


26.04.2023

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 27.06.2023 before D.B. Parcha Peshi given to the parties.



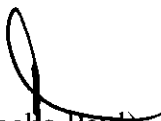
(Rozina Rehman)
Member (J)

Mutazem Shah


27.06.2023

1. Junior to counsel for the appellant present. Mr. Asad Ali Khan, learned Assistant Advocate General for the respondents present.

2. Former requested for adjournment due to engagement of learned senior counsel for the appellant before the Hon'ble Peshawar High Court, Peshawar. Granted. To come up for arguments on 25.10.2023 before the D.B. Parcha Peshi given to the parties.



(Fareeha Paul)
Member (E)



(Rashida Bano)
Member (J)

Kaleemullah

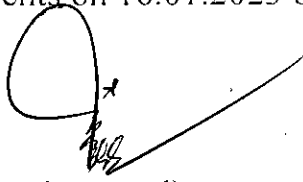
SCANNED
AT
Peshawar

21.11.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 16.01.2023 before the D.B.

SCANNED
BY
PES
TH



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

16.01.2023

Counsel for the appellant present. Muhammad Jan learned District Attorney for the respondents present.

Miss Fareeha Paul, learned Member (Executive) is on leave today, therefore, case is adjourned to 26.04.2023 for arguments before the D.B.

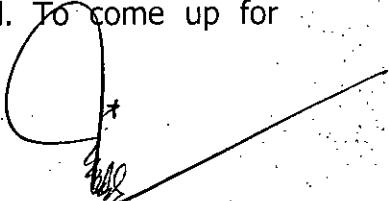


(Rozina Rehman)
Member (J)

02.09.2022

Learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General alongwith Mr. Sajid Khan, Section Officer for the respondents present.


Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments on the next date. Adjourned. To come up for reply/comments on 17.10.2022 before S.B.


(Mian Muhammad)
Member (E)

17.10.2022

Junior to counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General alongwith Nabi Gul, AD and Muhammad Shafeeq, Assistant for respondents present.

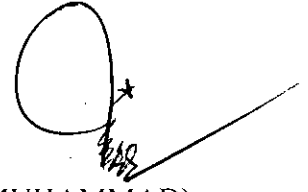
Written reply on behalf of respondents submitted which is placed on file. A copy of the same is handed over to the junior counsel for the appellant. To come up for rejoinder/argument on 21.11.2022 before D.B.


(Fareeha Paul)
Member (E)

26.04.2022

Counsel for the appellant present.

Preliminary arguments could not be heard due to paucity of time. Adjourned. To come up for preliminary hearing on 27.04.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER(E)

27.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant 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 respondents for submission of written reply/comments. To come up for reply/comments on 06.07.2022 before S.B.

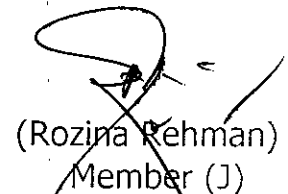
Rs-600/-
Appellant Deposit
Security & Process Fee

A. J. J. / 09/5/22

06th July, 2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional AG for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 02.09.2022 before S.B.



(Rozina Rehman)
Member (J)





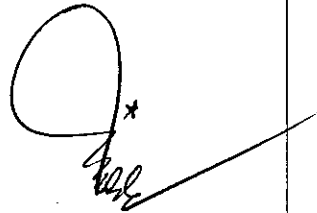
(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 493/2022


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 06/04/2022 | <p>The appeal of Mr. Ajab Khan resubmitted today by Mr. Saadullah Khan Marwat 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,</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>07-04-2022</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>07.04.2022</p> <p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 26.04.2022 before S.B.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER(E)</p> |

The appeal of Mr. Ajab Khan, Senior Clerk, VTCDP, Social Welfare, District Mardan received today i.e. on 18.03.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

1. Every memorandum of appeal shall be presented in approved file covers.
2. Checklist is not attached with the appeal.
3. Appeal has not been flagged/marked with annexure marks.
4. Annexures of the appeal may be attested.
5. Affidavit attached with the appeal may be attested by the Oath Commissioner.
6. Copy of impugned order is not attached with the appeal which may be placed on it.
7. Copy of departmental appeal in respect of appellants is not attached with the appeal which may be placed on it.
8. Copies of annexures A to H referred to in the memo of appeal are not attached with the appeal.
9. Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 695 /S.T,

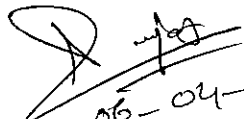
Dt. 21/03 /2022


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saad Ullah Khan Marwat Adv. Pesh.

