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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO.840/2024

Saeed Ur Rehman

VS


Govt. of KP etc.

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RESPONDENT NO.03

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
3rd Floor, Islamia Club Building
Khyber Bazar Peshawar
Cell # 03339390916

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

**Khyber Pakhtunkhwa
Service Tribunal**

SERVICE APPEAL NO.840/2024

Diary No. _____

Dated 04-07-2024

Saeed Ur Rehman Sub Engineer (BS-11)
Posted as SDO (OPS) (BS-17) Sub Division Bara.

APPELLANT

VERSUS

1. Government of Khyber Pkahtunkhwa through Chief Secretary, KP, Peshawar.
2. The secretary Govt. of Khyber Pakhtunkhwa irrigation, Department Khyber Pakhtunkhwa Peshawar.
3. Mr. Israrullah Shah, Assistant Engineer (BP-17), SDO Irrigation, Sub Division Kohat.

REPLY ON BEHALF OF RESPONDENT NO. 03

RESPECTFULLY SHEWETH:-

Preliminary Objections:

1. That the appellant is Sub Engineer (BS-11) in the respondent department, but he was posted on the post of SDO/Assistant Engineer (BS-17) on OPS basis in the impugned transfer order dated 04.06.2024 and transfer and posting on OPS basis is discouraged by the Superior Courts in plethora of judgments.
2. That the impugned transfer notification dated 04.06.2024 was passed by respondent No.2 i.e Secretary Irrigation Department and the appellate authority is respondent No.1 i.e Chief Secretary, but the appellant filed departmental appeal to respondent No.2 and he also rejected his departmental appeal despite the fact that respondent No.2 has no authority to take decision on the departmental appeal of the appellant.
3. That the appellant being civil Servant is bound to serve anywhere in the Province under Section-10 of KP Civil Servants Act, 1973.

FACTS:-

1. The respondent No.3 is also peaceful and law abiding citizen Of Pakistan and is entitled for all the rights guaranteed by the
2. The appellant is basically Sub Engineer (BS-11), but due to the favoritism and nepotism of the department he was posted on the post of SDO/Assistant Engineer (BS-17) on the OPS basis and posting on OPS basis is discouraged by Superior Courts in its plethora of judgments.
3. The appellant prior to the posting and transfer District D.I Khan, the appellant was posted as Assistant Engineer (OPS) in the Office of Chief Engineer (South) Irrigation Department vide notification dated 31.05.2022. Moreover, the respondent No.3 was appointed as Assistant Engineer/Sub Divisional Officer (BS-17) after proper recommendation of KP Public Service Commission vide notification dated 10.05.2013 and posted as Assistant Director (BS-17) Small Dams, Abbottabad against the vacant post vide notification dated 24.05.2023 and was performing his duty with the entire satisfaction of his superiors at Abbotabad and then he was transferred and posted as SDO Kohat Irrigation Division against the vacant post vide notification dated 27.11.2023 and he complied with all the orders of competent authority. **(Copies of notification dated 31.05.2022, notification dated 10.05.2023, notification dated 24.05.2023 and notification dated 27.11.2023 are attached as Annexure-A,B,C&D)**
4. That Respondent No.2 has passed the notification dated 04.06.2024, wherein the respondent No.3 being Assistant Engineer/ SDO (BS-17) was transferred from the post of SDO (BS-17) Kohat Irrigation Sub Division to the post of Assistant Engineer (BS-17) Sub Division Bara and appellant being Sub Engineer (BS-11) was transferred from the post of Assistant Engineer (OPS) (BS-17) Sub Division Bara to the post of SDO (OPS) (BS-17) Kohat Irrigation Sub Division and under Section-10 of KP Civil Servant Act 1973, both the appellant and respondent No.3 are legally bound to comply with the notification dated 04.06.2024 and the respondent No.3 in pursuance of notification dated 04.06.2024 relinquish the charge of the post of SDO Sub Division Kohat on 05.06.2024 and submitted his arrival report on 06.06.2024 on the post of Assistant Engineer (BS-17) Sub Division Bara, but the appellant instead of obeying the notification dated 04.06.2024 under section-10 of KP Civil Servant Act 1973 filed the instant service appeal against the notification dated 04.06.2024 along

