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To,
The Secretary,
Election Commission of Pakistan (ECP),
Government of Pakistan
Islamabad.

Naseer Sarwar Silawat
Muhammad Ismail Silawat
R/o House No. 1849 Muhallah
Silawat Para Rafique Sarwar
Manzil Hyderabad.
P.S 66.....Applicant

VERSUS

1. Chairman
Election Commissioner of Pakistan (ECP)
Government of Pakistan, Islamabad.
2. District Election Commissioner, Hyderabad
Shahbaz Building Hyderabad.....Respondents

SUBJECT **LEGAL OBJECTIONS AND PROPOSAL OVER
THE PRELIMINARY LIST OF NATIONAL
ASSEMBLY & PROVINCIAL ASSEMBLY
CONSTITUENCIES OF DISTRICT
HYDERABAD.**

Respected

The undersigned applicant do hereby submit the objection, on the consideration of the following facts and grounds as under:-

PRELIMINARY OBJECTIONS

1. With reference to Notification No. F. 8 (3) / 2018-Elec-I dated 05 March whereby Honorable Commission will hear and decide the objection / representations under Sub-Section (4) of Section 21 of the Elections Act,



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National and Provincial assembly
Constituencies of Pakistan.

2. That the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in Sub-section (1) of Section 20 of the Election Act 2017 is as under:-

"All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public conveniences and other cognate factors to ensure homogeneity in the creation of constituencies".

FACTS

1. That, the applicant is worker of PS-66 and permanent residing above said PS-66 and is also citizen of PS-66 of this area .
2. That, indeed the Censes charges No.16 to 19 to be excluded from PS-66 to PS-67 Taluka City District Hyderabad and Census Charge No. 1 (Part) and Census Charge No.2 (Part) of Hyderabad Cantt Taluka Qasimabad and Census Charge NO.1 (Part) of Hyderabad Cant Latifabad Hyderabad be included in the PS-66 in the interest of justice.
3. That the population of Hyderabad Taluka City is about 7,55,000/- which is divided into two PS-66 and PS-67 from which PS-66 is well developed and ricks of resources and PS-67 is



non developed and poor in resources and situated with katchi abadies and on backward areas out of reach of development programs.

4. That, in PS-67 area are Madina Town, Aliabad, Lalo Lashari, Phuelleli, Preatabad, Noorani Basti which are backward on non-developed areas and out of reach of backward development works.
5. That our request is that some of the charges of PS-66 may kindly be shifted to PS-67 and some of developed charges may kindly be shifted to PS-66.
6. That, through this act this city will developed equally and right of both PS will be infavour of equality and justice.
7. That charges NO. 1,2,17 and 18 are under Union Councils NO. 1,2,3,4,5 and are in Deh Gujjo from which charges 17 and 18 are given to PS-66 and 2 charges 1 and 2 are given to PS-67.
8. That, due to divide of Deh Gujjo People of this locality will face problems .
9. That, it will be favour of peoples of this constituency, if charges of 16, 17m 18, 19 will be given to PS-67 and charges of 10,11,12,13, and 14 will be given to PS-66 which was previously parts of PS-66, theses area are near to the constituency of PS-66.
10. That, through this Act of kindness both the PS-66 and PS-67 will develop equally and both



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will enjoy better development.

11. That, total population of PS-66 is 3,73,350/-. Hence this facts on the consideration of the following grounds.

GROUND/LEGAL OBJECTIONS

1. That, it is mandate of the law which requires to be delimitation with regard to the distribution of population in geographically compact areas.
2. That, it also include exist boundaries of various administrator units with regard to the facilities of the communication and public convenience including other cognate factors.
3. That the delimitation is required to be made to ensure homogeneity in the creation of the constituencies.
4. That, the population criteria has not been considered according.
5. That the boundaries of the administration units has been divided/bifurcated without applying the principle as laid down in the Act 2017.
6. That the preliminary list of the constituencies have been prepared without taking into the consideration the geographical area.
7. That, the convenience for the public at large has not been appraised in its true perspectives.
8. That all constituencies for the general seats have been prepared without taking into the consideration the population.



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9. That, the impugned constituencies of PS-66 has been made without preliminary list of constituencies has been issued for the published.
10. That, no invitation from the upcoming contesting candidates or representation which is violative to Sub-section (1) of section 20 of Elections Act, 2017 the basic principle of equity and statue as well.
11. That, no publication has been made in the official gazette.
12. That, the basic principle of reasonable classification and intelligible differentia has been observed being drastic in nature.
13. That, the aforesaid delimitation has caused serious prejudice applicants and the public at large as well.

PRAYER

1. It is therefore, prayed that this Honourable court may kindly be pleased to indeed the Censes charges No.16 to 19 to be excluded from PS-66 to PS-67 Taluka City District Hyderabad and Census Charge No. 1 (Part) and Census Charge No.2 (Part) of Hyderabad Cantt Taluka Qasimabad and Census Charge NO.1 (Part) of Hyderabad Cant Latifabad Hyderabad be included in the PS-66 in the interest of justice.



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2. Any other relief deem fit and proper in the facts and circumstances of the case.

Silawat

Islamabad
Dated -04-2018

APPLICANT/PETITIONER
Naseer Sarwar Silawat
Muhammad Ismail Silawat
R/o House No. 1849 Muhallah
Silawat Para Rafique Sarwar
Manzil Hyderabad.
P.S 66

Document attached herewith

1. Photocopy of Extent of Constituency of P.S 66 Taluka of Hyderabad City Hyderabad.
2. Photocopy of Voter Receipt of Election of 2002 of Election Commission of Pakistan.
3. Original Copy of Map of PS-66 issued by Election Commissioner of Pakistan.
4. Photocopy of Map of PS-66 Proposed by the applicant/petitioner.
5. Copies of eight (08) proposed maps of National Assembly constituencies are attached herewith.

