


FORM OF ORDER SHEET

Court of _____

Appeal No. 1067/2024

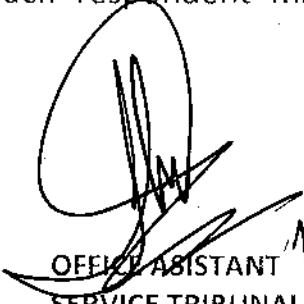
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/07/2024	<p>The appeal of Mr. Shaukat Ali resubmitted today by Mr. Muhammad Rahim Shah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on 04.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Shaukat Ali received today i.e on 11.07.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- In the heading of appeal necessary parties has not been made.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal be placed on it.
- ⑤ Copy of seniority list 01.11.2023 mentioned in para-4 of the memo of appeal is not attached with the appeal be placed on it.
- 6- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 334 /Inst./2024/KPST,

Dt. 11/7 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.
11/7/24

M. Rahim Shah Adv.
Supreme Court at Swat.

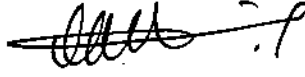
Sir,
Re-submitted after removing the
objections. All the necessary parties
has been impleaded.

Rahim

25/7/24

Sir,

Re-submitted after removing the objections.
All the necessary parties has been impleaded.

 27/7/24

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. 1067 /2024

Shaukat AliAppellant


VERSUS

Promotion Committee and others Respondents

INDEX

S.NO	DESCRIPTION	ANNEX	PAGES
1.	Memo of appeal and certificate		1 to 5
2.	Affidavit		6
3.	Address of the parties		7
4.	Copy of appointment order	A	8
5.	Copy of seniority list	B	9 to 14
6.	Copies of academic record	C	15 to 19
7.	Copies of orders 30-01-2024, 22-01-2024, 23-01-2024 & departmental appeal	D & E	20 to 27
8.	Wakalat Nama		

Appellant
Through Counsel


Muhammad Rahim Shah

Advocate, Supreme Court of Pakistan

Cell No. 0345-9524225

&


Arif Khan

Advocate High Court

Cell No.0346-9446061

Office: 3rd Floor Continental Plaza Makaanbagh Mingora Swat

(1)

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal 1067 /2024

Shaukat Ali S/O Muhammad Akbar R/O College
Coloney Saidu Sharif Swat presently service as Class -
IV at Government Nursing College Saidu Sharif Swat .

..... **Appellant**

VERSUS

1. Government of Khyber Pakhtunkhwa through
Secretary Health at Peshawar.
2. Director General P.H.S.A Khyber Pakhtunkhwa at
Peshawar.
3. Noor Khan Junior Clerk at Government
Paramedical Institute of Medical Technology,
Saidu Sharif Swat.
4. Ijazul Haq Junior Clerk at Government
Paramedical Institute of Medical Technology,
Saidu Sharif Swat.
5. Hamid Hussain Junior Clerk at Government
Paramedical Institute of Medical Technology,
Saidu Sharif Swat.

.....**Respondents**

**APPEAL UNDER SECTION 4 OF THE GOVT. OF
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT,
1974 AGAINST THE ORDERS**

Respectfully Sheweth;

1. That the appellant was initially recruited as
Class-IV on 23-08-2007 by the competent

2. That appellant rendered meritorious to the department without any complaint of the official and no complaint whatsoever has been made by the officials.
3. That the appellant being qualified having the requisite qualifications of metric to the post of Junior Clerk through the procedure of promotion given in the relevant rules seniority cum fitness.
4. That on 01-11-2023 the respondents^{1,2} circulated the seniority list of the Class-IV employee of the department wherein respondent No.3 stood on 27, appointed on 21-03-2021, respondent No.2 stood on serial No.48 appointed on 25-03-2016 & respondent No.5 stood on serial No.9 appointed on 21-06-2008, while the appellant stood on serial No.20. **(Copy of seniority list is attached as annexure "B")**
5. That the appellant is meritorious and highly qualified. **(Copies of academic record are attached as annexure "C")**
6. That the appellant being aggrieved from the promotion orders dated 30-01-2024, 22-01-2024 & 23-01-2024 submitted a departmental appeal for the promotion, which is still pending respondent No.2 through diary No. 774 dated 12-03-2024 (**Copies of orders 30-01-2024, 22-01-2024 , 23-01-2024 & departmental appeal is annexed as annexure "D")**
7. That the appellant being aggrieved from the actions of respondents having left no other remedy except to file the instant appeal inter alia on the following grounds.

GROUNDS

- A. That order of the promotion committee is illegal, against the law & violated the golden principle of seniority cum fitness, though the appellant is the most senior person in the list of class-iv employees, furthermore the 40% quota reserve for class-IV employee was violated by promoting the junior incumbent.
- B. That the respondent No. 2 utterly disregard the seniority list prepared by the department while promoting the most junior incumbent, thus violated the basic fundamental rights enshrined in the constitution.
- C. That the respondent No. 3 to 5 is illegally promoted by the respondent No.1 though they were appointed on 21-06-2008, 21-03-2011 & 25-03-2016, while the appellant is appointed on 23-08-2007, committed gross illegality, therefore liable to be struck down.
- D. That the seniority list circulated by the respondent No.1 & 2 depriving the appellant committed gross illegality liable to be struck down and inalienable right of the appellant was infringed.
- E. That the act of departmental authority is unlawful violated the mandatory provision of law available on the subject.
- F. That the impugned order is the result of colourable exercise of their authority of respondents No. 1 & 2 misreading and non-reading of material present on file.
- G. That the actions and inactions of the respondents are ultra vires, illegal, against the rules on the

subject because the impugned orders were passed against the law.

- H. That the respondents are not treating the appellant in accordance with law and rules.
- I. That the action and inaction of the respondents are clearly in disregard of the fundamental rights of the appellant.
- J. That, other grounds will be agitated during the course of argument with prior permission.

