

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO.1413/2024**

Dr. Ghafoor Ahmad ..... appellant

**Versus**

Govt: of Khyber Pakhtunkhwa and others ..... Respondents

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*S. Sagheer*  
**Section Officer (Lit-II)**  
Government of Khyber Pakhtunkhwa,  
Health Department

10-12-24

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**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA**

**SERVICE TRIBUNAL**

Khyber Pakhtunkhwa  
Service Tribunal

SERVICE APPEAL NO...../2024

Diary No. 16509

Dated 09-10-24

Dr. Ghafoor Ahmad.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa and others.....Respondents

**Respectfully Sheweth:**


**REPLY ON BEHALF OF THE RESPONDENTS NO 01 TO 03**

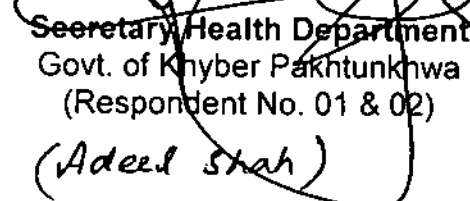
**Preliminary Objections:-**

- i. That the Appellant has got no cause of action or locus standi to file the instant petition.
- ii. That the Appellant has filed the instant Appeal just to pressurize the replying respondents.
- iii. That the petition is not maintainable in its present form and also in the present circumstances of the issue.
- iv. That the Appellant has filed the instant petition with mala-fide intention hence the petition is liable to be dismissed.
- v. That the Appellant has not come to the Tribunal with clean hands

**Facts**

1. No comments.
2. Subject to proof.
3. Incorrect. The impugned notifications have been issued in accordance with law.
4. Incorrect all the three ingredients area in favor of the replying respondents furthermore para-wise comments to the main appeal may kindly be considered part and parcel of the instant reply.
5. Incorrect already replied in para 4 above.
6. It is therefore humbly prayed that the instant petition of the appellant may very graciously be rejected with costs.

  
Director General Health Services  
Govt. of Khyber Pakhtunkhwa  
(Respondent No. 03)  
(Dr. Muhammad Saleem)

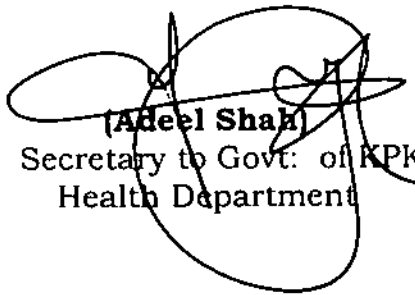
  
Secretary Health Department  
Govt. of Khyber Pakhtunkhwa  
(Respondent No. 01 & 02)  
(Adeel Shah)



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT**

**AUTHORITY LETTER**

**Mr. Safi Ullah**, Focal Person ( Litigation-II), Health Department Civil Secretariat Peshawar is hereby authorized to attend/defend the court cases and file comments on behalf of Secretary to Government of Khyber Pakhtunkhwa Health Department before the Service Tribunal and lower Courts.

  
**(Adeel Shah)**  
Secretary to Govt: of KPK  
Health Department

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

**SERVICE APPEAL NO.1413/2024**

Dr. Ghafoor Ahmad.....appellant

**Versus**

Govt: of Khyber Pakhtunkhwa and others ..... Respondents

**Affidavit**

I Dr. Muhammad Saleem, Director General, Health Services Khyber Pakhtunkhwa Health Department is hereby, solemnly affirmed on oath that the contents of the Parawise Comments in Service Appeal NO.1413/2024 on behalf of respondents are true and correct to the best of my knowledge and belief as per information provided and nothing has been concealed from this Honorable Court. *It is further stated on oath that in this appeal, the answering respondent neither has been pleaded ex-parte nor their defence has been struck off/cost.*

**Dr. Muhammad Saleem**  
Director General, Health Services,  
Khyber Pakhtunkhwa,  
Health Department