Sir,

Request for further time to remove
the objections.


06-04-22

BEFORE THE HONORABLE SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 492 to 498 / 2022

Mr. Syed Majid Ali Shah & Others..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat Peshawar

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BEFORE THE PESHAWAR SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 492 to 498 of 2022

Mr. Syed Majid Ali Shah & others..... (Appellant)

Versus

Government of Khyber Pakhtunkhwa

AFFIDAVIT

I Syed Nabi Gul, Superintendent (Lit), Directorate of Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the accompanying reply/comment are true and correct to the best of my knowledge and belief and that nothing has been concealed therein from this Hon'ble Tribunal.

DEPONENT

CNIC No.17101-0377128-9

Cell# 03469148582

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 492 to 498 / 2022

Syed Majid Ali Shah & 06 Others.....Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Zakat, usher, Social Welfare & Women Empowerment Department Peshawar.
2. Chief Secretary to Government of Khyber Pakhtunkhwa Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa Finance Department.
4. The Director, Social Welfare, Special education & Women Empowerment Department, Peshawar..... **(Respondents)**

Respectfully Sheweth:

PARA-WISE COMMENT ON BEHALF OF RESPONDENTS

PRE-LIMINARY OBJECTIONS:

1. The appellant has got no cause of action to file this service appeal.
2. That the appeal is not maintainable in its present form.
3. That the appellant has no locus standi or cause of action to file the present service appeal.
4. The appeal is badly time bard. Therefore, the appeal is not maintainable.
5. That the Health Professional Allowance was allowed by the Federal Govt. to only the employees of Directorate General of Special Education, Govt of Pakistan Islamabad and its allied Institutions in pursuance of the judgment of the Federal Services Tribunal, therefore the appeal is not maintainable.

FACTS:

1. Correct.
2. Correct to the extent that the appellant was transferred to Vocational Training for Disabled Persons Mardan on 19.09.2013.
3. Correct.
4. Correct to the extent that the Federal Govt. granted Health Professional Allowance to the employees of Special Education Institutions working under the Directorate General of Special Education Islamabad and not to the employees working in Social Services Medical Centers under the Ministry of Social Welfare & Special Education, Govt. of Pakistan Islamabad (Social Welfare side). The appellants were initially appointed on the strength of Social Welfare side under the said Ministry and they may not consider them at par with the employees of Special Education Institutions devolved under the 18th amendment just only by transferring themselves to the Special Education Institutions (devolved). As far as consolidated judgments dated 18.07.2017, 11.01.2016 and 05.01.2015 of the Federal Service Tribunal against the stoppage of allowance, the said judgments were purely in the favor of

the employees working under the Directorate General of Special Education Islamabad and not for the employees working on social welfare side under the Ministry of Social Welfare and Special Education Govt. of Pakistan Islamabad. It is further to clarify that the Govt. of Khyber Pakhtunkhwa Finance Department vide Notification No. FD(SOSR)-7/2019-53 dated 25-11-2019 granted Health Professional Allowance which is re-produced as under:

“In pursuance of the Supreme Court of Pakistan Civil Appeal No. 811/2016 titled “Muhammad Atique ur Rehman and others vs Federal Government through Secretary Capital Administration etc”, the Government of Khyber Pakhtunkhwa (Provincial Cabinet) has been approved health professional allowance at the rate of one basic pay to the devolved employees working in the Special Education Institutions from the date of their devolution to Provincial Government of Khyber Pakhtunkhwa.

Thus the above said allowance will be admissible only to the employees of the Special Education Institutions of Khyber Pakhtunkhwa devolved under the 18th constitutional amendment.”