It is therefore, most humbly prayed that on acceptance of instant appeal, the office order No.3 /PHSA/ Admin/ Office order 2023-2024/337 dated 30-01-2024. the office order No.3 /PHSA/ Admin/ Office order 2023-2024/133 dated 22-01-2024.& the office order No.29 /PHSA/ Admin/ Office order 2023-2024/162 dated 30-01-2024.of the respondent No.3 to 5 may kindly be declare are illegal, unlawful, void ab initio and liable to be struck down and the appellant may kindly be promoted the post of Junior Clerk (BPS—11) with all back benefits.

Any other relief which are proper in the instant circumstances of the case may also be granted.

Appellant
Through Counsel



Muhammad Rahim Shah
Advocate Supreme Court

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BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2024

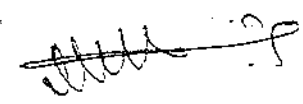
Shaukat Ali **Appellant**

VERSUS

Promotion Committee and others **Respondents**

CERTIFICATE

As per instruction of my client no such like appeal, earlier has been filed by the appellant on the subject matter before this Hon'able Court.



ADVOCATE

(6)

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2024

Shaukat Ali **Appellant**

VERSUS

Promotion Committee and others **Respondents**

ADDRESSES OF THE PARTIES

APPELLANT

Shaukat Ali S/O Muhammad Akbar R/O College Coloney Saidu Sharif Swat presently service as Class -IV at Government Nursing College Saidu Sharif Swat .

CNI C No:15602-57908395 MOB No:0346-9048283

RESPONDENTS

Govt of K.P.K through Secretary health at peshawar

1. Promotion Committee through Chairman Dr. Shaharyar Government Provincial Health Service Academy at Peshawar.
2. Director General Health Khyber Pakhtunkhwa at Peshawar.
3. Noor Khan Junior Clerk at Government Paramedical Institute of Medical Technology, Saidu Sharif Swat.
4. Ijazul Haq Junior Clerk at Government Paramedical Institute of Medical Technology, Saidu Sharif Swat.
5. Hamid Hussain Junior Clerk at Government Paramedical Institute of Medical Technology, Saidu Sharif Swat.

P.H.S.A

Appellant, through Counsel

Muhammad Rahim Shah
Advocate Supreme Court

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

Service Appeal No. _____/2024

Shaukat Ali **Appellant**

VERSUS

Promotion Committee and others **Respondents**

AFFIDAVIT

I, **Shaukat Ali S/O Muhammad Akbar R/O College Coloney Saidu Sharif Swat** do hereby solemnly affirm and declare on oath that the contents of the accompanying service appeal are true and correct to the best of my knowledge and belief, and not has been kept concealed from this Honourable court.

Shaukat

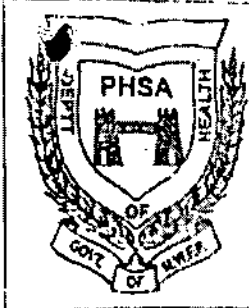
DEPONENT

Shaukat Ali

M

ATTESTED
Ms. Minhas Yousufzai Advocate
District Courts Swat
OATH COMMISSIONER
S.No: *125* Date: *9/7/2024*

8



PROVINCIAL HEALTH SERVICES ACADEMY

Dept. of Health Govt. of N.W.F.P,
Budhni Road Duran Pur Peshawar,
☎ # 091-2650861, 2650858, Fax # 091- 2261249
E-mail: phsa_peshawar@yahoo.com
Affiliated with University of Peshawar

OFFICE ORDER

Consequent upon the approval of the Govt. of NWFP finance department letter No.BVI/FD/4-48/2003-04/Vol-III dated 30/03/2007, Mr. Shoukat Ali S. Muhammad Akber is hereby appointed as Chowkidar in School of Nursing Saidu Sharif Swat on Fix pay @ Rs.4000/- per month with immediate effect in the interest of public service on the following terms and conditions:-

TERMS AND CONDITIONS

1. He will draw fixed pay @ Rs.4000/- per month.
2. Renewal of contract of the post of official concerned be taken immediately after 30/12/2007 subject to his performance from respect in charge.
3. No payment in context of salary after 30/12/2007 be made unless renewed granted.
4. Salary should only be paid when performing regular duty.

If the above terms and conditions are accepted to him, he should report the undersigned within 14 days on the receipt of this order, failing which his order will be treated as cancelled.

Sd/---
DIRECTOR

No.215/PHSA/Admn/Appointment class-VI(Fix)/2006-07/13652-56
Dated 21/08/2007.

Copy to:-

1. Deputy Director Management, PHSA.
2. District Accounts Officer Saidu Sharif Swat.
3. Vice Principal, School of Nursing Saidu Sharif Swat.
4. Accounts Officer PHSA.
5. Mr. Shaukat Ali S/o Muhammad Akber Miangano Cham Babozai Saidu Sharif wat.

DIRECTOR
4.

TENTATIVE SENIORITY LIST SSC AND ABOVE QUALIFICATION CLASS.IV (BPS-03-04) WORKING IN PHSA & ALLIED INSTITUTES AS
STOOD ON 01.11.2023

S#	Name /Father Name	Date of Birth	Domicile	Academic Qualification	Date of 1 st entry in Govt. Service	Promotion / Upgradation	Date of Promotion/ Upgradation	BPS at the time of Promotion	Place of Posting	Remarks
1	2	3	4	5	6	7	8	9	10	11
1.	Ali Rehman s/o Taza Gul	13.04.1971	Swat	SSC	26.01.1991 (BPS-2)	Upgradation	30.06.2015	(BPS-4)	DHDC Swat	P/F reviewed
2.	Haji Muhammad s/o Tawab Khan	23.12.1969	Peshawar	SSC	30.08.1997 (BPS-4) Cook	Upgradation	30.06.2015	(BPS-4)	PHSA	P/F reviewed
3.	Muhammad Sultan s/o Malik Aman	23.10.1975	ATD	SSC	16.9.1998 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PIMT ATD	P/F reviewed
4.	Mulazim Hussain s/o Shah Nawaz	01.07.1971	D.I. Khan	SSC	23.11.1999 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PIMT D.I.Khan	P/F reviewed
5.	Munsif Ali s/o Farzan Ali	10.04.1985	Mardan	F.A	10.04.1985 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	DHDC Mardan	P/F reviewed
6.	Shahid Mehmood s/o Allah Wasaya	24.04.1984	D.I. Khan	SSC	24.05.2004 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	PIMT D.I.khan	P/F reviewed
7.	Hassan Ali s/o Shareef Ullah	15.02.1986	Mardan	SSC	25.06.2007 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	GCON Mardan	P/F reviewed
8.	Tasleem Arif s/o Taj Muhammad	20.10.1986	Batagram	SSC	01.08.2007 (BPS-3) Cook	Upgradation	30.06.2015	(BPS-3)	DHDC Abbottabad	P/F reviewed
9.	Hameed Hussain s/o Gul Zameer	14.04.1987	Mardan	SSC	21.06.2008 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	GCON Mardan	Personal File not provided

