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BEFORE THE ELECTION COMMISSION OF PAKISTAN THROUGH SECRETARY

Application No. _____ of 2018

1. Abdul Rehman S/o Wali Muhammad R/o Village Muhammad Sadiq Shoro, Taluka Kotri, District Jamshoro, CNIC No. 4120437002683
2. Liaqat Ali Khaskheli S/o Taj Muhammad, CNIC No. 412045490290-3, Village Lakho Faqeer, Jamshoro Phattak, Taluka Kotri, District Jamshoro

.....Applicants

Versus

The Election Commission of Pakistan

.... Respondent

OBJECTION UNDER DELIMITATION OF CONSTITUENCY PS-82

The Applicant/ Appellant Submits as under:

1. That the applicants are of residents of aforementioned address and is the voter member of Karokho U.C. Allah Bachyo, Shoro, Village Muhammad Sadiq Shoro, Taluka Kotri, District Jamshoro of PS-82, Jamshoro-III, and Village Lakho Faqeer.
2. That the learned Respondent (Delimitation Committee) has issued the preliminary list of the constituencies of the PS-82. It is respectfully submitted that the said Committee has ignored, erred some factual and legal aspects while notifying the proposed delimitation.
3. That the Constituency PS-82, having total populations of 318,108 (after proposed delimitation), consists of three Union Councils, namely i) Allah Bachayio Shoro, ii) Dabhoon, iii) Sindh University and two Municipal Committees, namely i) Municipal Committee Kotri and Municipal Committee, Bolhari.
4. It is respectfully submitted that in the interest of just, fair and for the benefit of the voter of the Tapedar Circle (TC), Bada be excluded from the constituency, PS-81 and be inserted into the PS-82. Furthermore, from PS-80, TC-Manjhand be shifted and be inserted into the Constituency PS-81 for the best interest of the voters of the TCs.

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5. That it is also respectfully submitted that by doing the aforementioned proposal, voter of the constituency will not be suffered and prejudice owing they are much accessible and geographically adjacent/and compact to each other. Even otherwise if delimitation of the aforesubmitted constituency is reviewed, there will be no impediment of law and rules and even requirement of the population will not be disturbed.
6. That PS-82 is almost a city area and TC Bada is also city area of District Jamshoro, so inclusion of this area in PS-82 would not prejudice the right of any individual, however the aforementioned proposal will justify the constituency of entire District Jamshoro.
7. That the peoples of village Baradi Shoro, village Sain Dino Mallah, village Lakha Dino Shoro and others villages, residing of besides of Railway Phattak Jamshoro will also suffer to cost their votes.
8. That it is not worthy here that the peoples will feel comfortable to cost their valuable vote to the person with whom they have good relation, otherwise they will suffer and will be deprived from their right of vote.
9. That the people of the TC Bada were satisfied with the administrative unit of Kotri City, having easy access to their elected representative for the resolution of their problems.
10. That the equalisation of people among PS-82 in same District has been done with different yard stick.
11. That the proposed constituencies have been made without ascertaining the grounds reality of the voters of the PS-82 had been casting their vote as usually within the administrative unit and were fully satisfied having easy access to their elected representative to resolve their dispute.


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 intstant Application be allowed and TC Bada be included in PS-82 and TC Majhand be shifted from PS-80 to PS-81.


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




11/02/04/2018

Applicants


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