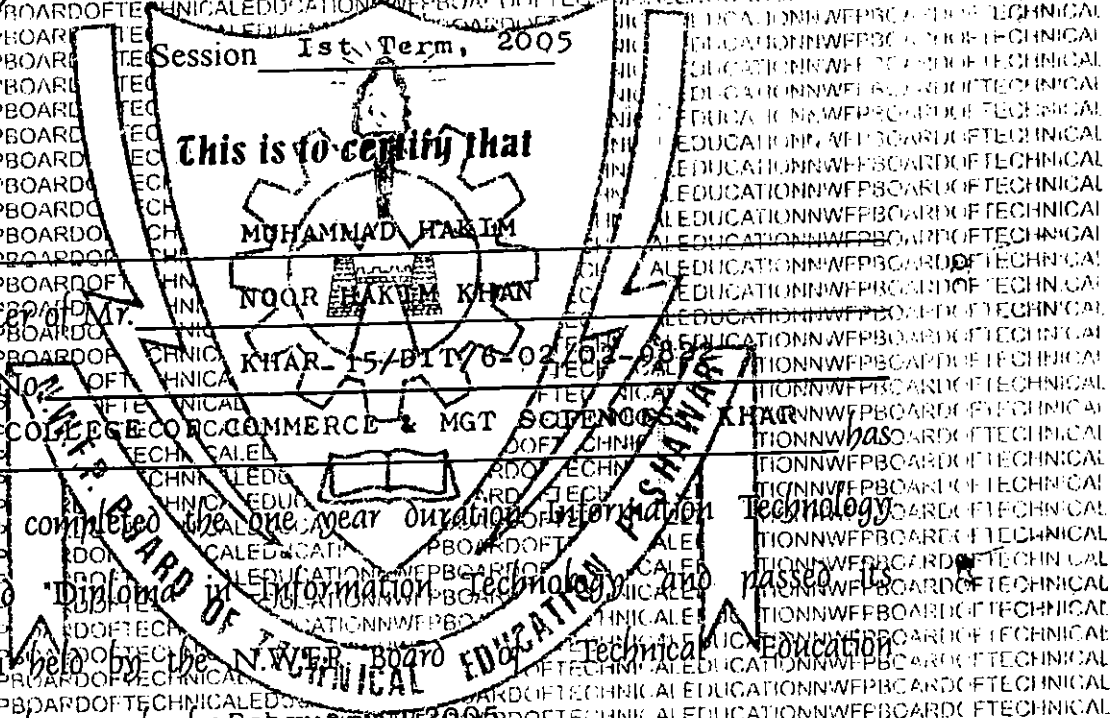
In recognition thereof this Diploma in Information Technology is

awarded to him/her at Peshawar

On the 10th day of

2005

Assistant Secretary



has *successfully* completed the one year duration of the course titled *Examination held by the* NWFP Board of Technical Education *Peshawar* in the month of *Feb* in the year *2005*. He/She secured *91.8* marks out of *100* and was placed in *Grade* *A*. In recognition thereof this Diploma in Information Technology is awarded to him/her at Peshawar. On the *10th* day of *August* *2005*.

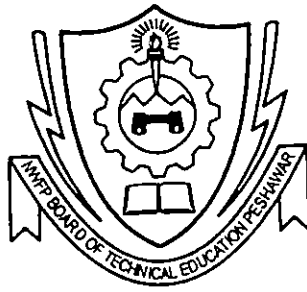
Assistant Secretary

Secretary

3

NWFP BOARD OF TECHNICAL EDUCATION

(13) 2215



PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA IN INFORMATION TECHNOLOGY (2nd SEMESTER)

Name of Candidate Muhammad Hakim
 Father's Name Noor Hakim Khan
 Roll No 7356 Session 1st Term 2005
 Institute/College Government College of Management Sciences Khar Bajaur

S.NO.	Subject Name	Total Marks	Marks Obtained	
			In Fig:	In Words
	1st Semester Marks	800	469	
1.	Oracle-DBA	T-100 P-100	44 72	forty-four seventy-two
2.	System Analysis & Design	T-100	40	forty
3.	Introduction to E-Commerce & internet programming	T-100 P-100	40 55	forty fifty-five
4.	Visual Basic	T-100 P-100	48 66	forty-eight sixty-six
5.	Business Communication	T-100	48	forty-eight
6.	Project	100	66	sixty-six
	Total Marks	1700	948	nine hundred forty-eight

NOTE:
 Theory passing Marks = 40%
 Practical passing Marks = 50%

Prepared by _____
 Checked by _____
 Errors and Omissions Excepted

Attested
 MENCAL OFFICER
 ANCH KHAH BAJAUR

Becker
 CONTROLLER OF EXAMINATIONS

EJ



**OFFICE OF THE AGENCY SURGEON
BAJAUR AT KHAR**



Experience Certificate

TO WHOM IT MAY CONCERN

It is certified thar Mr. Muhammad Hakim S/O Noor Hakim Khan
His Worked as a Mobile team leader in Polio Eradication Programme
Under the supervision of health department from 01-01-2005
Upto till date.

He worked in Measles Vaccination and IPV Vaccination.

During the said Period he was found dutiful and hard working
Having good working experience and communication skills.

Attest
Area In Charge

[Signature]
FBHO
EPI Unit
Khar Bajaur

[Signature]
DHT

Attested

[Signature]
**AGENCY OFFICER
BAJAUR**

[Signature]
**Agency Surgeon Bajaur
AGENCY SURGEON**

13 14

(57)

(18)

EXPANDED PROGRAMME ON IMMUNIZATION
NWFP, PESHAWAR.

No. _____

Date: _____



DEPARTMENT OF HEALTH
Government of NWFP (Pakistan)
EPI TRAINING CERTIFICATE

This is to Certify that Mr./Mrs. MUHAMMAD HAKIM S/o, D/o, W/o NOOR HAKIM KHAN
 resident of SHINKAY ALI ZAI BAJOUR AGENCY

P.O. KHAR Tehsil KHAR District BAJOUR AGENCY

Has successfully completed EPI Training, From 1.1.2006 to 31.1.2007

at EPI Centre AHQ HOSPITAL BAJOUR. KHAR. at his own cost and risk.

Prepared by: _____

Attested

MEDICAL OFFICER
 H.S. KHAK BAJOUR

DEPUTY DIRECTOR
EXPANDED PROGRAMME ON IMMUNIZATION
NWFP, PESHAWAR.

Handwritten signature

Allama Iqbal Open University Islamabad



(16) (10)

Certified that Mr/Ms MUHAMMAD HAKIM
 Son/Daughter of NOOR HAKIM KHAN
 Registration No. 03 ABR 0079 Roll No. N 607626 having
 completed the prescribed requirements in AUTUMN 2003 Semester, is awarded

Primary Teaching Certificate

Detail of courses is as under:

Course Code	Title of the Course	% Marks Obtained	Grade
613	Principles of Education	56	
614	Educational Psychology	54	
615	School Organization and Management	58	
616	School Community and Practical Arts	59	
617	Teaching of Urdu	53	
618	Teaching of Mathematics	59	
619	Teaching of Science and Physical Education	61	
620	Teaching of Islamiat and Social Studies	59	
611	Workshop and Teaching Practice	67	

Obtained/Total Marks: 526 / 900

He/she has secured 58 % marks and has been placed in grade C.

