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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Rejoinder In Service Appeal No. 1916 of 2023.

Muhammad Saeed

Versus

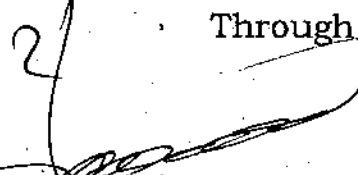
Govt of Khyber Pakhtunkhwa & Others

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Dated: 21-06-2024


Appellant

2/ Through

Javed Iqbal Gulbela

Advocate, Supreme Court.

Pakistan.

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SERVICES TRIBUNAL PESHAWAR

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Govt of Khyber Pakhtunkhwa & Others

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 13617

Dated 21/6/24

REJOINDER ON BEHALF OF THE APPELLANT TO THE
COMMENTS FILED BY THE RESPONDENTS.

Respectfully Sheweth,

Reply to Preliminary Objections:

1. Incorrect hence denied. Appellant has got good cause of action and prima-facia case.
2. Para No. 2 is incorrect. Appeal is maintainable and the Appellant rightly came to this Hon'ble Tribunal for recognition and enforcement of his right.
3. Incorrect and denied. Moreover reply is given in above para.
4. Incorrect and denied. Moreover the appeal is in time.
5. Incorrect and misleading hence denied.
6. Incorrect & misleading. Hence sternly denied.

On Facts:

1. No comments are necessary; hence, no further elaboration is required.
2. No comments, pertaining to record.
3. Incorrect. Hence denied. Subject to prove.

4. Incorrect & misleading. Hence denied. Actual picture and detailed view has been elaborated in the main service appeal.
5. Incorrect & misleading. Hence denied. True picture and detailed view has been elaborated in the main service appeal.
6. No comments needed.
7. Incorrect and hence sternly denied. The Respondent Department had drifted away from the instruments of law & thus the assertion of the Respondent Department will be negated on the time of arguments. The factual position was explained in preceding para & the main service appeal.
8. Incorrect hence denied. Reply already given in the above para.

On Grounds:

- A. No Incorrect & misleading. Hence denied. Actual picture and detailed view has been elaborated in the main service appeal.
- B. Incorrect, hence denied. The factual position has been detailed in the preceding paragraphs.
- C. Incorrect, hence denied. The factual position has been detailed in the preceding paragraphs.
- D. Incorrect. Hence, sternly denied. Reply already is given.
- E. Incorrect and so is denied. The Departmental Appeal of the Appellant was turned down in a classical cursory and whimsical manner without any rhyme and reason.
- F. Incorrect, hence denied. Need no comments.

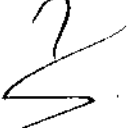
◆ **G. Incorrect. Sternly denied. The Appellant be allowed to advance grounds in order to assert his stance at the time of arguments.**

H. No comments.

It is, therefore, humbly prayed that on acceptance of the instant rejoinder, the appeal of the Appellant may graciously be allowed, as prayed for therein.

Dated: 21-06-2024


Appellant

Through 


Javed Iqbal Gulbela

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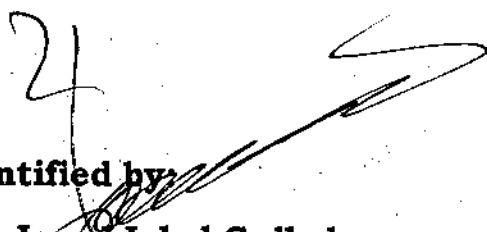
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AFFIDAVIT

I, **Muhammad Saeed** do hereby solemnly affirm & declare on oath that all contents of the instant service appeal are true & correct to the best of my knowledge and belief, and nothing has been kept concealed from this Hon'ble Tribunal.


Deponent


Identified by:
Mr. Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan
BC 10-79-24
0332-9279310

