2. That the appellant was dully registered with Employment Exchange District Nowshera under registration no 1445. (Copy of Employment Exchange Certificate is Annexure-A).

- 3. That the appellant, fulfilling all the codel formalities was appointed on the recommendations of the Departmental Selection Committee against the post of Ward Attendant (BPS-04) by the respondent No 03 Vide Officer Order No. 4836-40/DHO NSR dated 30.06.2022. (Copy of Appointment Order dated 30.06.2022 is Annexure-B).
- 4. That the appellant since his appointment has performed his duties with great zeal zest enthusiasm and to the entire satisfaction of the respondents.
- 5. That the appellant therafter was transferred and posted at MCH Center Abakhel Nowshera by the respondent No 03 Vide Office Order NO. 1931-33 DHO NSR dated 10.08.2022. Consequently, reported for duties in the center and submitted his arrival report on 12.08.2022 (Copy of vide office order NO. 1931-33 DHO NSR dated 10.08.2022 and Arrival Report dated 12/08/2022 are annexure C & D.)
- 6. That the appellant thereafter started performing his duties regularly with punctuality and to the entire satisfaction of the in-charge of the center. (Copy of and attendance certificate is annexure-E).
- 7. That despite of regularly performance of duties respondent No 03 did not release salary of appellant and to the appellant time and again approached for release of salary however on one or other pretext the salary was not released therefore the appellant made a request for release of salary to the respondent No 03 vide application dated 04.08.2023. However the same has not been responded till date. (Copy of application dated 04.08.2023 is Annexure-F)