

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In re-S.A No 1555/2023

Diry No. 15689

Dated 11-09-2024

Faheem Jan

Versus

Inspector General of Police, KP & others

Rejoinder on behalf of the appellant

Respectfully Sheweth,

On Preliminary Objections:

All the preliminary objections are wrong, incorrect, misleading and misconceived, hence denied.

On Facts:

1. Para No "1" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
2. Para No "2" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
3. Para No "3" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct. The appellant has neither been associated with the alleged inquiry nor the codal formalities are fulfilled.
4. Para No "4" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
5. Para No "5" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
6. Para No "6" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
7. Para No "7" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.

8. Para No "8" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.

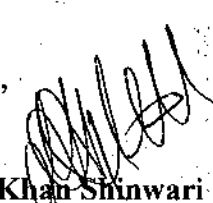
On Grounds:

- a. Para "a" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- b. Para "b" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- c. Para "c" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- d. Para "d" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- e. Para "e" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- f. Para "f" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- g. Para "g" of the comments is wrong, incorrect, misleading and misconceived, hence denied while that of the Service Appeal is correct.
- h. Needs no reply.

It is, therefore, prayed that the title Service Appeal may kindly be allowed as prayed for.

Appellant,

Through


M Ayub Khan Shinwari
Advocate Supreme Court

AFFIDAVIT

I, Fahim Jan S/o Azam Khan, Constable, Salary No 00672036, Khaar Kalay, Sada, Lower Kurram do hereby solemnly affirm and state on oath that the contents of the accompanying rejoinder are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.

Deponent



11/09/2024

