

*Sec.*  
**BEFORE THE HONOURABLE ELECTION COMMISSIONER  
OF PAKISTAN, ISLAMABAD.**

APPEAL NO. \_\_\_\_\_ / 2018.

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1. Zain Ali Bhatti S/o Zahid Hussain Haidry, R/o Kanda Kotli Peer Ahmad Shah, Bye-Pass Road, Gujranwala, voter of NA-80.
  2. Sarfraz Ahmad Advocate S/o Sardar Muhammad Hafeez Khan, Caste Rajput, R/o Abadi Muhammad Bukhsh, College Road, Gujranwala, voter of NA-81.

PETITIONER

VERSUS

Election Commission of Pakistan, Islamabad.

RESPONDENT

**APPEAL AGAINST DELIMITATION OF NA-80, NA-81, NA-83 & NA-84, DISTRICT GUJRANWALA ISSUED BY ELECTION COMMISSION OF PAKISTAN DATED: 05.03.2018.**

Respectfully Sheweth:-

1. That the addresses and names of the necessary & proper parties are given on head note of this petition for service of summon of notices which may be issued by this Honourable Election Commission.
2. That the issued list of Delimitation of Constituency NA-80 to NA-84, Gujranwala, is illegal, unlawful and against the Rules of 2017.

3. That the said list Delimitation of Constituency NA-80 to NA-84 Gujranwala is against the Chapter No. 3, Sec. 12, Clause 5 of Rules of Election Commission of Pakistan, which is absolutely illegal, unlawful, without any lawful justification.

4. That the respondent has ignored the fact while issuing the above said list of delimitation HALQA-BANDI relating the nearest area & population of constituency of Gujranwala about the said list of delimitation.

5. That NA-80, the respondent has attached QH-Talwandi Rahwali with Town Committee Qila Didar Singh, QH-Qila Didar Singh, which is away from the distance of 40 kilometer, whereas, the Town Committee Qila Didar Singh & QH- Qila Didar Singh, NA-84 Nowshera Virkan has to distance about 15 Kilometer from Nowshera Virkan to Qila Didar Singh, and its border line is attached with one and other since the establishing of District Gujranwala.

6. That NA-80 should be consisted upon the such areas & populations and its area of 10/12 kilometer, which detailed as under:-

- i. Gujranwala Cantt.
- ii. QH-Rahwali,
- iii. Charge No. 9,
- iv. Charge No. 10,
- v. Charge No. 11
- vi. Charge No. 12 Excluding Circle No. 8 & 9
- vii. Charge No. 38
- viii. Patwar Circle Bhatti Bhango, QH- Talwandi Musa Khan.

**Populations of the said constituency is approximately 8,02,833.**

7. That NA-81 should be consisted upon the such area / populations and its area about 10 kilometer, which

- i. Charge No. 6
- ii. Charge No. 7
- iii. Charge No. 8
- iv.A. Circle No. 8 & 9 of Charge No. 12
- iv. Charge No. 13,
- v. Charge No. 14 exclude Circle No. 6
- vi. Charge No. 15
- vii. Charge No. 16
- viii. charge No. 17
- ix. Charge No. 18
- x. Charge No. 19
- xi. Charge No. 20
- xii. Charge No. 32
- xiii. Charge No. 33
- xiv. Charge No. 34
- xv. QH-Talwandi Musa Khan, Gujranwala.
- xvii. QH-Sadar, Gujranwala.

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**Populations of the said constituency is approximately 8,50,759.**

8. That the respondent has attached QH-Talwandi Musa Khan with Kamoke NA-83, it has distance about 40 kilometer and the time consumed its traveling about 1 hour, whereas, QH-Talwandi Musa Khan and QH-Sadar NA-81 is located nearest to each other and it has distance about 10 kilometer.

9. That the NA-83 should be consisted upon the such area / populations and its area about 10 kilometer, which detailed as under:-

- i. Kamoke Tehsil
- ii. QH-Eminabad
- iii. Town Committee, Eminabad
- iv. Circle No. 10,13, 15 of Charge No. 22

**Populations of the said constituency is approximately 8,22,448.**

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10. That Tehsil Kamoke may be separated from HQ-Talwandi Musa Khan & QH-Sadar, Gujranwala, and Tehsil Kamoke may be attached to QH-Eminabad & Town Committee Eminabad because Town Committee & Tehsil Kamoke are situated on G.T Road and it has five minutes distance from one another.

11. That NA-84 should be consisted upon the such area / populations and its area about 15 kilometer, which detailed as under:-

- i. Tehsil Nowshera Virkan
- ii. QH-Qila Didar Singh
- iii. M.C Qila Didar Singh
- iv. M.C Ladhewala Warriach

**Populations of the said constituency is approximately 8,39,622.**

12. That Tehsil Nowshera Virkan should be separated from Eminabad, Nowshera Virkan has distance 60 kilometer from Eminabad and time consumed its traveling about 1-1/2 hours, and Eminabad Town Committee & QH-Eminabad may be attached with Tehsil Kamoke NA-83, which has only 7 kilometer distance from one another.

13. That Qila Didar Singh M.C, QH-Qila Didar Singh & Ladhewala Warriach Town Committee may be attached with Nowshera Virkan NA-84.

14. That the respondent has issued the list of delimitation under appeal is absolutely wrong, false & incorrect, and against the fundamental rights of the petitioners and other voters of the circle

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It is therefore, respectfully prayed that in the light of above said circumstances and facts that the appeal regarding delimitation of NA-80, NA-81, NA-83 & NA-84, District Gujranwala, issued by election commission of Pakistan dated: 05.03.2018 may please be accepted and the suggestions of the petitioners may please be accepted for the best interest of justice & equity.

PETITIONERS

SM2Mdt

0334-4263711

Dated: 15-03-18

Nasir  
0300-7794149

THROUGH COUNSELS:

Manzoor

Jameel

**MANZOOR QADIR BHINDER**  
Advocate High Court,  
40-Jinnah Chamber,  
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**HAFIZ JAMIL NASIR**  
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33-Jinnah Chamber,  
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M. Arfan

**SHEIKH MUHAMMAD ARFAN**  
Advocate High Court,  
33-Jinnah Chamber,  
District Courts, Gujranwala.

**SHAHZAD AHMAD DAR**  
Advocate High Court  
40-Jinnah Chamber,  
District Courts, Gujranwala

**VERIFICATION:**

Verified on Oath at Gujranwala, on this \_\_\_<sup>th</sup> of March, 2018, that the contents of the above said petition from para No. 1 to 11 are true and correct to best of my knowledge whereas the rest of the paras No. 12 to 14 along with grounds are also true and correct on the basis of my information and belief. Nothing has been misstated or concealed therein.

PETITIONER

SM2Mdt