Sample Draft Of Post Arrest Bail

**CRL. MISC.NO.<<crl\_misc\_no>>B/14.**

**<<petitioner\_name>> S/o <<petitioner\_father\_name>>, R/O <<petitioner\_address>>.**   
 ***.......Petitioner* VERSUS**

|  |  |
| --- | --- |
| ·**The State** ·**The Zonal Director Pakistan Telecommunication authority (PTA).** | ***…….Respondent*** |
| |  |  | | --- | --- | | **CASE FIR NO:** | **C-94/14, DATED: 27.11.2014** | | **OFFENCE U/SS:** | **36, 37-ETO-2002/31(1)PT (RO) Act-1996 r/w 420,109-PPC.** | | **POLICE STATION:** | **FIA/CCC.** | | **DISTRICT** | **Lahore.** | | |

***Petition U/S 497 Cr.P.C for the grant of post arrest bail.***

***Respectfully sheweth:-***

·**That above mentioned FIR was got registered on the application of <<respondent\_name>>.**

·**That succinct allegations as narrated in the FIR,**  
·**That the petitioner now seeks kind indulgence of this Honourable Court for the grant of post arrest bail inter-alia on the following amongst other grounds:**

**G R O U N D S**

·**That co-accused namely <<co\_accused\_name>> has been granted post-arrest bail by Learned Addl. Sessions Judge <<judge\_location>> vide his order dated <<order\_date>>**  **for kind perusal copy of order is annexed as *Annexure “D”*.**

·**That actual story behind the curtain is that witness of the alleged occurrence namely <<witness\_name>> has good relations with complainant and accused and**  **said Haji Nazeer in connivance with MuhamadSafdar (Muhamad Ali) received entire amount through present petitioner and it is pertinent to mention**  **here that petitioner is not the beneficiary of the alleged transaction ratherHaji Nazeer and MuhamadSafdar (Muhamad Ali) received the entire amount.**·**That present petitioner is also victim of his co-accused and witness of the alleged occurrence i.e. Haji Nazeer and co-accused namely Muhammad Safdar**  **(<<fake\_name>>) impersonated himself as Muhammad Ali and receive a sum of rupee <<amount>>. Against land measuring <<land\_measurement>> situated in Chak**  **no.<<counsel\_office\_no>>0 R.B Tehsil Jaranwala, District Faisalabad.and failing to owner said agreement, said Muhammad Safder (Muhammad Ali) issued 04 cheques to the**  **present petitioner which were dishonoured. It is pertinent to mention here that said Muhammad Safdar get opened his account in the fake name of**  **Muhammad Ali and Haji Nazeerwitness of instant occurrence was the introducer of said account and certain cheques of said account were also handed**  **over to the complainant in order to discharge liability of MuhamadSafdar.**

· **That complainant has been taking different stances before different forums with different set of accused persons. It is pertinent to mention here**  **thatabove mentioned FIR was lodged after getting orders from learned justice of peace whereas, almost with the same allegation, complainant with**  **different set of accused persons, the complainant’s version was falsified by the local police and apprehending dismissal of petition U/S 22A,22BCr.P.C**  **was withdrawn from the court of <<justice\_name>> Learned Justice of Peace and the same was dismissed as withdrawn by the order dated**  **<<withdrawal\_date>>.**

· **That there is another important aspect of the case is that complainant filed petition U/S 22A,22BCr.P.C and joined hands with local police and**  **complainant succeeded in getting favourable comments from one police official i.e. FayyazRasool ASI and said FayyazRasool ASI also succeeded in**  **taking investigation of the case into his own hands despite the fact that investigation above said case was transferred to some other police officer but**  **amazingly his name was cut off from said register. Thus complainant is acting malafidely in connivance with the local police.**

·**That malafide of the investigating officer of the case is floating on the surface of record i.e. in the comments given by said police officer, hecategorically stated in the comments that the complainant did not file any sort of application before any forum rather it is on the record that complainant has filed a petition before justice of peace which was dismissed as withdrawn on dated <<counsel\_office\_no\_2>>.09.11and comments in that application were also filed by the local police in which it is clearly stated that application has been consigned after inquiry due to the false stance of the complainant.**

