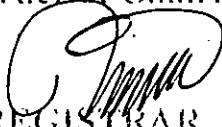


FORM OF ORDER SHEET

Court of _____

Appeal No. 322/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	27/02/2024	<p style="text-align: center;">3</p> <p>The appeal of Mr. Faisal Aftab resubmitted today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 28.02.2024 .Parcha Peshi is given to counsel for the appellant.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

BEFORE THE KPK SERVICE TRIBUNAL
PESHAWAR

S.A No _____ 2024

Faisal Aftab

Versus

Senior Member Board of Revenue and other


APPLICATION FOR FIXATION THE ABOVE TITLED
SERVICE APPEAL BEFORE THE PRINCIPLE SEAT
PESHAWAR INSTEAD OF CAMP COURT ABBOTTABAD
BENCH

Respectfully Sheweth:

1. That the above titled service appeal is pending / adjudication before this Hon'ble Tribunal in which no date of hearing is yet been fixed.
2. That the respondent No.1 & # as well as the council of the petitioner is at District Peshawar.
3. That there is no legal bar for the acceptance of the instant application.

It is therefore, most humbly prayed that the above titled Service Appeal may kindly be fixed for hearing before the principle seat Peshawar instead of Camp Court Abbottabad Bench.

Dated: 27.02.2024


Appellant

Through


Kabir Ullah Khattak


Advocate, High Court
Peshawar

The appeal of Mr. Faisal Aitab received today i.e on 26.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and to be filed within 15 days.

1. According to sub-rule 4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no. 2&4 are un-necessary/improper parties, 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 respondents.
2. Page nos. 13 & 16 of the appeal are illegible which be replaced by legible/better one.
3. Appeal has not been flagged/marked with annexures marks.
4. Annexures of the appeal are unattested.
5. Memorandum of appeal is not signed by the appellant.
6. Sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal requires that every civil servant to whom the relief claim may affect shall also be shown as respondents.
Three copies/sets of the appeal along with annexures i.e complete in all respect for Tribunal and one for each respondent be submitted with the appeal.

No. 426 /S.T.


dt. 26/02/24 /2024.


26/2/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Saeed Khan Adv.
High Court Peshawar.

objection has ^{Re-submitted}
been removed


27-2-24

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

S.A.No. 322 /2024

Faisal Aftab..... Appellant

Versus

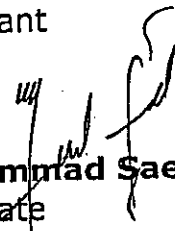
Senior Member Board of Revenue (SMBR)
Khyber Pakhtunkhwa and others..... Respondents

INDEX

S.No.	Description of documents.	Annexure	Pages.
1.	Grounds of appeal with affidavit.		1-6
2.	Application for suspension with affidavit.		7-9
3.	Addresses of the parties.		10
4.	Copy of order dated 30.10.2023	A	11-12
5.	Copy of transfer order/ notification dated 21.02.2024 with better copy	B	13
6.	Copies of departmental appeal and letter dated 26.02.2024 with better copy.	C	14-16
7.	Wakalatnama.		17

Appellant

Through


Muhammad Saeed Khan
Advocate
Supreme Court of Pakistan

Dated: 26.02.2024

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR.

Service Appeal No. 322 /2024

Faisal Aftab son of Gulzar Hussain
Patwari Halqa Kot Najeeb Ullah,
District Haripur.....Appellant

Versus

- 1) Senior Member Board of Revenue (SMBR)
Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Deputy Commissioner, Haripur
- 3) Rashid Khan, Patwari Halqa, Hattar District Haripur.

..... Respondents

Service Appeal u/s 4 of the Khyber
Pakhtunkhwa Service Tribunal Act,
1974 against the office order dated
26.02.2024 whereby the departmental
appeal/ representation of the appellant
against the order dated 21.02.2024
whereby the appellant was transferred
from Kot Najeeb Ullah to Halqa
Khanpur, has been dismissed.

PRAYER:

On acceptance of this appeal, the impugned orders dated 26.02.2024 and 21.02.2024 of the respondent No.2 may kindly be set-aside by restoring the appellant to his current position i.e. the post of Patwari Halqa Kot Najeeb Ullah on the ground that the appellant has not completed his normal tenure in terms of the various clauses of Posting/ Transfer Policy promulgated by the Provincial Government of Khyber Pakhtunkhwa.

