

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

C. M. No _____ 2024

In

Service Appeal No 2015/2022

Dr. Noor Khan.....**Appellant/Applicant**

VERSUS

Govt. & Others.....**Respondents**

INDEX

S.no	Description of documents	Annexure	Page
1.	Application With Affidavit		1-2
2.	Copy of Notification dated 08-05-2019		3-7

Dated: 28-03-2024


Appellant

Through 

Fazal Shah Mohmand

Advocate,

Supreme Court of Pakistan

19-04-2024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

C. M. No _____ 2024

In

Service Appeal No 2015/2022

Dr. Noor Khan.....**Appellant/Applicant**

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 11960
Dated 28/3/24

VERSUS

- 1. Govt. Of Khyber Pakhtunkhwa through chief secretary,
Civil Secretariat Peshawar**
- 2. Govt. of Khyber Pakhtunkhwa through Secretary Health
Department Peshawar.**
- 3. Director General Health Services Govt. Of Khyber
Pakhtunkhwa Peshawar.**

.....**Respondents**

**Application on behalf of the appellant for placing on record,
copy of Notification dated 08-05-2019, which may be read as
part and parcel of captioned Service Appeal.**

Respectfully Submitted:-

- 1.** That the above titled Service Appeal is pending before this honorable Tribunal which is fixed for 19-04-2024.
- 2.** That the annexed documents are very essential for the just decision of the case and directions to such effect was also issued by this honorable Tribunal, the documents are as follows:-

I. Copy of Notification dated 08-05-2019

- 3.** That the above documents would show that juniors to the appellant were promoted, denying such right to the appellant for no omission or commission on his part.

It is therefore prayed, that on acceptance of this application, the appellant may please be allowed to submit/file the annexed documents before this honorable Tribunal and be read as part and parcel of the captioned Service Appeal and may be treated accordingly.

Dated:- 28-03-2024

Appellant

Through

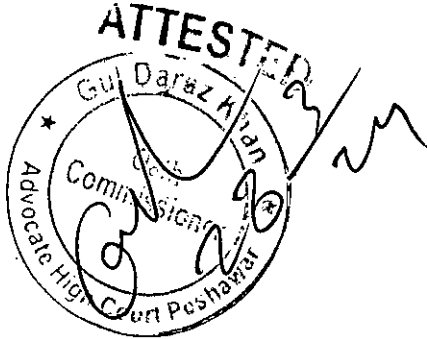
Fazal Shah Mohmand

Advocate,

Supreme Court of Pakistan

AFFIDAVIT

I, Dr Muhammad Noor Khan, Senior Medical Officer (BPS-18), Retired), (the Appellant), do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

3

Dated Peshawar, the 8th May, 2019

NOTIFICATION

NO.SOH(E-VI4-22/2019 The Government of Khyber Pakhtunkhwa on the recommendations of the Provincial Selection Board is pleased to promote the following Senior Medical Officers BS-18 to the post of Principal Medical Officers BS-19 on regular basis with immediate effect:-