with suspension application in this Honorable Tribunal. The Honorable court admitted that appeal of the appellant for regular hearing and in meanwhile suspended the operation of impugned order on 14.06.2024 and clearly mentioned in the order sheet dated 14.06.2024 that the operation of the impugned order shall remain suspended, *if not acted upon earlier* and as the respondent No.3 has took over charge on the post of Assistant Engineer (BS-17) Sub Division Bara which means that the notification dated 04.06.2024 has already acted upon earlier, but due to favoritism of respondent No.2 toward the appellant, respondent No.2 malafidly and illegally passed a notification dated 14.06.2024 on the same day of the hearing of the appeal of the appellant, whereby the notification dated 04.06.2024 is suspended to the extent of the appellant of respondent No.3. **(Copies of relinquish report dated 05.06.2024, arrival report dated 06.06.2024 and notification dated 14.06.2024 is attached as Annexure-E,F&G)**

5. Incorrect. The notification dated 04.06.2024 was passed by the competent authority according to section-10 of the KP Civil Servant Act 1973 and both the parties are legally bound to comply with the notification 06.04.2024 under section-10 of the KP Civil Servant Act 1973.
6. The appellant was transferred from the Office of Chief Engineer (South) Irrigation Department and posted as SDO (OPS) Drainage Irrigation Sub Division D.I.Khan vide notification dated 31.05.2022 and without completing normal his tenure at Drainage Irrigation Sub Division D.I Khan the appellant was transferred from Drainage Irrigation Sub Division, D.I Khan and posted as SDO (OPS) Irrigation Sub Division Bara, Khyber prematurely vide notification dated 16.11.2023, but he did not challenge notification dated 16.11.2023 on the basis of premature transfer but when he transferred from Irrigation Sub Division, Bara Khyber to Kohat Irrigation Sub Division he challenged that order in the instant appeal on the basis of premature transfer, which shows the malice on the part of the appellant that he wanted to be posted on his own choice, which is against the spirit of section-10 of the KP Civil Servant Act 1973 and as such the appellant has not aggrieved from the transfer notification 04.06.2024 under section-10 of the KP Civil Servant Act 1973. Moreover the impugned transfer notification dated 04.06.2024 was passed by respondent No.2 i.e Secretary Irrigation Department and respondent No.1 i.e Chief Secretary is the appellate authority and the appellant should file

departmental to respondent No.1, but he filed departmental appeal to respondent No.2 and he also rejected his departmental appeal despite the fact that respondent No.2 has no authority to take decision on the departmental appeal of the appellant.

7. Incorrect. The appellant has not aggrieved from the act of the respondents as the competent authority has passed the impugned transfer notification dated 04.06.2024 and as per section-10 of the KP Civil Servant Act 1973 he is legally bound to obey the same notification and as such the appellant has no cause of action to file the instant appeal.

GROUND:-

- A. The respondent No.3 is also peaceful and law abiding citizen Of Pakistan and is also fully entitled to all the basis and fundamental rights as enshrined in the fundamental law of the state, interpreted guaranteed by the law of the land.
- B. Incorrect. The competent authority has passed the impugned transfer notification dated 04.06.2024 in public interest of about 04-officials and none of those except appellant raised any objection. Moreover, it is also to be noted that the malice of the appellant is evident from the fact that the appellant was also prematurely transferred from Drainage Irrigation Sub Division, D.I Khan to Irrigation Sub Division Bara, Khyber vide notification dated 16.11.2023, but he never challenged the transfer notification dated 16.11.2023 premature basis which means that the appellant wanted to be posted on his own choice, which is against the spirit of section-10 of the KP Civil Servant Act 1973.
- C. Incorrect. The impugned transfer notification 04.06.2024 is in accordance with law and rules and as per section-10 of KP Civil Servant Act 1973, the appellant is legally bound to obey the impugned transfer notification dated 04.06.2024.
- D. Subject to proof, however, Civil Servants are bound to serve anywhere where the department requires to serve for public interest as well as for department interest.

