

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

**In S.A 7873/2021**

Adil Hussain

Versus

Inspector General of K.P.K & Others

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**Dated: 06/10/2021**

*Adil*  
Appellant

Through

*Javed*  
JAVED TOBAL GULBELA,  
Advocate, Supreme Court of  
Pakistan

**Off Add: B-1, Al-Nimrah Centre, Govt College Chowk Peshawar**

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

In S.A 7873/2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 6715

Dated 26-07-23

Adil Hussain

Versus

Inspector General of K.P.K & Others

**REJOINDER ON BEHALF OF THE APPELLANT TO THE COMMENTS  
FILED BY THE RESPONDENTS NO. 01 TO 03**

Respectfully Sheweth,

Reply to Preliminary Objections:

Para 1 to 7:

All the preliminary objections raised & agitated by the Respondents are false, concocted, misleading & hypocritic, hence are denied sternly. Not only the Appellant has got a good prima facie case having locus standi, to file the instant Appeal, but the instant Appeal is also strictly as per law & has rightly been moved against the impugned order dated 29-06-2021. The Service Appeal moved by the Appellant is well in time. Moreover this Hon'ble Tribunal has got the jurisdiction to entertain the instant service Appeal. The appellant did not conceal any fact from this Hon'ble Tribunal, And knock the door of this Hon'ble Tribunal for acknowledgement, recognition, protection and enforcement of his fundamental rights in shape of re-instatement into service with all back benefits.

On Facts:

1. Para "1" of the comments need no reply.

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2. Para "2" of the Reply is hypocritic, hence denied. While the corresponding Para of the main appeal is true and correct.
3. Para "3" of the Reply is hypocritic, hence denied. While the corresponding Para of the main appeal is true and correct.
4. Para "4" of the Reply is hypocritic and misleading, hence sternly denied. Moreover true, correct, and detail picture is portrait in the main appeal of the appellant.
5. Para "5" of the Reply is incorrect, wrong, misconceiving, illegal and void-ab-initio; therefore sternly denied. Moreover true, correct, and detail picture is portrait in the corresponding Para of the main appeal.
6. Para "6" of the Reply is incorrect, misleading, wrong, misconceiving, illegal, unlawful and void-ab-initio; therefore sternly denied. Moreover true, correct, and detail picture is portrait in the corresponding Para of the main appeal.
7. Para "7" of the Reply is incorrect, wrong, misconceiving, illegal and void-ab-initio; therefore sternly denied. Moreover true, correct, and detail picture is portrait in the corresponding Para of the main appeal. The appellant has been victimized in the shape of dismissal from service by the respondent which is illegal and unlawful. Thereafter the appellant moves Departmental appeal, but inspite of laps of statutory period his departmental appeal was not decided, Hence the instant service appeal to this Hon'ble Tribunal in accordance with law.

8. Para "8" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. Moreover true, correct, and detail picture is portrait in the main appeal of the appellant.
9. Para "9" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. Moreover true, correct, and detail picture is portrait in the main appeal of the appellant.
10. Para "10" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. Moreover true, correct, and detail picture is portrait in the main appeal of the appellant.

**On Grounds:**

- A. Para "A" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- B. Para "B" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- C. Para "C" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- D. Para "D" of the reply is incorrect and denied, while that of the main appeal is correct.

Para "E" to "J" of the reply are incorrect, false, concocted, illegal, unlawful and against the law as well as hypocritic; therefore sternly denied. Moreover True, legal, lawful, correct and detailed picture has already been

portrayed in the main appeal as well as in the preceding paras.

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

Dated: 25/01/2023.

Appellant  
Through  
Javed Iqbal Gulbela  
ASC  
Saghir Iqbal Gulbela  
Advocate, High Court  
Peshawar.  
Muhammad Arif Mohmand  
Advocate

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**AFFIDAVIT**

I, the Appellant, do hereby solemnly affirm and declare that all the contents of the accompanied rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*Adil*

**DEPONENT**

**CNIC:**

**Cell No.**

Identified By:

*Javed Iqbal Gulbela*  
ASC

*J. N.*  
*26-07-23*