

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

In S.A No.382/2022

Muhammad Asif

Versus

Govt. of K.P.K & Others

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Dated: 02/08/2023


Appellant

Through

JAVED IQBAL 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 No.382/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6793

Dated 02/08/23

Muhammad Asif

Versus

Govt. of K.P.K & Others

Rejoinder on behalf of the Appellant to the comments filed by the
Respondents No. 1, 2 & 3

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 31/03/2021. 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.

On Facts:

1. Para "1" of the comments need no reply.
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 incorrect, false, misleading, illegal and unlawful, hence sternly denied. Moreover true, correct,

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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.
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.
11. Para "11" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. Moreover true, correct,

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and detail picture is portrait in the main appeal of the appellant.

12. Para "12" 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 "M" 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: 02/08/2023.

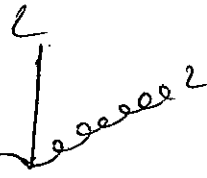
Through


Appellant

Javed Iqbal Gulbela
ASC

Saghir Iqbal Gulbela
Advocates, High Court Peshawar.





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Versus

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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.

MA Asif

DEPONENT

CNIC: 17301-4952500-5

Cell No. 03439119194

Identified By: ²

Javed Iqbal Gulbela
ASC

Javed Iqbal Gulbela

