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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

In re:

S.A No.7890/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 8135

Dated 05/10/23

Asad Ullah Khan PMS (BPS-18).....Appellant

VERSUS

Govt. of Khyber Pakhtunkhwa and others Respondents

REJOINDER ON BEHALF OF
THE PETITIONER

Sir,

PRELIMINARY OBJECTION

That all the preliminary objections are incorrect, misconceived, hence denied specifically.

ON FACTS

1. Para-1 of the appeal has been responded as "pertains to record", which means admission.
2. Para-2 of the appeal has been responded as "pertains to record", which means admission.
3. Para-3 of the appeal has been responded as "pertains to record", which means admission.
4. Para-4 of the appeal is correct and that of parawise comments is incorrect. Respondents have admitted the fact that juniors to the appellant were promoted to PMS (BS-19) on acting charge base on 03.10.2019.

- (2)
5. Para-5 of the appeal has been responded as "pertains to record", which means admission.
 6. Para-6 of the appeal has been responded as "pertains to record", which means admission.
 7. Para-7 of the appeal has been admitted as correct.
 8. Para-8 of the appeal has been admitted as correct.
 9. Para-9 of the appeal has been responded as "No Comments", which means admission.
 10. Para-10 of the appeal is correct and that of parawise comments is incorrect, hence denied.

GROUND:

- A. Ground "A" of the appeal has been admitted as correct.
- B. Ground "B" of the appeal has been admitted as correct.
- C. Ground "C" of the appeal is correct, while that of parawise comments is incorrect, hence denied specifically.
- D. Ground "D" of the appeal is correct, while that of parawise comments is incorrect, hence denied specifically.
- E. Ground "E" of the appeal has been responded as "Needs no comments, which means admission.
- F. Ground "F" of the appeal is correct, while that of parawise comments is incorrect, hence denied specifically.

(3)

G. Ground "G" of the appeal is correct, while that of parawise comments is incorrect, hence denied specifically.

H. Ground "H" of the appeal is correct, while that of parawise comments is incorrect, hence denied specifically.

It is, therefore, humbly prayed that the appeal may kindly be accepted and parawise comments may kindly be dismissed with cost please.

Dated: 5.10.2023

Asadullah

Appellant
Through

Amjid Ali
Amjid Ali (Mardan)

Advocate

Supreme Court of Pakistan

AFFIDAVIT

I, do hereby, solemnly declare on oath that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Asadullah

DEPONENT

