

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

SA No.919/2024

Shafiq Ullah Khan

Versus

Government of KPK through Secretary (High Way) C&W

Department & others

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1.	Application along with Affidavit		1-3
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Dated: 19-07-2024

Appellant  
Shafiq Ullah Khan

Through

Counsel  
Muhammad Tariq Qureshi  
(ASC)

①

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

Appeal No.919/2024

Shafiq Ullah Khan S/O Aziz Ur Rehman R/O Senior clerk in office  
of Executive Engineer ( Highway) Division C&W Dept. Bannu

.....Petitioner

**VERSUS**

Govt. of Khyber Pakhtunkhwa through secretary C & W  
department KPK Peshawar & Others

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 14379

Dated 19-07-24

.....(Respondents)

**APPLICATION FOR SETTING ASIDE/SUSPENSION THE**  
**TRANSFER ORDER OF THE APPELLANT DATED 12/07/2024**

Respectfully Sheweth:

The appellant respectfully submits this application for setting aside/ Suspension  
of the transfer orders issued against him. The details of his case are as follows:

1. On 05.03.2024, appellant was transferred by the Secretary C&W from the office of Executive engineer Highway Division Office North Waziristan to the office of Executive engineer Highway Division Abbottabad, vide Order No. CEC/C&WD/2-3/E&A. Dated. Peshawar 05/03/2024
2. Aggrieved by the said order, the appellant filed a departmental appeal on 01/04/2023, which was not decided within the statutory period of 90 days.
3. Consequently, the appellant challenged the transfer order through Service Appeal No. 919/2024, which is currently pending.
4. During the pendency of the service appeal, appellant was transferred again, this time to Bannu, vide Order No. CEC/C&WD/2-3/E&A/1076 Dated. Peshawar

(2)

04/07/2024, issued just one day after the institution of the appeal and assumed the charge of assignment. Copy of order dated :04/07/2024 is Annex as A.

5. Subsequently, Few days later, appellant was transferred once again to Abbottabad, vide Order No. CEC/C&WD/2-3/E&A-1113 Dated. Peshawar 12/07/2024, marking the third transfer within a short period. copy of order dated 12/07/2024 is annex as B.

6. The most recent transfer order, No. CEC/C&WD/2-3/E&A-1113 Dated. Peshawar 12/07/2024, was made on the basis of political victimization and with the intent to retaliate against appellant, while the post at bannu is laying vacant till date.

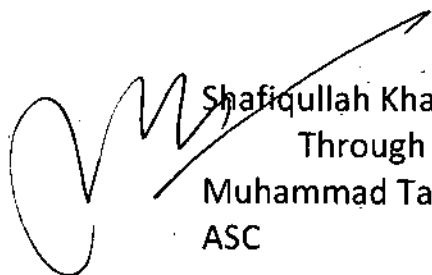
Given the above circumstances, it is clear that the multiple transfers are not based on administrative needs but are a means of harassment and political retribution and are the interest of other. These frequent and unjustified illegal transfer orders are causing undue hardship and disruption to appellant's professional and personal life.

In light of the facts presented, I humbly request the Honorable Tribunal to:

1. Set aside / suspend the transfer orders issued against appellant, particularly the latest Order No. CEC/C&WD/2-3/E&A-1113 Dated. Peshawar 12/07/2024.
2. Consider this application as part and parcel of the pending Service Appeal No. 919/2024.
3. Grant any other relief deemed appropriate in the interest of justice.

Dated: 19/07/2024

Yours sincerely,

  
Shafiqullah Khan (Appellant)  
Through  
Muhammad Tariq Qureshi  
ASC

(3)

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Appeal No.919/2024

Shafiq Ullah Khan S/O Aziz Ur Rehman R/O Senior clerk in office  
of Executive Engineer ( Highway) Division C&W Dept. Bannu

.....Petitioner

**VERSUS**

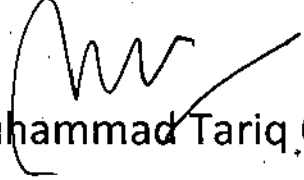
Govt. of Khyber Pakhtunkhwa through secretary C & W  
department KPK Peshawar & Others

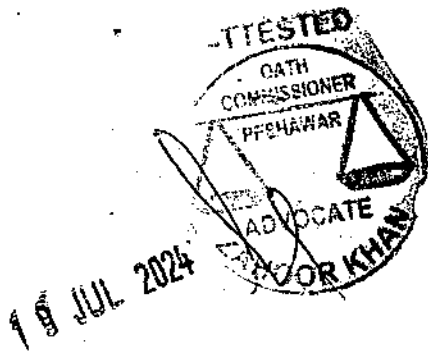
.....(Respondents)

**AFFIDAVIT**

I Muhammad Tariq Qureshi ASC Hereby solemnly affirm and  
declare that the contents of instant application are true and  
correct to the best of my knowledge and belief.