Respectfully Sheweth;

- A. That appellant is a law abiding citizen of Pakistan having fundamental rights of constitution of Pakistan, 1973.
- B. That appellant was initially appointed as Patwari and rendered more than 17 years services to the department.
- C. That earlier the appellant was transferred on 30.10.2023 from Halqa Ghandian to Kot Najeeb Ullah and resumed the charge and is performing his duties. (Copy of order is attached).
- D. That suddenly on 21.02.2024 the appellant was again transferred from Kot Najeeb Ullah to Halqa

Khanpur which is premature transfer within a span of 03 months and the tenure of the appellant was not completed under the law i.e appointment, posting transfer rules, 1989. (Copy of transfer order is attached)

E. That due to the premature transfer of the undersigned, my school going children and family members will be adversely affected.

It is pertinent to mention that I shifted my family members including my school going children to Halqa Khapur, therefore, at this premature stage it would not be convenient for the appellant as well for my school going children and family members to make abrupt shifting from Kot Najeed Ullah to Halqa Khanpur.

F. That the impugned office / transfer order dated 21.02.2024 is violative of mandatory clauses of Posting & Transfer policy of the provincial Government and various reported judgments of the Hon'ble Services Tribunal, Peshawar and the August Supreme Court of Pakistan.

G. That the appellant being aggrieved and dissatisfied from the impugned order dated: 21.02.2024 preferred his departmental appeal filed on dated: 23.02.2024 which was rejected on 26.02.2024 on no good grounds. (Copy of Departmental Appeal and Rejection Order are attached)

GROUND OF APPEAL:

That the appellant being aggrieved and dissatisfied from the impugned order dated 21.02.2024 referred above, prefers the instant service appeal on the following amongst other grounds.

- A. That the impugned order is against the law, facts and material available on record.
- B. That the impugned transfer/ posting notification dated 21.02.2024 is violative of the mandatory clauses of Posting & Transfer Policy of the Provincial Government and various reported judgments of this Hon'ble Tribunal and of the August Supreme Court of Pakistan as mentioned in the heading of this appeal.
- C. That this Hon'ble tribunal has already declared in a recent judgment in case titled Mst. Nilofar Kamran..VS.. The Chief Secretary Khyber Pakhtunkhwa in Appeal No.1490/2019 decided on 16.01.2020, wherein it was held that;

" In addition to this the appellant was prematurely transferred in sheer violation of Posting/ Transfer Policy notified by the Provincial Government".

It is pertinent to mention that this Hon'ble Tribunal further observed in an authoritative manner;

5

"Another funny thing that would expose high handedness, favouritism and misuse of authority is notification dated 03.05.2019 and 17.07.2019"

D. That the respondent No.3 frequent posting/ transfer suggest that he is securing desired posting by exerting political influence over the authorities which is a serious misconduct under E &D Rules 2011 which cannot be altogether ignored.

E. That due to the premature transfer of the appellant, his school going children and family members will be adversely affected.

It is pertinent to mention that the appellant shifted his family members including his school going children to Halqa Khanpur, therefore, at this premature stage it would not be convenient for the appellant as well for his school going children and family members to make abrupt shifting from Kot Najeeb Ullah to Halqa Khanpur.

F. That according to Para-5 of the Posting & Transfer Policy of the Government;

"All the concerned are requested to ensure that tenures of the concerned officers/ officials are invariably mentioned in the summaries submitted to the competent authorities for Posting/ Transfer"

G. That additional grounds will be raised with the permission of this Hon'ble Tribunal at the time of hearing.

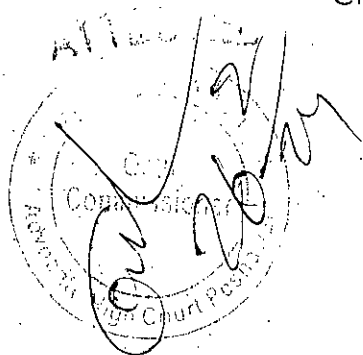
Keep in view what has been stated above, it is therefore, earnestly prayed from this Hon'ble Tribunal to accept this Service appeal, the impugned orders dated 26.02.2024 and 21.02.2024 of the respondents No. 1 and 2 may kindly be set-aside by restoring the appellant to his current position i.e. the post of Patwari Halqa Kot Najeeb Ullah on the ground that the appellant has not completed his normal tenure in terms of the various clauses of Posting/ Transfer Policy promulgated by the Provincial Government of Khyber Pakhtunkhwa.

