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J/A/31/07/2018  
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**BEFORE THE HONOURABLE SECRETARY ELECTION  
COMMISSION OF PAKISTAN, ISLAMABAD.**

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

Muhammad Ali S/o Ch. Abdul Hameed, R/o Gala Hameed Wala, Jinnah Road, Street No. 7, Mohallah Islam Pura, Gujranwala, voter member PP-57, Serial No. 602, Block Code 164350101.

PETITIONER

VERSUS

Election Commission of Pakistan, Islamabad.

RESPONDENT

**APPEAL AGAINST DELIMITATION OF PP-57,  
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 PP-57 Gujranwala, is illegal, unlawful and against the Rules of 2017 Sec-5.
3. That the said list Delimitation of Constituency PP-57 Gujranwala is against the Chapter No. 3, Sec. 12, Clause 5 of Rules of Election Commission of Pakistan, which is

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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 PP-57, which consisted upon of population 3,72,574, if Charge No. 35 exclude from PP-57 and its population consisting upon 22,866, the population of PP-57 will remain 3,49,708 and if Charge No. 35 include in PP-56, and the population of PP-56 is consisting upon 3,77,090, then the population of PP-56 will become 3,99,956, and if Circle No. 4 & 5 of Charge No. 29 which has its population 27,010 exclude from PP-56 & include in PP-57, the population of PP-57 will become 3,76,718 and population of PP-56 will become 3,72,946.
6. That the population of PP-57 & PP-56 and its areas will become according to Sec. 5.
7. That PP-57 which detailed as under:-
  - i. Charge No. 7,
  - ii. Charge No. 8,
  - iii. Charge No. 9,
  - iv. Charge No. 24,
  - v. Charge No. 25,
  - vi. Chare No. 26,
  - vii. Charge No. 28,
  - viii. Charge No. 30
  - ix. Charge No. 31,
  - x. Charge No. 32
  - xi. Charge No. 33
  - xii. Charge No. 34
  - xiii. Circle 4 & 5 of Charge No. 29

**Populations of the said constituency is approximately 3,76,718.**

The details of PP-56 is as under:-

- i. Charge No. 29 exclude Circle No. 4 & 5
- ii. Charge No. 35,
- iii. Charge No. 36,
- iv. Charge No. 37,
- v. Charge No. 38,

**Populations of the said constituency is approximately 3,72,946.**

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

It is therefore, respectfully prayed that in the light of above said circumstances and facts that the appeal regarding delimitation of PP-57, District Gujranwala, issued by election commission of Pakistan dated: 05.03.2018 may please be accepted and the suggestions of the petitioner may please be accepted for the best interest of justice & equity.

PETITIONER

Dated: 29-3-18

*A. D. D.*  
*03000303044*

THROUGH COUNSELS:

*0300-6446080*

**MANZOOR QADIR BHINDER**  
Advocate High Court,  
40-Jinnah Chamber,  
District Courts, Gujranwala.

**SARDAR SARFRAZ AHMAD**  
Advocate High Court  
33-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 4 are true and correct to best of my knowledge whereas the rest of the paras No. 5 to 7 along with grounds are also true and correct on the basis of my information and belief. Nothing has been misstated or concealed therein.

PETITIONER

*A. D. D.*