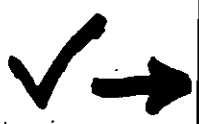
S.NO	Name of Doctor	S.NO.	Name of Doctor
1	Dr.Nayyar Halimi D/O Tanzeemul Haq	21	Dr.Arsale Khan S/O Chakhal Khan
2	Dr.Muhammad Younis Nadeem S/O Sikandar Khan	22	Dr. Hiaz Muhammad S/O Yar Muhammad
3	Dr.Muhammad Saddiq S/O Saeedullah Jan	23	Dr.Muhammad Anwar S/O Fazal Muhammad
4	Dr. Siver Zaman S/O Haji Sherin Khan	24	Dr.Riaz Mehmood Khan S/O Raza Khan
5	Dr.Masood-uz-Zaman S/O Ali Zaman	25	Dr.Bashir Ahmad S/O Shamsur Rehman
6	Dr.Farida Muhaiddin D/O Taj Ali	26	Dr.Salim Abbas S/O Ihsanullah
7	Dr.Zubaida Khanum D/O Jymna Khan	27	Dr.Muhammad Qamar S/O Firdous
8	Dr.Farzana Ayub D/O Sahibzada Muhammad Ayub	28	Dr.Akbar Khan S/O Fazal Manan
9	Dr.Najma Sultana D/O	29	Dr.Muhammad Yousaf S/O Muhammad Shariq
10	Dr.Abdur Rehman S/O Akbar Jan	30	Dr.Nasirullah S/O Rehmani Gul
11	Dr.Iqbal Jan D/O Muhammad Yaqoob	31	Dr.Fazli Raziq Khan S/O Fazia Khalq Khan
12	Dr.Sultan Bibi D/O Muhammad Zahir Shah	32	Dr.Fida Hussain S/O Khan Saddique
13	Dr.Muhammad Younas s/o Haji Subhan	33	Dr.Mukhlis Raza Ayub S/O Muhammad Ali Ayub
14	Dr.Zulfqar Ali S/O Shukat Ali	34	Dr.Faheem Shah Roghani S/O Manfal Shah
15	Dr.Rashid Hassan Khan S/O Amanullah Khan	35	Dr.Muhammad Nadeem S/O Haji Khan
16	Dr.Noor Muhammad S/O Palawan Khan	36	Dr.Rahman Gul S/O Haji Noor Gul
17	Dr.Ijaz Hussain Zaidi S/O M.Mehmood Zaidi	37	Dr.Saeed Ahmad S/O Habib Ahmad
18	Dr.Muhammad Saleem S/O Muhammad Ameen	38	Dr.Feroz Shah S/O Rahim Shah
19	Dr.Abdul Mujeeb S/O Abdul Waheed	39	Dr.Ambreen Wali D/O Abdul Wali
20	Dr.Iqbal Hussain S/O Musafar Khan	40	Dr.Waseem Kashif S/O Sahibzada Saad Johar

4

54%

10/10/20

S.NO	Name of Doctor	S.NO	Name of Doctor
41	Dr. Shakir Ali S/O Ghulam Muhammad	68	Dr. Tilawat Shah s/o Muhammad Akbar
42	Dr. Akhtar Ali Shah S/O Muzzaln Shah	69	Dr. Munawar Khan S/O Gul Zaman
43	Dr. Sanaulah Khan S/O Inayatullah Khan	70	Sr Saifur Rehman S/O Abdul Basir Khan
44	Dr. Farhad Badshah S/O Mian Mehtab Khan	71	Dr. Muhammad Ayub Masood S/O Midullah Khan
45	Dr. Arif Mehmood S/O Malik Rubnawaz Khan	72	Dr. Altaruddin S/O Abdul Kabir Bacha
46	Dr. Aminullah S/O Shera Jan	73	Dr. Abdul Hameed Afridi S/O Shughul
47	Dr. Sajjad Ali S/O Amir Nawaz	74	Dr. Hameedur Rehman S/O Habibur Rehman
48	Dr. Abdul Janan S/O Haji Gul Akbar	75	Dr. Abdul Malik S/O FHaji Mozar Khan
49	Dr. Muhammad Ayaz S/O Fazle Karim	76	Dr. Sher Muhammad S/O Haji Gul Muhammad
50	Dr. Sabir Muhammad S/O Muhammad Khan	77	Dr. Ihsanul Haq S/O Gulab Khan
51	Dr. Zahid Ashraf S/O Ashraf Hussain	78	Dr. Mumtaz Hussain S/O Sultan Hassan
52	Dr. Muhammad Shamim Khan S/O Muhammad Nadir Khan	79	Dr. Rahatullah S/O Pir Muhammad Tayeeb
53	Dr. Muhammad Akmal S/O Muniaat	80	Dr. Altafuddin S/O Amir Khan
54	Dr. Muhammad Anam S/O Muhammad Aslam	81	Dr. Amir Hamza S/O Said Faqir
55	Dr. Muhammad Jamal S/O Abdullah	81	Dr. Hidayatullah S/O Haider
56	Dr. Muhammad Haroon S/O Jan Muhammad	83	Dr. Zahir Shah S/O Aqeel Khan
57	Dr. Shabir Ahmad S/O Yaqoob Khan	84	Dr. Abdus Samad Khan S/O Haji Jamaldar Khan
58	Dr. Shahidullah Afridi S/O Noorullah Afridi	85	Dr. Hanif Khan S/O Sahbal Khan
59	Dr. Zafarullah S/O Gul Bahram Khan	86	Dr. Shah Alam S/O Muhammad Shaheer Khan
60	Dr. Muhammad Jamshed Khan S/O Dilshad Khan	87	Dr. Omparkash S/O Ishar Das
61	Dr. Muhammad Tahir Saeed Khan S/O Muhammad Afzal Khan	88	Dr. Mian Syed Dost S/O Mian Said Qamar
62	Dr. Habib Gul S/O Misri Khan	89	Dr. Nisar Ahmad S/O Sher Muhammad
63	Dr. Sher Ali Khan S/O Sher Gul Khan	90	Dr. Naseer Ahmad Khalil S/O Jan Muhammad Khalil
64	Dr. Asad Jehangir S/O Jehangir Khan Awan	91	Dr. Rawish Mohmand S/O Ahmad Jan
65	Dr. Qaisar Zaman S/O Khilab Gul	92	Dr. Shuja Ahmad S/O Shaukat Ali
66	Dr. Qazi Rafuddin S/O Qazi Nihaluddin	93	Dr. Toj Muhammad S/O Jan Muhammad
67	Dr. Imaq Shah S/O Hamidullah Shah	94	Dr. Ibrahim Iqbal S/O Saleh Khan



