

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

APPEAL NO. 2030/2023

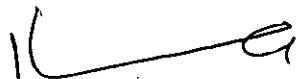
Mst. NIZAKAT VS EDUCATION DETP:

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THROUGH:

APPELLANT



KAMRAN KHAN
ADVOCATE

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

APPEAL NO. 2030/2023

Mst. NIZAKAT, SAT(BPS-16)

VS

**EDUCATION
DEPT**

**REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO THE COMMENTS/ REPLY SUBMITTED
BY THE RESPONDENTS**

R/SHEWETH:

PRELIMINARY OBJECTIONS:

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9744

Dated 07-12-2023

(1 to 7):

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal. Furthermore the respondents are taking different stance on the same issues hence they are stopped under the law to do so.

ON FACTS:

- 1- No need to comment.
- 2- Incorrect and misleading, the transfer order dated 24.07.2023 was issued by the competent authority in the best interest of public services accordingly in light of Clause-I of the transfer and posting policy of the provincial Government, furthermore there was one sanctioned post of SAT and that is why the appellant had withdraw her monthly salary from the DDO code of GGHS Kass. Copies of the sanctioned post and relevant documents are attached as annexureR.
- 3- Incorrect and not replied accordingly the appellant had withdrawn her monthly salary for the month of August, 2023 from the DDO code of GGHS Kass, so how could it is possible that if no post is there and even then pay was sanctioned on the DDO code of the GGHS Kass. That after the issuance of the impugned order the subject post has with mala fide intention been, withdrawn which is clear from the payroll.

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- 4- Incorrect and not replied accordingly, detail reply had been given in the above paras.
- 5- Incorrect and not replied accordingly.
- 6- Incorrect and misleading, proper rejection order was issued which is annexed with the appeal.
- 7- Incorrect, para of the appeal is correct.

GROUNDS:

(A TO F):

All the grounds of main appeal are correct and in accordance with law and prevailing rules and that of the respondent are incorrect and baseless hence denied.

It is therefore most humbly prayed that on acceptance of this rejoinder the appeal of the appellant may be accepted as prayed for.

Nizakat
APPELLANT

THROUGH:

Kamran Khan
**KAMRAN KHAN
ADVOCATE**

Affidavit:

Stated on oath that contents of this Rejoinder is true and correct to the best of my knowledge and belief.

*Nizakat
Deponent*





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CHANGE ALERT - 19.08.2023

(00278513 - MISS NIZAKA



Inbox



Employee S... 19 Aug



to me v

00278513

MISS NIZAKAT

DP6228

	DDO CODE CHANGED to DP6228 - Govt. Girls High School Kass Dir Upper
	DESIGNATION CHANGED to 80742266 - SENIOR ARABIC TEACHER
	DISTRICT GOVERNMENT KHYBER PAKHTUNKHWA
	EMPLOYEE GROUP UPDATED TO to 7 - Active Temporary
	Pay against wage type 0001 (Basic Pay) is Rs. 52930

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد ڈی ڈی او کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے۔ اگر اس ای-میل میں شامل ملازمین کی چینجز میں کوئی غلطی

AT TED

