

PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name  
Saira Bano

سائرہ بانو

Husband Name  
Ishfaq Ahmed Khan Tanoli

اشفاق احمد خان تنولی

Gender Country of Stay  
F Pakistan

Identity Number Date of Birth  
13503-0709224-0 15.02.1973

Date of issue Date of Expiry  
04.10.2019 04.10.2029



Saira Bano  
Holder's Signature

سیدہ ذریعہ بی بی

Uman's Pharmacy  
Registrar General of Pakistan

101221379754  
123-76-663131



13503-0709224-0

Handwritten text in Urdu script, including a signature and possibly a date or address, located in the lower-right area of the page.

P-①

**BEFORE THE SERVICE TRIBUNAL, K.P.**  
**PESHAWAR**

Saira Bano.....1118/22.....Appellant

**Versus**

Government of KP and  
other.....**Respondents**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15193

Dated 27/8/24

**SERVICE APPEAL**

**RE-JOINDER ON BEHALF OF APPELLANT**

**Respectfully Sheweth!**

**REPLY TO PRELIMINARY OBJECTIONS**

- 1) Para No. 1 is incorrect.
- 2) Para No. 2 is incorrect.
- 3) Para No. 3 is incorrect.
- 4) Para No. 4 is incorrect. There is no malafide or malice on the part of appellant in bringing appeal against the respondents.
- 5) Para No. 5 is incorrect.
- 6) Para No. 6 is incorrect.
- 7) Para No. 7 is incorrect as the rightful parties have been arrayed as respondents.
- 8) Para No. 8 is incorrect.
- 9) Para No. 9 of preliminary objection is incorrect and is based on malafide, malice and is in arbitrary notification.

depriving the appellant of her rights which are guaranteed to her by the constitution as well as service law.

- 10) Para No. 10 of the preliminary objection is incorrect as the entire proceedings were conducted at the back of appellant. The appellant has not been issued any show cause notice nor any inquiry was conducted nor the appellant was associated with any proceedings. The order/notification so passed is nullity in the eye of law which has legs to stand upon.

**FACTUAL OBJECTIONS**

- 1) Para No. 1 of the appeal stands admitted.
- 2) Para No. 2 of the written statement is incorrect, the appellant never absented nor any show cause notice was given. No inquiry was conducted in the presence of appellant nor appellant was issued any charge sheet. The entire proceedings were carried out at the back of appellant. There are constitutional guarantee as well as service laws also laid down. a parameter which has not been adhered to and this the entire proceedings and the order passed thereon carries no value in the eye of law.

3

- 3) Para No. 3 of written statement is incorrect.
- 4) Para No. 4 of written statement is incorrect.
- 5) Para No. 5 needs no comments.

**ON GROUNDS: -**

- A) Para "A" of the written statement is incorrect. The notification carries no value in the eye of law as no codal formalities were carried out nor the appellant is associated with.
- B) Para "B" is incorrect hence denied.
- C) Para "C" is incorrect hence denied.
- D) Para "D" is incorrect hence denied.
- E) Para "E" is incorrect.

It is, therefore, requested that on acceptance of the appeal, the impugned order may kindly be set aside and the appellant may kindly re-instated.

**Dated**    /07/2024

**Mst. Saira Bano**  
(Appellant)

Through:

**SHAD MUHAMMAD KHAN**  
Advocate Supreme Court of  
Pakistan (Mansehra)

**VERIFICATION**

I, MST. SAIRA BANO DAUGHTER OF SARFRAZ RESIDENT OF VILLAGE REERH, TEHSIL AND DISTRICT MANSEHRA, EX-PTC TEACHER, GOVT. GIRLS PRIMARY SCHOOL CHOCHANG, TEHSIL DASSU DISTRICT KOHISTAN DO HEREBY VERIFY THAT THE

(4)

CONTENTS OF FORE-GOING RE-JOINDER ARE TRUE  
AND CORRECT TO THE BEST OF MY KNOWLEDGE  
AND BELIEF AND NOTHING HAS BEEN CONCEALED  
OR SUPPRESSED FROM THIS HONOURABLE  
TRIBUNAL.

*Saira Bano*

MST. SAIRA BANO  
(DEPONENT)

5

**BEFORE THE SERVICE TRIBUNAL, K.P.**  
**PESHAWAR**

Saira Bano... 18/22 .....Appellant

**Versus**

Government of KP and  
other.....**Respondents**

**SERVICE APPEAL**

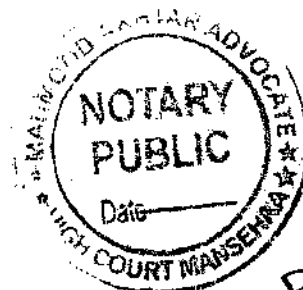
**RE-JOINDER ON BEHALF OF APPELLANT**

**AFFIDAVIT**

I, MST. SAIRA BANO DAUGHTER OF SARFRAZ  
RESIDENT OF VILLAGE REERH, TEHSIL AND  
DISTRICT MANSEHRA, EX-PTC TEACHER, GOVT.  
GIRLS PRIMARY SCHOOL CHOCHANG, TEHSIL DASSU  
DISTRICT KOHISTAN DO HEREBY SOLEMNLY AFIRM  
AND DECLARE ON OATH THAT THE CONTENTS OF  
FORE-GOING RE-JOINDER ARE TRUE AND CORRECT  
TO THE BEST OF MY KNOWLEDGE AND BELIEF AND  
NOTHING HAS BEEN CONCEALED OR SUPPRESSED  
FROM THIS HONOURABLE TRIBUNAL AND THE  
APPELLANT HAS NEITHER BEEN PLACED EX-PARTE  
NOR HER DEFENCE HAS BEEN STRUCK OFF.

*Saira Bano*  
MST. SAIRA BANO  
(DEPONENT)

**ATTESTED**



*19-7-2024*