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11.	Wasal Khan Hafeez ur Raman s/o Ubaid Khan	02.03.1978	Chitral	SSC	(BPS-3) Sweeper 28.06.2008	Upgradation	30.06.2010	(BPS-3)	DHDC Mardan	PI reviewed
12.	Muhammad Ali s/o Gulab Shah	08.03.1982	Swat	SSC	(BPS-3) Chowkidar 05.11.2008	Upgradation	30.06.2010	(BPS-3)	DHDC Chitral	PI reviewed
13.	Khuram Shehzad s/o Afsar Khan	2.5.1980	ATD	SSC	(BPS-3) Chowkidar 12.11.2008	Upgradation	30.06.2010	(BPS-3)	GE On Swat	PI reviewed
14.	Abdul Waheed s/o Abdul Aziz	10.6.1978	Kohat	SSC	(BPS-3) Naib Qasic 05.12.2008	Upgradation	30.06.2010	(BPS-4)	DHDC ATD	PI reviewed
15.	Ismail Khan s/o Shebaz Khan	02.01.1971	Peshawar	SSC	(BPS-3) Chowkidar 13.10.2009	Upgradation	30.06.2010	(BPS-3)	SON Kohat	PI reviewed
16.	Shahid Ali s/o Shoukat Ali	05.01.1975	Peshawar	SSC	(BPS-3) Mali 14.10.2009	Upgradation	30.06.2010	(BPS-3)	DHDC Peshawar	PI reviewed
17.	Rohul Amin s/o M. Amin	16.03.1983	Peshawar	SSC	(BPS-3) Chowkidar 14.10.2009	Upgradation	30.06.2010	(BPS-3)	SON Peshawar	PI reviewed
18.	Ramazan Khan s/o Ali Gohar	25.04.1990	Peshawar	F.A	(BPS-3) Bearer 14.10.2009	Upgradation	30.06.2010	(BPS-3)	PGCN	PI reviewed
19.	Waseem Bhatti s/o Mushtaq Bahtti	27.09.1983	DIKHAN	SSC	(BPS-3) Chowkidar 23.10.2009	Upgradation	30.06.2010	(BPS-3)	SON KTH	PI reviewed
20.	Shoukat Ali s/o Muhammad Akbar	01.12.1993	Swat	SSC	(BPS-3) Chowkidar 02.08.2007 On Fix Pay 24.10.2009	Upgradation	30.06.2010	(BPS-3)	PI D.I.KHAN	PI reviewed
21.	Murtaza Ali s/o Shafiq Hussain	01.01.1984	Kohat	B.A	(BPS-3) Chowkidar 04.02.2010	Upgradation	30.06.2010	(BPS-3)	PGCN Peshawar	PI reviewed
22.	M.Usman s/o M.Nawaz	29.03.1973	Mardan	SSC	(BPS-3) Chowkidar 22.03.2010	Upgradation	30.06.2010	(BPS-3)	SON KOHAT	PI reviewed
								(BPS-3)	DHDC SWAT	PI reviewed

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	Ahmad s/o Musharaf Khan				(BPS-3) Chowkidar				CHITRAL	reviewed
24.	Adnan Ghuri s/o Yousaf Masih	05.08.1982	Peshawar	SSC	15.10.2010 (BPS-3) Sweeper	Upgradation	30.06.2015	(BPS-3)	PHSA	P/F reviewed
25.	Hamayun Khan s/o Fazal khalig	02.01.1967	Peshawar	SSC	16.03.2011 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PHS- NISHTERAB AD	P/F reviewed
26.	Muhammad Jehan s/o Sultan Muhammad	02.03.1969	Mardan	F.A	21.03.2011 (BPS-3) Sweeper	Upgradation	30.06.2015	(BPS-3)	CON Kohat	P/F reviewed
27.	Noor khan s/o Agha khan	02.03.1978	Peshawar	SSC	21.03.2011 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PHSA	P/F reviewed
28.	Musafar khan s/o Gul Riaz	02.08.1992	Peshawar	B.A	21.03.2011 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PHSA	P/F reviewed
29.	Muhammad Usman s/o Abdul Wahid	06.06.1992	Peshawar	SSC	19.05.2011 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	ZAB PGPI	P/F reviewed
30.	Sartaj Ali s/o Umar Khan	03.04.1985	Nowshehra	F.A	11.07.2011 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	SoN LRH	P/F reviewed
31.	Tahir Khan s/o Rangeen Khan	01.01.1991	DIK	SSC	06.09.2011 (BPS-3) Mali	Upgradation	30.06.2015	(BPS-3)	SoN DIK	Personal File not provided
32.	Muhammad s/o Qayum Mukaram Shah	15.02.1988	Peshawar	SSC	16.01.2012 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	PHS Hayatabad	P/F reviewed
33.	Waqar s/o Fazal Rabi	14.04.1992	Peshawar	F.A	01.03.2012 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PHS Hayatabad	P/F reviewed
34.	Rashid Ashraf s/o M. Ashraf	04.02.1990	ATD	SSC	30.04.2012 (BPS-3) Lab Attendant	Upgradation	30.06.2015	(BPS-3)	PIMT ATD	P/F reviewed
35.	Rasool Shah s/o Noor Ali Shah	25.04.1985	Karak	SSC	13.04.2013 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PGCN	P/F reviewed

