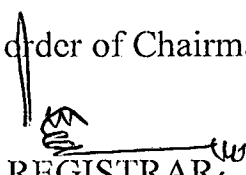


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 1648/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/11/2022	<p>The appeal of Mr. Mahroof Khan presented today by him. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL, PESHAWAR**

Service Appeal No. 1648 2022

Mahroof Khan Presently SDEO (M) Darband District Mansehra

...APPELLANT

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others.

...RESPONDENTS

**APPEAL**

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1.	Appeal alongwith affidavit	1 to 12	
2.	Copy of notification dated 13.01.2022	13	"A"
3.	Copy of modified order No. SO(MC)E&SED/4-16/Posting/ Transfer/ MC dated 06.04.2022	14	"B"
4.	Copy of order dated 14.07.2022	15	"C"
5.	Copy of impugned Notification dated 10.08.2022	16	"D"
6.	Copy of departmental appeal	17-18	"E"
7.	Copy of application	19-20	"F"

  
...APPELLANT  
IN PERSON

**MAHROOF KHAN**  
SDEO (M) Darband, Mansehra

Dated: 21/11/2022

(1)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No: 16618 /2022

Mahroof Khan Presently SDEO (M) Darband District Mansehra.

.....Appellant

**VERSUS**

1. Govt of Khyber Pakhtunkhwa through Chief Secretary,  
Khyber Pakhtunkhwa Peshawar.
2. Secretary Elementary & Secondary Education, Khyber  
Pakhtunkhwa Peshawar.
3. Director Elementary & Secondary Education Khyber  
Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Mansehra.
5. Shams Ur Rehman, Deputy DEO (Male) Mansehra.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4  
OF KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT 1974 FOR  
DECLARATION TO THE EFFECT  
THAT IMPUGNED TRANSFER  
ORDER/ NOTIFICATION NO.  
SO(MC)E&SED/4-16/2021/POSTING/  
TRANSFER/MC DATED 10.08.2022**

ISSUED BY RESPONDENT NO. 2, WHEREBY THE  
RESPONDENT NO. 2 HAS TRANSFERRED AND  
POSTED RESPONDENT NO. 5 AGAINST THE  
VACANT POST OF DEPUTY DEO MALE  
(MANSEHRA) WHICH IS PERVERSE,  
DISCRIMINATORY, AGAINST THE LAW ON THE  
SUBJECT.

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**PRAYER;** ON ACCEPTANCE OF INSTANT  
SERVICE APPEAL, THE IMPUGNED TRANSFER  
ORDER/ NOTIFICATION NO. SO(MC)E&SED/4-  
16/2021/ POSTING/TRANSFER/MC DATED  
10.08.2022 ISSUED BY RESPONDENT NO. 1 MAY  
GRACIOUSLY BE SET-ASIDE AND BY  
RESTORING THE NOTIFICATION  
SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC  
DATED 13.01.2022, THE PRESENT APPELLANT BE  
POSTED/ ADJUSTED AGAINST THE POST OF  
DEPUTY DEO (MALE) MANSEHRA. ANY OTHER  
RELIEF WHICH THIS HONORABLE COURT  
DEEMS FIT AND PROPER IN THE  
CIRCUMSTANCES OF THE CASE MAY ALSO BE  
GRANTED TO THE APPELLANT.

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Respectfully Sheweth;-

The appellant beg to submits as under;-

1. That the appellant is serving in District Mansehra SDEO (Male) Darband and is serving with complete devotion, dedication and leave no stone unturned in the smooth functioning of the department.
2. That the appellant was posted as Deputy DEO (Male) Mansehra vide Notification No. SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 13.01.2022. On the basis of dent of hard work and on the principle of seniority. Copy of notification dated 13.01.2022 is attached as Annexure "A".
3. That the appellant is absolutely a law abiding employee of the department has no nexus with the political entities of the KP, therefore, the appellant's order of posting as Deputy DEO (Male) Mansehra was challenged by one Raja Jahangir, having political influence and backing, before the Service Tribunal K.P Peshawar and got suspended Notification No. SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 13.01.2022. As a result, the said Raja Jahangir

was appointed as per direction of Service Tribunal as Deputy DEO (Male) Mansehra. Copy of modified order No. SO(MC)E&SED/4-16/Posting/ Transfer/ MC dated 06.04.2022 is attached as Annexure "B".

