

IN THE COURT OF THE DISTRICT & SESSIONS JUDGE AT

Crl.M.P.No. of 20
in
Cr. No. of 20
of P.S.

Between:-

---Petitioner/Accused No.

And

The State of
through S.H.O., P.S.

---Respondent/Complainant

CHARGE UNDER SEC. OF I.P.C.
PETITION FILED U/SEC.438 OF Cr.P.C

The petitioner humbly submits as hereunder:-

1. The petitioner is shown as Accused in the above crime that he is responsible for the charged levelled against him. But, the petitioner did not commit the alleged offence or any other offence whatsoever. The Police have falsely implicated the petitioner in the above crime at the instance of some interested persons in order to harass him.

2. The allegation of the prosecution is that

The above allegations are false and far away from the truth, hence denied by the petitioners. The petitioner never involved in said offence and he is no way concern with the alleged offence or any other offence.

3. The petitioner submits that there are no reasonable grounds to presume that the petitioner has committed the alleged offence punishable with imprisonment.

4. The petitioner is only earning member of his entire family. If the petitioner is not enlarged on bail his entire family members will be put to great hardship.

5. The petitioner is ready to abide by the conditions if any imposed by the Hon'ble Court. The petitioner is a law-abiding citizen and he will not avoid the due process of law.

6. The petitioner is ready to furnish sureties as ordered by the Hon'ble Court.

7. This is the first anticipatory bail application filed by the petitioner and no other bail application is filed or pending in any other Court including the Hon'ble High Court of

It is therefore prayed that the Hon'ble Court may be pleased to grant anticipatory bail to the petitioner directing the Respondent Police to release the petitioner on bail in the event of his arrest, in the interest of justice. In the event of granting bail the bail orders may be communicated to the concerned Lower Court, in the interest of justice.

Date:- - -20

Advocate for the Petitioner.

