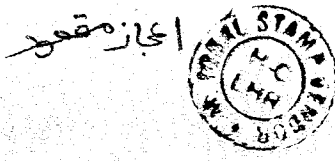


BEFORE THE SECRETARY ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD

M. J. Khan
4/4/18



Petition No. _____/2018

Ijaz Maqsood S/o Maqsood Ahmed R/o Rakh Baoli, UC-13 Daror Muslim, Tehsil Muridke, District Sheikhpura, 0321-4903427

PETITION FOR GRANT OF PERMISSION TO APPEAR AND DEFEND THE PRIMARY DELIMITATION OF THE CONSTITUENCIES PP-136, PP-142, NA-119 & NA-121 SHEIKHUPURA, PUNJAB,

Respectfully Sheweth:-

1. That the present petitioner is the Voter Member of UC-13 Daror Muslim fell within the constituency of PP-136 ibid and the Silsla Number 64, Shamariati Block code No.199050305 and CNIC No.35404-1593526-3. Copy of the voter list is attached herewith as **ANNEXURE-A**.
2. That according to primary de-limitation the total population of PP-136 is 379495, PP-137 IS 394130, PP-135 is 376922, PP-

MH
24/4/18

140 is 338523, PP-141 is 401160 and PP-142 is 364258. Due to the following facts the present petitioner is desired to defend the primary delimitations of said constituencies. Copies of Maps are attached herewith as **ANNEXURE-B**.

3. That according to the new delimitation, the principles of delimitation have correctly been followed. The balanced distribution of population, areas are geographically compact, correct physical features, the boundaries of administrative units are correct and facilities of communication and public convenience were followed. There is no need to disturb the present position of constituencies.
4. That it came to the knowledge of the petitioner that so many applications regarding objections upon primary delimitation have been filed before this forum and almost all the applications which have been filed are for the purpose to delay the matter/elections and those persons/applicants are non-serious persons and only spectators who enjoyed the situation and have no concern with the elections as candidates. They filed the objection petitions upon the instigation of non-stakeholders who did not digest the harmony.

- MHA
4/11/11
5. That all the objections are fake and have been taken without studying the geographical situation of the constituencies, and without any force. The said facts are not in air because the present petitioner has studied all the constituencies and did not find any flaw in primary delimitation. So, the petitioner prayed for leave to appear and defend the objection petitions so filed by various persons before this forum.
 6. That if the present new constituencies will be disturbed than there would be a great disaster in upcoming general elections and in that case there would be every possibility of postponement of upcoming general elections. So, the petitioner wants to assist this Forum. Hence this petition.
 7. That if the petitioner will not be allowed to appear and defend the primary delimitation then the petitioner and others shall be bound to face irreparable loss and injury.
 8. That the balance of convenience lies in favour of the petitioner and there is every likelihood of success of the petitioner to defend the primary delimitation.

PRAYER.

Under the above submissions it is humbly prayed that the petition in hand may kindly be

accepted and the petitioner may be allowed to appear
and defend the primary/ preliminary delimitation of
the afore said constituencies, in the interest of justice
equity and fair play.

Any other relief which this Learned Forum
deems fit and proper may also be awarded.

اعجاز مقبر
PETITIONER

Through

Waqas
WAQAS TAIMOUR
Advocate

GT Road Muridke, Sheikhpura.

Dated: 31-03-2018

CERTIFICATE

As per instructions of my client this is the first petition on the subject before this
Honourable Court.

Waqas
ADVOCATE

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BEFORE THE SECRETARY ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD

Petition No. _____/2018

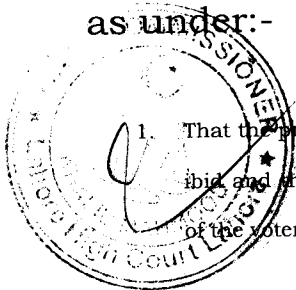
(PETITION FOR GRANT OF PERMISSION TO APPEAR AND DEFEND THE PRIMARY DELIMITATION OF THE CONSTITUENCIES PP-136, PP-142, NA-119 & NA-121 SHEIKHUPURA, PUNJAB)

AFFIDAVIT OF

Ijaz Maqsood S/o Maqsood Ahmed R/o Rakh Baoli, UC-13 Daror Muslim, Tehsil Muridke, District Sheikhupura

I, the above named deponent do hereby solemnly affirm and declare

as under:-



1. That the present petitioner is the Voter Member of UC-13 Daror Muslim fell within the constituency of PP-136 and the Silsla Number 64, Shamariati Block code No.199050305 and CNIC No.35404-1593526-3. Copy of the voter list is attached herewith as **ANNEXURE-A**.
2. That according to primary de-limitation the total population of PP-136 is 379495, PP-137 IS 394130, PP-135 is 376922, PP-140 is 338523, PP-141 is 401160 and PP-142 is 364258. Due to the following facts the present petitioner is desired to defend the primary delimitations of said constituencies. Copies of Maps are attached herewith as **ANNEXURE-B**.
3. That according to the new delimitation, the principles of delimitation have correctly been followed. The balanced distribution of population, areas are geographically compact, correct physical features, the boundaries of administrative units are correct and facilities of communication and public convenience were followed. There is no need to disturb the present position of constituencies.
4. That it came to the knowledge of the petitioner that so many applications regarding objections upon primary delimitation have been filed before this forum and almost all the applications which have been filed are for the purpose to delay the matter/elections and those persons/applicants are non-serious persons and only spectators who enjoyed the situation and have no concern with the elections as candidates. They filed the objection petitions upon the instigation of non-stakeholders who did not digest the harmony.

- 5. That all the objections are fake and have been taken without studying the geographical situation of the constituencies, and without any force. The said facts are not in air because the present petitioner has studied all the constituencies and did not find any flaw in primary delimitation. So, the petitioner prayed for leave to appear and defend the objection petitions so filed by various persons before this forum.
- 6. That if the present new constituencies will be disturbed than there would be a great disaster in upcoming general elections and in that case there would be every possibility of postponement of upcoming general elections. So, the petitioner wants to assist this Forum. Hence this petition.
- 7. That if the petitioner will not be allowed to appear and defend the primary delimitation then the petitioner and others shall be bound to face irreparable loss and injury.
- 8. That the balance of convenience lies in favour of the petitioner and there is every likelihood of success of the petitioner to defend the primary delimitation.



اعجاز مقصور
DEPONENT

VERIFICATION

Verified on Oath at Lahore this 31th day of March, 2018 that the contents of above affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therein

Declared On Oath Before Me
 By Mr. Imam Hussain
 S/o Imam Hussain
 R/o Imam Hussain
 Ident. Imam Hussain
 Mission Shubh Kala
 Oath Commissioner
 Lahore District Court Lahore
 Extension from 6-6-17 to 3-20 No. 367

اعجاز مقصور ✓
DEPONENT

31/3/18