

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 2293 of 2023

Dr. Zeeshan Khan.

...Appellant

VERSUS

The Secretary Health Services Government of Khyber Pakhtunkhwa, Peshawar
and Others.

...Respondents

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Appellant Through


Imdad Ullah

Advocate Swat

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BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 2293 of 2023

Dr. Zeeshan Khan.

Khyber Pakhtunkhwa
Service Tribunal
No. 13252
Dated 10-06-2024

...Appellant

VERSUS

The Secretary Health Services Government of Khyber
Pakhtunkhwa, Peshawar and Others.

...Respondents

REJOINDER BY THE APPELLANT

Respectfully Sheweth:

Preliminary Objections:

That all the preliminary objections are incorrect, baseless, against the law and rules on the subject, thus are specifically denied. Moreover the Appellant has got a prima facie case in her favour and has approached this Honourable Tribunal well within time and this Honourable Tribunal has got the jurisdiction to adjudicate upon the same.

On Facts:

- i. Para 1 of the comments as drafted amounts to admission, thus needs no reply, however the appointment order has erroneously been annexed, for the correction of which a separate

application has already been submitted before this Honourable Tribunal.

- ii. Para 2 of the comments as drafted also amounts to admission thus needs no reply.*
- iii. Para 3 of the comments as drafted is amounting to admission as well, hence needs no reply.*
- iv. Para 4 of the comments as drafted is ill construed, incorrect, devoid of merits and in complete negation of the law and rules on the subject, thus the same is denied specifically.*
- v. Para 5 of the comments as drafted amounts to admission, thus needs no reply.*
- vi. Para 6 of the comments as drafted is evasive and devoid of merits, thus the same is denied as well.*

On Grounds:

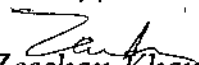
- a. Ground A of the comments as drafted is incorrect, baseless and devoid of merits thus the same is denied specifically.*
- b. Ground B of the comments as drafted also is incorrect and against the law and rules on the subject, thus the same is denied as well.*
- c. Ground C of the comments as drafted being admission, needs no reply.*

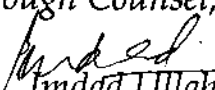
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d. Ground D of the comments as drafted is vague and evasive, thus the same is denied as well.

It is, therefore, very respectfully prayed that on acceptance of this rejoinder the appeal of the Appellant may very kindly be acceptance as prayed for originally.

Appellant


Dr. Zeeshan Khan
Through Counsel,


Imdad Ullah
Advocate Swat

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SERVICE TRIBUNAL, PESHAWAR

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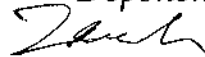
The Secretary Health Services Government of Khyber
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...Respondents

AFFIDAVIT

It is solemnly stated on Oath that all the contents of
this rejoinder are true and correct to the best of my
knowledge and belief and nothing has either been
misstated or kept concealed before this Honourable
Tribunal.

Deponent



Dr. Zeeshan Khan

