

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Appeal No.12(2)/591/2023

Ghulam Dastagir, Patwari, District Peshawar(Appellant)

VERSUS

1. Deputy Commissioner Peshawar and others
.....(Respondents)

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PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.1

Respectfully Sheweth,

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 7540
Dated 14/09/23

Preliminary Objections.

1. That the appellant in the instant case has no locus standi and cause of action to institute present appeal.
2. That the appellant has not come to this honourable court with clean hands.
3. That the appellant is estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in the present form.


REPLY ON FACTS.

1. Pertains to Registrar Services Tribunal.
2. As per Para No.1
3. As per Para No.1
4. As per Para No.1
5. Pertains to honourable Services Tribunal.
6. The order dated 07-08-2023 was issued by the honourable Services Tribunal and was followed.

REPLY ON GROUNDS

- A. Incorrect. Honourable Services Tribunal issued the order as per laid down rules/criteria.
- B. Incorrect. The honourable Services Tribunal has properly heard the appeal of the appellant and issued order accordingly.
- C. Incorrect. The honourable Services Tribunal decided on the appeal of the appellant on merit.

It is therefore prayed before the honourable Tribunal that appeal in hand having no weight may very humbly be dismissed with cost.


Deputy Commissioner/Collector
Peshawar
(Respondent No.1)

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AFFIDAVIT

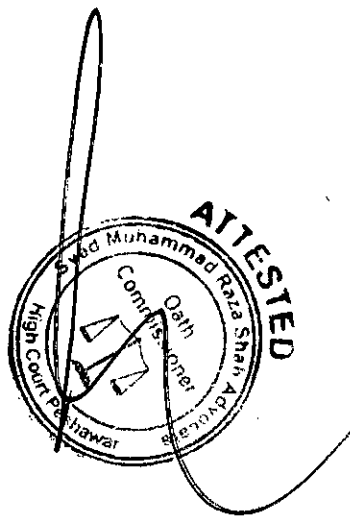
I, Muhammad Taj, Addl. Assistant Commissioner (Rev) Peshawar do hereby solemnly affirm and declare that the contents of accompanying Para-wise Comments on behalf of respondents No.1 are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

DEPONENT



(Muhammad Taj)
Addl. Assistant Commissioner (Rev)
Peshawar

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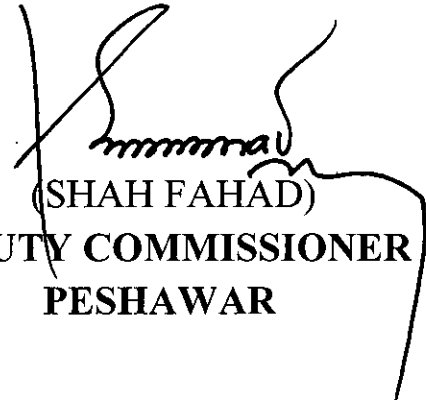
VERSUS

1. Deputy Commissioner Peshawar and others

.....(Respondents)

AUTHORITY LETTER

Mr. Muhammad Taj, Addl. Assistant Commissioner (Rev) Peshawar is hereby authorized to appear before the Honourable Khyber Pakhtunkhwa Services Tribunal in the instant writ appeal and file parawise comments on behalf of undersigned.


(SHAH FAHAD)
DEPUTY COMMISSIONER
PESHAWAR