

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 11 of 2021

Diary No. 11373

Muhammad Islam.

Dated 26-02-2024

...Appellant

**VERSUS**

The District Police Officer, Dir Upper 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, thus are specifically denied. Moreover the Appellant has got a prima facie case in his favour and has approached this Honourable Tribunal well within time and this Honourable Tribunal has got the jurisdiction to adjudicate upon the same.

On Facts:

1. Para 1 of the comments needs no reply being admission.
2. Para 2 of the comments as drafted is incorrect, baseless and based on misstatements and concealment of material facts, thus the same is denied.
3. Para 3 of the comments as drafted also being admission, thus needs no reply.

05-03-2024  
Peshawar

4. *Para 4 of the comments as drafted being incorrect, is denied.*
5. *Para 5 of the comments as drafted also being admission needs no reply.*
6. *Para 6 of the comments as drafted is denied as well, being based on misstatement and concealment of material facts.*
7. *Para 7 of the comments is denied being devoid of merits.*


On Grounds:

- A. *Ground A of the comments as drafted is denied being devoid of merits.*
- B. *Ground B of the comments being admission and furthers the stance of the Appellant, thus needs no reply.*
- C. *Ground C of the comments also being devoid of merits and based on concealment is denied.*
- D. *Ground D of the comments is devoid of merits and misconstrued, thus the same is denied specifically as well.*
- E. *Ground E of the comments as drafted is denied being devoid of merits.*
- F. *Ground F of the comments as drafted also is incorrect, based on misstatements and devoid of merits is denied.*
- G. *Ground G of the comments as drafted is also denied being devoid of merits.*

- H. Ground H of the comments as drafted is devoid of merits and against the law and rules on the subject, thus is denied as well.
- I. Ground I of the comments as drafted is ill construed, thus the same is denied as well.
- J. Ground J of the comments as drafted is against the law and rules on the subject and devoid of merits is also denied.
- K. Ground K of the comments as drafted will be rebutted at the time of the arguments, with the leave of this Honourable tribunal.

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  
  
Muhammad Islam

Through Counsel,  
  
Imdad Ullah  
Advocate Swat

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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

*Muhammad Islam*  
Muhammad Islam