- E. Subject to proof, however, Civil Servants are legally bound to serve anywhere, where the department requires to serve for public interest as well as for department interest.
- F. Incorrect. The impugned transfer notification dated 04.06.2024 was passed by the competent authority in public interest and the Apex Court hold in its recent judgment that transfer and posting is the domain of executive authorities and interference of the Tribunal or Courts in matter relating to postings and transfers is encroachment upon the executive domain and as such the impugned transfer notification dated 04.06.2024 is liable to be maintain in public interest.
- G. Incorrect. The competent authority has passed the impugned transfer notification dated 04.06.2024 in public interest and as per section-10 of KP Civil Servant Act 1973, the appellant is bound to obey the impugned transfer notification.
- H. Incorrect. No fundamental right of the appellant has been violated by the respondent department rather the respondent department passed the impugned transfer notification in public interest which is to be obeyed by the all the officials as per section-10 of KP Civil Servant Act 1973.
- I. Incorrect. The impugned transfer notification dated 04.06.2024 was passed by the competent authority in public interest and has not violated the rules and regulations and the impugned transfer notification dared 04.06.2024 is in accordance with law and rules, hence liable to be maintained.
- J. Incorrect. The impugned transfer notification was passed by the competent authority in public interest and the Apex Court hold in its recent judgment that transfer and posting is the domain of executive authorities and interference of the Tribunal or Courts in matter relating to postings and transfers is encroachment upon the executive domain and as such the impugned transfer notification dated 04.06.2024 is liable to be maintain in public interest.
- K. Incorrect. Every case has its own facts and circumstances. Moreover political subservience and favoritism has shown on the part of the appellant as the appellant is Sub Engineer (BS-11), but he is working in the respondent department as Assistant Engineer (BS-17) on OPS

basis and such OPS basis posting has been discouraged by the Superior Courts in plethora of judgments.


- L. Incorrect. The impugned transfer notification was passed by the competent authority in public interest and has not violated the rules and regulations and the impugned transfer notification dated 04.06.2024 is in accordance with law and rules, hence liable to be maintained.
- M. Incorrect. The competent authority has passed the impugned transfer notification dated 04.06.2024 in public interest and as per section-10 of KP Civil Servant Act 1973, the appellant is bound to obey the impugned transfer notification.
- N. Incorrect. The respondents have not violated any fundamental rights of the appellant while passing the impugned transfer notification dated 04.06.2024 and is liable to be maintained.
- O. The respondent No.3 also seeks permission of this Honorable Tribunal to advance other grounds and proof at the time of hearing.

It is, therefore, most humbly prayed that on the basis of above submission, the appeal of the appellant being devoid of merit may kindly be dismissed.

THROUGH:


RESPONDENT NO.03

Israrullah Shah


(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

&


(SHAKIR ULLAH TORANI)

ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO.840/2024

Saeed Ur Rehman

VS

Govt. of KP etc.

AFFIDAVIT

I, Israrullah Shah, Assistant Engineer (BP-17), SDO Irrigation, Sub Division Kohat, (Respondent No.3) do hereby affirm and declare that the contents of this reply are true and correct and nothing has been concealed from this Honorable Tribunal.



DEPONENT



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO.840/2024

Saeed Ur Rehman

VS

Govt. of KP etc.

REPLY TO APPLICATION FOR SUSPENSION OF
IMPUGNED TRANSFER ORDER DATED 04.06.2024

RESPECTFULLY SHEWETH:

1. No comments.
2. Incorrect. The respondent No.3 has good prime facie in his favour and is sanguine about his success.
3. Incorrect. The balance of convenience lies in the favour of the respondent No.3.
4. The appellant has filed the instant appeal against the impugned transfer notification dated 04.06.2024 in this Honorable Tribunal. The case of the appellant was fixed on 14.06.2024 and the Honorable Service Tribunal admitted the appeal of the appellant for regular hearing and in meanwhile suspended the operation of impugned order on 14.06.2024 and clearly mentioned in the order sheet dated 14.06.2024 that the operation of the impugned order shall remain suspended, *if not acted upon earlier* and as the respondent No.3 has took over charge on the post of Assistant Engineer (BS-17) Sub Division Bara which means that the notification dated 04.06.2024 has already acted upon earlier, but due to favoritism of respondent No.2 toward the appellant, respondent No.2 malafidly and illegally passed a notification dated 14.06.2024 on the same day of the hearing of the appeal of the appellant, whereby the notification dated 04.06.2024 is suspended to the extent of the appellant and respondent No.3.
5. The facts and grounds of the reply of respondent No.3 may also be considered as an integral part of the reply to application.

It is therefore most humbly prayed that order dated 14.06.2024 on which impugned notification dated 04.06.2024 was suspended by this Honorable Tribunal may kindly be recalled/cancelled as in the order dated 14.06.2024 it was clearly mentioned that the operation of the impugned order shall remain suspended, *if not acted upon earlier* and as the respondent No.3 has took over charge on the post of Assistant Engineer (BS-17) Sub Division Bara which means that the notification dated 04.06.2024 has already acted upon earlier and the suspension of impugned transfer notification dated 04.06.202 is impracticable to be implemented.