Result declared on: February 21, 2005

Date of issue: June 22, 2005

Prepared by: _____

Checked by: _____

Attested

MEDICAL OFFICER
 ANJUM ABAS
 RAJOUR

Controller of Examinations

Note: This certificate is valid without alterations/erasure.

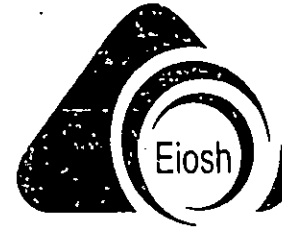
ATTESTED

17



OSHAcademy™

Occupational Safety & Health Training



This is to certify that

MUHAMMAD HAKIM

Has successfully completed all academic requirements in this 30-hour Occupational Safety & Health Course of study presented by
OSHAcademy Authorized Training Provider (ATP), EIOSH Private Limited

Construction Safety and Health

Topics covered in this training include (30 hours): Introduction to OSHA (2 h); Managing Safety and Health (2 h); OSHA Focus Four Hazards (6 h); PPE (1 h); Life Saving (1 h); Health Hazards in Construction (2 h); Stairways and Ladders (1 h); Concrete and Masonry (1 h); Confined Space Entry (1 h); Cranes, Derricks, Hoists, Elevators, and Conveyors (3 h); Excavations (2 h); Fire Protection and Prevention (1 h); Powered Industrial Vehicles (1 h); Scaffolds (3 h); Hand- and Power-Tools (1 h); and Welding and Cutting (2 h).

Atiq

Msteyd

MEDICAL OFFICER
AHCH AFFAIR BAHALUR

Quaid

Steven J. Geigle

Steven J. Geigle, M.A., CET, CSHM
Training Director
OSHAcademy Safety & Health Training

102843-117

04-15-2017

Student #

Issue Date

Ansar Mahmood
Training Director
EIOSH Private Limited
Pakistan
ATP #: 201003PK

Validate Certificate:



Certificates can be validated through the
OSHAcademy website.
Validation Code: 102843-117-109-6cc73
www.oshacademy-atp.com/ verify

Recognized by



The content of this training conforms with U.S. Department of Labor (OSHA) training standards and ANSI Z490.1, Criteria for Accepted Practices in Safety, Health and Environmental Training.

Vertical stamp: RECEIVED
Signature: B. I. M.



PRESIDENT:
GOVERNOR KHYBER PAKHTUNKHWA

2

Pakistan Red Crescent
بلال احمر پاکستان
PRC - FATA, Bajaur Agency

18

TO WHOM IT MAY CONCERN

It is certified that Mr. Muhammad Hakim S/O Noor Hakim Khan is a volunteer with Pakistan Red Crescent Bajaur branch. In the capacity of volunteer he can deliver his services with dedication and commitment.

I wish him success in his future endeavors.

Regards
Shah Hussain
Agency Secretary

Attested

MEDICAL OFFICER
KHAR BAJAUR


APPROVED

C-19

SENIORITY LIST OF NAIB QASID AHQ:HOSPITAL KHAR BAJAUR AGENCY.

S#	Name	F/Name	DOB	Date of appointment	Qualification	Domicile
1.	Muhammad Hakim	Noor Hakim Khan	11/06/1982	21/08/2003	B.A/DIT	Bajaur
2.	Liaq Zada	Sahib Zada	14/07/1985	-do-	Nil	-do-
3.	Ghulam Khaliq	M, Yusaf	1985	-do-	Nil	-do-
4.	Sar Zamin	Momin Khan	15/02/1970	-do-	SSC	-do-
5.	Said Maroof Jan	Rahmanullah Jan	1974	-do-	Nil	-do-
6.	Said Arif Khan	Said Muhammad	1982	-do-	Nil	-do-
7.	Abdul Wali	Mir-Wali Khan	1976	-do-	SSC	-do-
8.	Muhammad	Gul Rahman	1983	-do-	Nil	-do-
9.	Rohullah Pacha	Said Gul Pacha	1885	-do-	Nil	-do-
10.	Abdul Salam	Jan Muhammad	1986	16/01/2004	Nil	
11.	Noor Muhammad	Ghulam Muhammad	08/09/1985	28/02/2004	SSC	
12.	Shahzullah	Kalimullah	01/07/1965	16/07/2005	Nil	
13.	Yasir Muhammad	Sultan Muhammad	01/01/1992	04/12/2010	Nil	

ATTESTED


Medical Superintendent,
AHQ:Hospital Khar.

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated the August 2, 2017.

No. SO(PE)4-10/SSRC/Ministerial Staff/2013:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(PF)4-10/SSRC/Ministerial Staff/2013 dated 28.01.2013, the following amendments shall be made, namely.

AMENDMENTS

In the Appendix:

1- Against Sr. No-9, in column No. 5(a), for the existing entry, the following entry in column 5 (a) shall be substituted.

a)Thirty three percent by promotion on the basis of Seniority-Cum-Fitness from amongst the Daftares, G. Operators, Qasids and Naib Qasids including other equivalent posts in the attached department/offices/institutions with two years service as such having SSC qualification.

SECRETARY

Endst. No. & Date as above.

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated the August 2, 2017. ✓

Handwritten marks and circled numbers: 20, 20, D-20

No. SO(PE)A-10/SSRC/Ministerial staff/2013:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department, hereby directs that in this Department's Notification No. SO(PE)A-10/SSRC/Ministerial Staff/2013 dated: 28.01.2013, the following amendments shall be made, namely:

AMENDMENTS

In the Appendix:-

(i) Against Sr. No. 9, in column No. 5(a), for the existing entry, the following entry in column 5 (a) shall be substituted

- a) Thirty three per cent by promotion on the basis of Seniority-Cum-Fitness from amongst the Daitanes, G. Operators, Qasids and Naib Qasids including other equivalent posts in the attached department/offices/institutions with two year service as such having SSC qualification.

Condition of 2nd division has been omitted.

SECRETARY

Encl. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary to Govt. of Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (E&A) Khyber Pakhtunkhwa, Peshawar.
8. The Director Curriculum & Teachers Education Abbottabad.
9. The Director (PHE) Khyber Pakhtunkhwa Peshawar.
10. The Director ESRU, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
11. The Deputy Director (EMIS) E&SE Department.
12. All Deputy Commissioners in Khyber Pakhtunkhwa.
13. All District Education Officers, Elementary & Secondary Education Khyber Pakhtunkhwa.
14. All District Accounts Officers, Khyber Pakhtunkhwa/Agency Accounts Officers.
15. All Agency Education Officers.
16. P.S to Governor, Khyber Pakhtunkhwa.
17. P.S to Chief Minister, Khyber Pakhtunkhwa.
18. P.S to Chief Secretary, Khyber Pakhtunkhwa.
19. P.S to Minister E&SE Khyber Pakhtunkhwa Peshawar.
20. P.S to Secretary E&SE Department.
21. Mr. Akbar Khan Mohmand, Provincial President Class-IV Association, Khyber Pakhtunkhwa.
22. Master File.

ATTESTED

Handwritten signature

(NAIK MUHAMMAD)
SECTION OFFICER (PRIMARY)

Handwritten signature and stamp

(18) (21)



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: awfpdshs@yahoo.com Office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230
No. 15675-9 Personnel Dated: 22 / 11 / 2017

To,

1. The All Hospital Directors MTIs in Khyber Pakhtunkhwa.
2. The All DHOs in Khyber Pakhtunkhwa.
3. The All MSs in DHQ/Teaching Hospital in Khyber Pakhtunkhwa.

