

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

**Rejoinder in Service Appeal No. 1930-P/2023.**

Ghulam Muhammad

Versus

Govt. of KPK, etc.


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Dated: 6/02/2024

  
Appellant

Through

  
Javed Iqbal Gulbela,  
Advocate, Supreme Court of  
Pakistan

Office Address: B-1, Al-Nimrah Centre, Govt College Chowk Peshawar

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Govt. of KPK, etc.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 13132

Dated 04-06-2024

**REJOINDER ON BEHALF OF THE APPELLANT TO THE**  
**COMMENTS FILED BY THE RESPONDENTS NO. 01 TO 08.**

*Respectfully Sheweth,*

**Reply to Preliminary Objections:**

**Para 1-5:** All preliminary objections are mere objections for the sake of objections and are nothing more. Not only the appellant has got a good case but rather has got cause of action and locus-standi, and hence the Appellant has rightly approached this Hon'ble Tribunal for the redressal of his grievances.

**On Facts:**

1. **Para No.1** of comments needs no reply.
2. **Para No. 2** needs no comments.
3. **Para No.3** misleading and hypocritic, hence sternly denied, moreover the detailed picture is portrayed in the main service appeal
4. **Para No.4** of the comments is misleading and hypocrite, hence denied, while the corresponding Para of the main appeal is true and correct.
5. **Para No.5** of the comments is wrong, misleading, hence denied, while the corresponding Para of the main appeal is true and correct.
6. **Para No.6** of the comments pertains to record.
7. **Para No.7** of the comments needs no reply.
8. **Para No.8** needs no reply.
9. **Para No.9** of the comments is misleading and hypocrite, hence denied, while the corresponding Para of the main appeal is true and correct.

**On Grounds:**


- A. Para "A" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- B. Para "B" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- C. Para "C" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- D. Para "D" of the reply is incorrect and denied, while that of the main appeal is correct.
- E. Para "E" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied. While the corresponding Para of the main appeal is true and correct.
- F. Para "F" of the Reply is incorrect, false, misleading, illegal and unlawful, hence sternly denied.
- G. Para "G" of the reply need no comment.

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

Dated: 4/6/2024.

Through

  
Appellant

  
Javed Iqbal Gulbela  
Advocate, Supreme Court  
Pakistan.

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**AFFIDAVIT**

I, **Ghulam Muhammad**, do hereby solemnly affirm and declare that all the contents of this **application** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

  
DEPONENT

CNIC:

**Identified By**

  
**JAVED IQBAL GULBELA,**  
Advocate, Supreme Court of  
Pakistan

