

IN THE COURT OF THE

JUDICIAL FIRST CLASS MAGISTRATE AT

CrI.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

CHARGES UNDER SEC.

OF B.N.S.

PETITION FILED U/SEC.478 OF B.N.S.S

The petitioner humbly submits as under:-

1. The petitioner is the alleged Accused in the above crime. The petitioner did not commit the alleged offence or any other offence whatsoever. The Respondent Police have falsely implicated the petitioner in the above crime at the instance of some interested persons in order to harass him.
2. The petitioner was remanded to Judicial Custody on - -20 by this Hon'ble Court. Since then the petitioner is in Judicial Custody.
3. The allegation of the prosecution is that,

The above allegations are false and far away from the truth, hence denied by the petitioner. The petitioner is no way concern with the alleged offence.

4. The petitioner is only earning member of his family and his family members are completely depending upon his earnings. If the petitioner is not enlarged on bail his family members will be put into great hardship.
5. The petitioner is a law abiding citizen and he will not avoid the due process of laws. The petitioner is ready to furnish sureties to the satisfaction of the Hon'ble Court.
6. This is the first bail petition filed by the petitioner and no other bail petition 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 enlarge the petitioner on bail, pending trial, in the interest of justice.

Date:- - -20

Advocate for the Petitioner.

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FILED ON:- - -20

FILED BY:-

ADVOCATE