

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

Service Appeal No. 1622/2023

Sultan Zeb M-SI No. 247 Police Training School Swat, District Swat.

...Appellant

VERSUS

The Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and another.

...Respondents

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Appellant Through

  
Imdad Ullah

Advocate Swat

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**BEFORE THE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL, PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12734

Dated 13.05.2024

Service Appeal No. 1622/2023

Sultan Zeb M-SI No. 247 Police Training School Swat,  
District Swat.

...Appellant

**VERSUS**

The Provincial Police Officer Khyber Pakhtunkhwa,  
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**REJOINDER BY THE APPELLANT**

Respectfully Sheweth:

Preliminary Objections:

That all the preliminary objections are incorrect, baseless, based on misstatements and against the law and rules on the subject, hence are specifically denied. Moreover the Appellant has got a prima facie case in his favour and approached this Honourable Tribunal well within time with clean hands and this Honourable tribunal has got the jurisdiction to adjudicate upon the same.

On Facts:

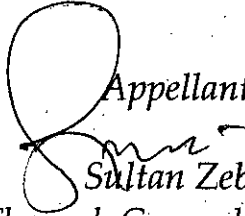

- i. *Para 2 of the comments as drafted is amounting to admission, hence needs no reply.*
- ii. *Para 2 of the comments as drafted is incorrect, baseless and against the available record. Moreover the para is evasive, hence the same is specifically denied.*
- iii. *Para 3 of the comments as drafted is devoid of merits and based on misstatements. The Appellant has duly completed all the courses in due course of law, thus the para is denied specifically as well.*
- iv. *Para 4 of the comments as drafted is vague evasive, volt face and against the record. The Appellant was duly selected for the said course from the candidates of Hangu as by then he was posted at Hangu. Thus the para is denied as well.*
- v. *Para 5 of the comments as drafted also is devoid of merits and reflects the arbitrary use of authority to the utter detriment of the Appellant as well as the negation of the relevant rules and misinterpreting the law. The Respondents on one hand have referred to the reply of the concerned quarter while the same time have misinterpreted the same according to their own whims and wishes, thus the para is denied specifically.*

- vi. *Para 6 of the comments as drafted is vague, evasive and devoid of merits thus the same is denied.*
- vii. *Para 7 of the comments as drafted being evasive and devoid of merits, thus the same is denied as well.*
- viii. *Para 8 of the comments as drafted also is denied being evasive.*
- ix. *Para 9 of the comments as drafted is denied being devoid of merits.*

On Grounds:

- a. *Ground A of the comments as drafted is incorrect and devoid of merits, hence the same is denied.*
- b. *Ground B of the comments as drafted is also incorrect, baseless and devoid of merits, thus the same is denied as well.*
- c. *Ground C of the comments as drafted also is devoid of merits, hence the same is denied.*
- d. *Ground D of the comments as drafted also is incorrect and devoid of merits and based on personal whims and wishes, thus the same is denied.*
- e. *Ground E of the comments as drafted also is denied being baseless and devoid of merits.*

It is, therefore, very respectfully prayed that on acceptance of this rejoinder the service appeal of the Appellant may very kindly be decided as prayed for originally.

  
Appellant  
Sultan Zeb  
Through Counsel,  
  
Imdad Ullah  
Advocate Swat

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR**

*Service Appeal No. 1622/2023*

*Sultan Zeb M-SI No. 247 Police Training School Swat,  
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*...Appellant*

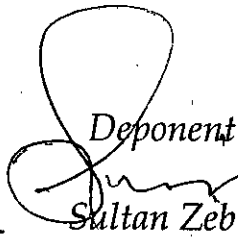
**VERSUS**

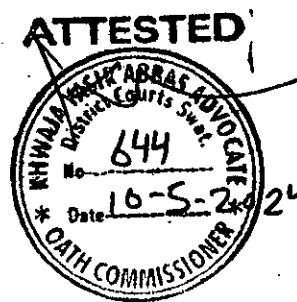
*The Provincial Police Officer Khyber Pakhtunkhwa,  
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*...Respondents*

**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*  
  
*Sultan Zeb*

**ATTESTED**  
  
*10-5-24*