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12

	Fazal Rabi				(BPS-3) Bearer				Margan	reviewer
37.	Asif Ullah s/o Habib Ullah	06.08.1982	Peshawar	F.A	17.05.2013 (BPS-2) Naib Qasid	Upgradation	30.06.2015	(BPS-4)	PGCN	P/F reviewed
38.	Syed Manzoor Ali s/o Syed Jamal Shah	10.04.1987	Mardan	B.A	07.08.2013 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	SoN Mardan	P/F reviewed
39.	Ibrar Hussain s/o Gul Faraz	01.05.1993	ATD	F.A	26.12.2013 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PHS ATD.	P/F reviewed
40.	Junaid Ahmad s/o Fazli Ahmad	08.04.1995		SSC	29.12.2014 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	DHDC Chitral	P/F reviewed
41.	M. Sadheer s/o M. Taj	02.04.1989	ATD	SSC	30.09.2015 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PIMT ATD	P/F reviewed
42.	Ghareeb Nawaz s/o Dost Muhammad	05.09.1979	ATD	SSC	30.09.2015 (BPS-3) Lab Attendant	Upgradation	30.06.2015	(BPS-3)	SoN ATD	P/F reviewed
43.	Taimoor Khan s/o Fareed Ullah	01.01.1982	Peshawar	SSC	08.01.2016 (BPS-3) Cook	Upgradation	30.06.2015	(BPS-3)	PHS HAYATABA D	P/F reviewed
44.	Fazal e Haq s/o Fazal e Rabbi	15.02.1982	Peshawar	F.A	08.01.2016 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	SON KTH	P/F reviewed
45.	Ibad Gul s/o Shahab Gul	04.01.1987	Peshawar	F.A	08.01.2016 (BPS-4) Naib Qasid	Upgradation	30.06.2015	(BPS-3)	PHS HAYATABA D	P/F reviewed
46.	Shoaib Ahmad s/o Bakhtiar Ahmad	05.08.1990	Peshawar	B.A	09.01.2016 (BPS-3) Cook	Upgradation	30.06.2015	(BPS-3)	PGCN	P/F reviewed
47.	M.Zahir shah s/o M.Ghafoor	01.04.1984	Swat	FSC	25.03.2016 (BPS-4) Naib Qasid	Upgradation	30.06.2015	(BPS-3)	PIMT SWAT	P/F Reviewed

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	Ijaz Ul Haq s/o Fazal e-Haq	11.02.1991	Swat	FSC	25.03.2016 (BPS-4) Naib Qasid					provided
49.	Inam Ullah s/o Zahir Rawan	03.09.1994	Swat	FSC	25.03.2016 (BPS-3) Lab attendant	Upgradation	30.06.2015	(BPS-3)	PIMT SWAT	Personal File not provided
50.	Nawaz Hussain S/O Ayaz Hussain	06.10.1995	Swat	FSC	25.03.2016 (BPS-4) T/O	Upgradation	30.06.2015	(BPS-3)	PIMT Swat	Personal File not provided
51.	Akhtar Hussain s/o Akbar Hussain	15.03.1996	Swat	SSC	25.03.2016 (BPS-3) Sweeper	Upgradation	30.06.2015	(BPS-3)	PMIT SWAT	P/F reviewed
52.	Imran Khan s/o Fazal Rehman	8.6.1986	Swat	SSC	08.03.2018 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	PIMT SWAT	P/F reviewed
53.	Hazrat Noor s/o Hazrat Gul	09.03.1991	Peshawar	SSC	27.03.2018 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PHS NISHTERAB AD	P/F reviewed
54.	Asif Ullah s/o Sakin Ullah	02.04.1987	Nowshera	F.A	02.08.2018 (BPS-4) Naib Qasid	Upgradation	30.06.2015	(BPS-3)	DHQC SWAT	P/F reviewed
55.	Azeem Ullah s/o Mukhtiar Khan	10.02.1995	Peshawar	F.A	02.08.2018 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	ZAB PGPI	P/F reviewed
56.	Safi Ullah s/o Nasir-Ullah	24.08.1996	Nowshera	FSC/DA E	02.08.2018 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	PHSA	P/F reviewed
57.	Asad Iqbal s/o Umer Zada	02.04.1983	Mardan	SSC	03.09.2018 (BPS-3) Chowkidar	Upgradation	30.06.2015	(BPS-3)	SON LRH	P/F reviewed
58.	Asad Ghulam Yousaf s/o Amen Ul Haq	13.04.1988	Mardan	B.A	17.09.2018 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	PHS HAYATABA D	P/F reviewed
59.	Sulieaman Shah s/o Abdul Ghafoor	02.01.1991	Nowshera	M.A	17.09.2018 (BPS-3) Bearer	Upgradation	30.06.2015	(BPS-3)	SON LRH	P/F reviewed

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U/C

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60.	Mubashir Hussain s/o Bashir Ahmad	18.08.1990	Peshawar	SSC	27.09.2018 (BPS-3) Sweeper	Upgradation	30.06.2015	(BPS-3)	SON LRH	P/F reviewed
61.	Mehmood Alam S/O Gul Alam	10.05.1979	Peshawar	F.A	09.08.2019 (BPS-3) Security Guard	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
62.	Laiq ur Rehman s/o Taj Ali Khan	16.01.1986	Bannu	SSC	09.08.2019 (BPS-3) Sweeper	Upgradation	30.06.2015	(BPS-3)		P/F reviewed
63.	Ijaz Khan S/o Fazal Elahi	11.06.1989	Charsada	Matric	09.08.2019 (BPS-3) Security Guard	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
64.	Muhammad Kifayat S/O Ismail Khan	01.04.1990	Peshawar	F.A DIT Diploma anesthe sia	09.08.2019 (BPS-3) Security Guard	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
65.	Abdullah S/O Fayaz Ud Din	08.04.1994	Charsadda	Matric	09.08.2019 (BPS-3) Security Guard	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
66.	Hazrat Bilal S/O Hamid Ur Rehman	05.03.1998	Charsadda	F.A	09.08.2019 (BPS-3) Security Guard	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
67.	Atiq Ur Rehman S/O Hafeez Ur Rehman	02.12.1998	Peshawar	F.A	09.08.2019 (BPS-3) Naib Qasid	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
68.	Muhammad Sheraz S/O Mumtaz Muhammad	20.05.1999	Peshawar	SSC	09.08.2019 (BPS-3) Cook	Upgradation	30.06.2015	(BPS-3)	PGPI Peshawar	P/F reviewed
69.	Rehman Ullah s/o Gul M.khan	02.05.1997	Bannu	F.A	25.02.2021 Naib Qasid	Upgradation	30.06.2015	(BPS-3)	SON Bannu	P/F reviewed
70.	Shoaib Afridi S/O Bahawal Shah Afridi	06.04.1999	Khyber Agency	FSC	10.08.2019 (BPS-3) Sweeper	Initial Appointment	NIL	(BPS-3)	PGPI	P/F reviewed
					16.08.2019 (BPS-3) Naib Qasid					P/F reviewed

