

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 998/2024

Diary No. 16897

Dated 17-10-24

Mst. Zahida Azeem

.....Appellant

VERSUS

Director Elementary & Secondary Education & others

.....Respondent

REJOINDER ON BEHALF OF APPELLANT.

Respectfully Submitted

Preliminary objections:

All the preliminary objection raised by the respondents are incorrect baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raised any objection at that stage on the appeal.

FACTS

All the facts of the appeal are correct while replies incorrect, despite that the appellant has not been treated in accordance with law, rules and transfer posting policy as such the appellant is unmarried lady, who residing with her parents was transferred before completion of her normal tenure by the respondents departments through impugned transfer order dated 11.06.2024 which is against clause-(IV) and (X) of the transfer posting policy of the Provincial Government. Beside that there is no prove or evidence regarding the alleged allegation mentioned in the impugned order dated 11.06.2024 against the appellant.

That as such the appellant is an unmarried lady residing with her parents and their parents have serious health issues and that's why the impugned transfer order dated 11.06.2024 may be liable for setting aside as per law, rules and policy.

It is therefore most humbly prayed that on acceptance of the instant rejoinder the appeal of the appellant may kindly be accepted as prayed for.

Dated 17/10/2024


Appellant

Through


Roeeda Khan
Advocate, High Court Peshawar