Subject: **OBSERVANCE OF QUOTA'S.**

Memo,

I am directed to refer to the subject noted above and to convey the judgment of Peshawar High Court Peshawar in Writ Petition No. 2334-P/2014 announced on 08.12.2015 in case of Mr. Niaz Muhammad Ward Orderly v/s. Chief Executive LRH & 05 others regarding his promotion under 33% quota.

"The Hon'able Court has declared null & void and are set aside the respondent No.1 and 2 and other over helms of affairs are directed to reconstitute the Selection and Promotion Committee afresh, who shall made approval for promotion strictly in accordance with the seniority list. The promotion would be deemed w.e.f 17.05.2013 and petitioner will be entitled for back benefits also from the said date. It is further directed that the judgment of this Court be implemented within one month according to law".

It is further clarified that the following quota should be observed in accordance with laid down rules/ policy of the Government:-

1. Observance of 100% quota for deceased/permanantly incapacitated on medical board.
2. 25% quota for Class-IV employees who retired on the age of superannuation, who retired on sixty years of age according to matriculate seniority list.
3. 33% quota for promotion of Class-IV to Ministerial cadre only.

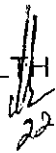
The Muslim Sweepers should be converted into Ward orderly or other Class-IV posts in accordance with two separate judgments of Peshawar High Court Peshawar in W.P 293-P/13 dated 2009 SCMR-I as well as Govt: of Khyber Pakhtunkhwa Health Department letter No. SOH-(Lit-I) 1-1/2017(Gen:Misc) dated 16.02.2017.

You are requested to please implement the above mentioned quota's in letter and spirit to avoid further complications faced by the above mentioned employees including MTIs.

ATTESTED



ADDITIONAL DG (HRM)
DIRECTORATE GENERAL HEALTH
SERVICES, K.P PESHAWAR.


22/11/17

C.C

1. Mr. Khawaja Abdul Qayoum Chairman Provincial Paramedical Association Class-IV Khyber Pakhtunkhwa.
2. Mr. Nabi Amin President Provincial Paramedical Association Class-IV Khyber Pakhtunkhwa.

ATTESTED



To

The Additional Accountant General
Pakistan Revenues, Sub Office,
Peshawar

E-22

Subject-

CREATION OF 544 POSTS FOR 9 DIFFERENT HEALTH FACILITIES IN FATA.

Dear Sir,

I am directed to convey approval / sanction of the competent authority for creation of posts for the following Health facilities with immediate effect:-

I. TYPE "D" HOSPITAL JAMRUD, KHYBER AGENCY

#	Designation	BPS	Posts in the Yardstick	Existing Posts	Posts Sanctioned
1	Administrator/SMO	18	1	1	0
2	Surgical Specialist	18	1	0	1
3	Medical Specialist	18	1	0	1
4	Gynaecologist	18	1	0	1
5	Paediatrician	18	1	0	1
6	GDMOs	17	11	2	8
7	Nurses	16	9	0	9
8	Anaesthesia Tech:	12	2	1	1
9	OT Tech:	12	2	1	1
10	Blood Bank Tech:	12	1	0	1
11	Lab: Tech:	12	2	1	1
12	X-ray Tech:	12	2	1	1
13	ECG Tech:	12	1	0	1
14	Sterilization Tech:	12	1	1	0
15	Dental Tech:	12	5	4	1
16	Pharmacy Tech:	12	1	0	1
17	LHV	12	2	0	2
18	EPI Tech:	12	1	0	1
19	Store keeper	11	1	0	1
20	Junior Clerk	6	1	0	1
21	Driver	4	4	3	1
22	Dai	4	6	4	2
23	Ward Attendants	4	4	2	1
24	Sweeper	3	1	1	0
25	Mali	3	5	2	1
26	Chowkidars	3	2	0	0
27	N/Oasid	3	2	0	2
28	Laundry	3	0	1	0
29	Cook	3	0	1	0
30	Dental Attendant	3	0	3	0
31	Behishti	3	0	3	0
	Total		72	29	42

22

DHS

ATTESTED

[Signature]

Ladi Beghar

1778

15	Dental Tech:	12	1	1	0
16	Pharmacy Tech:	12	5	4	0
17	LHV	12	1	1	0
18	EPI Tech:	12	2	0	1
19	Store keeper	12	1	0	1
20	Junior Clerk	11	1	0	0
21	Driver	6	1	1	0
22	Dai	4	4	0	0
23	Ward Attendants	4	6	1	5
24	Sweeper	3	4	1	2
25	Mali	3	1	1	0
26	Chowkidars	3	5	1	3
27	N/Qasid	3	2	0	0
28	Laundry	3	2	0	2
29	Midwife	5	0	1	0
30	Dental Attend:	3	0	1	0
31	Behishtti	3	0	1	0
32	Cook	3	0	1	0
Total			72	20	43

→

IV.

UPGRADATION OF CIVIL HOSPITAL NAWAGAI TO TYPE "D"
HOSPITAL, BAJAUR AGENCY

#	Designation	BPS	Posts in the Yardstick	Existing Posts	Posts sanctioned
1	Administrator/SMO	18	1	1	0
2	Surgical Specialist	18	1	0	1
3	Medical Specialist	18	1	0	1
4	Gynaecologist	18	1	0	1
5	Paediatrician	18	1	0	1
6	GDMOs	17	11	3	4
7	Nurses	16	9	0	9
8	Anaesthesia Tech:	12	2	2	0
9	OT Tech:	12	2	2	0
10	Blood Bank Tech:	12	1	1	0
11	Lab: Tech:	12	2	2	0
12	X-ray Tech:	12	2	0	0
13	ECG Tech:	12	1	1	0
14	Sterilization Tech:	12	1	1	0
15	Dental Tech:	12	5	2	0
16	Pharmacy Tech:	12	1	1	0
17	LHV	12	2	0	0
18	EPI Tech:	12	1	1	0
19	Store keeper	12	1	0	0
20	Clerk	11	1	1	0
21	Driver	6	1	1	0
22	Dai	4	4	4	0
23	Ward Attendants	4	6	6	0
24	Sweeper	3	4	1	0
25	Mali	3	1	1	0
26	Chowkidars	3	5	2	0
27	N/Qasid	3	2	0	0
28	Laundry	3	2	0	0
29	X-ray attend:	5	0	1	0
Total			72	35	17

→

Sadiq Akhbar

ATTESTED

ATTESTED

CONSTRUCTION OF TYPE "C" HOSPITAL MISHTI MELA, ORAKZAI

AGENCY

(24) (18)

#	Designation	BPS	Posts in the Yardstick	Posts sanctioned
1	Medical Superintendent	19	2	1
2	Surgical Specialist	18	1	1
3	Medical Specialist	18	1	1
4	Gynecologist	18	1	1
5	Pediatrician	18	1	1
6	Eye Specialist	18	1	1
7	ENT Specialist	18	1	1
8	Orthopedics Specialist	18	1	1
9	Anesthetics	18	1	1
10	Dental Surgeon	18	1	1
11	GDMOs	17	51	38
12	Pharmacist	17	1	1
13	Nurses	16	56	42
14	Accountant	16	1	1
15	Anesthesia Tech:	12	3	3
16	OT Technician	12	4	4
17	Blood Bank Tech:	12	2	2
18	Lab Tech:	12	3	3
19	X-ray Tech:	12	3	3
20	ECG Tech:	12	3	3
21	Sterilization Tech:	12	2	2
22	Dental Tech:	12	2	2
23	Ophthalmic Tech:	12	10	10
24	Pharmacy Tech:	12	2	2
25	EPI Tech:	12	1	1
26	Store keeper	12	4	4
27	Junior Clerk	11	4	3
28	Driver	6	3	29
29	Ward Attendant	4	32	21
30	Dal	4	24	3
31	Naib Qasid	3	3	2
32	Laundry	3	2	2
33	Sweeper	3	22	20
34	Mali	3	2	2
35	Chowkidar	3	10	9
	Total		260	223

