

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No:- 7729/2021

MST: SHAHWAR BEGUM

VS

EDU: DEPTT:

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APPELLANT

THROUGH:

**NOOR MOHAMMAD KHATTAK,
ADVOCATE SUPREME COURT**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

Service Appeal No.7729/2021

SHAHWAR BEGUM

VS

EDU: DEPTT:

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE TO
REPLY SUBMITTED BY THE RESPONDENTS.**

PRELIMINARY OBJECTIONS:

1 TO 8

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 13037

Dated 29-05-2024

All the preliminary Objections raised by the respondents are incorrect, baseless and not in accordance with law and rules, rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

R/SHEWETH:

ON FACTS:

1. Para No 1 of the appeal is admitted as correct.
2. Para No 2 of the appeal is admitted as correct.
3. Para No 3 of the appeal is admitted as correct.
4. Para No 4 of the appeal is admitted as correct.
5. In reply to Para No 5 of the reply, it is humbly submitted that the colleagues and junior colleagues were promoted to the PSHT (BPS-15) on 25/02/2021 & 17/06/2021, respectively. In this respect the appellant filed the departmental appeal, but the same was not responded.
6. Para No 6 of the appeal is admitted as correct.

GROUND:

A to I

All the grounds of appeal are correct and in accordance with law, prevailing rules and the settled precedents on the subject issue, while the reply of the respondents are incorrect and baseless hence denied. That the appellant has been discriminated from his legal and fundamental right.

It is therefore, most humbly prayed that on acceptance of this rejoinder the service appeal of the appellant may kindly be accepted as prayed.

APPELLANT

Shahwar
Shahwar Begum

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

&

M. Jan
Mahmood Jan
Advocate High Court

AFFIDAVIT

I, **Mst: Shahwar Begum** (the appellant) do hereby solemnly affirm that the contents of this **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



Shahwar
DEPONENT