

To,
The Honourable Secretary,
Election Commission of Pakistan,
Islamabad.

8/5/04/2019
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Subject: APPLICATION FOR IMPLEADMENT OF MR. MUMTAZ ALI S/O GHULAM HUSSAIN, R/O SAMANO KHAN SHAR, P.O KHABRA BONDI, TEHSIL UBARRO, DISTRICT GHOTKI, CNIC NO. 45105-4471472-3 AS NECESSARY PARTY IN THE OBJECTION PETITION FILED BY JAM MAHTAB HUSSAIN DAHAR AND ALTAF HUSSAIN CHUGHTAI.

Respected Sir,

With due respect, the applicant submits as under:-

1. That the total population of the District Ghotki is 16,47,239. District Ghotki consists of two seats of National Assembly and four seats of Provincial Assembly allocated by the ECP.
2. That the applicant is one of the voter member constituency and reserve right to take care of his constitutional right. It is important to mention here that the petitioners i.e. Jam Mehtab Hussain Dahar and Altaf Hussain Chughtai has challenged the constituencies of PS 18 to PS 21 Ghotki with malafide intentions and ulterior motives.

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- A/S/64/2.8
3. That the Election Commission of Pakistan has divided constituencies of District Ghotki on the basis of formula laid down by the competent authority with due care and caution also keeping in mind the rights of voters.
 4. That the few peoples like petitioners want to disturb the division with malafide intention to grab their own interest and the present applicant is one of the voter member and fully aware of the facts, therefore, the applicant reserve the right to become the necessary party in the above captioned objection petition.
 5. That applicant is one of the important figure, therefore, the same may kindly be impleaded in the above captioned petition as necessary in the best interest of justice and fair play.
 6. That the valuable rights of the applicant are involved in the instant matter and the applicant is not impleaded as necessary party in the above captioned objection petition, the applicant and other voter members shall suffer an irreparable loss.

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03/04/2018

PRAYER:-

In view of the above mentioned circumstances, it is therefore, most humbly prayed that the applicant may kindly be impleaded as necessary party in the above captioned objection petition on the constituencies of PS 18 to PS 21 Ghotki, in the best interest of justice.

Any other relief which this Honourable Court deems fit and proper may also be awarded.



Applicant _____
MR. MUMTAZ ALI
S/O Ghulam Hussain
R/O Samano Khan Shar,
P.O Khabra Bondi,
Tehsil Ubarro, District Ghotki
CNIC No. 45105-4471472-3
Cell No. 0300-3195623

Islamabad
Dated: 03-04-2018