Appellant
Through
Muhammad Saeed Khan
Advocate
Supreme Court of Pakistan

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent
CNIC No.13302-2109631-7



7

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

C.M No. _____/2024
IN
S.A.No. _____/2024

Faisal Aftab..... Appellant

Versus

Senior Member Board of Revenue (SMBR)
Khyber Pakhtunkhwa and others..... Respondents

APPLICATION FOR SUSPENSION OF
IMPUGNED TRANSFER ORDER DATED
21.02.2024 TILL THE FINAL DISPOSAL OF
INSTANT SERVICE APPEAL WITH FURTHER
PRAYER NOT TO TRANSFER THE APPELLANT
AGAIN DURING PENDENCY OF
ACCOMPANYING APPEAL.

It is also requested that official
respondents may kindly be restrained from
taking any adverse action against the
appellant till the final disposal of the instant
appeal.

Respectfully Sheweth:-

1. That the accompanying service appeal has been filed before this Honorable Service Tribunal against the impugned transfer order dated 21.02.2024, hence seeking early fixation of the same.

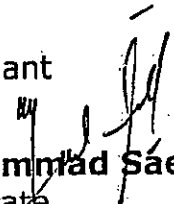
2. That the accompanying service appeal may kindly be treated as part and parcel of this application.
3. That through the instant Misc. application, the appellant is seeking suspension of the impugned Transfer dated 21.02.2024 till the final decision of the main service appeal in the best interest of justice, fair play and equity.
4. That balance of convenience also lies in favour of appellant having a good prima facie case in his favour.

It is therefore humbly prayed that on acceptance of this application the impugned Transfer order dated 21.02.2024 be suspended till the final disposal of the accompanying service appeal with further direction to the respondents not to transfer the appellant again during pendency of the service appeal.

It is further requested to restrain the official respondents not to take any adverse action against the appellant till final adjudication of the appeal.

Dated: 26.02.2024

Appellant
Through


Muhammad Saeed Khan
Advocate
Supreme Court of Pakistan

9

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,

PESHAWAR.

C.M No. _____/2024

IN

S.A.No. _____/2024

Faisal Aftab..... Appellant

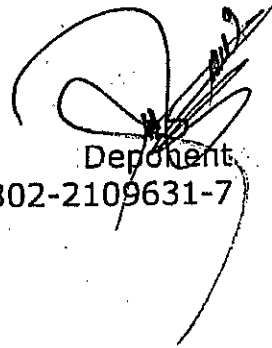
Versus

Senior Member Board of Revenue (SMBR)

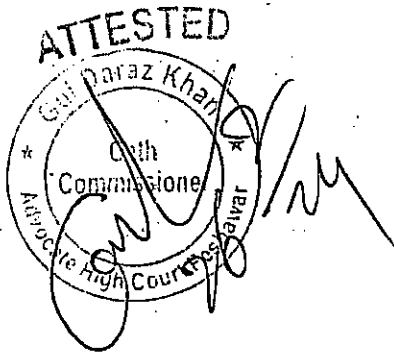
Khyber Pakhtunkhwa and others..... Respondents

AFFIDAVIT

I, Faisal Aftab Patwari Halqa Kot Najeeb Ullah (BS-9)
R/o Mohallah Malakpura, House No.1507, Haripur, do
hereby affirm and declare on oath that the contents of the
Application are true and correct to the best of my
knowledge and belief and nothing has been concealed from
this Hon'ble Tribunal.


Depoent

CNIC No.13302-2109631-7

ATTESTED

Oath
Commissioner
Peshawar
High Court

18

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,
PESHAWAR.

S.A.No. ____/2024

Faisal Aftab..... Appellant

Versus

Senior Member Board of Revenue (SMBR)
Khyber Pakhtunkhwa and others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

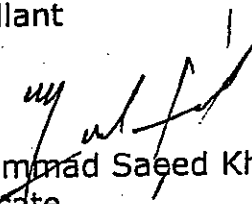
Faisal Aftab son of Gulzar Hussain
Patwari Halqa Kot Najeeb Ullah
R/o Mohallah Malakpura, House No.1507, Haripur

RESPONDENTS:

- 1) Senior Member Board of Revenue (SMBR)
Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Deputy Commissioner, Haripur
- 3) Rashid Khan, Patwari Halqa, Hattar District Haripur.

