

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Rejoinder In Service Appeal No.542/2024.

Hassan Gul

Versus

Govt of Khyber Pakhtunkhwa & Others

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Dated: 21-06-2024


Appellant

Through


Jayesh Iqbal Gulbela

Advocate, Supreme Court.

Pakistan.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Rejoinder In Service Appeal No.542/2024.

Hassan Gul

Versus

Govt of Khyber Pakhtunkhwa & Others

Khyber Pakhtunkhwa
Service Tribunal

Case No. 14661

Date: 05-08-24

REJOINDER ON BEHALF OF THE APPELLANT TO THE
COMMENTS FILED BY THE RESPONDENT NO.01 & 02

Respectfully Sheweth,

Reply to Preliminary Objections:

Para 1-8: 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. No comments are necessary; hence, no further elaboration is required.
2. No comments.
3. No comments.
4. Incorrect & misleading. Hence denied. Actual picture and detailed view has been elaborated in the main service appeal.
5. Incorrect & misleading. Hence denied. True picture and detailed view has been elaborated in the main service appeal.

6. Incorrect and hence sternly denied. Moreover true and correct picture is given in the corresponding para of the main service appeal.

7. Incorrect and hence sternly denied. Actual picture and detailed view has been elaborated in the main service appeal.

8. No comments.

On Grounds:

A. Incorrect & misleading. Hence denied.

B. Incorrect, hence denied.

C. Incorrect, hence denied.

D. Incorrect. Hence, sternly denied.

E. Incorrect and so is denied.


F. Incorrect, hence denied.

G. Incorrect. Sternly denied.

H. No comments.

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

Dated: 26-07-2024


Appellant
Through
Javed Iqbal Gulbela
Advocate, Supreme Court.
Pakistan.

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Rejoinder In S.A # 542/2024

Hassan Gul

Versus

The Government of Khyber Pakhtunkhwa and Others

AFFIDAVIT

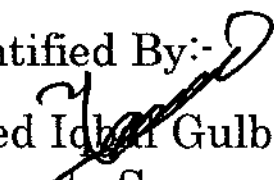
I, Hassan Gul S/o "Senior Qari" (BPS 15) Government High School Umralai, District Dir Upper do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

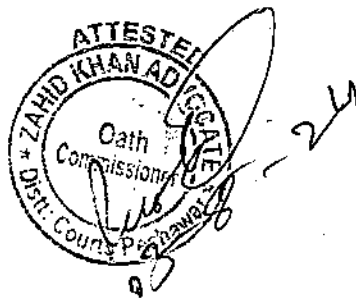

Deponent

CNIC: 15702-7027205-3

Cell No. 0301-8551112

Identified By:-


Javed Iqbal Gulbela
Advocate Supreme Court
Of Pakistan



BEFORE THE HONBLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Rejoinder In S.A # 512024

Hasan Gul

Verus

The Government of Khyber Pakhtunkhwa and Others

AFFIDAVIT

I, Hasan Gul No "Senior (S)" (BPS 15) Government High School Umalai, District Dir Upper do hereby solemnly affirm and declare on oath that contents of the Rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from the Honble court.

Deponent

Cell No: 15702-702702-8

CNIC: 8251112-0301

Identified By:
Javed Iqbal Gulbela
Advocate Supreme Court
Of Pakistan