ATTESIA

5

S NO	Name of Doctor S/O	S.NO	Name of Doctor
95	Dr. Saadullah Khan S/O Muhammad Ayub Khan	119	Dr. Sajjad Ahmad S/O Waheedullah
96	Dr. Rabia Meher (Waheed) D/O Meher DJ Khan	120	Dr. Zahir Shah S/O Serwar Khan
97	Dr. Haroon Nasir Khattak S/O Rub Nawaz	121	Dr. Mumnoon Elahi S/O Muhammad Khurshid
98	Dr. Fazal Rehman S/O Muhammad Amir Khan	122	Dr. Noor Muhammad Khan S/O Shahmul Khan
99	Dr. Yousaf Khan S/O Sald Rehman	123	Dr. Muhammad Karim S/O Samiullah Khan
100	Dr. Hamidullah S/O Muhammad Saleem	124	Dr. Shahab Khan S/O Wali Khan
101	Dr. Mustafa S/O Haji Bahramand.	125	Dr. Muhammad Shahzwan S/O Muhammad Namzeb
102	Dr. Nazir Ahmad Khalil S/O Jan Muhammad	126	Dr. Azizur Rehman S/O Shah Tareen
103	Dr. Rizwanullah S/O Amrullah Khan	127	Dr. Misbahul Haq S/O Israruddin
104	Dr. Zaffar Iqbal S/O Muhammad Anin	128	Dr. Rafiullah S/O Areeba Jan
105	Dr. Abdul Hameed Khan S/O Abdul Majeed Khan	129	Dr. Muhammad Tariq S/O Wazir Jung
106	Dr. Amjad Ali Shah S/O Mian Muhammad Ali Shah	130	Dr. Akram Khan S/O Arbab Khan
107	Dr. Rafiullah S/O Haji Khanzada	131	Dr. Ijaz Akbar S/O Mir Akbar
108	Dr. Ali Shah S/O Fazle Ghafoor	132	Dr. Muhammad Ayub Khan S/O Badshah Gul
109	Dr. Shabir Ahmad S/O Juma Khan	133	Dr. Sharifullah S/O Muhammad Zaman Khan
110	Dr. Masood Jalaj S/O Khushim Khan	134	Dr. Muhammad Hasham S/O Ghulam Habib
111	Dr. Habibullah Khan S/O Hameedullah Khan	135	Dr. Umar Zada S/O Zer Noor
112	Dr. Muhammad Zahid S/O Qaiser Ahmad	136	Dr. Syed Muhammad Tariq Shah S/O Ghulam Mustafa Shah
113	Dr. Imtiaz Ahmad S/O Fazle Karim	137	Dr. Meraj Gul S/O Sohail Din
114	Dr. Shabir Ahmad S/O Gulistan Khan	138	Dr. Fazal Rehman S/O Gul Sheikh
115	Dr. Anwar Saad S/O Noor Muhammad	139	Dr. Izzal Khan S/O Rasool Jan
116	Dr. Fazal Subhan S/O Ghulam Nabi	140	Dr. Habibullah Jan S/O Mir Abdullah
117	Dr. Spin Gul S/O Haji Lalbaz	141	Dr. Yasin Muhammad S/O Syed Atzal
118	Dr. Zaffar Ali Shah S/O Syed Badshah	142	Dr. Fida Hussain S/O Haji Khyal Hussain