4. That during the pendency of service appeal before the this Honourable Tribunal, the said officer has been transferred from Mansehra to District Haripur as Deputy DEO (Male) Haripur vide order/ Notification No. SO(MC)E&SED/ 4-16/2022 dated 14.07.2022. Copy of order dated 14.07.2022 is attached as Annexure "C".

5. That in case of transfer of the Raja Jahangir from Mansehra to Haripur, service appeal of the said officer has gone infructuous and the order of the appellant as Deputy DEO (Male) Mansehra Notification No. SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 13.01.2022 is in field. Therefore, the appellant was/ is Deputy DEO (Male) Mansehra as the order of the appellant has not specifically been cancelled.

6. That thereafter, another junior officer/ respondent No. **S** has illegally been posted from District Abbottabad to Mansehra as Deputy DEO (Male) vide

Notification No. SO(MC)E&SED/4-16/2021/  
POSTING/ TRANSFER/MC, dated 10.08.2022. Copy  
of impugned Notification dated 10.08.2022 is annexed  
as Annexure "D".

7. That it is a settled principle of law that no officer is posted where senior officer is available. Now, the appellant is suffering mental agonies and hardships to serve under the command and control of a junior officer, besides, as submitted above, the posting order of the appellant as Deputy DEO (Male) Mansehra is still in field and two persons cannot be posted against one post.
8. That feeling aggrieved, the appellant has filed departmental appeal/ representation vide diary No. 2485 dated 15.08.2022 before the respondent No. 1 Copy of departmental appeal is annexed as Annexure "E".
9. That after lapse of more than 3 months, when the competent authority has not decide the fate of appeal of appellant, the appellant also submitted an application for his adjustment, but in vain. Copy of application is annexed as Annexure "F".

10. That feeling aggrieved, the appellant has now come to this Honourable Tribunal with the instant appeal for setting-aside the impugned transfer/ order impugned notification dated 10.08.2022, inter-alia on the following grounds:-

**GROUND S;-**

a) That, the impugned Notification dated 10.08.2022 has been issued by the respondent No 2 is illegal, unlawful, without lawful authority, arbitrary, perverse, discriminatory, malafide and consequently of no legal effects upon the rights of appellant.

b) That, appellant was posted as Deputy DEO (male) Manshra vide Notification dated 13.01.2022 and transferred from the said station vide impugned Notification dated 10.08.2022 without allowing him to complete his tenure, which is highly unjust, unfair, unwarranted and against the transfer/ posting policy on the subject.

c) That it is well settled by now that Article 199 casts an obligation on the High Court to act in Aid of



law, protect the rights of the citizens within framework of the Constitution against infringement of law and constitution by the executive authorities, strike a rational compromise and fair balance between the rights of the citizens and action of the state functionaries, claimed to be larger interest of the society. A power is conferred on the High Court under the constitution and is to be exercised subject to constitutional controlled executive action so as to bring it inconformity with the law. Whenever, the executive acts in violation of the law an appropriate order can be granted, which will relieve the citizen of effects of illegal action. It is an omnibus article under which relief can be granted to the citizen of the country against infringement of any provision of law or of the constitution. If the citizen of this country are deprived of the guarantee given to them under the constitution, illegally or, not accordance with law then Article 199 can always be invoked for redress. Reliance placed on PLD 2006 SC 276.

- d) That even otherwise, there was no lawful justification with the respondent No 2 to transfer the appellant. Even if the respondents were

desirous to facilitate the official namely Raja Jahangir, as well as respondent No. 5, he could have been adjusted in some other station. This act of the respondents depicts malafide on their part. Hence, the impugned notification is liable to be set-aside.

- e) That it is pertinent to mention here, that present appellant is a senior most from the respondent No. 5 who have been appointed/ adjusted against the post of Deputy DEO (male) Mansehra where, the order/ notification dated 13.01.2022 of appellant is in field. It is a settled principle of law that no officer is posted where senior officer is available, due to which the appellant is suffering mental agonies and hardships to serve under the command and control of a junior officer, besides, as submitted above, the posting order of the appellant as Deputy DEO (Male) Mansehra is still in field and two persons cannot be posted against one post.
  
