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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 274/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5485

Dated 22/5/2023

MUHAMMAD IQBAL

VS

GOVT: OF KP & OTHERS

REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO THE COMMENTS SUBMITTED BY
THE RESPONDENTS

R/SHEWETH:

PRELIMINARY OBJECTIONS:

A TO H: All preliminary objections raised by the respondents are incorrect and baseless rather the respondents are estopped due to their own conduct to raise any objection at this stage of the case.

ON FACTS:

1. Need no reply.
2. Need no reply.
3. Incorrect and misconceiving as the appellant initiated the process for admission in the Ph.D. program before the issuance of appointment order. Copy of transcript and other relevant documents are attached as annexure.....**A.**
4. Incorrect.
5. Incorrect.

ON GROUNDS:

(A TO S):

A- All paras of grounds of appeal are correct while the comments of the respondents are incorrect and baseless. That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973. That, the treatment meted out to the appellant is a clear violation of the Fundamental Rights of the appellant enshrined in the Constitution of Pakistan 1973.

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It is therefore, humbly prayed that on acceptance of this rejoinder the appeal of appellant may kindly be accepted as prayed for.


APPELLANT

THROUGH: 
NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

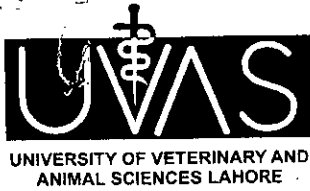
AFFIDAVIT

I Muhammad Iqbal the applicant do hereby solemnly affirm that the contents of this Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


DEPONENT







University of Veterinary & Animal Sciences,
Lahore - Pakistan

"A"

OFFICIAL TRANSCRIPT OF RECORD

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No.C.E/ 18/4086
NAME: MUHAMMAD IQBAL FATHER'S NAME: NAZAR GUL
REGD. No.: 2015-VA-439 DEGREE: Ph.D. Pathology
JOINED UNIVERSITY IN THE ACADEMIC SESSION: 2015-2016 COMMENCED ON: 11.01.2016
RESULT NOTIFIED VIDE No.C.E./Ph.D./ 1166 DATE: 08-06-2018
AFFILIATED COLLEGE / CAMPUS NAME: Main Campus, Lahore.

Course No.	Title of Course	Subject Type	Credit Hours	Max. Marks	Marks Obtained	Grade	Quality Points	Remarks
Spring Semester-II, 2015-2016								
STAT-1002	Experimental Design	Major	3(1-2)	60	48	A	12.00	
PATH-1015	Food Animal Pathology	Major	3(2-1)	60	39	B	9.00	
BIOC-1002	Advanced Biochemical Techniques	Minor	3(0-3)	60	39	B	9.00	
PATH-1007	Canine and Feline Pathology	Major	3(2-1)	60	34	C	7.33	
Winter Semester-I, 2016-2017								
PARA-1002	Advanced Protozoology	Minor	4(3-1)	80	60	B	14.67	
PATH-1010	Camel Pathology	Major	3(2-1)	60	42	B	10.00	
PATH-1014	Pathology of non-infectious diseases of Poultry	Major	3(2-1)	60	39	B	9.00	
PATH-1003	Necropsy Practice	Major	2(0-2)	40	30	B	7.33	

NOTE: This Transcript is valid when signed and stamped by the Controller of Examinations, University of Veterinary and Animal Sciences, Lahore (Pakistan).

Total Marks 331/460
Aggregate Marks% 68.95%
Cumulative Grade Point Average (CGPA) 3.26/4.00
Prepared by: [Signature]
Issued Date 26-09-2018

[Signature]
Controller of Examinations
Controller of Examinations
University of Veterinary and Animal Sciences,
LAHORE

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to be true copy
Advocate



UNIVERSITY OF VETERINARY AND ANIMAL SCIENCES
LAHORE, PAKISTAN

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Tel. Off. 042-9212865 (042-9211449, 9211374 Ext. 151-152-155)

DIRECTORATE OF ADVANCED STUDIES

DAS / 1263

DATED 13-11-17

Dr. Muhammad Yasin Tipu (Supervisor)
Prof. Dr. Asim Aslam (Member)
Prof. Dr. Kamran Ashraf (Member)

Memorandum:

You are hereby requested to serve as a member of Thesis Committee of the candidate. The Chairman of the Committee has the principal responsibility but other members are expected to assist in the guidance of the student by contributing constructive criticism at all stages of the work.

The Chairman of the Committee shall call meetings of the Committee and the student from time to time, to consider the progress of work and the method/procedure followed.

The title of the synopsis for the thesis has been provisionally approved by the Advanced Studies and Research Board in its 46th meeting held on 27-10-2017. It is necessary that upon completion of the work thesis must be acceptable to all members of the Committee. The student will confer with all members of the Committee as frequently as possible, so that all may get familiar with the progress of the work and the student may profit from the experience and guidance of the members of the Committee.

Candidate: Muhammad Iqbal
2015-VA-439

Degree: Ph. D
Pathology

Thesis Title: Pathological studies on toxoplasmosis in food animals in Khyber Pakhtunkhwa, Pakistan

(Prof. Dr. Muhammad Sarwar Khan)
Director Advanced Studies

C.C.