RESPONDENT NO.03

Israrullah shah

THROUGH:


(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

& 

(SHAKIR ULLAH TORANI)

ADVOCATE

AFFIDAVIT

I, Israrullah Shah, Assistant Engineer (BP-17), SDO Irrigation, Sub Division Kohat, (Respondent No.3) do hereby affirm and declare that the contents of this reply to suspension application are true and correct and nothing has been concealed from this Honorable Tribunal.


DEPONENT





1

2



GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT
(Establishment Section)

Dated Peshawar 31st May, 2022

NOTIFICATION:

No. SO(E)/IRR/4-9/77/Vol-VI: The competent authority (Secretary Irrigation) is pleased to order posting/transfer of the following officers of Irrigation Department, in relaxation of ban, with immediate effect, in the best public interest: -

S#	Name of Officer	From	To
1.	Engr. Abdul Sadiq, Assistant Engineer (B-17)	SDO, Irrigation Sub Division, Shangla, Swat	Deputy Director (Planning) (OPS), O/o the Chief Engineer (North) against the vacant post.
2.	Syed Muhammad Younas, Assistant Engineer (BS-17)/XEN (OPS)	Deputy Director (OPS), PHLCE Project, Swabi	Deputy Director (OPS), Jabba Dam Project, Peshawar against the vacant post.
3.	Mr. Jehanzeb, Assistant Engineer (BS-17)	Assistant Director, PHLCE Project Swabi	Deputy Director (OPS), PHLCE Project Swabi. Vice Sr. No. 02
4.	Mr. Kamal Khan, Sub Engineer/SDO (OPS)	Assistant Engineer (OPS), O/o the Chief Engineer (Merged Areas), Irrigation Department.	SDO (OPS), Irrigation Sub Division, Khar Bajuar. Vice Sr. No. 06
5.	Mr. Daud Khan, Sub Engineer/SDO (OPS)	SDO (OPS), Tangi Irrigation Sub Division, Charsadda	SDO (OPS), Charsadda Irrigation Sub Division, Charsadda against the vacant post.
6.	Mr. Manan, Sub Engineer/SDO (OPS)	SDO (OPS), Irrigation Sub Division, Khar Bajuar.	SDO (OPS), Tangi Irrigation Sub Division, Charsadda. Vice Sr. No. 05
7.	Mr. Saeed ur Rehman, Sub Engineer/SDO (OPS)	Assistant Engineer (OPS), O/o the Chief Engineer (South), Irrigation Department.	SDO (OPS), Drainage Irrigation Sub Division, D.I.Khan. Vice Sr. No. 09
8.	Engr. Naveed Ullah, Assistant Engineer (BS-17)	Assistant Engineer, O/o the Chief Engineer (South)	SDO, Irrigation Sub Division Shangla, Swat. Vice Sr. No. 01
9.	Engr. Noor Yaseen, Assistant Engineer (BS-17)	SDO, Drainage Irrigation Sub Division, D.I.Khan	Assistant Director, Small Dams, Mardan against the vacant post.
10.	Mr. Safdar Naz, Sub Engineer/SDO (OPS)	SDO-II (OPS), Flood Irrigation Sub Division, D.I.Khan	SDO (OPS), Irrigation Sub Division, Mehsud Areas, South Waziristan Tribal District Tank against the vacant post.
11.	Mr. Zeeshan Zaheer, Sub Engineer/SDO (OPS)	Under transfer as SDO (OPS) Kalkot Irrigation Channel Dir Upper.	SDO (OPS), Gohati Irrigation Sub Division, Swabi against the vacant post.
12.	Mr. Noor Faraz, Sub Engineer/SDO (OPS)	Assistant Engineer (OPS), O/o the Chief Engineer (South)	SDO (OPS), Mir ali Irrigation Sub Division, North Waziristan. Vice Sr. No. 13
13.	Engr. Siddique Umar, Assistant Engineer (BS-17)	SDO, Mir ali Irrigation Sub Division, North Waziristan	Assistant Director, Raising of Baran Dam against the vacant post.