FOUR WARDS OF 20 BEDED EACH IN AHO HOSPITAL, BAJAUR AGENCY

#	Designation	BPS	Posts Sanctioned
1	Surgical Specialist	19	2
2	Medical Specialist	19	2
3	Orthopedic	19	2
4	Senior Medical Officer	18	4
5	Medical Officers	17	12
6	Charge Nurses	16	12
7	OT Sterilizations Tech:	12	3
8	Ophthalmic Tech:	12	3
9	Dental Tech:	12	3
10	OT Tech:	12	3
	Total		46

Sad Azghar

ATTESTED

[Handwritten signature]

VII

(25)  M 3


ESTABLISHMENT OF TRAUMA CENTER IN BAJAUR AGENCY

#	Designation	BPS	Yardstick	Posts Sanctioned
1	Casualty Medical Officer	18	1	1
2	General Surgeon	18	2	2
3	Neuro Surgeon	18	2	2
4	Orthopedic Surgeon	18	2	2
5	Medical Officer	17	6	6
6	Women Medical Officer	17	2	2
7	Female Nurse	16	6	6
8	LHV	12	2	2
9	Pharmacy Tech:	12	4	4
10	OT Technician	12	4	4
11	Anesthesia Technician	12	4	4
12	Ward Orderly	4	4	4
13	Dai	4	2	2
14	Chowkidar	3	2	2
15	Sweeper	3	2	2
	Total		45	45

VIII. SHEIKH FATIMA BINT-E-MUBARAK MODEL HOSPITAL SHOLAM SWA

#	Designation	BPS	Posts in the Yardstick	Posts sanctioned
1	Medical Superintendent	18	1	1
2	Surgical Specialist	18	1	1
3	Medical Specialist	18	1	1
4	Gynaecologist	18	1	1
5	Children Specialist	18	1	1
6	Nephrologist (Dialysis specialist)	18	0	1
7	GDMOs	17	11	10
8	Charge Nurse	16	9	9
9	Anesthesia Tech	12	2	2
10	OT Tech:	12	2	2
11	Blood Bank Tech:	12	1	1
12	Lab: tech:	12	2	2
13	X-ray Tech:	12	2	2
14	ECG Tech:	12	1	1
15	Sterilization Tech	12	1	1
16	Dental Tech:	12	1	1
17	Pharmacy Tech:	12	5	5
18	Dialysis Tech	12	0	2
19	Ophthalmic Tech:	12	0	1
19	EPI Tech:	12	2	2
20	LHV	12	1	1
21	Storekeeper	12	1	1
22	Junior Clerk	11	1	1
23	Drivers	6	1	1
24	Dai	4	4	4
25	Ward Attendants	4	6	6
26	Sweeper	3	4	4
27	Mafi	3	1	1
28	Chowkidars	3	5	5
29	N/Qasid	3	2	0
30	Laundry	3	2	2
31	Total		72	73

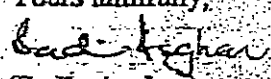
ATTESTED



ATTESTED

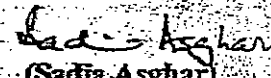
Sl. No.	Designation	BPS	Posts sanctioned
1	Principal	18	1
2	Vice Principal	17	1
3	Nursing Tutor	17	3
4	Computer Operator	16	1
5	Senior Clerk	14	1
6	House Keeper	12	1
7	Junior Clerk	11	1
8	Driver	6	2
9	Naib Qasid	3	4
10	Chowkidar	3	2
11	Cook	3	1
12	Bearer	3	2
13	Sweeper	3	2
	Total		22

2. The expenditure involved shall be debitable to the major Head 07-Health, 073-Hospital Services, 0731-General Hospital Services, 073101-General Hospital Services under DDO Code PR0049, and shall be met out within the sanctioned Budget Grant under Demand No.99-FATA in the current financial year 2017-18, subject to observance of all codal formalities under intimation to Finance Department FATA, Secretariat and Additional Accountant General, Pakistan Revenues, Sub Office, Peshawar.

Yours faithfully,

 (Sadia Asghar)
 Section Officer (FATA-II)

Copy forwarded to the- 2478-37


- | | | |
|-----------------------------------------------|---|---------------------------------------|
| 1. Secretary Social Services Department, FATA | } | for information and necessary action. |
| 2. Secretary A,I&C Department, FATA | | |
| 3. Director Health Services (FATA) | | |
| 4. PS to Additional Chief Secretary, FATA | } | for information. |
| 5. PS to Secretary Finance, FATA | | |


 (Sadia Asghar)
 Section Officer (FATA-II)


Government of Pakistan
Finance Division
FA's (FATA), Organization,
Peshawar

Endst. No. SO.F-II/FD/FA/SNE/Vol-XI Dated 05.02.2018


- Endorsed to:-
- The Additional Finance Secretary (Exp), Finance Division, Govt of Pakistan, Islamabad.
 - The FA (SAFRON Division), Government of Pakistan, Islamabad
 - AGPR Islamabad.
 - AGPR Sub office Peshawar


 (M. Sulaiman Khan)
 Deputy Financial Advisor, FATA

Authority: DEA (SAFRON), Finance Division, Govt of Pakistan, Islamabad
 U.O No.5(1)/2012-DEA (SAFRON)/556, dated 21.11.2017.

ATTESTED


6



Better copy

محترم جناب ڈاکٹر گلبرگ سے ملنے پر خوش خاتما ہے۔

درخواست پر آپ کی محنت جو نیکو ہے۔

شعبہ عالی!
شعبہ نرسنگ میں آپ کی محنت کا صلہ لائسنس لینے کے لئے درخواست لیا گیا ہے۔
میں ڈیوٹی سرانجام دے رہی ہوں جو کہ سائنس اور طبی ذرائع سے معلوم ہوا
ہے کہ آپ کے زیر سایہ ہیڈ کوارٹر میں لائسنس لینے کے لئے درخواست لیا گیا ہے۔
کے اسامی عالی ہے جو کہ آپ کے ہیڈ کوارٹر میں لائسنس لینے کے لئے درخواست لیا گیا ہے۔
میں 33 کوڈ کے تحت اس درخواست کے مطابق درخواستیں پیش کرتا ہوں۔

لہذا مذکورہ اسامی پر ہوتی کے احکامات سے درخواست لیا گیا ہے۔
تعمیراتی -
تعمیراتی و علاجی سہولتیں۔

آپ کا نام لکھ کر ڈاکٹر گلبرگ کے پاس لائسنس لینے کے لئے درخواست لیا گیا ہے۔

10/4/2018.