1. The Chairman, Department of Pathology
2. The Controller of Examinations, U.V.A.S., Lahore.
3. Student concerned

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advocate

Due Date: Dec 11, 2015

4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Sheikh Abdul Qadir Jillani (Out Fall) Road, Lahore - Pakistan

Bank Name: HBL Civil Lines, Lahore
Bank Challan: 2016-01-0002
Issue Date: 9-12-2015

Account No.: 01277900351801

Name:	MUHAMMAD IQBAL
Residential Status:	Non Boarder
Student ID:	2015-PhD-2004
Degree:	PhD
Semester:	1
Department:	Pathology

Fee	Amount (Rs.)
Fee To Be Paid	47510
PVMC Amount	3200
Total Amount (Upto 11 Dec, 2015)	50710

Bank Stamp

Due Date: Aug 19, 2016

4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Shekh Abdul Qadir Jillani (Out Fall) Road, Lahore - Pakistan

Bank Name: HBL Civil Lines
Bank Challan: 2016-09-0414
Issue Date: 15-8-2016

Account No.: 01277900351801

Name:	MUHAMMAD IQBAL
Residential Status:	Boarder
Student ID:	2015-phd-2004
Degree:	PhD
Semester:	

Fee	Amount (Rs.)
Fee To Be Paid	30320
Other Amount	0
Income Tax	0
PVMC	0
Total Amount (Upto 19 Aug, 2016)	30320
Total Amount (Upto 22 Aug, 2016)	31520
Total Amount (Upto 23 Aug, 2016)	32720

Bank Stamp

RECEIVED
17 AUG 2016
Civil Lines Branch
Lahore
To be used copy
Advocate

Due Date: Jan 20, 2017

4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Sheikh Abdul Qadir Jilani (Out Fall) Road, Lahore - Pakistan

Bank Name: **HBL Civil Lines**
Bank Challan: **2017-01-0336**
Issue Date: **17-1-2017**

Account No.: 01277900351801

Name:	MUHAMMAD IQBAL
Residential Status:	Boarder
Student ID:	2015-Phd-2004
Degree	PhD
Semester	3

Fee	Amount (Rs.)
Fee To Be Paid	30320
Other Amount	0
Income Tax	0
PVMC	0
Total Amount (Upto 19 Jan, 2017)	30320
Total Amount (Upto 23 Jan, 2017)	31520
Total Amount (Upto 24 Jan, 2017)	32720

CASH RECEIVED

Bank Stamp

1/17/2017

Due Date: Aug 18, 2017

4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Sheikh Abdul Qadir Jilani (Out Fall) Road, Lahore - Pakistan

Habib Bank Limited, Payable at any HBL Branch
Bank Challan: **2017-09-0618**
Issue Date: **15-8-2017**

Account No.: 01277900351801

Name:	MUHAMMAD IQBAL
Residential Status:	Boarder
Student ID:	2015-Phd-2004
Degree	PhD
Semester	

Fee	Amount (Rs.)
Fee To Be Paid	30320
Other Amount	1000
Income Tax	0
PVMC	0
Total Amount (Upto 18 Aug, 2017)	31320
Fine of Rs. 200 /-Per day after due date i.e. Aug 18, 2017	

Bank Stamp

ATTESTED
15 AUG 2017
UNIVERSITY COPY
LAHORE

7

Due Date: Jan 22, 2018 4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Sheikh Abdul Qadir Jillani (Out Fall) Road, Lahore - Pakistan

Habib Bank Limited, Payable at any HBL Branch

Bank Challan 2018-01-0419

Issue Date: 17-1-2018

Account No.: 01277900351801

Name:	MUHAMMAD IQBAL
Residential Status:	Boarder
Student ID:	2015-Phd-2004
Degree:	PhD
Semester:	5

~~HBL CIVIL LINES BR. LAHORE-0127~~

~~HBL CIVIL LINES BR. LAHORE-0127~~

17 JAN 2018

TRANSFER

Fee	Amount (Rs.)
Fee To Be Paid	30320
Other Amount	0
Income Tax	0
PVMC	0
Total Amount (Upto 22 Jan, 2018)	30320
Fine of Rs. 200 /-Per day after due date i.e. Jan 22, 2018	

Bank Stamp

Due Date: Sep 14, 2018 4. Student's Copy



University of Veterinary and Animal Sciences, Lahore

Sheikh Abdul Qadir Jillani (Out Fall) Road, Lahore - Pakistan

Habib Bank Limited, Payable at any HBL Branch

Bank Challan 2018-09-1367

Issue Date: 10-9-2018

Account No.: 00427991793003

Name:	MUHAMMAD IQBAL
Residential Status:	Boarder
Student ID:	2015-Phd-2004
Degree:	PhD
Semester:	6

Same Branch Cash Deposit

Fee	Amount (Rs.)
Fee To Be Paid	30320
Other Amount	0
Income Tax	0
Total Amount (Upto 14 Sep, 2018)	30320
Total Amount (Upto 21 Sep, 2018)	33320
Total Amount (Upto 28 Sep, 2018)	36320

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