5. Pertains to record. As explained above, the appellant is not entitled to receipt Health Professional Allowance and the allowance received by the appellant is against the rules, law and liable to be recovered in lump sum and do not justify for permanent receipt.
6. No comments. The matter relates to Health Department.
7. Incorrect, hence denied. Stoppage of Health Professional Allowance was within the law and rules. Agitation of the appellant was based on malafide.
8. Correct to the extent that the appellant along with other employees of Special Education Institutions (Devolved) filed a Writ Petition No. 5452-P/2018 in the Honorable Peshawar High Court, Peshawar and later on the petitioners devolved from the Directorate General of Special Education, Govt. of Pakistan withdrew the petition due to grant of Health Professional Allowance by the Govt.
9. Correct.
10. Incorrect, hence denied. The appellant was devolved from Social Welfare Side of Ministry of Social Welfare & Special Education Govt. of Pakistan, Islamabad which was an independent entity and the Health Professional Allowance was allowed only to the employees working under the Directorate General of Special Education Institutions, Islamabad. Both the Special Education and Social Welfare are quite different entities having different job description and working under the administrative control of Social Welfare, Special Education & Women Empowerment Department. The Finance Department Govt. of Khyber Pakhtunkhwa issued notification dated 25.11.2011 of which text has been narrated in Para-4 above.
11. Incorrect, hence denied. According to the letter dated 19.08.2020 of the Director Social Welfare & Special Education Special Education Complex Phase-V Sector B/2 Plot No. 5 Peshawar. he requested the Director Social Welfare, Special Education & Women Empowerment Department Govt of Khyber Pakhtunkhwa for approaching Finance

Department Govt. of Khyber Pakhtunkhwa for creation of new object Head "Health Allowance" for the Financial Year 2019-2020 which was already allowed by the Finance Department Govt of Khyber Pakhtunkhwa vide (**Annex-A**) dated 25.11.2019 to the devolved employees working in the Special Education Institutions from the date of their devolution to Provincial Govt of Khyber Pakhtunkhwa (**Annex-B**). Therefore, the letter date 19.08.2020 was for the purpose of creation of new object head of "Health Allowance" for the financial year 2019-2020 for the employees of Special Education Institutions devolved under the 18th amendment and not a summary for allowing one running basic pay as Health Allowance to all the employees of Special Educations and Directorate of Social Welfare, Special Education and Women Empowerment Khyber Pakhtunkhwa

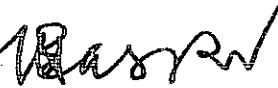
12. Incorrect, hence denied. The WP came up for hearing 16.02.2022 was dismissed on the grounds of jurisdiction and not of merit.
13. Incorrect, hence denied. The appellant has no cause of action to file the present appeal.

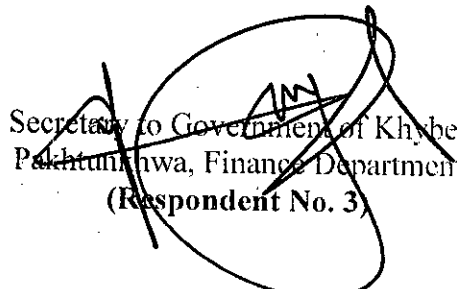
GROUNDS


- A. Incorrect, hence denied. The Respondents are law abiding civil servants and respect the Constitution of Islamic Republic of Pakistan & did not violate any article of the Constitution of Islamic Republic of Pakistan. Moreover, as per Notification of the Finance Department the appellants are not eligible for the said relief (**Annex-A**).
- B. Incorrect, hence denied. The factual position has been explained in the preceding para.
- C. Incorrect hence denied. The factual position has been explained in the preceding para.
- D. Incorrect, hence denied. The factual position has been explained in the preceding paras. The judgment of the August Supreme Court of Pakistan allowing the said allowance to allied institutions / centers NCRDP (PCRDP) at Provincial level, burden of proof is on the shoulders of the appellants. Provincial Council for the Rehabilitation of Disabled Persons (PCRDP) being autonomous body employees of which are working under the administrative control of Social Welfare, Special Education and Women Empowerment Department Khyber Pakhtunkhwa are not receiving such like allowance nor allowed by the Government of Khyber Pakhtunkhwa. Therefore, keeping in view the above factual position, the appellants are not entitled to draw Health Professional Allowance.
- E. Incorrect, hence denied. No official (s) of the Social Welfare, Special Education & Women Empowerment Khyber Pakhtunkhwa are drawing / allowed such facility. Only those devolved employees who were under the administrative control of Directorate General of Special Education, Government of Pakistan, Islamabad are drawing / allowed such like facility as explained in the preceding paras. As far as working in the Special Education Institution Mardan, in this respect it is stated that the appellant several time requested for transfer to Mardan for the reasons mentioned in his applications / requests, therefore keeping in view his requests, he was transferred to Mardan. Posting of the appellant in the Special Education Complex Mardan does not meant for the allowance i.e. Health Professional Allowance to be granted to him. Requests for transfer to Mardan are at (**Annex-C, D, E, F G & H**).