·**That petitioner has no concern whatsoever with the alleged occurrence and is innocent and is ready to prove his innocencethough reliable evidence, but**  **local police is bent upon to arrest and humiliate the present petitioner.**

·**That the Petitioner is a law abiding citizen and has nothing to do with the case and is previously non-convict.**

·**That there is no apprehension of Petitioner’s absconding away or tampering with the prosecution evidence particularly when the Petitioner is ready to**  **furnish surety bond according to the entire satisfaction of this Honourable Court.**

·**That further submissions and arguments shall be advanced at the time of hearing of titled case.**

·**That all the facts and circumstances of the case make case of the petitioner one of further inquiry.**

**It is therefore, respectfully prayed that titled petition may kindly be allowed and petitioner may kindly be admitted to pre-arrest bail till final decision of the case.**

**Meanwhile ad-interim per-arrest bail may also be granted to the petitioner.**

**Any other relief this Honourable court, thinks fit, may also be awarded.**

**PEITITONER.**

**THROUGH COUNSEL**

(<<counsel\_name>>)   
Advocates High Court,   
C.C.No.<<counsel\_cc\_no>> Office No.10,3rd Floor,<<counsel\_office\_building>> , Lahore.

**CERTIFICATE:-**  
**Certified that as per instructions provided, this is first pre-arrest bail petition on behalf of the petitioner.**

**ADVOCATE.**

***IN THE LAHORE HIGH COURT LAHORE.***

**C.M.NO.<<cm\_no>>/2012.**   
**IN**

**Crl.Misc. NO. <<crl\_misc\_no\_2>>-B/2012**

**<<petitioner\_name\_2>>VERSUSThe State**

**etc.**

**PETITION U/S 561-A Cr.P.C. FOR DISPENSATION.**

**Respectfully Sheweth:**

**That the petitioner has filed un-certified but true copies of some of the annexures to which the petitioner undertakes to produce and place on record as and when**

**directed by this Honourable Court.**

**It is, therefore, respectfully prayed that sproduction of certified copies of annexures may please be dispensed with for the time being for just**

**decision of the case.**

**PEITITONER.**

**THROUGH COUNSEL**

(<<counsel\_name\_2>>)   
Advocates High Court,   
C.C.No.<<counsel\_cc\_no\_2>> Office No.10,3rd Floor,<<counsel\_office\_building\_2>> , Lahore.

**IN THE LAHORE HIGH COURT, LAHORE.**

**C.M.NO.<<cm\_no\_2>>/2012.**   
**IN**

**Crl.Misc. NO. <<crl\_misc\_no\_3>>-B/2012**

**<<petitioner\_name\_3>>VERSUSThe State**

**etc.**

**PETITION U/S 561-A Cr.P.C. FOR DISPENSATION.**

***AFFIDAVIT***

**I, <<deponent\_name>> S/O<<deponent\_father\_name>> Caste <<deponent\_caste>>, R/O P-58, Fateh AbadSharqi, Faisalabad, do hereby solemnly affirm and declare as under,**

·**That contents of the accompanying petition are true and correct and may kindly be considered as an integral part of this affidavit.**

**DEPONENT.**

***VERIFICATOIN:-***

**Verified upon oath at Lahore at this day of <<verification\_date>> that contents of the affidavit are true and correct and nothing has been concealed therefrom.**

**DEPONENT.**

**IN THE LAHORE HIGH COURT LAHORE.**

Crl.Misc.No.<<crl\_misc\_no\_4>>\_\_-B-12.

SOHAIL AHMAD **VERSUS T**he State etc**.**

**I N D E X.**

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| **Sr. No.** | **Description of Documents** | **Annex.** | **Dated** | **Page** |
| 01 | Grounds of bail Petition+Affidavit. |  |  |  |
| 02 | Copy of FIR. | **“A”** |  |  |
| 03 | Copy of bail Petition before Learned ASJ. | **“B”** |  |  |
| 04 | Copy of Order of Learned ASJ. | **“C”** |  |  |
| 05 | Copy of bail order of co-accused | **“D”** |  |  |
| 06 | Petition for dispensation +affidavit. |  |  |  |
| 07 | Necessary documents. |  |  |  |
| 08 | Power of Attorney. |  |  |  |

**PEITITONER.**

**THROUGH COUNSEL:**