F-27
39

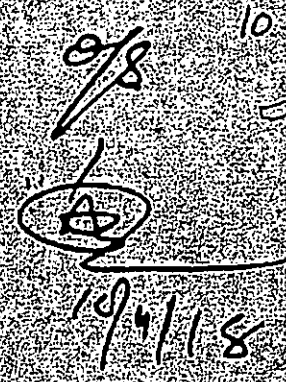
عزیز ہونے کے لیے اس کے مسائل کو حل کرنا ہے۔
میں نے اس کے لیے ایک پروگرام تیار کیا ہے
جس کے تحت اس کے مسائل کو حل کرنے کے لیے
33% کے شرح پر اس کے مسائل کو حل کیا گیا ہے

کیا یہ سہولت اس کے لیے
میں نے اس کے لیے ایک پروگرام تیار کیا ہے



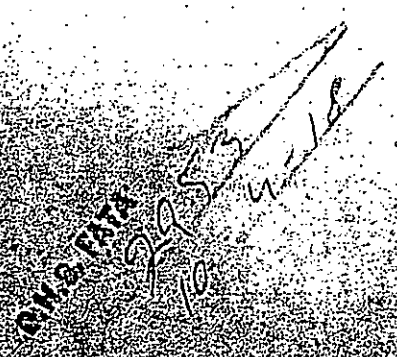
آپ کے پاس اس کے لیے ایک پروگرام تیار کیا گیا ہے

10-04-2018


19/01/18

ATTESTED







28

**OFFICE OF THE
MEDICAL SUPERINTENDENT,
AHO, HOSPITAL KHAR BAJAUR.**

3

Phone # 0942-221200.

No 1668 /PF/C-5 dated 14 /05/2018

To,

The Director Health Services,
FATA. Peshawar.

Subject: -

APPLICATION OF MR. MUHAMMAD HAKIM NAIB OASID AHO:
HOSPITAL KHAR.

Sir,

I have the honour to forward herewith an application submitted by Mr. Muhammad Hakim N/Q of AHQ, Hospital Khar Bajaur along with all relevant documents, wherein he is requesting for appointment against the vacant post junior clerk in Nursing School at AHQ: Hospital Khar.

Medical Superintendent,
AHQH, Bajaur at Khar.

Attested

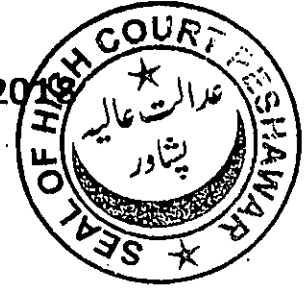
MEDICAL OFFICER
AHQ KHAR BAJAUR

RECEIVED

G-29

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO. _____ / 20



Mr. Muhammad Hakim, Naib Qasid (BPS-04),
Agency Headquarter Hospital at Khar, Bajaur Agency

..... Petitioner

VERSUS

- 1- The Additional Chief Secretary FATA, FATA Secretariat Warsak Road Peshawar.
- 2- The Secretary Social Sector Department FATA, FATA Secretariat, Warsak Road, Peshawar.
- 3- The Director Health Services FATA, FATA Secretariat, Warsak Road, Peshawar
- 4- The Agency Surgeon Bajaur Agency.
- 5- The Medical Superintendent Agency Headquarter Hospital, Bajaur Agency

..... Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF PAKISTAN 1973 AS AMENDED UP TO
DATE**

PRAYER:

That on acceptance of this writ petition the inaction of the respondents by not promoting the petitioner to the post of Junior Clerk (BPS-11) may be declared as illegal, unconstitutional and ineffective upon the rights of petitioner. That the respondents may very kindly be directed to consider the petitioner for promotion to the post of Junior Clerk (BPS-11) under the 33% quota reserved for class-IV employees. Any other remedy which this august Court deems fit that may also be awarded in favor of the petitioner.

R/SHEWETH:
ON FACT:-

ATTESTED
EXAMINER
Peshawar High Court

- 1- That the petitioner was appointed as Naib Qasid (BPS-2) in the respondent Department vide order dated 21-8-2003. That after appointment till date the petitioner performed his duty quite efficiently and upto the entire satisfaction of his superiors. Copies of CNIC and Domicile are attached as annexure A & B.

- 2- That petitioner is serving the respondent Department as Naib Qasid since 2003 and has the qualification of B.A. That according to the seniority list of class-iv employees the petitioner is at serial No.1 of the seniority list. That according to rules the petitioner is entitle for promotion to the post of junior clerk under the 33% quota but the respondents are not willing to do the same. Copies of the Educational testimonials, seniority list and Notification are attached as Annexure **C, D & E.**

- 3- That petitioner filed Departmental appeal before the respondent No.3 for promotion to the post of Junior clerk BPS-9 in the light of above mentioned 33% quota reserved for the class-iv employees but in response has been received so far. Copies of the list & departmental appeal are attached as Annexure **F & G.**

- 4- That feeling aggrieved and having no other remedy the petitioner filed this writ petition on the following grounds amongst the others.

GROUND:

- A- That not promoting the petitioner to the post of junior clerk (BPS-09) by the respondents inspite of eligibility and seniority is against the law, facts and norms of natural justice.

- B- That the petitioner has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the respondent Department acted in arbitrary and malafide manner by not promoting the petitioner to the post of junior clerk (BPS-9) despite of having eligibility and the seniority.

- D- That according to the service structure and promotion orders already issued by the respondent No.3 the petitioner is fully entitled to be promoted to the post of junior clerk (BPS-09).

- E- That petitioner is at the top of the seniority list of class-4 employees working at the office of the respondent No.4, therefore the petitioner has the right to be promoted to the post of junior clerk (BPS-9) under the 33% quota reserved for class-iv employees.

ATTESTED
EXAMINER
Peshawar High Court

11/05/2014

31

F- The petitioner seeks the permission to advance other grounds and proofs at the time of hearing.

It is therefore humbly prayed that the writ petition of the petitioner may be accepted as prayed for.

Interim relief:

That the respondents may kindly be restrained from appointment against the post of Junior Clerk (BPS-9) till the disposal of the instant writ petition.

PETITIONER


MUHAMMAD HAKIM

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

VERIFICATION:


It is verified that no other earlier writ petition was filed between the parties.


DEPONENT

LIST OF BOOKS:

1. CONSTITUTION OF PAKISTAN.
2. SERVICES LAWS BOOK.
3. ANY OTHER CASE LAW AS PER NEED.

ATTESTED


ATTESTED
EXAMINER
Peshawar High Court

32

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

WRIT PETITION NO _____/2018

MUHAMMAD HAKIM VS A.C.S FATA & OTHERS

AFFIDAVIT

I Muhammad Hakim S/O Noor Hakim Khan R/O Ali Zai, P/O Khar, Shanki, Tehsil Khar Bajaur, Bajaur Agency, do hereby solemnly affirm that the contents of this writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**MUHAMMAD HAKIM
(PETITIONER)
CNIC NO. 21103-2881108-9**

IDENTIFIED BY:
NOOR MOHAMMAD KHATTAK
ADVOCATE, HIGH COURT,
PESHAWAR

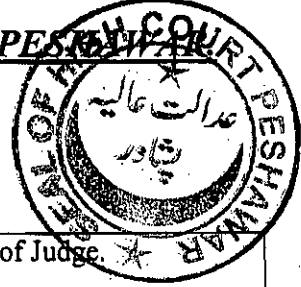
23202
Certified that the above was verified on solemnly affirmation before me in office, this 21st day of May 18 by Muhammad Hakim s/o Noor Hakim Bajaur, Peshawar who was identified by Noor M. Khattak Who is personally known to me:
Commissioner Peshawar High Court 21/5/18

