

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

Rejoinder in;
Service Appeal No. **5967**/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. **5967**

Dated **30/5/2023**

Ramzan Bibi

VERSUS

The Government of Khyber Pakhtunkhwa and Others

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Dated: 14/03/2023

Through

Appellant

AHSAN SARDAR,

&

JUNAID UR REHMAN

Advocates High Court

Peshawar.

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**REJOINDER ON BEHALF OF THE APPELLANT
TO THE REPLY FILED BY RESPONDENTS NO:
1,2 & 3.**

Respectfully Sheweth,

Reply to Preliminary objections: -

1. Incorrect and denied. The appellant has got a good cause of action.
2. Incorrect and denied.
3. Incorrect and denied.
4. Incorrect and denied.
5. Incorrect and denied, the instant appeal is not barred under the law nor barred by time.

On Facts: -

1. No comments.
2. Paragraph Numbered 2 of the Reply needs no comments.
3. No comments.
4. Paragraph Numbered 4 of the Reply is hypocritic, hence denied & misleading, hence denied. It is clearer than crystal from the Notification Dated: 28-10-2023, which is already been annexed with the main Appeal.

5. Paragraph Numbered 5 of the Reply needs no comments.
6. Paragraph Numbered 6 of the Reply is incorrect, wrong, false and misleading hence denied. The Appellant is on serial no. 188 of the seniority list so annexed by the Respondents themselves, hence the stance, that the Appellant is at serial no. 183 is totally incorrect, false, and fabricated. Hence denied sternly. Moreover, the private Respondents i.e., respondent No. 4, 5 & 6 are at serial no. 182, 183 * 184 respectively & got appointed into service after the Appellant and are juniors to the Appellant.
7. Paragraph Numbered 7 of the Reply is incorrect and denied. The Appellant has previously moved plethora of applications to the Respondents but all in vain. The Applications have been already annexed with the main appeal, duly received by the Respondents.
8. Paragraph Numbered 8 of the Reply is incorrect and misleading, denied. While true, correct and detailed picture is given in the abovementioned paras as well as in the main appeal.

On Grounds:-

- A. Incorrect and Hypocritic. The appellant is fully entitled for the relief they have sought from this Hon'ble Tribunal
- B. Hypocritic and malicious. That According to the seniority list attached by the Respondents the Appellant is at serial No.188 not on serial No.183, moreover the Respondent No. 4, 5 & 6 remained at serial No.182, 183 and 184 not on serial No.199, 200 and 201. Which is false, wrong, incorrect and violation of the fundamental rights of the Appellant which guaranteed by the law of the land.
- C. Misleading and hypocritic. That appellant is not treated according to Law, Rules, and Regulation. Detailed picture is given above in the main appeal.
- D. Incorrect and denied.
- E. Incorrect and denied.
- F. Incorrect and denied.
- G. Incorrect and denied.
- H. Incorrect and denied.
- I. Incorrect and denied.
- J. Incorrect and denied.

K. Incorrect and denied.

L. Instant para is legal 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: 14/03/2023

Through

Appellant

Ahsan
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&
JUNAID UR REHMAN
Advocates High Court
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AFFIDAVIT

I, *Mst. Ramzan Bibi (The Appellant)*, 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.

Ramzan Bibi
Deponent

Dated: 14-03-2023

Ramzan Bibi
14-3-23