Secretary to Govt. of Khyber Pakhtunkhwa
Irrigation Department

Copy of the above is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Chief Engineers (North/South/Merged Areas), Irrigation Department.
3. The Director General, Small Dams, Irrigation Department.
4. All the Project Directors, Irrigation Department.
5. All Superintending Engineers of Irrigation Department.
6. All Executive Engineers, Irrigation Department.
7. The PS to Minister Irrigation, Khyber Pakhtunkhwa.
8. All District Accounts Officers (Concerned).
9. The Section Officer (General), Irrigation Department.
10. PS to Secretary Irrigation Department.
11. The Officers concerned.
12. PA to Additional Secretary, Irrigation Department.
13. Personal Files of the officers.

ATTSTED

Ijaz Khan
(Ijaz Khan)
Section Officer (Estt:) 31/5/22



B 11

GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT
(Establishment Section)

=====

Dated Peshawar the 10th May, 2023

NOTIFICATION:

No. SO(E)/IRR/4-14/73/PSC/Vol-V: The Competent Authority on the recommendations of the Khyber Pakhtunkhwa, Public Service Commission, the Government of Khyber Pakhtunkhwa in the Irrigation Department is pleased to offer appointment to the following candidates as Assistant Engineers/Sub Divisional Officers (BPS-17) (Rs. 45,070-3,420-113,470) with usual allowances as admissible under the rules in Irrigation Department, subject to the terms & conditions as under: -

S#	Name with Father's Name	Domicile/Zone	Permanent Address
1.	Israrullah Shah S/O Inayatullah Shah	N.W Agy/ 1	Assad Shah Communication Golon Market Khaisor, Mirali Bazar, North Waziristan.
2.	Muhammad Duraiz Khan S/O Muhammad Saleem Khan	Malakand/ 3	Post Office Khas, Dargai and District Malakand.

TERMS & CONDITIONS:

- i. They will get at the minimum pay of BPS-17 including usual allowances as admissible under the Rules. They will also be entitled to annual increment as per existing policy.
 - ii. The above posts, for all intents and purposes, shall be within the definition of Civil Servants.
 - iii. They will be governed by the Khyber Pakhtunkhwa Civil Servants Act 1973 and all the laws applicable to the Civil Servants and Rules framed there-under.
 - iv. They will initially be on probation for a period of one year under rule-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.
 - v. Their services shall be liable to termination at any time without assigning any reason, before the expiry of the period of probation, if their work or conduct during this period is found unsatisfactory. In such an event, they will be given one month's prior notice of termination from service or one month's pay in lieu thereof. In case they wish to resign at any time, one month's notice shall be necessary or in lieu thereof one month's pay shall be forfeited.
 - vi. They will undergo for 4-months pre-service training. Training schedule will be issued separately.
 - vii. Their appointment will be subject to the verification of their domicile and testimonial from the concerned authorities/Institutions.
 - viii. They will not be entitled to any TA/DA on their first appointment as Assistant Engineer/Sub Divisional Officer. They will join duty at their own expenses.
2. In case the above terms and conditions are acceptable, an **UNDERTAKING** to the effect on a Stamp Paper worth Rs. 100/- signed & duly attested by the Oath Commissioner, should be produced to the Irrigation Department, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar within a month time without fail.

3. In case of failure of response to the above offer within stipulated period as mentioned above, the offer shall stand cancelled subject to the extension for the acceptance by the Government.

Chief Secretary
Govt. of Khyber Pakhtunkhwa

ATTSTED

1/2



12

Endst. No. & date even.

Copy forwarded for information & necessary action to: -

1. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
2. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. The Chief Engineers (South/North/Merged Areas) Irrigation Department.
4. The Director General, Small Dams, Peshawar.
5. All Superintending Engineers of Irrigation Department.
6. The Director (Tech:), PMC, Irrigation Department.
7. All Project Directors in Irrigation Department.
8. The Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar w/r to letter No. PSC/SR-VI/003261 dated 31.01.2023.
9. The PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
10. The Manager, Government Printing Press, Peshawar.
11. The Section Officer (General), Irrigation Department.
12. PS to Secretary Establishment Department, Peshawar.
13. PS to Secretary Irrigation Department.
14. PA to Additional Secretary/Deputy Secretary (Admn) Irrigation Department.
15. The Candidates concerned.
16. Office Order File/Personal Files.
17. Master file.



(Maqsood Khan)
Section Officer (Estt:)

ATTSTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT
(Establishment Section)

Dated Peshawar, the 24th May, 2023

NOTIFICATION:

No. SO(E)/IRR/4-9/77/Vol-VI: The following posting/transfer of officers of Irrigation Department is hereby ordered, with immediate effect, in the public interest.

