

(Shahid (1-3))
- 1 -

BEFORE THE ELECTION COMMISSION OF PAKISTAN Through Secretary

Application No. _____ of 2018

1. Junaid Jabbar S/o Abdul Jabbar R/o Vilage Hatri Taluka
And District Hyderabad

2. Ali Ahmed S/o Muhammad Ismail
Muslim, Adult, R/O Village Qasim Shah
U.C. Hatri Taluka and District Hyderabad

3. Asif Raza S/o Baig Muhammad, Muslim, adult,
R/o Village Kakoo Mangwano
UC Hatri Taluka and District

.... Applicant

Versus

The Election Commission of Pakistan

.... Respondent

REQUEST FOR KEEPING OF UC HATRI IN PS-63

Aurangzeb S/o Muhammad Saleh Khan Burriri,
Village Haji Khan Burriri Deh Khanpota.
U.C.Hatri Taluka and District Hyderabad

Applicant/Respondent

APPLICATION ON BEHALF OF THE APPLICANT/AURANGZEB FOR
IMPLEADMENT AS AN INTERVNOR/RESPONDENT BEING THE PROPER AND
NECESSARY PARTY IN THE AFORETITLED OBJECTION FILED BY ETITIONER IN
PS-63.

The Applicant/ Appellant Submits as under:

1. That the applicant is the resident of aforementioned address and is the voter member of Deh Khanpota U.C. Hatri Village Haji Khan Burriri Post Office Hatri Taluka and District Hyderabad.
2. That Junaid Jabbar and 2 others voter members of U.C. Hatri have filed the aforetitled objection with the prayer that the UC-Hatri may be shifter to PS-63 from PS-62, which contention are baseless, without force and unlawful.
3. That the in the proposed constituency, shifting of UC Hatri in PS-62, is totally in accordance with the law/ rules and also shifting the same is for the benefit of the voter of the U.C. of the said Constituency.

Q. No. 31103/18

4. It is respectfully submitted that before the year 1988 the Hatri was one Union Council (whole Qasimabad Teshil was part the Union Council Hatri), and after the year 1988, the Hatri was divided into two. Half of the union council was made part of the Municipal Corporation, Hyderabad and rest half remained the part of the Union Council Hatri. In 1997, Qasimabad Tehsil was established and the half of the Hatri was given Tehsil Qasim Abad and rest half went to the Rural areas of the Tehsil Hyderabad. Meaning thereby, PS-62 historically the newly merged Union Council was part and parcel of the Hatri (PS-62).
5. It is also respectfully submitted that the merger of the Union Council Hatri into the PS-62 is adjacent/and compact and there is no inconvenience to the voters.

There was no other convenient adjacent and lawful way except, the learned Commission has proposed the merger of the Union Council, Hatri for the fulfillment of requirement of the population/criteria in accordance with law and rules.

6. Similarly, the Police Station of the Hatri was and has the jurisdiction of the newly merger in the jurisdiction of Qasimabad.
7. That for the sake of arguments it is submitted that the Head Quarter of the Hatri and Qasim Abad before and after merger are Hyderabad City. Therefore, the question of the distance of PS-62, does not arises. The Commissioner, Mukhtiarkar, Assistant Commissioner, Revenue Department and hospital before and after are sitting in the Head Quarter, Hyderabad. Therefore, the access to these departments/hospital does not suffer and prejudice to the voters of the newly merger Union Council in the Qasimabad.
8. That the Applicant reserves his rights to urge more arguments at the time of hearing when this honourable Commissioner permit him to be an Intervener and argue the case.
9. It is respectfully submitted that the applicant (Intervener), being the voter of the same U.C. Hatri is the proper and necessary party to be called and heard at the time of the hearing of the above titled objection as any order adverse to the applicant may cause suffer to the Applicant.

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- 3 -

By reason of the aforementioned, it is most humbly prayed that it would be just, fair, proper and in the interest of the justice that the instant Application for impleadmetn may graciously be allowed and the Applicant/Intervener may be impleaded as Respondent to the above titled Objection Petition.

Further the objections filed by the Applicants/Petitioners may be rejected.

Any other relief deems fit and proper by this learned Commission may also be granted.

Applicant/Respondent

Aurangzeb

Aurangzeb S/o Muhammad Saleh Burriro
CNIC No. 41303-325800-3
0333-2539306

Through

Hamid Ahmad

Hamid Ahmad
Advocate High Court
House No.9, Street No. 74, G-6/4, Islamabad
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Dated 31-03-2018