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71.	Basrullah jan s/o Bahadur Khan	15.10.1992	Lakki Marwat	Matric	20.08.2019 (BPS-3) Chowkidar	Initial Appointment	NIL	(BPS-3)	DHDC Bannu	P/F reviewed
72.	Muhammad Ali s/o Muhammad Noor	21.08.1994	Peshawar	FA	20.08.2019 (BPS-3) Chowkidar	Initial Appointment	NIL	(BPS-3)	PGCN	P/F reviewed
73.	Shabir Jan S/O Muhammd Ghayas	01.02.1985	Charsadda	B.A	26.08.2019 (BPS-3) G/O	Initial Appointment	NIL	(BPS-3)	PGPI Peshawar	P/F reviewed
74.	Muhammad Yousaf S/O Jameel Ahmad	18.08.2001	Mardan	SSC	03.09.2019 Sweeper (BPS-3) Chowkidar	Initial Appointment	NIL	(BPS-3)	DHDC Abbottabad	P/F reviewed
75.	Muhammad Yousaf S/O Liaq Ali	15.02.1988	Nowshera	B.A	17.09.2019 (BPS-3) Sweeper	Initial Appointment	NIL	(BPS-3)	PGPI Peshawar	P/F reviewed
76.	Miss Muna s/o Miskin Khan	13.04.1988	Nowshera	B.A	17.09.2019 (BPS-3) AAYA	Initial Appointment	NIL	(BPS-3)	PHS HAYATABA D	P/F reviewed
77.	Fazal e Amin s/o Hazrat Amin	05.03.1996	Peshawar	SSC	08.10.2019 (BPS-3) Sweeper	Initial Appointment	NIL	(BPS-3)	SON HMC	P/F reviewed
78.	Sadaqat Ali S/O Muhammad Aslam	23.09.1993	Abbottabad	SSc Diploma in Associa te Enginee ring	12.11.2019 Sweeper (BPS-3)	Initial Appointment	NIL	(BPS-3)	DHDC Abbottabad	P/F reviewed
79.	Anwar Ali Khan s/o Noor Ullah khan	25.03.1992		SSC	26.12.2019 (BPS-3) Bearer	Initial Appointment	NIL	(BPS-3)		Personal File not provided
80.	Muhammad Daud s/o Qaseed Gul	05.02.2000	Peshawar	FA	31.05.2021 (BPS-3) Bearer	Initial Appointment	NIL	(BPS-3)	PGCN	P/F reviewed
81.	Farhan Khan s/o Nawab Sher	03.05.2002	Peshawar	Matric	31.05.2021 (BPS-3) Cook	Initial Appointment	NIL	(BPS-3)	PHSA	P/F reviewed
82.	Anwar Khan S/O Alam Khan	05.02.1987	Peshawar	B.A DIT	05.07.2021 (BPS-3) Cook	Initial Appointment	NIL	(BPS-3)	Swat	P/F reviewed

83.	Naseer Ullah Khan S/O Jamrud Khan	20.04.1995	Peshawar	D.Com DIT	13.08.2021 (BPS-3) Naib Qasid	Initial Appointment	NIL	(BPS-3)	PHSA	P/F reviewed
84.	Niaz Ali S/O Noor Ali	---	Bannu	FSc	16.08.2021 (BPS-3) Naib Qasid	Initial Appointment	NIL	(BPS-3)	GCN Bannu	P/F reviewed
85.	Zeeshan Umar S/O Gul Zaman	08.06.1993	Abbottabad	SSC Diploma Electrician	05.09.2021 Sweeper (BPS-3)	Initial Appointment	NIL	(BPS-3)	DHDC Abbottabad	P/F Reviewed
86.	Muhammad Aamir	01.04.1999	D.I.KHAN	FSC	09/08/2019 (BPS-3) Bearer	Initial Appointment	NIL	(BPS-3)		P/F Reviewed
87.	Hidayat Ullah S/O iqbal Hussain	14-08-1988	Di Khan	SSc	24.09.2019 Cook (BPS-03)	Initial Appointment	NIL	(BPS-3)	PIMT DI Khan	P/F Reviewed
88.	Haneef Ullah S/o Fazl e Mula	25.4.2000	Swat	F.A	6.7.2021 (BPS-03) Cook	Initial Appointment	NIL	(BPS-3)	PIMT Swat	P/F Reviewed
89.	Inayat Khan S/o Sher Bahadar Khan	3.3.1998	Swat	SSC	12.11.2019 (BPS-3) Sweeper	Initial Appointment	NIL	(BPS-3)	PIMT Swat	P/F Reviewed
90.	Asif Khan S/o Quli Khan		Laki Marwat		19.9.2018 Cook Bps-3	Initial Appointment	NIL	(BPS-3)	PIMT DI Khan	P/F reviewed only office order attached
91.	Muhammad Ismail S/o Mir Zali Khan		Laki Marwat		19.9.2018 Cook Bps-3	Initial Appointment	NIL	(BPS-3)	PIMT DI Khan	P/F reviewed only office order attached