S#	Name of Officer	From	To
1.	Engr. Israrullah Shah, Assistant Engineer (BS-17)	Upon acceptance of offer of appointment vide notification No.SO(E)/IRR/4-14/73/PSC/ Vol-V dated 10.05.2023	Assistant Director (BS-17), Small Dams, Abbottabad, against vacant post.
2.	Engr. Tajamul Khan, Assistant Engineer (BS-17)	Upon acceptance of offer of appointment vide notification No.SO(E)/IRR/4-14/73 /PSC/ Vol-V dated 19.05.2023	Assistant Engineer (BS-17), O/o the Chief Engineer (Merged Areas), against vacant post.
3.	Engr. Muhammad Duraiz Khan, Assistant Engineer (BS-17)	Upon acceptance of offer of appointment vide notification No.SO(E)/IRR/4-14/73/PSC/ Vol-V dated 10.05.2023	Assistant Director (BS-17), Remodeling of Warsak Canal System Project, Peshawar. Vice Sr. No. 04
4.	Mr. Farman Ullah, Assistant Engineer (BS-17)	Assistant Director (BS-17), Remodeling of Warsak Canal System Project, Peshawar	SDO-III (BS-17), Flood Irrigation Sub Division, D.I.Khan, against vacant post.

Secretary to Govt. of Khyber Pakhtunkhwa
Irrigation Department

Endst: No. & Date as above

Copy of the above is forwarded to: -

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Chief Engineers (North/South/Merged Areas), Irrigation Department.
3. The Director General, Small Dams, Irrigation Department.
4. All Project Directors, Irrigation Department.
5. The Superintending Engineer, D.I.Khan Irrigation Circle, D.I.Khan.
6. The District Accounts Officer (Concerned).
7. The Section Officer (General), Irrigation Department.
8. PS to Minister Irrigation, Khyber Pakhtunkhwa.
9. PS to Secretary Irrigation Department.
10. The Officers concerned.
11. The Web Developer, Irrigation Department.
12. PA to Deputy Secretary (Admn), Irrigation Department.
13. Personal Files of the Officer.

(Maqsood Khan)
Section Officer (Estt:)

ATTSTED



OFFICE OF THE CHIEF ENGINEER (NORTH)
GOVT: OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT PESHAWAR

Phone/Fax: 091-9212123 Email: chiefnorthirr@gmail.com

D 14

No. 3983 /North/

Dated Peshawar 27 /11/2023

NOTIFICATION:

The following posting / transfer of officers / officials of Irrigation Department is hereby ordered with immediate effect, in the public interest.

S#	Name of Officer / Official	From	To	Remarks
1	Mr. Farman Ullah	SDO Flood Irrigation Division D.I.Khan	Assistant Director Jabba Dam Peshawar.	Vice No. 2
2	Mr. Wajahat Ali Khan	Assistant Director Jabba Dam	SDO Mardan Irrigation Division Mardan	Against vacant post.
3	Mr. Israr Ullah	Assistant Director Small Dams Abbottabad	SDO Kohat Irrigation Division	Against vacant post

CHIEF ENGINEER

Copy forwarded to the:

1. Secretary to Govt: of Khyber Pakhtunkhwa Irrigation Department Peshawar.
2. Accountant General Khyber Pakhtunkhwa, Peshawar.
3. Chief Engineer (South/Merged Areas), Irrigation Department, Peshawar.
4. All Project Directors Irrigation Department concerned.
5. All Superintending Engineer Irrigation Department concerned.
6. Deputy Secretary (Admin) O/o the Secretary to Govt: of Khyber Pakhtunkhwa Irrigation Department Peshawar.
7. All Executive Engineer Irrigation Department concerned.
8. All District Accounts Officer concerned.
9. Officers / Officials concerned.

CHIEF ENGINEER

ATTACHED




KOHAT IRRIGATION DIVISION KOHAT
IRRIGATION SUB DIVISION KOHAT.

No. 333 /2 - E,

Dated Kohat the 05/06/2024.

RELINQUISH OF CHARGE

In compliance to the secretary to Government of Khyber Pakhtunkhwa Irrigation Department Office order No.SO(E)/IRR:/4-9/77/Vol-VI, dated 04.06.2024, I Engr. Israr Ullah Shah relinquish the charge of Sub Divisional Officer, Irrigation Sub Division Kohat today on 05.06.2024 (F.N) please.