Appellant

Through


Muhammad Saeed Khan
Advocate
Supreme Court of Pakistan



Office Of The Deputy Commissioner, Haripur

Phone No. 0995 - 920200 / 920202, FAX 0995 - 615412

OFFICE ORDER:

Following postings / transfers amongst the Patwaris are hereby ordered with immediate effect, in the best public interest, till further orders:

Annex A

11

S#	Name of Patwari	From	To
1.	Taj Muhammad	Patwar Halqa Dheri	Patwar Halqa Jagal
2.	Mr. Abdul Haleem	Patwar Halqa Kalinjer	Patwar Halqa Gherrian
3.	Mr. Imran Aziz	Patwar Halqa Gherrian	Patwar Halqa Sarai Naimat Khan
4.	Mr. Khalid Mehmood	Patwari Halqa Bakka	Patwari Halqa Talokar
5.	Muhammad Ishaq	Patwar Halqa Talokar	Patwar Halqa Haripur.
6.	Muhammad Firdous	Patwar Halqa Chehar	Patwar Halqa Swabi Maira with additional charge of Patwar Halqa Gandaf
7.	Mr. Azhar Khan	Patwar Halqa Sarai Naimat Khan	Patwar Halqa Chohar with additional charge of Patwar Halqa Dehdan
8.	Mr. Nadir Khan	Patwar Halqa Kakotri	Patwar Halqa Meclan
9.	Mr. Nadir Ali	Patwar Halqa Sarai Saleh	Patwar Halqa Dureshkhel
10.	Syed Rizwan Ali Shah	Patwar Halqa Gandaf	Patwar Halqa Pind Khankhel
11.	Mr. Atif Rabbani	Patwar Halqa Khalabat	N.O.K Tehsil Haripur with additional charge of Patwar Halqa Dheendah
12.	Mr. Dilfaraz Khan	Patwar Halqa Swabi Maira	Patwar Halqa Chechian with additional charge of Patwar Halqa Chajjian
13.	Mr. Zahid Rasheed	Patwar Halqa Haripur	Patwar Halqa Mankarai
14.	Mr. Mohib ur Rehman	Patwar Halqa Shah Maqsood	Patwar Halqa Pind Hashim Khan
15.	Mr. Amir Mehmood	Patwar Halqa Pind Khankhel	Patwar Halqa Pharrala
16.	Mr. Kumran Shah	Patwar Halqa Dureshkhel	Patwar Halqa Sirikot with additional charge of Patwar Halqa Gojra
17.	Mr. Hamayun Khan	Patwar Halqa Mankarai	Patwar Halqa Bareela
18.	Muhammad Qasim	Patwar Halqa Lalogali	Patwar Halqa Khalabat with additional charge of Patwar Halqa Dari
19.	Mr. Pervez Khan	Patwar Halqa Bagra	Patwar Halqa Shah Maqsood
20.	Syed Ghulam Qadir Shah	Patwar Halqa Dari	Patwar Halqa Shah Muhammad, He is also directed to attend the civil courts for the cases of Sub Registrar office Haripur
21.	Mr. Asad Khan	Patwar Halqa Noorpur Paswal	Patwar Halqa Chamba Pind
22.	Mr. Jahanzeb Khan	Patwar Halqa Pharrari	Patwar Halqa Jattipind
23.	Mr. Zahid Irshad	Patwar Halqa Noordi	Patwar Halqa Akhoon Bandi
24.	Mr. Kafayat Khan	Patwar Halqa Ali Khan	Patwar Halqa Noordi
25.	Mr. Javed Iqbal	Patwar Halqa Changi Bandi	Patwar Halqa Noorpur Paswal
26.	Mr. Asad Nawaz	Patwar Halqa Akhoon Bandi	Patwar Halqa Sarai Saleh
27.	Mr. Abdul Hanun	Patwar Halqa Kailag	Patwar Halqa Kholian Bala
28.	Imran Khan	Patwari Halqa Kholian Bala	Patwari Halqa Bagra
29.	Rashid Khan	Patwar Halqa Kot Najibullah	Patwar Halqa Hattar
30.	Malik Allahyar	Patwar Halqa Bandi Secran	Patwar Halqa Bakka
31.	Faisal Anab	Patwar Halqa Ghundian	Patwar Halqa Kot Najibullah
32.	Waseem ur Rehman	Patwar Halqa Chajjian	Patwar Halqa Makhan
33.	Sajid Khan	Patwar Halqa Jattipind	Patwar Halqa Baigali with additional of Patwar Halqa's Sathana, Kiya, Khabal
34.	Mr. Amir Shehzad	Patwar Halqa Kangra	Patwar Halqa Pharrari
35.	Mr. Arsalan Afzal	Patwar Halqa Pind Hashim Khan	Patwar Halqa Kakotri with additional charge of Patwar Halqa Beer