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92	Muhammad Sulaiman S/o Farhan Ud Din	9.1.1995	nowshera	B.A	9.8.201 Sweeper BPS-03	Initial Appointment	NIL	(BPS-3)	ZAB PGPI	P/F Reviewed
93	Adnan Mazhar Sethi S/O Khwaja Mazhar Jamil Sethi	18.10.1991	Peshawar		20.08.2019 Mali (BPS-3)	Initial Appointment	NIL	(BPS-3)	ZAE PGPI	P/F Reviewed
94	Muhammad Toheed S/O Abdul Waheed	09.01.1992	peshawar	F.A	11.06.2019 Naib Qasid (BPS-03)	Initial Appointment	NIL	(BPS-3)	PHSA	P/F Reviewed
95	Rashid Ahmad S/O Fazal Rahman	01.03.1984	Swat	F.A	20.08.2019 Bearer (BPS-03)	Initial Appointment	NIL	(BPS-3)	DHDC SWAT	P/F Reviewed
96	Haider Hussain S/O Sherd Ullah	15.11.1976	Swat		27.12.2012 Sweeper (BPS-01)	Initial Appointment	NIL	(BPS-3)	DHDC SWAT	P/F Reviewed
97	Mr Fazal Mobin S/O Sultan Muhammad	01.05.1993	Swat		18.04.1993 Sweeper (BPS-01)	Initial Appointment	NIL	(BPS-3)	DHDC SWAT	P/F Reviewed
98	Rasheed Ullah S/o Zarwali Khan	13.02.2000			20.08.2019 Bearer (BPS-03)	Initial Appointment	NIL	(BPS-3)		P/F Reviewed

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17

99	Muhammad Pervez S/O Haji Thal Khan	12.03.1979			9.08.2019 Naib Qasid (BPS-03)	Initial Appointment	NIL	(BPS-3)	ZAB-PGP!	P/F Reviewed
100	Hidayat Ullah S/o Balqias Khan	01.01.1999			05.03.2018 bearer (BPs-03)	Initial Appointment	NIL	(BPS-3)	DHDC Bannu	P/F Reviewed

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100

M. Shalikh
Deputy Director (HRD)
PHSA Peshawar

Director
PHSA Peshawar

(18)

(19)



PROVINCIAL HEALTH SERVICES ACADEMY
Government Of Khyber Pakhtunkhwa
Health Department



①

F-267/PHSA/Admn:/S.Lists/2017-18/ 340

Dated: 26/02/2018

To,

- The Principal Public Health School,
Nishterabad, Hayatabad Peshawar, D. I. Khan and Abbottabad.
- The Vice Principal School of Nursing,
LRH, KTH, HMC Peshawar, Kohat, Bannu, D. I. Khan, Swat, ATH Abbottabad &
Mardan.
- The Principal ZAB PGPI Duranpur Peshawar.
- The Principal, PGCN Hayatabad Peshawar.
- The Principal, PIMTs, Swat, Abbottabad and D. I. Khan.
- The Deputy Directors, DHDCs, Mardan, Swat, Chitral, Abbottabad and Bannu.

Subject:- PROVISIONAL SENIORITY LIST OF CHOWKIDARS (BPS-03) OF PHSA NETWORK, HEALTH DEPARTMENT KHYBER PAKHTUNKHWA.

In pursuance of Section 8 (1) of Khyber Pakhtunkhwa Civil Servant Ac, 1973 read with Rule 17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and Rule 3 of the Khyber Pakhtunkhwa, tentative seniority list of Chowkidars (BPS-03) as upto 31.12.2017, working under the administrative control of the DG PHSA is hereby being circulated amongst all Chowkidars (BPS-03) for their information and confirmation about correctness of the entries therein.

In case, any one has any objection with regard to seniority or any other particulars shown in this list, the same may please be communicated to this office for reconsideration and rectification, within one month of the receipt of this communication.

In case of non-receipt of any objection/s within the stipulated time, no representation whatsoever will be accepted and it will be presumed that they have no objection on this seniority list and the same will be considered as FINAL.

Since the establishment of PHSA till date, final seniority lists have never been issued and this Directorate desires to finalize the same once forever.

THE MATTER BE GIVEN TOP PRIORITY PLEASE.

DIRECTOR (HRD)

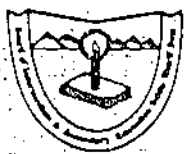
Cc:

PS to Secretary to the Govt: of Khyber Pakhtunkhwa Health Department for information.

S.B. 14488

Roll No. 15088

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



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

**PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION**

Session 200 2 Annual / Supplementary

THIS IS TO CERTIFY THAT Shaukat Ali
 Son / daughter of Mohammad Akber
 and a candidate of District Swat

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education Saidu Sharif held in oct 200 2 as a Regular / Private candidate. He/She obtained 331 Marks out of 850 and has been placed in Grade 2 Representing Satisfactory

The candidate passed in the following subjects :

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pak: Studies
- 5. G: Maths/Maths (Elec.)
- 6. 88
- 7. 18
- 8. AA

Internal assessment Grade awarded by the institution concerned is _____

Date of Birth according to admission form is first December

One thousand nine hundred and Eighty Three (01-12-1983)

Prepared by _____
 Checked by _____
 Date of Preparation _____

[Signature]
 Assistant Secretary
 Assistant Secretary Certificate
 Board of Inter & Sec. Edu.
 Saidu Sharif Swat.

Board Of Intermediate & Secondary Education

SAIDU SHARIF, SWAT.

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination

(GENERAL GROUP)

S.No. Su. 06889 Session 2022 (Annual/Supplementary)Name Shaukat Ali Roll No. 15088Father's Name Muhammad Akbar

SUBJECTS	Total Number of marks allotted	MARKS OBTAINED	
		In figures.	In words
1. English	150	62	
2. Urdu	150	54	
3. Islamiat Comp.	75	41	
4. Pak. Studies	75	25	
5. Mathematics	100	47	
6. Gen. Science	100	33	
7. <u>IS</u>	100	33	
8. <u>PG</u>	100	36	
Total	850	331-E	Three hundred & thirty one

Errors and omissions excepted.

Prepared by [Signature]Checked by [Signature]

Controller of Examinations

Board of Intermediate & Secondary Education

SAIDU SHARIF, SWAT.