- f) That, the respondent No. 2 transferred/ posted the appellant without mentioning any reasons, under political pressure, ignoring all the rules and regulations on the subject, only to accommodate

their well wisher(s) and blue eyed, which is not only against the law/ rules on the subject but is in violation of Article 4, 8 and 25 of the Constitution *ibid.*

g) That the respondents have not treated the appellant in accordance with law, rules and policy on the subject and acted in violation of Article-4 of the Constitution of Islamic Republic of Pakistan 1973 and unlawfully refused to adjust the appellant which is unjust, unfair, illegal, hence not sustainable in the eye of law.

h) That under Section 24-A of General Clauses Act, 1897, where any authority is vested with the power to make any order, such power shall be exercised reasonably, fairly, justly and for the advancement of the purposes of the enactment under which the power is conferred but in the case in hand the power was not exercised as such, rather, the same was misused arbitrarily to the detriment of appellant without any rhyme or reason, therefore, the impugned act of respondents is not legally maintainable.

i) That it is inalienable right of every citizen to be treated in accordance with law and especially when placed in similar position with the other persons, thus, the impugned act being nullity in the eye of law is liable to be struck down.

j) That the impugned Notification dated 10.08.2022 if seen from any angle, both factually and legally is not maintainable, hence, liable to be set-aside.

k) That there is no other efficacious, speedy or adequate remedy available to the petitioner except the instant constitutional petition.

l) That the addresses of the parties are correctly mentioned in heading of writ petition.

m) That the other grounds shall be urged at the time of arguments with the leave of this Honourable Court.

Under the circumstances it is respectfully prayed that on acceptance of instant service appeal, the impugned transfer order/ notification no. SO(MC)E&SED/4-16/2021/ posting/transfer/MC dated 10.08.2022 issued by respondent

no. 2 may graciously be set-aside and by restoring the notification SO(MC)E&SED/4-16/2021/posting/transfer/MC dated 13.01.2022, the present appellant be posted/ adjusted against the post of Deputy DEO (Male) Mansehra. Any other relief which this Honorable Court deems fit and proper in the circumstances of the case may also be granted to the appellant.

**INTERIM RELIEF:**

It is further prayed that operation of the impugned Notification dated 10/08/2022 may kindly be suspended and respondents be directed not to compel the appellant to relinquish the charge of the post of Deputy DEO (M) Mansehra, till final disposal of the Appeal.

  
...APPELLANT  
IN PERSON

**MAHROOF KHAN**  
SDEO (M) Darband, Mansehra

Dated: 21/11/2022

**VERIFICATION:-**

*Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court*

  
...APPELLANT  
IN PERSON

(12)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_ 2022

Mahroof Khan Presently SDEO (M) Darband District Mansehra  
...APPELLANT

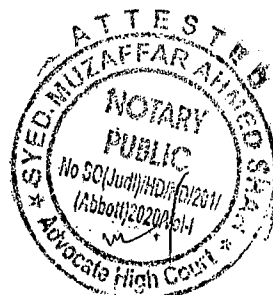
**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary  
Education, Khyber Pakhtunkhwa Peshawar and others.  
...RESPONDENTS

**APPEAL**

**AFFIDAVIT**

***I, Mahroof Khan Presently SDEO (M) Darband District Mansehra, do hereby  
solemnly affirm and declare that the contents of foregoing appeal are true  
and correct and nothing has been concealed therein from this Honourable  
Court.***



21/11/22

  
**DEPONENT**



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
 Phone No. (011) 4221584

"A"

Dated Peshawar the January 13<sup>th</sup>, 2022

**NOTIFICATION**

**NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC:** The Competent Authority is pleased to order the posting/transfer of the Management Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mr. Maroof Khan, (MC BS-17)	SDEO (Male) Darband, Mansehra	Deputy DEO (Male) Mansehra (Vice No-2)
2.	Mr. Raja Jehangir (MC BS-17)	Deputy DEO (Male) Mansehra	SDEO (Male) Martung, Shangla (AVP)

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) Mansehra and Shangla.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Mansehra and Shangla.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.

