

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

In S.A# 11/2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 4349

Dated 15/3/2023

Muhammad Ismail

Versus

Government of Khyber Pakhtunkhwa and Others

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Dated: 15/03/2023

Through

Appellant

  
JAVED IQBAL GULBELA  
ASC

&

  
SAGHIR IQBAL GULBELA

Advocate High Court

Peshawar

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**REJOINDER ON BEHALF OF THE  
APPELLANT TO THE COMMENTS  
FILED BY THE RESPONDENTS NO:**

**1, 2.**

**Respectfully Sheweth,**

**Reply to Preliminary objections:-**

That the appellant has a good prima facie case and has lightly approached this Hon'ble Tribunal the appellant has got locus stand to file the instant appeal the appellant has never concealed material fact from the Hon'ble Tribunal and this Hon'ble Tribunal has got ample jurisdiction to adjudicate upon the matter the appellant remained since and devoted follow and has always performed his duties with full zest and devotion.

**On Facts:-**

1. Para No.1 no comments.

2. Para No.2 no comments.
3. Para No.3 no comments.
4. Para No.4 no comments.
5. Para No.5 is incorrect, fabricated hence denied.
6. Para No.6 is incorrect and hence denied.
7. Para No.7 is incorrect and hence denied.
8. Para No.8 is incorrect and hence denied.
9. Para No.9 is incorrect and sternly denied the aggrieved appellant has right of appeal.

**On Grounds:-**

- A. Incorrect and denied.
- B. Incorrect and denied.
- C. Incorrect fabricated hence denied.
- D. Incorrect, false allegation on appellant and hence denied.
- E. Incorrect that appellant is an extremely poor and never think of giving resignation so hence denied.
- F. Incorrect and hence denied. No office order legally issued to appellant so is entitled for

the reinstated in to service with all back benefits.

G. Incorrect and hence denied.

H. Needs no comments.

*It is, therefore, most humbly prayed that on acceptance of instant rejoinder, the appeal of the appellant may graciously be allowed, as prayed for therein.*

Dated: 15/03/2023

Through

Appellant

  
JAVED IQBAL GULBELA

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**AFFIDAVIT**

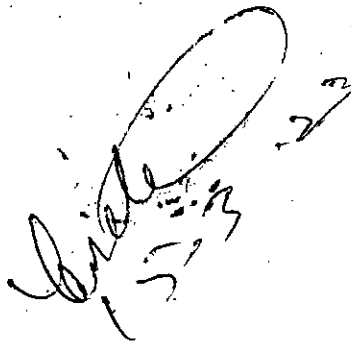
I, Saghir Iqbal Gulbela (Adv) S/o Jan Muhammad R/o Gulbela Peshawar, as per instruction of my client, do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Deponent

CNIC: 17301-1502481-3

Identified By:-

Javed Iqbal Gulbela  
Advocate Supreme Court of  
Pakistan

A handwritten signature in black ink, appearing to be 'Javed Iqbal Gulbela', with a large, stylized scribble or flourish above it. The signature is written over the printed name of the advocate.