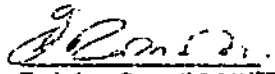
Date _____

APPRENTICE IN PHARMACY



CERTIFICATE

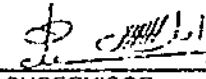
Certified that Mr: Shaukat Ali
S/O: Muhammad Akbar
Address Rehan Surgical, Karim Daud Market, Mingora, Swat has
completed 5 (Five) days Oreintation course for registration in category "c" as
Per syllabus approved / specified by pharmacy council K.P.K pehsawar.
w.e.f 20-02-2018 to 27-02-2018 (Morning & Evening Sessions)



Training Coordinator

IKRAM UR RAHMAN

Pharmacist Category "A"



SUPERVISOR

AMAN ULLAH

GENERAL SECRETARY

Swat Chemist Association Distt Swat

22

S. No. 5193

Reg. No. S-00157

SWAN COMPUTER INSTITUTE MINGORA SWAT



(Affiliated with Board of Technical Education Government of NWFP, Peshawar)

CERTIFICATION

Certify that Mr/Miss MR. SHAUKAT ALI

S/O/ D/O MR. MUHAMMAD AKBAR has successfully completed SOFTWARE course

of 06 Months from 01/10/2008 to 06/04/2009

COURSE COVERED: MS-OFFICE, INPAGE, PHOTOSHOP

PRINT ARTIST, WINDOWS XP, INTERNET

Dated: 24/04/2009



Shahzad
PRINCIPAL


83

APPRENTICE IN PHARMACY



CERTIFICATE


Certified that Mr: Shaukat Ali
S/O: Muhammad Akbar
Address Rohan Surgical, Karim Qad Market, Mingora, Swat Dist
completed 5 (Five) days Oreintation course for registration in category "c" as
Per syllabus approved / specified by pharmacy council K.P.K behsawar.
w.e.f 20-02-2013 to 27-02-2013 (Morning & Evening Sessions)

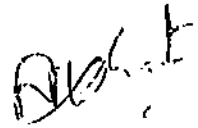

Training Coordinator

IKRAM UR RAHMAN
Pharmacist Category "A"


SUPERVISOR

AMAN ULLAH
GENERAL SECRETORY
Swat Chemist Association Distt Swat

AK



Principal
Mingora

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PROVINCIAL HEALTH SERVICES ACADEMY
Government of Khyber Pakhtunkhwa
Department of Health



OFFICE ORDER

Consequent upon the recommendation of Department Promotion committee meeting held on 15/01/2024. Mr. Noor Khan Chowkidar (BPS-03), attached to Provincial Health Services Academy Peshawar, is hereby promoted to the post of Junior Clerk (BPS-11) with immediate effect in the best public interest.

Subsequent to the above Mr. Noor Khan Junior Clerk (BPS-11) is hereby placed at the disposal of Principal Paramedical Institute of Medical Technologies (PIMT) Swat for further adjustment against vacant post.

DIRECTOR GENERAL (Health),
PHSA PESHAWAR.

No. 25 /PHSA/Admn/Office order/2023-24/ 337

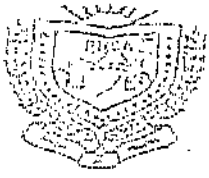
Dated. 27/01/2024

- Accountant General, Khyber Pakhtunkhwa Peshawar.
- Principal PIMT Swat.
- Section Officer --VI Govt. of Khyber Pakhtunkhwa Health Department.
- District Accounts Officer Swat.
- Deputy Director I.T PHSA Peshawar.
- Accounts Officer, PHSA Peshawar.
- Mr. Noor Khan Junior Clerk (BPS-11).

Ameslep

PHSA Peshawar

DIRECTOR GENERAL (Health),
PHSA PESHAWAR.



PROVINCIAL HEALTH SERVICES ACADEMY
Government of Khyber Pakhtunkhwa
Department of Health



21

26

OFFICE ORDER

Consequent upon the recommendation of Department Promotion committee meeting held on 15/01/2024. Mr. Ijaz Ul Haq Naib Qasid (BPS-03), attached to Paramedical Institute of Medical Technologies (PIMT) Swat, is hereby promoted to the post of Junior Clerk (BPS-11) with immediate effect in the best public interest.

Subsequent to the above, Mr. Ijaz Ul Haq Junior Clerk (BPS-11) is hereby posted to PIMT Swat against the vacant post.

DIRECTOR GENERAL (Health),
PHSA PESHAWAR.

No. 3 /PHSA/Admn/Office order/2023-24/ 133

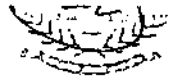
Dated. 22/01/2024

- Accountant General Khyber Pakhtunkhwa Peshawar.
- Principal Paramedical Institute of Medical Technologies Swat
- Section Officer -VI Govt. of Khyber Pakhtunkhwa Health Department.
- Deputy Director I.T PHSA Peshawar.
- District Account Officer Swat.
- Mr. Ijaz Ul Haq Junior Clerk (BPS-11).

Received
[Signature]

[Signature]
DIRECTOR GENERAL (Health),
PHSA PESHAWAR.





OFFICE ORDER

(27)

In consequent upon the recommendation of Department Promotion committee meeting held on 15/01/2024. Mr. Hamid Hussain Chowkidar (BPS-03), attached to Government College of Nursing (GCN) Mardan, is hereby promoted to the post of Junior Clerk (BPS-11) with immediate effect in the best public interest.

In consequent to the above Mr. Hamid Hussain Junior Clerk (BPS-11) is hereby transferred/posted at Paramedical Institute of Medical Technologies (PIMT) Swat against the vacant post.

DIRECTOR GENERAL (Health),
PHSA PESHAWAR.

Dated: 23/01/2024

PHSA/Admn/Office order/2023-24/ 102

- Principal PIMT Swat
- Principal Government College of Nursing Mardan.
- Section Officer -VI Govt. of Khyber Pakhtunkhwa Health Department.
- Deputy Director I.T PHSA Peshawar.
- District Accounts Officer Swat and Mardan.
- Mr. Hamid Hussain Junior Clerk (BPS-11) PIMT Swat.

Handwritten signature
DIRECTOR GENERAL (Health),
PHSA PESHAWAR.