*(Handwritten Signature)*  
**(HARBEZUR-REHMAN SHAH)**  
**SECTION OFFICER (Management Cadre)**

14

"B"



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-5223588

Dated Peshawar the April 06<sup>th</sup> 2022

**NOTIFICATION**

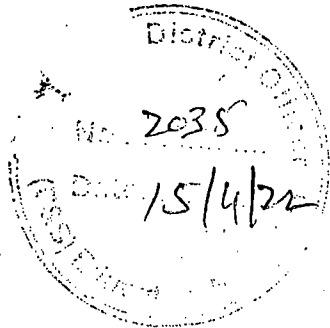
**NO. SO(MC)E&SED/4-16/POSTING/TRANSFER/MC:** This Department's Notification of even number dated 13-01-2022 regarding posting/transfer of Mr. Maroof Khan (MC BS-17) SDEO (Male) Darband Mansehra and Mr. Raja Babu Jehangir (MC BS-17) Deputy DEO (Male) Mansehra is hereby suspended in light of the Khyber Pakhtunkhwa Service Tribunal Order sheet dated 02-02-2022 in Service Appeal No. 150/2022, till date fixed.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Male) Mansehra and Shangla.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. District Accounts Officers Mansehra and Shangla.
7. Section Officer (Litigation-II) E&SE Department with the direction to pursue the case in KP Service Tribunal Peshawar till final decision.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.



*(Signature)*  
(JUNAID SHAH)  
SECTION OFFICER (Management Cadre)





"C" (S)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the July 14<sup>th</sup> 2022

**NOTIFICATION**

**NO.SO(S/F)/E&SE/4-16/2022/:** The following posting transfer order of Management Cadre officers are hereby ordered with immediate effect, in the best public interest.

Sr. No	Name & Designation	From	To
01	Mr. Raja Babu Jehangir (MC BS-17)	Deputy DEO in (OPS) (Male) Manshra	Deputy DEO in (OPS) (Male) Haripur.
02	Mr. Fazal Qadir (MC BS-17)	SDEO (Male) Ogai, Manshra	SDEO (Male) Khanpur, Haripur

2. No TA/DA is allowed.

**SECRETARY**  
ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT

**Endst: of even No.& date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) Manshra, Haripur & Shangla.
4. District Accounts Officer, Manshra, Haripur & Shangla.
5. Director EMIS, E&SE Department.
6. PS to Secretary, E&SE Department.
7. Officer concerned.
8. Office order file.

*Naseer*  
14.7.22.  
**(NASEER ABBAS KHALIL)**  
SECTION OFFICER (Management Cadre)

"D" (16)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the August 10<sup>th</sup>, 2022

**NOTIFICATION**

**NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC:** The following posting / transfers of Male Management Cadre Officers are hereby ordered with immediate effect, in the best public interest as stop gap arrangement till further orders: -

Sr. No	Name of officer	From	To
1.	Mr. Shams ur Rehman (MC BS-17)	SDEO (Male) Abbottabad	Deputy DEO (Male) Mansehra in OPS (AVP).
2.	Mr. Ihsan Ullah (MC BS-17)	SDEO (Male) Landi Kotal Khyber	Deputy DEO (Male) Mohmand in OPS (AVP).

SECRETARY TO THE GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) Abbottabad and Khyber.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Abbottabad and Khyber.
6. PS to Minister E&SE Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

(NASEER ABBAS KHALIL)  
SECTION OFFICER (Management Cadre)

*Naseer*  
10-08-22

10/12

To

Diary # 2485

Dated 15-08-2022

(17)

The Worthy Chief Secretary  
Government of Khyber Pakhtunkhwa  
Peshawar

Subject; **DEPARTMENTAL APPEAL:** AGAINST IMPUGNED  
TRANSFER ORDER/ NOTIFICATION NO. SO(MC)E&SED/  
4-16/2021/POSTING/TRANSFER/MC DATED 10.08.2022,  
WHEREIN JUNIOR TO THE APPELLANT HAS BEEN POSTED  
AS DEPUTY DEO (MALE) MANSEHRA.

