**In The Hon'ble High Court Of Himachal Pradesh At Shimla**

Criminal Appeal :\_\_\_\_\_\_\_of 2004

Memo of Parties

Petitioner

Versus

Respondents

Application under Section 482 of the Code of Criminal Procedure

Respectfully Sheweth :-

1. That the petitioner hereinabove has reasonable apprehensions of being arrested by the Police Station : \_\_\_\_\_ Distt : \_\_\_\_\_\_, under Sections \_\_\_\_\_ of the Indian Penal Code pursuant to a complaint filed by \_\_\_\_\_\_, which complaint is false, frivolous, vexatious and fabricated with a view to harass the petitioner and seek vengeance against him.

2. That briefly stated the facts leading to present bail application are that \_\_\_\_\_

3. That the petitioner is an innocent person and has nothing to do with the present crime.  The petitioner is not even remotely related to the present crime.  The petitioner belongs to a well-reputed family of the area and has a good landed property and orchard.  The petitioner is the only bread winner for his family.  If the petitioner is permitted to be arrested by the police, he will be lead to unnecessary humiliation and the family will face hardship.

4. That the petitioner undertakes to abide by the conditions as envisaged in the Cr. P. C. or such further conditions as may be laid down buy this Hon'ble court and will fully co-operate the police in the investigations.

5. That the petitioner submits that no such application on the same or similar grounds has been filed or is pending in any other court.

6. That the petitioner has immovable property in the said village and there is no chance of his jumping over the bail.

7. That the petitioner undertakes to join the investigations as and when required by the I. O. or ordered by this Hon'ble court in accordance with law.

8. That the petitioner further undertakes not to tamper with any prosecution evidence or terrorize the witnesses.

9. That in case the petitioner is arrested in that eventuality there will be great hazard to the health of the petitioner.

10. That the petitioner undertakes that he will not leave the jurisdiction of State of HP and India without the orders of the Court.

11. It is, therefore, most respectfully prayed that this application may be allowed in the interest of justice and the petitioner may be directed to be enlarged on bail in case of arrest.

AND FOR THIS ACT OF KINDNESS, THE HUMBLE PETITIONER AS IN DUTY BOUND, SHALL ALWAYS PRAY.

Shimla                                                                          Petitioner

\_\_\_\_\_\_\_                                                                                  Through, Advocate

**IN THE HON'BLE HIGH COURT OF HIMACHAL PRADESH AT SHIMLA**

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Shimla                                                                                      Petitioner

\_\_\_\_\_\_                                                                                    Through, Advocate

**Annexure - A**

**High Court of \_\_\_\_\_\_\_\_\_\_\_**

**Appellate Side**

Receipt showing Court Fees Paid :   OA No :\_\_\_\_\_\_of 2004

\_\_\_\_\_\_ Versus \_\_\_\_\_\_

|  |  |
| --- | --- |
| Particulars | Amount |
| Court Fees stamp on Memo | 50.00 |
| Petition |  |
| Enclosures |  |
| Vakalatnama | 2.65 |
| Process Fees |  |
| Others |  |
| Total | 52.65 |

Date :\_\_\_\_\_\_

Signature of Receiving Clerk