

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

Rejoinder in Service Appeal No. 1609-P/2023.

Muhammad kamran

Versus

I G P, etc.

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Dated: 23/05/2024

Through

Kamran
Appellant
2
Javed Iqbal Gulbela,
Advocate, Supreme Court of
Pakistan

29-05-24

D.B

Peshawar

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

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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Rejoinder in Service Appeal No. 1609-P/2023.

Muhammad kamran

Versus

I G P, etc.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12956

Dated 24-05-24

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: 23/15/2024.

Through

Kamran
 Appellant
Javed Iqbal Gulbela
 Advocate, Supreme Court
 Pakistan.

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**BEFORE THE HON'ABLE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

Rejoinder in Service Appeal No: 1609-P/2023

Muhammad Kamran

.....Petitioner

Versus

IGP etc

..... Respondents

Affidavit

I, Muhammad Kamran S/o Hakeem Ullah R/o Mashokhil Peshawar (Attorney for petitioner), Solemnly affirm and declare on oath that the contents of this Petition are true and correct to the best of my knowledge, belief and information and information and that nothing has been concealed from this Honourable Court.

Kamran

Deponent

CNIC NO. 17301-0862770-7

CELL NO. 0311-9236104

Identified by;

Javed Iqbal Gulbela

Advocate Supreme Court



Shafiq

24/05/24.