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 177 of
The Constitution of Pakistan Order 1973
25 MAR 2019
RECORDED

H-34

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order/ Proceedings	Order or other Proceedings with Signature of Judge.
<u>19/03/2019</u>	<p><u>WP No. 2749-P/2018</u></p> <p><u>Present:</u> Mr. Noor Muhammad Khattak, Advocate, for the petitioner.</p> <p>Syed Qaiser Ali Shah, AAG, for the respondents.</p> <p>==</p> <p><u>WAQAR AHMAD SETH, CJ.-</u> Through the instant Writ Petition, petitioner has prayed for issuance of an appropriate writ in the following manner:-</p> <p><i>“That on acceptance of this writ petition the inaction of the respondents by not promoting the petitioner to the post of Junior Clerk (BPS-11) may be declared as illegal, unconstitutional and ineffective upon the rights of petitioner. That the respondents may very kindly be directed to consider the petitioner for promotion to the post of Junior Clerk (BPS-11) under the 33% quota reserved for class-IV employees. Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioner”.</i></p> <p>2. Arguments of learned counsel for the parties heard at length. At page-31 of the Writ Petition, the petitioner has filed departmental appeal before respondent No.3 for redressal of grievance and the same is still pending, therefore, without</p>

ATTESTED
EXAMINER
Peshawar High Court

35

touching the merits of the case, we direct respondent No.3 to decide the departmental appeal of the petitioner within a month positively.

3. Writ Petition stands disposed of accordingly.

Chief Justice

Judge

CERTIFIED TO BE TRUE COPY

EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 67 of
The Qanun-e-Shahadat Order 1984

25 MAR 2019

NO..... 12313

Date of Presentation of Application..... 25/3/19

No of Pages..... 87

Copying Fee.....

Urgent Fee.....

Total..... 2412

Date of Preparation of Copy..... 25/3/19

Date of Delivery of Copy..... 25/3/19

Received By..... Amir Ahsan

ATTESTED

ATTESTED
EXAMINER
Peshawar High Court

IX

NURSING SCHOOL KHAR BAJAUR AGENCY

#	Designation	BPS	Posts sanctioned
1	Principal	18	1
2	Vice Principal	17	1
3	Nursing Tutor	17	3
4	Computer Operator	16	1
5	Senior Clerk	14	1
6	House Keeper	12	1
7	Junior Clerk	11	1
8	Driver	6	2
9	Naib Qasid	3	4
10	Chowkidar	3	2
11	Cook	3	1
12	Bearer	3	2
13	Sweeper	3	2
	Total		22

2. The expenditure involved shall be debitable to the major Head 07-Health, 073-Hospital Services, 0731-General Hospital Services, 073101-General Hospital Services under DDO Code PR0049, and shall be met out within the sanctioned Budget Grant under Demand No.99-FATA in the current financial year 2017-18, subject to observance of all codal formalities under intimation to Finance Department FATA, Secretariat and Additional Accountant General Pakistan Revenues, Sub Office, Peshawar.

Yours faithfully,

Sadia Asghar
(Sadia Asghar)

Section Officer (FATA-II)

Copy forwarded to the- 2478-37

1. Secretary Social Services Department, FATA
2. Secretary A,I&C Department, FATA
3. Director Health Services (FATA)

for information and necessary action.

4. PS to Additional Chief Secretary, FATA
5. PS to Secretary Finance, FATA

for information.

Sadia Asghar
(Sadia Asghar)

Section Officer (FATA-II)

Government of Pakistan
Finance Division
FA's (FATA) Organization
Peshawar

Encls. No. SO.F-II/FD/FA/SNE/Vol-XI

Dated 06.02.2018

Endorsed to-

1. The Additional Finance Secretary (Exp), Finance Division, Govt of Pakistan, Islamabad
2. The FA (SAFRON Division), Government of Pakistan, Islamabad
3. AGPR Islamabad
4. AGPR Sub office Peshawar

M. Sulaiman Khan
(M. Sulaiman Khan)

Deputy Financial Advisor, FATA

Authority: DEA (SAFRON), Finance Division, Govt of Pakistan, Islamabad
U.O No.5(1)/2012-DEA (SAFRON)/556, dated 21.11.2017.

6
ACCEPTED



**DIRECTORATE GENERAL HEALTH
SERVICES GOVT: OF KHYBER
PUKHTUNKHWA PESHAWAR**

37

OFFICE ORDER

Consequent upon approval accorded by the Departmental Promotion Committee in its meeting held on 29.03.2019, under the Chairmanship of the DGHS Khyber Pakhtunkhwa Health Department Peshawar, the following senior most Junior Clerks of sub cadre of Health Department are hereby promoted to the post of Senior Clerk (BPS-14).

S.#	Name Of Official
1.	Ajmal Khan S/O Muhammad Afzal
2.	Amjad Ali S/O Abdur Rasheed
3.	Shakir Ullah
4.	Iftiraz Gul
5.	Aurangzeb Qureshi S/O Abdu Salam
6.	Muhammad Azam S/O Muhammad Hitab
7.	Jamshad Ali S/O Ameer ul Mulk
8.	Ali Zaman S/O Gul Re khan
9.	Mehmood Haroon S/O Muhammad Baseer Khan
10.	Sana Ullah Jan
11.	Abdul Hamid Khan
12.	Abdul Salam S/O Abdul Hayee
13.	Said Rahim S/O Muhibullah Khan
14.	Rashid Ali S/O Noor-ul-Huda
15.	Abdul Malik S/O Sher Zaman Khan
16.	Kamal Amar Baig S/O Uz Baig
17.	Shakeel Ahmad S/O Muhammad Amin
18.	Sardar Muhammad Waseem S/O Muhammad Ilyas
19.	Tahir Ali S/O Khair Din
20.	Hidayatullah S/O Muhammad Arif Khan
21.	Abdur Rahim S/O Haidar Khan
22.	Muhammad Javed S/O Sultan Muhammad
23.	Muhammad Maqsood S/O Ali Hussain
24.	Muhammad Riaz
25.	Arsahd Mehmood
26.	Anwar Iqbal S/O Qaimat Gul
27.	Haroon Ahmad S/O Ibni Amin Khan
28.	Sharif Khan S/O Abdul Zaman
29.	Muhammad Shoukat S/O Faqir Muhammad
30.	Syed Wajid Hussain
31.	Aslam Noor S/O Muhammad Ameer
32.	Nazeer Hussain S/O Shabir Hussain
33.	Muhammad Atif S/O M Yousaf Akhonzada
34.	Pervez Akhtar Afridi
35.	Abdul waheed S/O Muhammad Saeed
36.	Feroz Khan
37.	Zahidullah
38.	Sher Wali
39.	Fazal Amin S/O Khuna
40.	Asad Parvaiz
41.	Rashid Ali
42.	Said Nawaz Khan S/O Malak Baz Khan
43.	Gohar Ali S/O Noor Ul Huda
44.	Hamayun S/O Ameer Hamza
45.	Liaqat Ali
46.	Muhammad Sulaiman Ul Mulk S/O Saiful Mulk
47.	Nasir Ahmad
48.	Nisar Muhammad
49.	Imtiaz Ahmad
50.	Waheed S/O Sain Muhammad
51.	Hussain Ahmad S/O Sher Goli Khan
52.	Riaz Khan S/O Muhammad Hanif
53.	Muhay-ud-Din S/O Mujahid Din
54.	Abdul Karim S/O Qalander

