

BEFORE THE KHYBER PUKHTOON KHWA

SERVIC TRIBUNAL PESHAWAR

Service Appeal No 1303 2022

Tahir khanAppellant

Versus

KPK and others..... Respondents

Parawise comments on Behalf of the Respondent no : 06

Respectfully Sheweth:

Preliminary objections

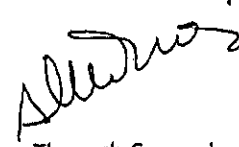
1. That the Para no : 1 is being factual one hence denied
2. That the Para no : 2 is also regarding legal as well as factual assertions hence denied.
3. That Para no 3 is related to respondent no 1 to 3 hence denied .
4. That the contents of Para no : 4 is not within the knowledge of respondent no 6 hence denied.
5. That the Para no : 5 is also denied due to lack of knowledge.
6. That the Para no : 6 is also denied because it is a matter between appellant and Respondents no 1 to 3. actually appellant and respondent no 1 to 3.
7. That the Para no : 7 is also correct to the extent of promotion of Respondent no 6 while rest of the para is in correct hence denied The promotion of Respondent no 6 is in accordance with law and also within the line of service rules more so the Respondent no 6 was illegible competent and have fulfilled all the due requirements of promotion. Whereby the concerned department promoted him to the relevant post .

Grounds:

- A. That the ground mentioned as (A) is illegal , wrong , incorrect hence denied.
- B. That the ground mentioned as (B) is also wrong, illegal, incorrect hence denied.
- C. That the ground mentioned as (c) is also wrong hence denied.
- D. That the ground mentioned as (D) is factual one hence denied.
- E. That the ground mentioned as (E) is legal one hence denied . The judgments which is mentioned for the ready reference is also did not attracted to the facts of instant appeal.
- F. That the ground mentioned as (F) is also factual cum-legal hence denied and not relevant to the instant appeal .
- G. That the ground mentioned as (G) is related to the constitution of Pakistan which is true and correct while rest of the para is incorrect hence denied.
- H. That the ground mentioned as (H) is legal one and regarding the constitution of Pakistan to that extent ground (H) is correct while rest of the para is incorrect and the judgments mentioned in Ground (H) is also not attracted to the instant appeal.
- I. That the ground mentioned as (I) is incorrect, wrong, hence denied.
- J. That the ground mentioned as (J) is incorrect, wrong, hence denied.
- K. That the ground mentioned as (K) is wrong, and legal one hence denied.
- L. That the ground mentioned as (L) is wrong, incorrect hence denied.

It is therefore very humbly prayed that the instant Appeal of the Appellant may kindly be dismissed with cost.

Respondent No 6
Muneer Iqbal

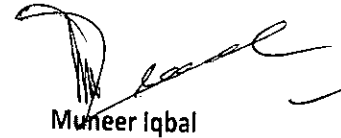


Through Counsel
Arshad Iqbal Advocate
High Court

AFFIDAVIT:

I Muneer Iqbal son of Mohammad Quraish Respondent No 6 do hereby solemnly affirm and declare on oath that all the contents of Para wise comments are true and correct to the best of my knowledge and belief.

Deponent



Muneer Iqbal