

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR AT CAMP COURT
ABBOTABAD.

IN S.A No. 487/2024

Zulfiqar Ahmad

VERSUS

Govt of KPK through Secretary E& SE & others

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Dated: 19/04/2024

Respondent No 3

Jaffer Rehman

ASDEO (M)

Circle Dhamtour

Abbottabad

Jaffer Rehman

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR AT CAMP COURT
ABBOTABAD.**

IN S.A No. 487/2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12298

Dated 19/4/24

Zulfiqar Ahmad

VERSUS

Govt of KPK through Secretary E& SE & others

**WRITTEN COMMENTS ON BEHALF OF
RESPONDENT NO 3 JAFFER REHMAN**

RESPECTFULLY SHEWETH:

- 1) That the appellant has no right to file the instant service appeal.
- 2) The appellant has concealed material facts from this august tribunal.
- 3) That the instant appeal is not maintainable in its present form.
- 4) That the appellant cannot claim any right of posting on a particular post.
- 5) That the impugned transfer order dated 21-03-2024 has been passed according to law and rules.

On Facts:

1. Para 1 pertains to record.
2. That para 2 pertains to record but the transfer order 06-05-2023 has been passed by incompetent authority, having no legal value.
3. Para no 3 pertains to record.
4. Para 4 is incorrect, as the impugned order was passed on 21-03-2024, while the ban was imposed on 22-03-2024.
5. Para 5 is in incorrect.
6. Para 6 pertains to record.
7. Para no 7 is incorrect.
8. Para no 8 pertains to record.
9. Para no 9 pertains to record.

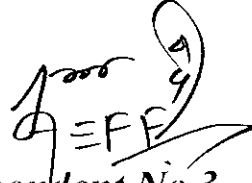
GROUND:

- A. *Grounds A to C are incorrect, As it is the right of any authority to accept on reject any appeal that comes in front of him.*
- B. *Ground D is not related to answer the respondent.*
- C. *Ground E is incorrect, as the appellant Mr. Zulfiqar Ahmad has given no evidence.*
- D. *Ground F is incorrect.*
- E. *Ground G to J are incorrect.*
- F. *Ground K is incorrect, as the order has been passed in the best public interest.*
- G. *Ground L is correct.*

H. Ground M & N are correct.

It is therefore most humbly requested that on the basis of instant written reply/comments of respondent no 3 the appeal of the appellant may kindly be dismissed.

Dated 06/06/2014



*Respondent No 3
Jaffer Rehman
ASDEO(M)
Circle Dhamtour
Abbottabad*

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AFFIDAVIT

I, Mr. Jafar Rehman ASDEO (Male) Circle Dham
Tor (Abbottabad), do hereby affirm and declare on oath
that the contents of this reply is true and correct to the
best of my knowledge and belief nothing has been
concealed from this honorable service tribunal.

It is further stated on oath that the answering
respondent have neither been placed ex-parte
nor his defence has been struck off.

DEPONENT