F. Incorrect, hence denied. No constitutional violation has been made by the respondents by not allowing the said allowance to the appellant. The appellant is a devolved employees devolved from Ministry of Social Welfare SSMC and not from the Directorate General of Special Education Govt. of Pakistan. The Social Services Medical Centers etc and Directorate General of Special Education Govt. of Pakistan were quite different wings with different job description and were just only under one Ministry i.e. Social Welfare & Special Education. That any other grounds which has not been specifically taken in the above mentioned comments/reply maybe argued at the time of arguments with the permission of this Honorable Tribunal.

In the view of above factual position it is humbly prayed that the order / letter dated 03.10.2018 is according to the law / rules and the benefits of Notification dated 25.11.2019 may not be extended to the appellants being not relevant and this Appeal being devoid of any merit may graciously be dismissed with cost.


Secretary to Government of Khyber
Pakhtunkhwa, Social Welfare, Special
Education & Women Empowerment
Department
(Respondent No. 1)


Secretary to Government of Khyber
Pakhtunkhwa, Finance Department
(Respondent No. 3)


Director
Social Welfare, Special Education and Women
Empowerment Khyber Pakhtunkhwa
(Respondent No. 4)

Annex A 5



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

(REGULATION WING)

Dated Peshawar the 25-11-2019

NOTIFICATION

- 53

No.FD(SOSR-II)8-7/2019. In pursuance of the Supreme Court of Pakistan Civil Appeal No.811/2016 titled "Muhammad Atique-Ur-Rehman & Others v/s Federal Government of Pakistan through Secretary Capital Administration etc." the Government of Khyber Pakhtunkhwa (Provincial Cabinet) has been pleased to approve Health Allowance at the rate of one running basic pay to the devolved employees working in the Special Education Institutions from the date of their devolution to Provincial Govt of Khyber Pakhtunkhwa.


2. The above said allowance will be admissible only to the employees of Special Education Institutions of Khyber Pakhtunkhwa devolved under 18th Constitutional Amendment.

Secretary to Govt of Khyber Pakhtunkhwa
Finance Department

Endst: No. & Date Even.

Copy is forwarded for information and necessary action to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Principal Secretary to Governor, Khyber Pakhtunkhwa.
4. Secretary to Social Welfare, Special Education & Women Empowerment Deptt.
5. Director, FMIU, Finance Department, Khyber Pakhtunkhwa.
6. PS to Minister Finance, Khyber Pakhtunkhwa.
7. PS to Secretary, Finance Department, Khyber Pakhtunkhwa.
8. PS to Special Secretary, Finance Department, Khyber Pakhtunkhwa.
9. PA to Additional Secretary (Regulation), Finance Department.
10. Master File.


SECTION OFFICER (SR-II)
FINANCE DEPARTMENT

Annex B

(b)

Governn unkhwa
Social Welfare & Special Education & Women Empowerment Department
SPECIAL EDUCATION COMPLEX
Hayatabad Phase -V, Sector B/2 Plot No.5

59/2018/SEC/10127

Peshawar, the 19th August 2020.

✓
The Director,
Directorate of Social Welfare, SE & WE,
Khyber Pakhtunkhwa, Peshawar.

