

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In S.A# 1558/2022

Khalil Ullah

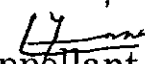
Versus

Khyber Pakhtunkhwa Public Service Commission through its
Chairman and Others

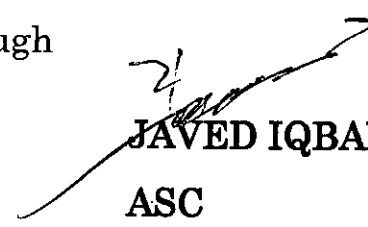
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Dated: 25/10/2023


Appellant

Through


JAVED IQBAL GULBELA
ASC


SAGHIR IQBAL GULBELA
Advocate High Court
Peshawar

26-10-23
Peshawar

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REJOINDER ON BEHALF OF THE
APPELLANT TO THE COMMENTS
FILED BY THE RESPONDENTS.

Respectfully Sheweth,

Reply to Preliminary objections:-

That the appellant has a good prima facie case and has rightly approached this Hon'ble Tribunal the appellant has got locus stand to file the instant appeal and the appellant has never concealed material facts from this Hon'ble Tribunal and this Hon'ble Tribunal has got ample jurisdiction to adjudicate upon the matter. The appellant remained sincere and devoted follow and has always performed his duties with full zest and devotion.

On Facts:-

1. No comments.

2. No comments.

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25-10-23

3. No comments.
4. Para No.4 of the comments is incorrect, wrong and hence dined. The appellant had applied for 15 days leave to the Secretary Khyber Pakhtunkhwa Public Service Commission through proper channel. The application was duly acknowledge by Assistant Director Admin and Deputy Director Admin and have accordingly written their comments upon application.
5. Para No.5 of the comments incorrect and hence dined.
6. Para No.6 of the comments incorrect and hence dined.
7. Para No.7 of the comments incorrect and hence dined.
8. Para No.8 incorrect and hence dined. The appellant never ever given opportunity of personal hearing.
9. Para No.9 needs no comments.
10. Para No.10 incorrect and hence dined.
11. Para No.11 incorrect and hence dined.
12. Para No.12 incorrect and hence dined.

On Grounds:-

- A. Incorrect and denied.

B. Incorrect and denied.

C. Incorrect and denied.

D. Incorrect and denied.

E. Incorrect and denied.

F. Incorrect and denied.

G. Incorrect and denied, no opportunity to the appellant was ever extended. Nor was heard in person and ~~was~~ condemned unheard.

H. Incorrect and denied.

I. Incorrect and denied.

J. Incorrect and denied.

K. Incorrect and denied, the impugned office order is illegal, unlawful and the same is liable to be set aside.

L. Incorrect and denied, the appellant is genuinely aggrieved person.


It is, therefore, most humbly prayed that on acceptance of instant rejoinder, the appeal of the appellant may graciously be allowed, as prayed for therein.

Dated: 25/10/2023

Through


Appellant


JAVED IQBAL GULBELA
ASC


SAGHIR IQBAL GULBELA
Advocate High Court
Peshawar

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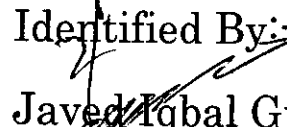
AFFIDAVIT

I, Khalil Ullah S/o Faiz Ullah Khan R/o P.O Badhaber.
Mira Masho Gagar, Tehsil & District Peshawar, do
hereby solemnly affirm and declare on oath that contents
of the Rejoinder are true and correct to the best of my
knowledge and belief and nothing has been concealed
from this Hon'ble court.


Deponent

CNIC: 17301-1502187-7

Identified By:-


Javed Iqbal Gulbela
Advocate High Court
Peshawar