Handwritten Signature
ATTESTED

6

5

S.NO	Name of Doctor	S.NO.	Name of Doctor
143	Dr.Muhammad Gul S/O Rehmat Gul	170	Dr.Sawab Gul S/O Badshah Gul
144	Dr.Mazhar Hayat S/O Malik Hazrat Mir	171	Dr.Rab Nawaz Khan Afridi S/O Haji Sald Jan
145	Dr.Badshah Jan S/O Muhammad Jan	172	Dr.Sejida Yaqoob D/O Muhammad Yaqoob
146	Dr.Mohsin Ali Shah S/O Ahmad Shah	173	Dr.Syed Anwar Hussain S/O Noor Syed Man
147	Dr.Muhammad Iqbal S/O Syed Pacha	174	Dr.Syeda Shahnaz Jabeen D/O Israrullah Shah
148	Dr.Khurshid Alam S/O Jan Akbar	175	Dr.Sultan-un Nisa D/O Haji Mohabat Khan
149	Dr.Fazal Gul S/O Haji Mousa Khan	176	Dr.Nasreen Haider D/O Haider Khan
150	Dr.Taj Gul S/O Amin Gul	177	Dr.Inayatur Rehman S/O Mani Khan
151	Dr.Gohar Zaman S/O Muhammad Zaman	178	Dr.Nawab Ali S/O Sher Ali
152	Dr.Wali Muhammad S/O Gul Ghanir Khan	179	Dr.Badquillah Gumrani S/O Samullah
153	Dr.Gulab Khan S/O Inayatullah	180	Dr.Muhammad Ayaz S/O Noor Ahmad Shah
154	Dr.Haji Muhammad Khan S/O Sharif Khan	181	Dr.Sajjad Khan S/O Sher Muhammad
155	Dr.Daryab Wali Khan S/O Nazir Wali Khan	182	Dr.Jamshed Qadar S/O Qadar Gul
156	Dr.Muhammad Zahir Shah S/O Bakhtiar Khan	183	Dr.Sardeep Kumar S/O Hukam Chand
157	Dr.Said Muhammad S/O Ali Bai Khan	184	Dr.Muhammad Riaz S/O Ghulam Rasool
158	Dr.Muhammad Younas Khan S/O Abdul Sattar	185	Dr.Ajmal Khan S/O Zulqadar Khan
159	Dr.Gul Ali S/O Hussain Ali	186	Dr.Muhammad Ayaz S/O Zakirullah
160	Dr.Zahid Din S/O Yousaf Khan	187	Dr.Noor Muhammad S/O Ahmad Saeed
161	Dr.Syed Riazuddin S/O Zaman Shah	188	Dr.Shamkur Rehman S/O Haji Faqir Muhammad
162	Dr.Gul Rashid S/O Muhammad Gul	189	Dr.Nasreen Begum D/O Ghulam Farid Khan
163	Dr.Ashiq Muhammad S/O Muhammad Ishaq	190	Dr.Goltar Zaman S/O Minhajuddin
164	Dr.Ali Muhammad S/O Ahmad Ali	191	Dr.Abdul Karim S/O Fazal Karim
165	Dr.Farid Hassan S/O Wazir Hussain	192	Dr.Riaz Ali S/O Sher Bahadar
166	Dr.Hussain Jan S/O Amin Jan	193	Dr.Zalib Khan S/O Bakhtbiland
167	Dr.Muhammad Mehdi S/O Iftikhar Sardar Ali Khan	194	Dr.Muhammad Ali Jan S/O Bughdadi Jan
168	Dr.S Iftikhar Hussain S/O Kamal Hussain	195	Dr.Mumtaz Ali S/O Ashraf Khan
169	Dr.Azizullah Khan S/O Ahsanullah Khan	196	Dr.Azra Sarwar D/O Sarwar Jan