A

36.	Mr. Mubashir Alam	Acquisition Branch DC Office	TIRA Tehsil Haripur with additional charge of Patwar Halqa Acquisition Branch DC Office
37.	Mr. Zubair Khan	Patwar Halqa Terbella	Patwar Halqa Lademang with additional charge of Patwar Halqa's Dalri Chaintri, Lalogali, Dheri
38.	Mian Muhammad Irfan	Patwar Halqa Jagal	Patwar Halqa Jabri
39.	Mr. Sajid Hussain	Patwar Halqa Beer	Patwar Halqa Kalinjir
40.	Mr. Farman Khan	Patwar Halqa Meclan	Patwar Halqa Chungi Handi
41.	Mr. Shahid Iqbal	Patwar Halqa Baitgali	Patwar Halqa Nara Amazai with additional charge of Patwar Halqa's Kali Lar, Parba, Ashra, Kupri.
42.	Mr. Zulfiqar Ali	Patwar Halqa Sirikot	Patwar Halqa Ghazi
43.	Mr. Waqar Ahmed	Patwar Halqa Ghazi	Report to Tehsil Office Haripur
44.	Mr. Wajid Mehmood	Patwar Halqa Mian Dheri	Patwar Halqa Qazipur
45.	Muhammad Shafaqat	Patwar Halqa Parba	Patwar Halqa Badarose with additional charge of Patwar Halqa Thalikut
46.	Ghulam Dastaghir	Patwar Halqa Salam Khand	Patwar Halqa Dal Mohat with additional charge of Patwar Halqa Salam Khand
47.	Mr. Yasir Khan	Patwar Halqa Jammu	Patwar Halqa Kotchra
48.	Muhammad Pervez	Patwar Halqa Qazipur	Patwar Halqa Patwar Halqa Mian Dheri with additional charge of Patwar Halqa Jammu
49.	Muhammad Basharat	Patwar Halqa Toskian	Patwar Halqa Najafpur
50.	Mr. Shah Nawaz Khan	Patwar Halqa Makhan	Patwar Halqa Choi
51.	Mr. Abdul Malik	Patwar Halqa Khanpur	Patwar Halqa Toskian
52.	Majid Nawaz Khan	Patwar Halqa Barcela	Patwar Halqa Kailag
53.	Mr. Zahid Rashid	Patwar Halqa Shadi	Patwar Halqa Jab
54.	Muhammad Ali	Patwar Halqa Jab	Patwar Halqa Ali Khan
55.	Mr. Zamir Haider Shah	Patwar Halqa Najafpur	Patwar Halqa Khoi Nara
56.	Mr. Bilal Bashir	Patwar Halqa Jabri	Patwar Halqa Sarri
57.	Mr. Sajjad Ahmed Khan	Patwar Halqa Hattar	Patwar Halqa Khanpur


 Deputy Commissioner
 Haripur

Dated: 30/10/2023

No. 2934-42 A(2)/PT/ICR/DC(H)
 Copy to the:-

1. Additional Deputy Commissioner (General), Haripur.
2. Additional Deputy Commissioner (Relief & HR), Haripur.
3. Assistant to Commissioner (Rev / GA), Hazara Division, Abbottabad.
4. Assistant Commissioner Haripur, Khanpur & Ghazi.
5. Addl: Assistant Commissioner-I, II & Revenue, Haripur.
6. Deputy Director Database, Haripur.
7. Tehsildar Haripur, Khanpur & Ghazi.
8. Sub Registrar, Haripur, Khanpur & Ghazi.
9. Officials concerned with the directions to submit handing / taking over reports immediately.


