

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Murad Gul VERSUS Police Department Swat

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 8345

Dated 17/10/23

INDEX

S #	Description of Documents	Annex	Pages
1.	Rejoinder		1-54
2.	Affidavit		5

Dated: 17-10-2023

Appellant
Murad Gul

Through Counsels,

Aziz-ur-Rehman

Imdad Ullah

Advocates Swat

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 11879 of 2023

Murad Gul.

...Appellant

VERSUS

The Provincial Police Officer Khyber Pakhtunkhwa,
Peshawar and Others.

...Respondents

REJOINDER BY THE APPELLANT

Respectfully Sheweth:

Preliminary Objections:

That all the preliminary objections are incorrect, baseless, against the law, rules and facts, hence are specifically denied. Moreover the Appellant has got a prima facie case in his favour and has approached this Honourable Tribunal well within time with clean hands and this Honourable Tribunal has got the jurisdiction to adjudicate upon the same.

On Facts:

- i. Para 1 of the comments as drafted is admission, hence needs no reply.
- ii. Para 2 of the comments as drafted is incorrect and based on misstatements as the criminal case is yet to be concluded and till then the Appellant

is innocent under the law, thus the para is denied.

- iii. Para 3 of the comments as drafted is admission, thus needs no reply.*
- iv. Para 4 of the comments as drafted is based on misstatements and concealment of material facts. The Appellant after his bail resumed his duties and performed his duties till 07-03-2023, thus the para is denied specifically.*
- v. Para 5 of the comments as drafted also is incorrect and based on misstatements, hence denied.*
- vi. Para 6 of the comments as drafted also is incorrect and based on concealment material facts, thus the same denied specifically.*
- vii. Para 7 of the comments as drafted is also against the law and rules on the subject, thus the same is denied.*
- viii. Para 8 of the comments as drafted is incorrect and baseless thus the same is denied.*
- ix. Para 9 of the comments as drafted also is incorrect and devoid of merits, thus the same is denied.*

On Grounds:

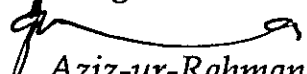
- a. Ground A of the comments as drafted is incorrect, baseless and based on misstatements, thus the same is denied specifically.
- b. Ground B of the comments as drafted also is incorrect and based on misstatements, thus the same is denied.
- c. Ground C of the comments as drafted is incorrect, based on concealment of material facts and devoid of merits and in need of solid proof, thus the same is denied specifically.
- d. Ground D of the comments as drafted also is incorrect and based on personal whims and surmises thus the same is also denied specifically.

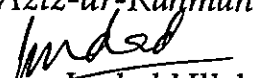
It is, therefore, very respectfully prayed that on acceptance of this rejoinder the appeal of the Appellant may very kindly be decided as prayed for originally.

Appellant


Murad Gul

Through Counsels,


Aziz-ur-Rahman


Imdad Ullah
Advocates Swat

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1187 of 2023

Murad Gul.

...Appellant


VERSUS

*The Provincial Police Officer Khyber Pakhtunkhwa,
Peshawar and Others.*

...Respondents

AFFIDAVIT

*It is solemnly stated on Oath that all the contents of
this rejoinder are true and correct to the best of my
knowledge and belief and nothing has either been
misstated or kept concealed before this Honourable
Tribunal.*

Deponent
Mr. 
Murad Gul