APPROVED

55.	Aftabul Muks/O Nadir shah Jahan
56.	Muhammad Ajmal
57.	Ali Imran
58.	Malik Imran S/O Malik Fazal ur Rehman
59.	Sareer Ahmad S/O Zanjeer Khan
60.	Muhammad Daud S/O Muhammad Yaqoob
61.	Muhammad Shoaib S/O Ghulam Haider.
62.	Amjad Ali S/O Abdul Haleem
63.	Muhammad Israr
64.	Said Ahmad S/O Said Akbar Khan.
65.	Muhammad Yousaf Jamal
66.	Khana Dan
67.	Wali Khan
68.	Munawar Khan
69.	Bahadar Sher S/O Lal Din
70.	Fazli Rabbi
71.	Khurshed Ahmad S/O Abdul Karim
72.	Muhammad Raza
73.	Tanq Nazim
74.	Naeemullah
75.	Fayaz Ahmad S/O Mumtaz Khan
76.	Zahid Ali S/O Abbas Ali
77.	Javed Masah
78.	Naveed Saqib S/O Qalander Khan
79.	Akram Khan
80.	Faheem Khan S/O Mir Madal Khan
81.	Syed Tahir Hussain S/O Syed Ibrahim Shah
82.	Nooran Zaib
83.	Nazeer ul Haq
84.	Tanq Ahmad S/O Noor Ahmad
85.	Jamal Shah S/O Faqir Gul
86.	Akhtar Nawaz Khan
87.	Sher Akbar S/O Rahim ullah
88.	Shaukat Hussain
89.	Muhammad Ayaz Khan
90.	Aurangzeb S/O Muhammad Zaman
91.	Abdul Jamil S/O Mir Qamat Khan
92.	Saleem Iqbal
93.	Niaz Muhammad
94.	Mumtaz Ali Khan S/O Mir Zali Khan
95.	Muhammad Ilyas

38

Consequent upon their promotion to the post of Senior Clerk (BPS-14) they are hereby transferred and posted against the vacant posts are as under:-

S#	Name of officers	From	To	Remarks
1.	Ajmal Khan	DHO Mansehra	DHO Office Mansehra	Against the vacant post
2.	Amjad Ali	DHQ Hosp: Mardan	DHQ Hosp: Mardan	-do-
3.	Shakir Ullah	KTH Peshawar	KMC Peshawar	-do-
4.	Ifiraz Gul	DHO Mardan	DHO Mardan	-do-
5.	Aurangzeb Qureshi S/O Abdu Salam	DHO Kohat	DHO Kohat	-do-
6.	Muhammad Azam S/O Muhammad Hitab	DHO Chitral	DHO Hospital Chitral	-do-
7.	Jamshed Ali S/O Ameer ul Mulk	DHO Charsadda	DHQ Hosp: Mardan	-do-
8.	Ali Zaman S/O Gul Re khan	W & C Hospital Karak	DHO Karak	-do-
9.	Mehmood Haroon S/O Muhammad Baseer Khan	W&C/ LMH Kohat	DHQ/ KDA Kohat	-do-
10.	Sana Ullah Jan	W & C Hospital Bannu	KGN Bannu	-do-
11.	Abdul Hamid Khan	DHQT Hospital DI Khan.	DHQT Hospital DI Khan.	-do-
12.	Abdul Salam S/O Abdul Hayee	DHO Mansehra	DHS Merged Areas Peshawar	-do-
13.	Said Rahim	DHO Dir Lower	DHO Lower Dir	-do-

39

14.	Rashid Ali S/O Noor-ul-Huda	DHO Swat	DHO Swat	-do-
15.	Abdul Malik	DHQ Hospital Timergara	DHO Dir Lower	-do-
16.	Kamal Amar Baig	DHO Abbottabad	DHO Kohistan Lower	-do-
17.	Shakeel Ahmad S/O Muhammad Amin	BBS Teaching Hospital Abbottabad	DHS Merged Areas Peshawar	-do-
18.	Sardar Muhammad Waseem	BBS Teaching Hospital Abbottabad	BBS Teaching Hospital Abbottabad	-do-
19.	Tahir Ali S/O Khair Din	BBS Teaching Hospital Abbottabad	DHS Merged Areas Peshawar	-do-
20.	Hidayatullah	DHO Swat	DHO Swat	-do-
21.	Abdur Rahim	MMC Mardan	MMC Mardan	-do-
22.	Muhammad Javed	KATH Mansehra	DHS Merged Areas Peshawar	-do-
23.	Muhammad Maqsood	BBS Teaching Hospital Abbottabad	BBS Teaching Hospital Abbottabad	-do-
24.	Muhammad Riaz	Govt. Mental & General Dadar	DHO Swabi	-do-
25.	Arshad Mehmood	DHO Abbottabad	DHO Abbottabad	-do-
26.	Anwar Iqbal S/O Qaimat Gul	DHO Swat	DHO Swat	-do-
27.	Haroon Ahmad S/O Ibni Amin Khan	DHO Swat	DHO Swat	-do-
28.	Sharif Khan S/O Abdul Zaman	DHO Charsadda	DHS Merged Areas Peshawar	-do-
29.	Muhammad Shoukat S/O Faqir Muhammad	King Abdullah Teaching Hospital Mansehra	DHO Kohistan Lower	-do-
30.	Syed Wajid Hussain	General & Mental Hospital Dadar	DHQ Hospital Haripur	-do-
31.	Aslam Noor S/O Muhammad Ameer	DHS Merged Areas	DHS Merged Areas Peshawar	-do-
32.	Nazeer Hussain S/O Shabir Hussain	Agency Surgeon Kurram Agency	DHS Merged Areas Peshawar	-do-
33.	Muhammad Atif S/O M Yousaf Akhonzada	DHO Mansehra	DHO Swabi	-do-
34.	Pervez Akhtar Afridi	DHO Peshawar.	Sarhad Hospital for Psychiatric Diseases Peshawar	-do-
35.	Abdul waheed S/O Muhammad Saeed	DHO Mansehra	DHO Battagram	-do-
36.	Feroz Khan	DHO Mardan	DHO Mardan	-do-
37.	Zahidullah	MMC Mardan	DHO Mardan	-do-
38.	Sher Wali	NBMH Peshawar	NBMH Peshawar	-do-
39.	Fazal Amin S/O Khuna	DHO Swat	DHS Merged Areas Peshawar	-do-
40.	Asad Parvaiz	LRH Peshawar	DHS Merged Areas Peshawar	-do-
41.	Rashid Ali	SMC Swat.	SMC Swat	-do-
42.	Said Nawaz Khan S/O Malak Baz Khan	DHO Malakand	DHO Malakand	-do-
43.	Gohar Ali S/O Noor Ul Huda	STH Swat	SMC Swat	-do-
44.	Hamayun S/O Ameer Hamza	DHO D.I Khan	DHO DIKhan	-do-
45.	Liaqat Ali	SMC Swat	DHO Shangla	-do-
46.	Muhammad Sulaiman Ul Mulik S/O Saiful Mulik	DHO Chitral	DHS Merged Areas Peshawar	-do-
47.	Nasir Ahmad	DHO Chitral	DHQ Hospital Timergara	-do-