 Deputy Commissioner
 Haripur



Office Of The Deputy Commissioner, Haripur
Phone No. 0995 - 920200 / 920202, FAX 0995 - 615442

OFFICE ORDER:

Following postings / transfers amongst the Patwaris are hereby ordered with immediate effect, in the best public interest, till further orders:

Amir B

13

S#	Name of Patwari	From	To
1.	Sajjad Khan	Patwari Halqa Khanpur	Patwari Halqa Hattar
2.	Rashid Khan	Patwari Halqa Hattar	Patwari Halqa Kot Najibullah
3.	Faisal Akhbar	Patwari Halqa Kot Najibullah	Patwari Halqa Khanpur

630-38 (10)P/HA/DC(11)

[Signature]
Deputy Commissioner
Haripur

Dated: 31/02/2024

Copy to:

1. Additional Deputy Commissioner (General), Haripur.
2. Assistant Commissioner Haripur & Khanpur.
3. Addl. Assistant Commissioner-1, II & Revenue, Haripur.
4. Deputy Director Database, Haripur.
5. Tehsildar Haripur & Khanpur.
6. Officials concerned with the directions to submit handing / taking over reports immediately.

[Signature]
Deputy Commissioner
Haripur

BETTER COPY

OFFICE OF THE DEPUTY COMMISSIONER, HARIPUR

Phone No.0995 920200/920202/ FAX 0995—(615412)

13

OFFICE ORDER:

Following posting/ transfers amongst the Patwaris are hereby ordered by immediate effect, in the best public interest, till further orders.

S#	Name of Patwari	From	To
1.	Sajjad Khan	Patwari Halqa Khanpur	Patwari Halqa Hattar
2.	Rashid Khan	Pawari Halqa Hattar	Patwari Halqa Kot Najeebullah
3.	Faisal Aftab	Patwari Halqa Kot Najeebullah	Patwari Halqa Khanpur

Deputy Commissioner
Haripur

No.630-38/(2)/PT/AE/DC (H)

Copy to

- 1) Additional Deputy Commissioner (General) Haripur.
- 2) Assistant Commissioner Haripur & Khanpur.
- 3) Addl: Assistant Commissioner-I, II & Revenue, Haripur.
- 4) Tehsildar Haripur & Khanpur
- 5) Officials concerned with eh directions to submit handing/ taking over reports immediately.

Deputy Commissioner
Haripur

To

Secretary,
Senior Member Board
Khyber Pakhtunkhwa, Peshawar

Annex C

14

Subject: Application/ departmental appeal/ representation of cancellation of transfer order of applicant/ petitioner namely Faisal Aftab, Patwari Halqa Kot Najeed Ullah dated 21.02.2024 whereby the appellant was transferred from Kot Najeed Ullah to Halqa Khanpur.

Respectfully Sheweth;

- 1) That appellant is a law abiding citizen of Pakistan having fundamental rights of constitution of Pakistan, 1973.
- 2) That appellant was initially appointed as Patwari and rendered more than 17 years services to the department.
- 3) That earlier the appellant was transferred on 30.10.2023 from Halqa Ghandian to Kot Najeed Ullah and resumed the charge and is performing his duties.
- 4) That suddenly on 21.02.2024 the appellant was again transferred from Kot Najeed Ullah to Halqa Khanpur which is premature transfer within a span of 03 months and the tenure of the appellant was not completed under the law i.e. Appointment, Posting Transfer Rules, 1989.
- 5) That due to the premature transfer of the undersigned, my school going children and family members will be adversely affected.

It is pertinent to mention that I shifted my family members including my school going children to Halqa Khanpur, therefore, at this premature stage it would not be convenient for the appellant as well for my school going children and family members to make abrupt shifting from Kot Najeed Ullah to Halqa Khanpur.

6) That the impugned office/ transfer order dated 21.02.2024 is violative of the mandatory clauses of Posting & Transfer Policy of the Provincial Government and various reported judgments of the Hon'ble Services Tribunal, Peshawar and the August Supreme Court of Pakistan.