Handwritten mark

Handwritten signature and stamp

(7)

S.NO	Name of Doctor	S.NO	Name of Doctor
197	Dr. Zafer Ali S/O Amir Ghous	219	Dr. Hamidullah S/O Said Amin Khan
198	Dr. Areehad Ali S/O Sarfaraz Khan	220	Dr. Khalrun Nabi S/O Gul Nabi
199	Dr. Shehla Saeed D/O Saeed Ahmad	221	Dr. Muhammad Zamin Khan S/O Hayat Khan
200	Dr. Fayyaz Ali S/O Qaiser Khan	222	Dr. Alam Khan S/O Feroz Khan
201	Dr. Khalid Mehmood S/O Rehmatullah	223	Dr. Niamatullah S/O Malik Mehbub Khan
202	Dr. Tahir Hussain S/O Ghulam Muhammad	224	Dr. Afshan Saleem D/O Muhammad Saleem
203	Dr. Saeedur Rehman S/O Ashtar Khan	225	Dr. Sofia Khan D/O Muhammad Roshan
204	Dr. Fazli Raziq S/O Fazle Maula	226	Dr. Muhammad Ikram S/O Azim Khan
205	Dr. Muhammad Parvez Khan Durrani S/O Muhammad Nisar Durrani	227	Dr. Khalid Iqbal Burki S/O Akhtar Khan Burki
206	Dr. Naheed Sultana D/O Muhammad Akram	228	Dr. Imran Khan S/O Professor Rashid Ali
207	Dr. Akhtar Nawaz S/O Muhammad Amir Khan	229	Dr. Muhammad Amjad Khan S/O Shah Jehan
208	Dr. Rozat Shah S/O Mursaleem Shah	230	Dr. Muhammad Akil Rouf S/O Abdur Rouf
209	Dr. Salra Gulzar D/O Altaullah Jan	231	Dr. Zarin Khan S/O Khan Zala Khan
210	Dr. Muhammad Humayum S/O Muhammad Usman	232	Dr. Shallullah Khan S/O Saidul Wahab
211	Dr. Sahib Gul S/O Munir Gul	233	Dr. Badshah Khan S/O Raees Khan
212	Dr. Jamal Hayat S/O Sultan Zarin	234	Dr. Syed Umair Hussain S/O Syed Majid Hussain
213	Dr. Amir Sher S/O Pir Muhammad Khan	235	Dr. Nusrat Ara D/O Abdullah Jan
214	Dr. Taj Wali Shah S/O Gul Sher	236	Dr. Shazia Gul D/O Masood Ahmad
215	Dr. Said Badshah S/O Musafar Khan	237	Dr. Soema Sharif D/O Sharif Gul
216	Dr. Abdul Ghafoor S/O Badshah Khan	238	Dr. Shamsul Qamar D/O Muhammad Hanif
217	Dr. Gul Nazar S/O Samandar Khan	239	Dr. Fahmeeda Khan D/O Ali Khan
218	Dr. Zuhra Nasir D/O Naqir Shah	240	Dr. Riz Shohid S/O Rehmat Khan

2. In term of Rule 6 (3) of Civil Servants Act, 1973 and Rule 15 (1) of Appointment, Promotion and Transfer Rules, 1989, they will be on probation till their retirement.

3. The postings/transfers of the above named doctors shall be notified later on.

ceel
ATTESTED

SECRETARY HEALTH
Govt of Khyber Pakhtunkhwa

Scanned by CamScanner