

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

In S.A 7871-P/2021

Abdur Rashid

Versus

Govt of Khyber Pakhtunkhwa & Others

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Dated: 24/10/2023.

Through

Appellant

**JAVED IQBAL GULBELA,
Advocate, Supreme Court of
Pakistan**

Off Add: B-1, Al-Nimrah Centre, Govt College Chowk Peshawar

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In S.A 7871-P/2021

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Khyber Pakhtunkhwa
Service Tribunal

No. 8574

Dated 24-10-2023

**REJOINDER ON BEHALF OF THE APPELLANT TO THE COMMENTS
FILED BY THE RESPONDENTS NO. 01, 04, 05, 06, & 07**

Respectfully Sheweth,

Reply to Preliminary Objections:

Para 1 to 6:

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 notification# SO(C-II)/HED/2-6/2019/2156/59 dated 29-06-2021 & impugned notification # SO(C-II)/HED/2-6/2019/3810/13 dated 25-10-2021. 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 hypocritic and misleading, hence sternly denied. Moreover true, correct, and detail picture is portrait in the main appeal of the appellant.
5. Para "5" of the Reply is hypocritic; hence 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; therefore sternly denied. Moreover true, correct, and detail picture is portrait in the corresponding Para of the main appeal.

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, 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 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 hypocritical and denied, while that of the main appeal is correct.

Para "E" to "O" of the reply are incorrect, false, concocted, illegal, unlawful and against the law as well as hypocritical; 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: 24/10/2023.

Through


Appellant

Javed Iqbal Gulbela

ASC

Saghir Iqbal Gulbela

&

Syed Zain Ul Abbiden.

Advocates, High Court

Peshawar.

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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.


DEPONENT

CNIC:

Cell No.

Identified By:


Javed Iqbal Gulbela
ASC