Keep in view what has been stated above it is, therefore, earnestly prayed that on acceptance of this Departmental Appeal, the impugned office Order dated 21.02.2024 may kindly be set-aside while restoring the appellant to his current position i.e. the post of Patwari Halqa Kot Najeab Ullah on the ground that the appellant has not completed his normal tenure in terms of the various clauses of Posting/ Transfer Policy promulgated by the Provincial Government of Khyber Pakhtunkhwa.

Appellant



Faisal Akbar
Patwari Halqa
Kot Najeab Ullah
Cell: 0331-5860672

Dated: 23.02.2024

16



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF LAND RECORDS
REVENUE & ESTATE DEPARTMENT

Phone: 091-9210057
Fax: 091-9213989
E-Mail: landrecords@kpk.gov.pk

fb: fb.com/landrecord.kpk
X: @LandrecordKP

LR-IV/application/ 375860

Peshawar dated the 26/02/2024

Mr. Faisal Afab.
Patwari Halqa Khanpur, Haripur.

SUBJECT: APPLICATION/ DEPARTMENTAL APPEAL AGAINST TRANSFER ORDER DATED 21.02.2024

I am directed to refer to your application/departamental appeal dated 23.02.2024 against transferred order dated 21.02.2024, has been examined and file by the competent authority.

Assistant Director Land Records
Khyber Pakhtunkhwa

Copy: No. and date even:

- 1. PA to Director Land Records, Khyber Pakhtunkhwa.
- 2. Master File.

Assistant Director Land Records
Khyber Pakhtunkhwa

16

BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF LAND RECORDS
REVENUE & ESTATE DEPARTMENT

No.LR-IV/application/ 325860

Peshawar dated the 26.02.2024

To,

Mr.Faisal Aftab,
Patwari Halqa Khanpur, Haripur.

SUBJECT: APPLICATION/ DEPARTMENTAL APPEAL AGAINST
TRANSFER ORDER DATED 21.02.2024.

I am directed to refer to your application/ departmental appeal dated 23.02.2024, against transferred order dated 21.02.2024, has been examined and file by the competent authority.

Assistant Director Land Records
Khyber Pakhtunkhwa

Endst: No. and date even:

- 1) PA to Director Land Records, Khyber Pakhtunkhwa.
- 2) Master file.

Assistant Director Land Records
Khyber Pakhtunkhwa

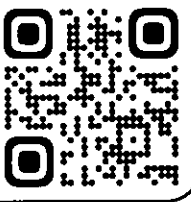
قیمت 50 روپے

25955

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

17

ایڈویکٹ: محمد صفحان
بار کونسل ایسوسی ایشن نمبر: 10-10-50
رابطہ نمبر: 9925792



او اسٹیٹوٹو

بعدالت جناب:

منجانب: محمد صفحان	دعویٰ:
اس کیلئے	علت نمبر:
دوسرا کینام	مورخہ:
سرکار	جرم:
	تھانہ:

باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ ان مقام کیلئے محمد صفحان کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگزانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تازہ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

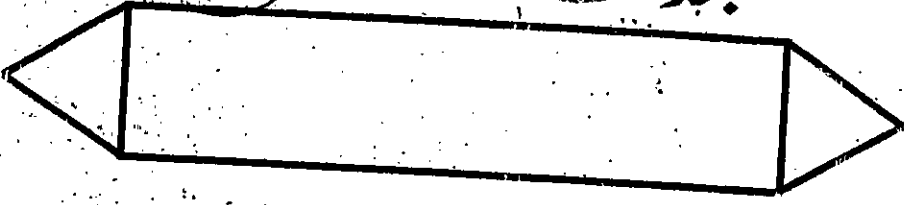
صفحان کو وکیل مقرر کیا گیا

الموافق 2/20
Saeed Khanadvis@gmail.com

العمر بعد واہ شد الع بعد

مقام کے لیے منظور ہے۔

بعدالت مناب سے وصول کیا گیا



2024 منجانب اسلام آباد

فیصل آباد بنام SCMPBR

مورخہ

مقدمہ

دعویٰ

جرم

سرورس اسلام آباد
باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

کیلئے لکھنے والے (مقدمہ) روایت

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی عمل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیار حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دور پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سندر ہے۔

مقدمہ مناب

ماہ جنوری - 20

27 المرقوم

واہ العبد