

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

**Rejoinder in Service Appeal No. 1608-P/2023.**

Kachkol Muhammad

Versus

I G P, etc.

**INDEX**

<b>S#</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Rejoinder		1- 2
2.	Affidavit.		3

Dated: 23/05/2024

*Kachkol Muhammad*

Appellant

Through

*Javed Iqbal Gulbela*  
Javed Iqbal Gulbela,  
Advocate, Supreme Court of  
Pakistan

*29-05-24*  
*Peshawar*

**Office Address: B-1, Al-Nimrah Centre, Govt College Chowk Peshawar**

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

**Rejoinder in Service Appeal No. 1608-P/2023.**

Kachkol Muhammad

Versus

I G P, etc.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12949

Dated 23-05-24

**REJOINDER ON BEHALF OF THE APPELLANT TO THE**  
**COMMENTS FILED BY THE RESPONDENTS NO. 01, 02, 03 &**  
**04.**

*Respectfully Sheweth,*

**Reply to Preliminary Objections:**

Para 1-7: All preliminary objections are mere objections for the sake of objections and are nothing more. Not only the appellant has got a good case but rather has got cause of action and locus-standi, and hence the Appellant has rightly approached this Hon'ble Tribunal for the redressal of his grievances.

**On Facts:**

1. Para No.1 of comments needs no reply.
2. Para No. 2 needs no comments.
3. Para No.3 misleading and hypocritic, hence sternly denied, moreover the detailed picture is portrayed in the main service appeal.
4. Para No.4 of the comments is misleading and hypocrite, hence denied.
5. Para No.5 of the comments is wrong, misleading, hence denied, moreover he appellant performed his duty with full zeal and zest and the appellant has a remarkable service record.
6. Para No.6 of the comments is misleading and hypocrite, hence denied. Moreover the appellant consistently performed his duty with full zeal and zest and proactive attitude towards his duty.
7. Para No.7 of the comments is misleading and hypocrite, hence denied. And detailed reply is given in above Para.
8. Para No.8 of the comments is misleading, concocted and hypocrite, hence denied.
9. Para No.9 of the comments is need no reply.

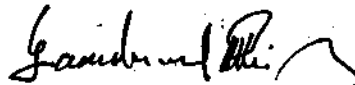
**On Grounds:**

- A. Para "A" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- B. Para "B" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- C. Para "C" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- D. Para "D" of the reply is incorrect and denied, while that of the main appeal is correct.
- E. Para "E" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- F. Para "F" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- G. Para "G" of the reply need no comment.
- H. Para "H" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- I. Need no reply.

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

Dated: 23 / 05 / 2024.

Through



Appellant

**Javed Iqbal Gulbela**  
Advocate, Supreme Court  
Pakistan.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR**

**Rejoinder in Service Appeal No. 1608-P/2023.**

Kachkol Muhammad

Versus

IGP, etc.

**AFFIDAVIT**

I, **Kachkol Muhammad**, do hereby solemnly affirm and declare that all the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

*Kachkol Muhammad*

DEPONENT

**Identified By**

*Javed Iqbal Gulbela*  
**JAVED IQBAL GULBELA,**  
Advocate, Supreme Court of  
Pakistan