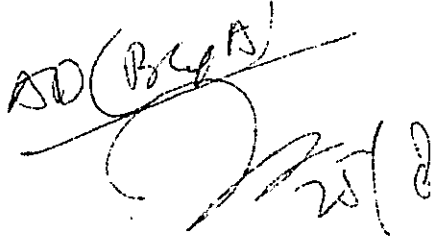
Subject: - **REQUEST FOR CREATION OF NEW OBJECT HEAD FOR HEALTH ALLOWANCE IN THE LIGHT OF APPROVAL BY PROVINCIAL CABINET AND NOTIFICATION OF FINANCE DEPARTMENT, GOVERNMENT OF KHYBER PAKHTUNKHWA.**

This case pertains to the creation of new object head of "Health Allowance" for the Financial Year 2019-20. In this connection Finance Department, Govt of Khyber Pakhtunkhwa, Peshawar issued **vide Notification No. FD (SOSR-II) 8-7/2019-53 dated 25.11.2019 (Regulation Wing)** regarding admissibility of Health Allowance at the rate of one Running Basic pay to the devolved employees working in the Special Education Institutions from the date of their devolution to Provincial Government of Khyber Pakhtunkhwa.

Presently No object Head Exists in the Budget SNE for "Health Allowance" the Said Allowance is drawn under the Head "Health Professional Allowance" therefore the new head is required to be create from the Provincial Finance Department, Peshawar in the Budget SNE for the current financial year 2020-21. In the light of decision of the Provincial Cabinet Committee and with reference to the Notification of Finance Department, Peshawar, Govt of Khyber Pakhtunkhwa vide Notification No. FD (SOSR-II) 8-7/2019-53 dated 25.11.2019 (copy enclosed).

Keeping in view the above position the case may be taken up with Finance Department, Peshawar for the creation of new Head Object of "Health Allowance" in the Budget SNE for the current financial year 2020-21 please.

TO
FROM
SUBJECT
DATE
BY

SD (P&A)


Directorate of Social Welfare
Peshawar
Date: 50278
26-8-2020


(QISMAT KHAN)
DIRECTOR

Copy forwarded to:-

1. PS to Special Secretary (Finance) Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. PS to Accountant General, Government of Khyber Pakhtunkhwa, Peshawar.

DIRECTOR

Annex C

7

25

To

The secretary,
Social Welfare: Spl: Edu& WE
Khyber Pakhtunkhwa.

Subject:- REQUEST FOR DETAILMENT TRANSFER

Respected Sir,

It is respectfully that I am resident of village Gujrat Tehsil& District Mardan and working as "office Assistant" Grade BPS-14 at Directorate Social Welfare: Spl: Edu& WE Peshawar.

It is very Difficult for me and facing very treble due to daily convenience, In the light of above it is therefore humbly request to your kind honour that I May kindly be detailment transferred to special Education Sheikh Maltoon Town Mardan.

I will pray for this act of kindness forever.

Yours Faithfully,

Majid

Syed Majid Ali shah (Asstt)
Litigation Section
Contact No.0300-9146641
0343-9990775

*Director Sew
He post him at
NSDC Mardan on
detailment basis.*

Dated:-04-06-2012

Majid
11/6/2012

Secretary, Directorate of
Social Welfare, Peshawar
Khyber Pakhtunkhwa
Pakistan

AD(A)

*SN
11/6/12*

Per file

12/6

Administrative of
Social Welfare
No. 10415
Date: 12-06-2012

Annex D

B

Director
Social Welfare and Special Education
Peshawar

Request

838
31/5/19

Respected Sir, I am resident of village Gujrat Tehsil & District Mardan and working as "Office Assistant" Grade BPS-14 in Social Welfare and Special Education Peshawar.

Due to my daily commute for me and facing very trouble due to daily traffic. In the light of above it is therefore humbly request to you that I may kindly be transferred to Special Education Mardan.

Thank you for this act of kindness forever.

Yours faithfully,

Syed Majid Ali Shah

Office Assistant

Contact No: 0300 9146641

0343 9990775

BETTER COPY

To

The Director
Social Welfare and Special Education
Peshawar

Subject: TRANSFER

R/Sir,

It is respectfully that I am resident of village Gujrat Tehsil & District Mardan and working as Office Assistant" Grade BPS-14 at Directorate of Social Welfare and Special Education Peshawar.

It is very difficult for me and facing very trouble due to daily convenience. In the light of above it is therefore humbly request to your kind honour that I may kindly be transferred to Special Education Sheikh Maltoon Town Mardan.

I will pray for this act of kindness forever.

Dated 17/05/2012

Yours faithfully,

Syed Majid Ali Shah
Office Assistant
Contact No. 0300 9146641
0343 9990775

The Secretary
Social Welfare and Special Education
Peshawar.

