

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9867

Dated 13-12-2023

C.M. No. ____ of 2023 In S.A. No. 1417/2022

Taj Muhammad Khan.

...Appellant/Respondent

VERSUS

The Secretary E&SE and Others.

...Respondents/Applicants

**REPLY BY THE APPELLANT TO THE
APPLICATION FOR SETTING ASIDE
ORDER OF EX PARTE PROCEEDINGS
AND STRIKING OFF OF DEFENCE.**

Respectfully Sheweth:

Preliminary Objections:

- a. That the Applicants have got no cause of action to file the instant application.
- b. That the application is not maintainable in its present form.
- c. That this Honourable Tribunal lacks the jurisdiction to entertain the application.

On Facts:


1. Para 1 of the application as drafted is incorrect and based on misstatements, hence denied.

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2. Para 2 of the application needs no reply.
3. Para 3 of the application as drafted is incorrect and based on misstatements, hence denied. Moreover the Respondents were will within the knowledge of the date fixed.
4. Para 4 of the application as drafted also is based on misstatement hence denied.
5. Para 5 of the application as drafted is against the law hence denied.
6. Para 6 of the application as drafted is whimsical and irrelevant, hence denied.
7. Para 7 needs no reply.

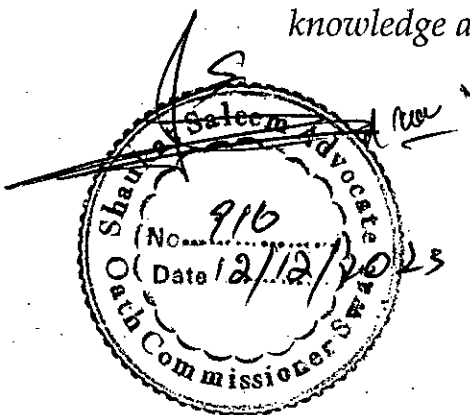
It is, therefore, very respectfully prayed that on acceptance of this replication the application may very kindly be dismissed with costs throughout.

Respondent/Appellant



Taj Muhammad Khan

Affidavit:

It is solemnly stated on oath that all the contents of the this application are true and correct to the best of my knowledge and belief.



Deponent


Taj Muhammad Khan