

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In Re S.A No. 617/22

Hameed Ullah

Versus

Inspector General of Police, Khyber Pakhtunkhwa & Others

Khyber Pakhtunkhwa
Service Tribunal

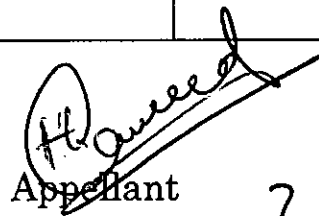
Case No. 2821

Date: 9/11/2023

INDEX

S#	Description of documents	Page No
1	Rejoinder	1-2
2	Affidavit	3

Dated: 10/11/2022


Appellant

Through


JAVED IQBAL GULBELA
Advocate Supreme Court
of Pakistan

①

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

In Re S.A No. 617/22

Hameed Ullah

Versus

Inspector General of Police, Khyber Pakhtunkhwa & Others

**REJOINDER ON BEHALF OF THE APPELLANT TO
THE COMMENTS FILED BY RESPONDENT NO. (01,
02, 03, & 04)**

Respectfully Sheweth,

Reply to the preliminary objections:

All the preliminary objections raised & agitated by the Respondents are false, concocted, misleading & hypocritical hence are denied sternly. Not only the Appellant has got a good prima facie case having locus standi, to file the instant Appeal, but the instant Appeal is also strictly as per law & has rightly been moved against the impugned Dismissal order dated 11-10-2019 & impugned orders dated 31/01/2022 & 01/04/2022. The Service Appeal moved by the Appellant is well in time. Moreover this Hon'ble Tribunal has got the jurisdiction to entertain the instant service Appeal.

Reply on Facts:

1. Para no. 1 is need No reply.
2. Para no. 2 of the comments need no reply.
3. Para no. 3 of the comments is incorrect, and misleading therefore sternly denied. While the corresponding para of the main appeal is true and correct.
4. Para "4" of the comments is incorrect and hypocritical hence denied. While true, correct and detail picture is portrayed in the main appeal.
5. Para 5 needs no comments. As the corresponding para of the appeal has portrayed true and correct detail.
6. Para "6" of the comments is incorrect, hypocritical and misleading therefore sternly denied. Moreover, true, correct, legal and lawful detail is given in the corresponding para of the main appeal.

(2)

7. Para "7" of the comments is incorrect misleading, misconceiving and as well as unlawful, hypocritic hence denied; while that of the main para of the main appeal is true and correct.
8. Para"8" of the comments is incorrect, misleading, illegal and unlawful hence sternly denied.
9. Para"9" of the comments is incorrect, & misleading hence sternly denied. Moreover, true, correct, legal and lawful detail is given in the corresponding para of the main appeal.
10. Incorrect and denied. Already discussed in the corresponding Para No. 10 of the main appeal.
11. Incorrect and denied. Already discussed in corresponding Para No. 11 of the main appeal.
12. Incorrect & denied. True & detailed picture has been portrayed in the main appeal.

Grounds:

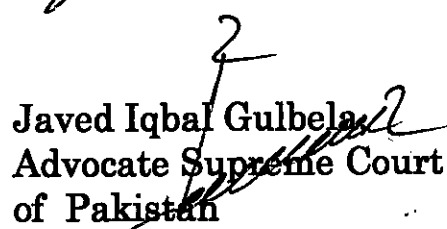
A To I: All the replies as given to the grounds of the main Appeal are baseless, concocted, fabricated and illegal and unlawful therefore sternly denied. The respondents have given a malicious and hypocritic scenario just to mislead the Hon'ble Tribunal while the true, correct and legal picture is given at the main Appeal.

It is therefore, most humbly prayed that on acceptance of the instant rejoinder, the Service Appeal of the Appellants may very graciously be allowed as prayed for therein.

Dated: 10/11/2022


Appellant

Through


Javed Iqbal Gulbela
Advocate Supreme Court
of Pakistan
&
Saghir Iqbal Gulbela
Advocate High Court
Peshawar

(3)

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In Re S.A No. 617/22

Hameed Ullah

Versus

Inspector General of Police, Khyber Pakhtunkhwa & Others

AFFIDAVIT

I, Hameed Ullah (Ex-LHC No.940), S/o Muhammad Ashraf R/o Ghazni Kheli Sorazai Payan Peshawar, do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.


Deponent

CNIC: 14301-5115847-3

Identified By?

Javed Iqbal Gulbela
Advocate Supreme Court
of Pakistan.