40

48.	Nisar Muhammad	Maternity Hospital Peshawar	Maternity Hospital Peshawar	-do-
49.	Imtiaz Ahmad	DHO Abbottabad	DHO Abbottabad	-do-
50.	Waheed S/O Sain Muhammad	DTO Office Mansehra	GKMC Swabi	-do-
51.	Hussain Ahmad S/O Sher Goli Khan	DHO Chitral	GKMC Swabi	-do-
52.	Riaz Khan	NBM Hospital Peshawar	DHS Merged Areas Peshawar	-do-
53.	Muhay-ud-Din S/O Mujahid Din	DHO Chitral	DHO Chitral	-do-
54.	Abdul Karim S/O Qalander	SGTH Swat	SGTH Swat	-do-
55.	Aftabul Mulks/O Nadir Shah Jahan	DHO Hospital Chitral	DHO Hospital Chitral	-do-
56.	Muhammad Ajmal	KATH Mansehra	KATH Mansehra	-do-
57.	Ali Imran	DHO Abbottabad	DHS Merged Areas	-do-
58.	Malik Imran	KATH Mansehra	KATH Mansehra	-do-
59.	Sareer Ahmad S/O Zanjeer Khan	LRH Peshawar	DHS Merged Areas Peshawar	-do-
60.	Muhammad Daud S/O Muhammad Yaqoob	KATH Mansehra	DHO Mansehra	-do-
61.	Muhammad Shoaib S/O Ghulam Haider.	Agency Surgeon Bajour Agency.	DHS Merged Areas Peshawar	-do-
62.	Amjid Ali S/O Abdul Haleem	KTH Peshawar	KTH Peshawar	-do-
63.	Muhammad Israr	DHO Peshawar	DHO Peshawar	-do-
64.	Said Ahmad S/O Said Akbar Khan.	Agency Surgeon Bajour Agency	DHS Merged Areas Peshawar	-do-
65.	Muhammad Yousaf Jamal	LRH Peshawar	DHS Merged Areas Peshawar	-do-
66.	Khana Dan	Agency Surgeon Landi Kotal	DHS Merged Areas Peshawar	-do-
67.	Wali Khan	DHS FATA	DHO Kohat	-do-
68.	Munawar Khan	Agency Surgeon Orakzai	DHS Merged Areas Peshawar	-do-
69.	Bahadar Sher S/O Lal Din	DHO Kohat	DHO Kohat	-do-
70.	Fazli Rabbi	DHO Hospital Mohmand	DHS Merged Areas Peshawar	-do-
71.	Khurshed Ahmad S/O Abdul Karim	DHO Swat	DHO Swabi	-do-
72.	Tariq Nazim	LRH Peshawar	DHS Merged Areas Peshawar	-do-
73.	Naeemullah	DHO Mardan	DHO Hospital Mardan	-do-
74.	Fayaz Ahmad S/O Mumtaz Khan	PGMI Peshawar	DHO Swabi	-do-
75.	Zahid Ali S/O Abbas Ali	DHO Hosp. Mardan	DHO Mardan	-do-
76.	Javed Maseh	PGMI Peshawar	DHS Merged Areas Peshawar	-do-
77.	Naveed Saqib S/O Qalander Khan	DHO Mansehra	DTO Mansehra	-do-
78.	Akram Khan	Agency Surgeon Orakzai	DHS Merged Areas Peshawar	-do-
79.	Faheem Khan S/O Mir Madat Khan	DHO Bannu	DHO Bannu	-do-
80.	Syed Tahir Hussain S/O Syed Ibrahim Shah	LRH Peshawar	DHS Merged Areas Peshawar	-do-
81.	Nooran Zaib	TBC Agency Surgeon Bajaur	DHS Merged Areas Peshawar	-do-
82.	Nazeer ul Haq	KMC Peshawar	KMC Peshawar	-do-
83.	Tariq Ahmad S/O Noor Ahmad	BBS Teaching Hospital Abbottabad	DHS Merged Areas Peshawar	-do-
84.	Jamal Shah S/O Faqir Gul	LRH Peshawar	DHS Merged Areas Peshawar	-do-

RECEIVED
 15/11/2018
 15/11/2018

(41)

85.	Akhtar Nawaz Khan	DHO Mansehra	DHS Merged Areas	-do-
86.	Sher Akbar S/O Rahim ullah	DHQ Hospital Charsadda	DHQ Hospital Charsadda	-dc-
87.	Shaukat Hussain	TBC Khyber Agency	DHS Merged Areas Peshawar	-do-
88.	Muhammad Ayaz Khan	Agency Surgeon Mohmand	DHS Merged Areas Peshawar	-do-
89.	Aurangzeb S/O Muhammad Zaman	BBS Teaching Hospital Abbottabad	DHS Merged Areas Peshawar	-do-
90.	Abdul Jamil S/O Mir Qamat Khan	Khalifa Gul Nawaz Teaching Hosp: Bannu	Khalifa Gul Nawaz Teaching Hosp: Bannu	-do-
91.	Abdul Jamil	Khalifa Gul Nawaz Teaching Hosp: Bannu	Khalifa Gul Nawaz Teaching Hosp: Bannu	-do-
92.	Saleem Iqbal	PGMI Peshawar	DHS Merged Areas Peshawar	-do-
93.	Niaz Muhammad	DHO Karak	DHO Hospital Karak	-do-
94.	Mumtaz Ali Khan S/O Mir Zali Khan	DHO Karak	DHO Karak	-do-
95.	Muhammad Ilyas	AHQH: Miranshah	DHS Merged Areas Peshawar	-do-
96.	Mr. Muhammad Asfandyar Junior Clerk working against the post of Senior Clerk	Sarhad Hospital Psychiatric Diseases Peshawar	DHO Office Peshawar	Vice S.No.63

Arrival/ departure report should be submitted to this Directorate for record.

Sd/xxxxxxxx

DIRECTOR GENERAL HEALTH SERVICES, K.P.K, PESHAWAR.

Dated : 19/04/2019.

No: 3445-2648 /Personnel/Promotion

Copy forwarded to the:-

1. Secretary to Govt: of Khyber Pakhtunkhwa Health Department Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Health Service Merged Areas Peshawar.
4. Dean PGMI Peshawar.
5. Dean KMC Peshawar.
6. All Principals Medical Colleges in Khyber Pakhtunkhwa.
7. All Hospital Directors MTIs Khyber Pakhtunkhwa.
8. All District Health Officers in Khyber Pakhtunkhwa
9. All Medical Superintendents DHQ/ Teaching Hospitals in Khyber Pakhtunkhwa.
10. MS Govt: Naseerullah Khan Babar Memorial Hospital Peshawar
11. MS Services Hospital Peshawar.
12. MS Moulvi Ameer Shah Memorial Hospital Peshawar.
13. MS Sarhad Hospital for Psychiatric Diseases Peshawar.
14. MS Mental & General Hospital Dadar Mansehra.
15. All District Account Officers in Khyber Pakhtunkhwa.
16. PA to DGHS, Khyber Pakhtunkhwa Peshawar.
17. DA Concerned.
18. Officials concerned.

For information and necessary action.

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.

ATTENDED

VAKALATNAMA

Before the KP Service Tribunal, Peshawar

No. _____/2019

Muhammad Hakim

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Govt. of KP & Others

(RESPONDENT)
(DEFENDANT)

I/We *Muhammad Hakim*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2019

M. Hakim

CLIENT

N. M. Khattak

ACCEPTED
NOOR MOHAMMAD KHATTAK

Sh. Yousafzai

SHAHZULLAH KHAN YOUSAFZAI

M. Zaman Safi

MIR ZAMAN SAFI
ADVOCATES

OFFICE:

Room No. 1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391