

**BEFORE THE KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

**Appeal No. 636/2018**

Muhammad Asif Ex. Assistant Professor Govt College  
Technical Peshawar.

**(Appellant)**

**VERSUS**

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber  
Pakhtunkhwa, Civil Secretariat Peshawar and others.

**(Respondents)**

**REJOINDER ON BEHALF OF THE APPELLANT**

**Preliminary Objections:**

- a. Contents incorrect, the appeal is well within time.
- b. Contents incorrect and misleading, because the appellant remained in the employment of the Department, hence he has got necessary cause of action and locus standi.
- c. Contents incorrect and misleading, the appellant has approached this Hon;able Tribunal with clean hands.
- d. Contents incorrect and false. All necessary parties are arrayed as parties in the instant appeal.
- e. Contents incorrect and false.

**ON FACTS:**

1. Contents needs no comments, however, the respondents have clarified the position of the appellant that he has been appointed on Diploma of Associate Engineering , moreover the contents of Para 1 of the appeal is true and correct.

2. Contents needs no comments, hence however, contents of Para 2 of the appeal is true and correct.
3. Contents needs no comments, hence however, contents of Para 3 of the appeal is true and correct.
4. Contents of Para 4 needs no comments, however contents of Para 4 of the appeal is true and correct.
5. Contents of Para 5 of the needs no comments, however, contents of Para 5 of the appeal is true and correct..
6. Contents of Para 6 of the Appeal are correct, the reply submitted to the Para is incorrect & misleading.
7. Contents of Para 7 of the Appeal are correct, the reply submitted to the Para is incorrect & misleading.
8. Contents of Para 8 of the Appeal are correct.
9. Contents of Para 9 of the Appeal are correct, the reply submitted to the Para is incorrect & misleading.
10. Contents of Para 11 of the Appeal are correct, the reply submitted to the Para is incorrect & misleading, detailed reply has been given above.

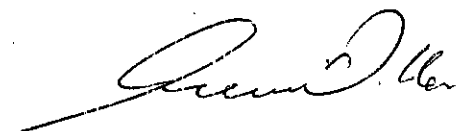
**Grounds of appeal:**

Grounds (A) to (I) taken in the Memo of this Appeal are legal and will be substantiated at the time of hearing of this Appeal.

It is, therefore, prayed that on acceptance of this *Service Appeal*, may please be accepted as prayed for.

**Appellant**

Through



**ZARTAJANWAR**

Advocate Peshawar

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**Affidavit**

I, do hereby solemnly affirm and declare that the contents of the *above Rejoinder* are true and correct and that nothing has been kept back or concealed from this Honourable Court.

Deponent