Sub Divisional Officer,
Irrigation Sub Division
Kohat

Copy to: -

1. The Account General, Khyber Pakhtunkhwa.
2. The Chief Engineer (South/North/Merged Area) Irrigation Department.
3. All Superintending Engineers, Irrigation Department (Concerned).
4. Personal file of the Officer.
5. The District Accounts Officer (Concerned).
6. The Officer Concerned.
7. PS to Minister Irrigation, Khyber Pakhtunkhwa.
8. The Section Officer (General), Irrigation Department.
9. PS to Secretary Irrigation Department.
10. Executive Engineer Kohat Irrigation Division Kohat for Information please.

Sub Divisional Officer.

ATTACHED

F (16)

ARRIVAL / CHARGE ASSUMPTION REPORT

In compliance with Secretary to Government of Khyber Pakhtunkhwa, Irrigation Department, Peshawar Notification No.SO(E)/IRR/4-9/77/Vol-VI, dated: 04.06.2024, I, Mr. Israr Ullah Shah, Assistant Engineer (BS-17) submit my arrival report and assume the charge of Assistant Engineer Bara Sub Division District Khyber today dated: 06.06.2024 (F/N).



(Israr Ullah Shah)
Assistant Engineer
Bara Sub Division
Irrigation Division District Khyber

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Chief Engineer (Merged Areas) Irrigation Department, Peshawar.
3. Superintending Engineer (North) Merged Areas Irrigation Department.
4. Section Officer (Estt.), Irrigation Department, Peshawar.
5. Section Officer (General), Irrigation Department, Peshawar.
6. PS to Secretary Irrigation, Khyber Pakhtunkhwa.
7. PS to Minister Irrigation, Khyber Pakhtunkhwa.
8. Executive Engineer Irrigation Division District Khyber.
9. District Accounts Officer, Jamrud District Khyber

(Israr Ullah Shah)
Assistant Engineer
Bara Sub Division
Irrigation Division District Khyber

ATTSTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT
(Establishment Section)

Dated Peshawar, the 14th June, 2024

NOTIFICATION:

No. SO(E)/IRR/4-9/77/Vol-VI: In pursuance of the Khyber Pakhtunkhwa Service Tribunal, Peshawar order dated 14.06.2024 in service appeal No. 840/2024, "Saeed Ur Rehman VS Govt. of Khyber Pakhtunkhwa and others" the competent authority (Secretary Irrigation) is pleased to suspend the operation of this Department Notification dated 04.06.2024 to the extent of Engr. Israrullah Shah and Mr. Saeed Ur Rehman (Sr. No. 01 & 02 of said notification) till final decision of the appeal before the tribunal.

Secretary to govt. Of Khyber Pakhtunkhwa
Irrigation department

Copy of the above is forwarded to: -

1. The Accountant General, Khyber Pakhtunkhwa.
2. The Registrar, Khyber Pakhtunkhwa, Service Tribunal, Peshawar.
3. The Chief Engineers (South/North/Merged Areas), Irrigation Department.
4. All Superintending Engineers, Irrigation Department (Concerned).
5. The District Accounts Officer (Concerned).
6. The Officer concerned.
7. PS to Minister Irrigation, Khyber Pakhtunkhwa.
8. The Section Officer (General), Irrigation Department.
9. The Section Officer (Litigation), Irrigation Department.
10. PS to Secretary Irrigation Department.
11. PA to Additional Secretary, Irrigation Department.
12. PS to Deputy Secretary (Admn), Irrigation Department.
13. Personal file of the officer.

(Masood Khan)
Section Officer (Estt:)

ATTACHED

VAKALAT NAMA

NO. _____/2024

IN THE COURT OF Khyber Pakhtunkhwa Service Tribunal
Peshawar

Saeed-ur-Rehman (Appellant)
(Petitioner)
(Plaintiff)

VERSUS


Govt of K.P.K & others (Respondent)
(Defendant)

I/We, Israr Ullah Shah (Resp No. 03)

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.


I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2024

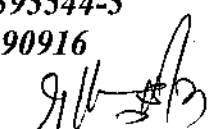


(CLIENT)

ACCEPTED


TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916


SHAKIR ULLAH TORANI
Advocate Peshawar
BC-22-4994
03409146056