Deponent

  
Muhammad Tariq Qureshi  
Advocate  
(ASC)



(4)

Annex A



OFFICE OF THE CHIEF ENGINEER (CENTRE)  
COMMUNICATION & WORKS DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR

No. CEC/C&amp;WD/2-3/E&amp;A, 1076

Dated Peshawar the, 04/07/2024

OFFICE ORDER

The following postings/transfers amongst the Senior Clerks/ SDAs (BPS-14) C&W Department is hereby ordered, (in relaxation of ban) with immediate effect, in the best public interest:

No.	Name	From	To	Remarks
	Mr. Khayyam-ur-Rahman	Chief Engineer (South-I) C&W Department Peshawar.	Executive Engineer Highway Division, Khyber.	Vice # 2
	Mr. Imran Khan	Executive Engineer Highway Division, Khyber.	Executive Engineer Highway Division, Abbottabad.	Vice # 3
	Mr. Shafiq Ullah Khan	Executive Engineer Highway Division, Abbottabad.	Executive Engineer Highway Division, Bannu.	A.V.P

CHIEF ENGINEER (CENTRE)

COPY FORWARDED TO THE:

- Accountant General Khyber Pakhtunkhwa Peshawar.
- Chief Engineer (South-I) C&W Department, Peshawar with the request to intimate this office regarding Arrival/ Departure of the official.
- Chief Engineer (South-II) C&W Department, D.I.Khan.
- Chief Engineer (East) C&W Department, Abbottabad.
- Superintending Engineer C&W Circle, Khyber.
- Superintending Engineer C&W Circle, Abbottabad.
- Superintending Engineer C&W Circle, Bannu.
- Executive Engineer Highway Division, Khyber, with the direction to intimate this office regarding Arrival/ Departure of the official.
- Executive Engineer Highway Division, Bannu, with the direction to intimate this office regarding Arrival/ Departure of the official.
- Executive Engineer Highway Division, Abbottabad, with the direction to intimate this office regarding Arrival/ Departure of the official.
- Districts Accounts Officers, Concerned.
- Copy to Minister C&W Department Peshawar.
- Copy to Secretary C&W Department, Peshawar.
- Officials concerned.

Attested

ASC

CHIEF ENGINEER (CENTRE)

2nd 4-7-026

(5)

Annex B



**COMMUNICATION & WORKS DEPARTMENT  
KHYBER PAKHTUNKHWA PESHAWAR**

No. CEC/C&WD/2-3/E&A, 1113

Dated Peshawar the, 12/07/2024

**OFFICE ORDER**

The following postings/ transfers amongst the Senior Clerks/ SDAs (BPS-14) in C&W Department is hereby ordered, (in relaxation of ban) with immediate effect, in the best public interest:

S.No.	Name	From	To	Remarks
1.	Miss. Saira Sunny	Chief Engineer (South-I) C&W Department Peshawar	Executive Engineer Maintenance Division-II, Peshawar.	Vice # 2
2.	Mr. Ziaullah	Executive Engineer Maintenance Division-II, Peshawar.	Chief Engineer (South-I) C&W Department Peshawar	Vice # 1
3.	Mr. Imran	Executive Engineer Highway Division Abbottabad	Executive Engineer Building Division-I, Peshawar	Vice # 5
4.	Mr. Shafiq Ullah Khan	Executive Engineer Highway Division, Bannu.	Executive Engineer Highway Division, Abbottabad.	Vice # 3
5.	Mr. Abdullah Shah	Executive Engineer Building Division-I, Peshawar	Chief Engineer (South-I) C&W Department Peshawar	A.V.P

/

**CHIEF ENGINEER (CENTRE)**

**COPY FORWARDED TO THE:**

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Chief Engineer (South-I) C&W Department, Peshawar with the request to intimate this office regarding Arrival/ Departure of the official.
3. Chief Engineer (South-II) C&W Department, D.I.Khan.
4. Chief Engineer (East) C&W Department, Abbottabad.
5. Chief Engineer (Maintenance) C&W Department Peshawar.
6. Superintending Engineer C&W Circle, Abbottabad.
7. Superintending Engineer C&W Circle, Bannu.
8. Superintending Engineer C&W Circle, Peshawar.
9. Superintending Engineer Maintenance Circle, Peshawar.
10. Executive Engineer Maintenance Division-II Peshawar, with the direction to intimate this office regarding Arrival/ Departure of the official.
11. Executive Engineer Highway Division Abbottabad, with the direction to intimate this office regarding Arrival/ Departure of the official.
12. Executive Engineer Highway Division Bannu, with the direction to intimate this office regarding Arrival/ Departure of the official.
13. Executive Engineer Building Division-I Peshawar, with the direction to intimate this office regarding Arrival/ Departure of the official.
14. Districts Accounts Officers, Concerned.
15. PS to Minister C&W Department Peshawar.
16. PS to Secretary C&W Department, Peshawar.
17. Officials concerned.

**CHIEF ENGINEER (CENTRE)**

3rd. 12-7-024