

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Case No. 8282

Dated 13-10-23

In re-Service Appeal No 216/2023

Zaheer ud Din

Versus

Govt of KP & Others

Rejoinder on behalf of the Appellant

Respectfully Sheweth,

On Preliminary Objections:

All the preliminary objections are wrong, incorrect, misleading and misconceived, hence denied.

On Facts:

1. Para No "1" of the Service Appeal is admitted to be correct, hence needs no reply.
2. Para No "2" of the Service Appeal is admitted to be correct, hence needs no reply.
3. Para No "3" of the Service Appeal is admitted to be correct, hence needs no reply.
4. Para No "4" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
5. Para No "5" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
6. Para No "6" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
7. Para No "7" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.

On Grounds:

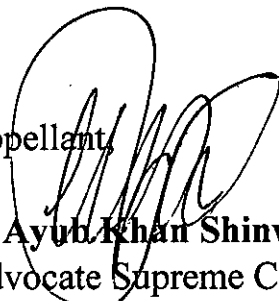
- a. Para "a" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
- b. Para "b" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
- c. Para "c" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.

- d. Para "d" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
- e. Para "e" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.
- f. Para "f" of the comments is denied being wrong, incorrect, misleading and misconceived, while that of Service Appeal is correct.

It is, therefore, prayed that the title Service Appeal may kindly be allowed as prayed for.

Through

Appellant,


M Ayub Khan Shinwari
Advocate Supreme Court

AFFIDAVIT

I, Zaheer ud Din S/o Muhammad Saeed, SDEO(M), Khar Bajaur, do hereby solemnly affirm and declare on oath that the contents the accompanying rejoinder are true and correct to the best of my knowledge and belief and nothing is kept concealed from this Honorable Tribunal.



DEPONENT

13/10/2023