Government of Khyber Pakhtunkhwa, Peshawar, Ph: 091-2614223-5, Fax: 091-2614360
Website: www.pksa.gov.pk

BEFORE THE DIRECTOR HEALTH, KHYBER
PAKHTUNKHWA, PESHAWAR

Shaukat Ali

V/S

Promotion Committee through Chairman Dr. Shaharyar Govt.
Provincial Health Services Academy at Peshawar & others

INDEX

S #	Description	Annexure	Pages #
1.	Departmental appeal	---	
2.	Copy of appointment order	A	
3.	Copy of promotion order	B	
4.	Copy of seniority list	C	
5.	Copies of academic record	D	

Appellant

Shaukat Ali
Cell No: 0346-9048283

BEFORE THE DIRECTOR HEALTH, KHYBER
PAKHTUNKHWA, PESHAWAR

Departmental Appeal No. _____ of 2024

Shaukat Ali son of Muhammad Akbar resident of College Colony, Saidu Sharif, District Swat presently service as Class-IV at Govt. Nursing College, Saidu Sharif, Swat.

.....Appellant

VERSUS

1. Promotion Committee through Chairman Dr. Shaharyar Govt. Provincial Health Services Academy at Peshawar.
2. Noor Khan Junior Clerk at Govt. Paramedical Institute of Medical Technology, Saidu Sharif, Swat
3. Ijazul Haq Junior Clerk at Govt. Paramedical Institute of Medical Technology, Saidu Sharif, Swat
4. Hamid Hussain Junior Clerk at Govt. Paramedical Institute of Medical Technology, Saidu Sharif, Swat

.....Respondents

DEPARTMENTAL APPEAL AGAINST THE
OFFICE ORDER NO. 29/PHSA/ADMN/OFFICE
ORDER/ 2023-24 / 337 DATED 30-01-2024,
OFFICE ORDER NO. 03/ PHSA/ADMN/OFFICE
ORDER/ 2023-24 / 133 DATED 22-01-2024 AND
OFFICE ORDER NO. 29/PHSA/ADMN/OFFICE
ORDER/ 2023-24 / 162 DATED 23-01-2024,

WHEREBY THE RESPONDENTS NO. 2 TO 4 HAS BEEN ILLEGALLY PROMOTED TO THE POST OF JUNIOR CLERK.

Respectfully Sheweth,

Brief facts giving raise to appellant to file the instant appeal are as under;

- 1) That the appellant was initially recruited as Class-IV on 02-08-2007 by the competent authority after completion of all formalities. (copy of appointment order is attached here with as Annexure "A")
- 2) That appellant rendered meritorious to the department without any complaint of the official and no complaint whatsoever has been made by the officials.
- 3) That the appellant being qualified having the requisite qualifications of merit to the post of Junior Clerk through the procedure of promotion has been given in the relevant rules seniority come fitness. Therefore, the respondent No. 1 violated the said rules by promoting the juniors staffs / respondents No. 2 to 4. (Copies of office orders are attached as annexure "B")
- 4) That on 01-11-2023, the department issued seniority list wherein the respondent No. 2 stood on serial No. 27, appointed on 21-03-2011, respondent No. 3 stood on serial No. 48, appointed on 25-03-2016 and respondent No. 4 stood on serial No. 9, appointed on 21-06-2008, while the appellant

stood on serial No. 20. (Copy of seniority list is attached as annexure "C").

- 5) That the order of the promotion committee is illegal, against the law & violated the golden principle of seniority come fitness, though the appellant is the most senior person in the list of class-iv employee, furthermore the 40% quota reserve for class-IV employee was violated by promoting the junior incumbent.
- 6) That the respondent No. 1 utterly disregard the seniority list prepared by the department while promoting the most junior incumbent, thus violated the basic fundamental rights enshrined in the constitution.
- 7) That the respondents No. 2 to 4 are illegally promoted by the respondent No. 1, though they were appointed on 21-03-2011, 25-03-2016 and 21-06-2008 committed gross illegality, therefore liable to struck down.
- 8) That the seniority is the continues cause of action which can be agitated at any time so, the appellant is fit for promotion on the strength of length of service, but the act of respondents toward appellant is very harsh so, the act of respondents is amount to be contempt, on the reasons the respondents have no mandate under the law to ignore the appellant for the propose promotion.
- 9) That the act of departmental authority is unlawful, violative of all norms of justice so, the appellant entitled to promotion without influence extraneous consideration.

10) That the appellant is meritorious and highly qualified.

(Copies of academic record are attached as annexure "D")

11) That the impugned order is the result of mis-reading & non-reading of material present on case file.

Therefore in view of the above submissions, it is most humbly prayed that on acceptance of the instant appeal the office order No. 29/PHSA/ADMN/OFFICE ORDER/ 2023-24 / 337 Dated 30-01-2024, office order No. 03/ PHSA/ADMN/OFFICE ORDER/ 2023-24 / 133 Dated 22-01-2024 AND office order No. 29/PHSA/ADMN/OFFICE ORDER/ 2023-24 / 162 dated 23-01-2024 of the respondents No. 2 to 4 may kindly be declared as illegal, unlawful, void-ab-initio and liable to be struck down and the appellant may kindly be promoted to the post of Junior Clerk (BPS-11) with all back benefits. Any other relief which are proper in the instant circumstances of the may also be granted.

Appellant

Shaukat Ali

Dated: 11-03-2024

بعدالت جناب سروس لکھنؤ بیورو بمقام پشاور۔

34

منجانب شریک علی

مورخہ ۱۵ - ۷ - ۲۰۲۶

بنام پیر و مرشد شریک علی

مقدمہ شریک علی

دعویٰ

جہم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنے طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام پشاور محمد رحیم شاہ خان + عمارت خان مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ بر حلف دینے جواب دہیا و اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف اپیل کی برآمدگی اور منسوخ مذکور کے مکمل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند رہے

2024

7

ماہ

10

المرقوم

العبد

گواہ شد

Shaukat

Affected & Accepted
Addu Arif
M. Rahim Shaikh

شریک علی ولد محمد الرحیم
سکنہ کالج مارلی میوڈیشن سوان

العبد

گواہ شد

العبد

کیلئے منظور ہے۔

پشاور بمقام