Respected Sir,


The appellant rights to submits as under;-

1. That the appellant is serving in District Mansehra SDEO (Male) Darband and is serving with complete devotion, dedication and leave no stone unturned in the smooth functioning of the department.
2. That the appellant was posted as Deputy DEO (Male) Mansehra vide Notification No. SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 13.01.2022. On the basis of dent of hard work and on the principle of seniority. Copy of notification dated 13.01.2022 is attached herewith.
3. That the appellant is absolutely a law abiding employee of the department has no nexus with the political entities of the KP, therefore, the appellant's order of posting as Deputy DEO (Male) Mansehra was challenged by one Raja Jahangir, having political influence and backing, before the Service Tribunal K.P Peshawar and got suspended Notification No. SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 13.01.2022. As a result, the said Raja Jahangir was appointed as per direction of Service Tribunal as Deputy DEO (Male) Mansehra. Copy of modified order No. SO(MC)E&SED/4-16/Posting/ Transfer/MC dated 06.04.2022 is attached herewith.

- (18)
4. That during the pendency of service appeal before the K.P Service Tribunal, the said officer has been transferred from Mansehra to District Haripur as Deputy DEO (Male) Haripur vide order/ Notification No. SO(MC)E&SED/4-16/2022 dated 14.07.2022. Copy of said order dated 14.07.2022 is attached herewith.
  5. That in case of transfer of the Raja Jahangir from Mansehra to Haripur, service appeal of the said officer has gone infructuous and the order of the appellant as Deputy DEO (Male) Mansehra Notification No. SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 13.01.2022 is in field. Therefore, the appellant was/ is Deputy DEO (Male) Mansehra as the order of the appellant has not specifically been cancelled.
  6. That another junior officer, namely Shams ur Rehman to the appellant has illegally been posted from Abbottabad to Mansehra as Deputy DEO (Male) vide Notification No. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC, dated 10.08.2022. It is a settled principle of law that no officer is posted where senior officer is available. Now, the appellant is suffering mental agonies and hardships to serve under the command and control of a junior officer, besides, as submitted above, the posting order of the appellant as Deputy DEO (Male) Mansehra is still in field and two persons cannot be posted against one post. Copy of Notification dated 10.08.2022 is attached herewith.

In view of the above, it is prayed that impugned posting order/ notification of Shams ur Rehman Deputy DEO (Male) Mansehra may be set-aside as per the principle of seniority and the appellant may be allowed to serve as Deputy DEO (Male) Mansehra with peace of mind and as per law.

Dated; 15/8 /2022

  
(APPELLANT)  
Mahroof Khan  
Presently SDEO (M) Darband  
District Mansehra

To

"F"  
19

The Worthy Secretary  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject; APPLICATION FOR ADJUSTMENT.

Respected Sir,

With profound veneration it is submitted as under;-

1. The applicant was working as SDEO (Male) Darband, District Mansehra.
2. That the applicant was transferred from SDEO (Male) Darband to the post of Deputy DEO (Male) Mansehra vide Notification No. SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 13.01.2022 on the basis of seniority. Copy of order dated 13.01.2022 is attached herewith.
3. That the applicant's order of posting as Deputy DEO (Male) Mansehra was challenged by one Raja Jahangir, having political influence and backing, before the Service Tribunal K.P Peshawar and got suspended Notification No. SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 13.01.2022. As a result, the said Raja Jahangir was appointed as per direction of Service Tribunal as Deputy DEO (Male) Mansehra. Copy of modified order No. SO(MC)E&SED/4-16/Posting/Transfer/MC dated 06.04.2022 is attached herewith.
4. That during the pendency of service appeal before the K.P Service Tribunal, the said officer has been transferred from Mansehra to District Haripur as Deputy DEO (Male) Haripur vide order/ Notification No. SO(MC)E&SED/

20

4-16/2022 dated 14.07.2022. Copy of said order dated 14.07.2022 is attached herewith.

5. That another junior officer, namely Shams ur Rehman to the appellant has illegally been posted from Abbottabad to Mansehra as Deputy DEO (Male).
6. That It is a settled principle of law that no officer is posted where senior officer is available. Now, the appellant is suffering mental agonies and hardships to serve under the command and control of a junior officer.

In view of the above, it is requested that the applicant may kindly be posted/ adjusted as Deputy DEO (Male) Battgram against vacant post.

Thanking you in anticipation

Dated; 16/11/2022

Respectfully Yours  
Mahroof Khan  
Presently SDEO (M) Darband  
District Mansehra