Subject: Request for Transfer

Date
24/4/2013

Sir,

It is submitted that I am permanent resident of Dera Mandan and working as office Asst (B-14) at Directorate of Social Welfare and Special Education Peshawar. As I am living with my ailing and aged parents in ~~in~~ Mandan so it is very difficult for me to perform my duties properly ^{in Peshawar} and look after my ailing parents.

I have come to know that Mr Iqtian Asst (BS-14) posted at Mandan Special Education Complex and performing their duties in Char Sara Special Education Center on attachment basis,

therefore it is requested to kindly transfer Mr Iqtian Asst (BS-14) to the nearest place Peshawar and sayed Majid Ali Shah (BS-14) to my home town Mandan.

Thanks

Syed Majid Ali Shah
Asst (B-14)
Peshawar

Annex E

11

101

To

The Director,
Social welfare, S.P.I. Edu & W.E.
Peshawar.

Subject: Attachement Transfer.

Sir,

S/R:

It is submitted I belong to Vill Gujrat Distt
Mardan, I am working as office Assistant (B-14) at Directorate
of social welfare S.P.I. Edu & W.E Peshawar.

It is further stated that my aged & ailing parents
who are also wholly dependent upon me are residing at Mardan.
It is very difficult for me to look after them properly
as I am posted at Peshawar.

It is therefore requested that I may kindly
be transferred to attachment basis from Peshawar to
Mardan. It will enable me to perform my official duties
properly and also look after my aged parents.

Thanks.

14/5

Yours obediently,
Syed Majid ali Shah.
Assistant (B-14)

Directorate of
Social Welfare S.P.I. Edu & W.E.
No. 3102
Date: 15-5-2013

DD(I)
14/5

Date: 13/5/13

Amru G 12

113

TO,

AD E Pu
10/9

The Director
social welfare SPI, Edu - 8
W.E Govt. of Khyber Pakhtunkhwa,
Peshawar.

subject:- Request for Transfer against the Post of V/I (BS-14)

R/sir

It is submitted I belong to vill, Gujrat Distt Mardan,
I am working as office Assistant (BS-14) at Directorate of Social
welfare SPI, Edu - 8 W.E Peshawar.

It is further stated that my aged & ailing parents who are
also wholly dependent upon me are residing at mardan. It is
very difficult for me to look after them properly as I am
posted at Peshawar.

It is therefore requested that I may
kindly be transferred from Peshawar to Special Education
Mardan against the some vacant posts of "Vocational Instructors
(BS-14) at V.T.C.D.P Special Education Mardan.

It will able me to perform my official duties
properly and also look after my aged parents.

Thanks,

Your's obediently,
Syed

Syed Majid ALI Shah.
Assistant (BS-14)
Peshawar.

Date: 10-09-13

DD

10/9/13

Directorate of
Social Welfare K.P.K.

No: 2947

Date: 10-9-2013

Annex B H

11/13

1181
03/04/2012

The Secretary
Social Welfare and Special Education
Peshawar

Subject :- TRANSFER

Respected sir,

It is respectfully submitted that I am permanent resident of village Gujarat Tahsil & Mardan and working as an office Assistant grade B.S-14 at directorate of social welfare and special Education Peshawar . It is very difficult for me and facing very trouble due to daily convenience. Moreover having come to know that Mr. ISHTIAQ who is also working as an office Assistant at Special Education Sheikh Maltoon Town Mardan and he is the resident of Charsadda and near to Peshawar.

SW
SE

In the light of above it is therefore humbly request to you kind honor that I may kindly be transferred to Special Education Sheikh Maltoon Mardan and Mr. Ishtiaq an office Assistant may kindly be transferred to the Directorate of social Welfare and special Education Jam road Road Peshawar on humane companionate ground.

I will pray for this act of kindness forever.

Your's Faithfully

Date: 01/04/2012

SM
(SAYED MAJID ALI SHAH)

Peshawar.

Assistant litigation section

Contact No: 0300-9146641

0543-9990775

So-ii
Forward to the
Director Genl & SE
to order the
mutual transfer of
Mr. Majid and
Mr. Ishtiaq.
J
3/4/2012