

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In Re-Service Appeal No 5796/2021

Sl. No. 4065

Dated 6/2/2023

Fahim Jan

Vs

I.G KP & Others

Rejoinder on behalf of Appellant

On Preliminary Objections:

All the preliminary objections are wrong, incorrect, misleading and misconceived, hence denied.

On Facts:

1. Para No "1" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
2. Para No "2" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
3. Para No "3" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
4. Para No "4" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.

On Grounds:

- a. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
- b. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
- c. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
- d. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
- e. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.
- f. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.

g. Para "a" of the comments is wrong and incorrect, hence denied while that of Service Appeal is correct.

It is, therefore, prayed that on the title Service Appeal may kindly be allowed as prayed for.

Appellant,
Through
Muhammad Ayub Khan Shinwari
Advocate Supreme Court

Affidavit

I, Fahim Jan S/o Azam Khan, Constable, Salary No 00672036, Khaar Kalay, Sada, Lower Kurram do hereby solemnly affirm and declare on oath that the contents of the accompanying rejoinder are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

Fahim Jan
Deponent

21302-9845070-7



6/3/2023