

BEFORE THE KHYBER PAKHTUNKHWA 19/6/2023

SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 594 of 2023

*Ikram Ud Din Junior Clerk at AAC (R) Dir Lower.*

...Appellant

**VERSUS**

*The Senior Member Board of Revenue Government of  
Khyber Pakhtunkhwa, Peshawar and Others.*

...Respondents

REJOINDER BY THE APPELLANT

Respectfully Sheweth:

Preliminary Objections:

*That all the preliminary objections are incorrect, baseless, against the law, rules and facts and thus are specifically denied. Moreover the Appellant has got prima facie case in his favour and has approached this Honourable Tribunal well within time and that too with clean hands and this Honourable Tribunal has got the jurisdiction to adjudicate upon the same.*

On Facts:

- i. *Para 1 of the comments amounts to admission, thus needs no reply.*
- ii. *Para 2 of the comments as drafted comments as drafted is ill construe and the same is rather*

*further endorsement of the stance of the Appellant.*


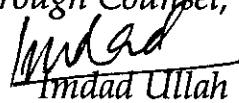
- iii. Para 3 of the comments as drafted is incorrect and based on misstatements and concealment of material facts, thus the same is specifically denied.*
- iv. Para 4 of the comments as drafted is based on misstatements and in need of solid proof, thus the same is denied as well.*
- v. Para 5 of the comments as drafted also is devoid of merits and vague, thus the same is also denied as well.*
- vi. Para 6 of the comments as drafted also is baseless, incorrect and against the available record, thus the same is denied as well.*
- vii. Para 7 of the comments as drafted amounts to admission, hence needs no reply.*
- viii. Para 8 of the comments amounts to admission, thus needs no reply.*
- ix. Para 9 of the comments is vague, evasive and devoid of merits, thus the same is denied.*

On Grounds:

- a. Ground A of the comments as drafted is incorrect, baseless and devoid of merits, hence denied specifically.*

- b. Ground B of the comments as drafted also is incorrect, baseless and in need of solid proof, hence the para is denied as well.
- c. Ground C of the comments as drafted also is incorrect, based on misstatements and is against the facts available on record, thus the same is denied as well.
- d. Ground D of the comments as drafted is vague, evasive and devoid of any merits, hence the same is denied as well.
- e. Ground E of the comments as drafted also is incorrect, baseless, based on misstatements and concealment of facts, hence denied.
- f. Ground F of the comments as drafted amounts to admission, thus needs no reply.

It is, therefore, very respectfully prayed that on acceptance of this rejoinder the appeal of the Appellant may very kindly be decided as prayed for originally.

  
Appellant  
Ikram Ud Din  
Through Counsel,  
  
Imdad Ullah  
Advocate Swat

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**AFFIDAVIT**

*It is solemnly stated on Oath that all the contents of  
this rejoinder are true and correct to the best of my  
knowledge and belief and nothing has either been  
misstated or kept concealed before this Honourable  
Tribunal.*

*Deponent*

*Ikram Ud Din*

