Two <<fir\_annex>>ccused <<order\_annex>>ail Application with Affidavit

1.<<accused1\_name>> son of <<accused1\_father\_name>> Caste <<accused1\_caste>> Resident of <<accused1\_residence>> Post Office <<accused1\_post\_office>> tehsil and district <<accused1\_tehsil\_district>>.

2.<<accused2\_name>> <<accused2\_father\_name>> Reident of <<accused2\_residence>> Post Office <<accused2\_post\_office>> tehsil and district <<accused2\_tehsil\_district>>.

(petitioners) **Vresus**

The ………………………………….….………..<<respondent>>. (Respondent)

***FiR No P.SOffence*** <<fir\_number>> <<police\_station>> <<offence\_code>> P.P.C

**BAIL APPLICATION U / S <<bail\_section>> CR.P.C FOR THE GRANT OF PRE ARREST BAIL.**

MAY IT PLEASE YOUR HONOUR:-

1.That the accused petitioners were involved in the above mention case due to the malafide intention of the complainant as well as local police, otherwise the accused / petitioner is quite innocent.

2.That the above mentioned case has been got Register against the petitioner is false frivolous baseless and concocted, with malafide intentions and ulterior motives of the complainant and police.

3.That the allegations leveled against the petitioner are totally false and petitioner has no concern with the commission of the alleged offence.

4.That the complainant under ulterior motive and with malafide intention to harass and black mail the petitioner, has got registered the above noted false case, no such incident as alleged in the F I R (copy of F.I.R Annex as A & better copy annex as <<fir\_annex\_better>> )had ever took place. Moreover, pre arrest bail of the petitioners were dismissed by learned Additional Session Jude vide order <<order\_date>>.(copy of order dt 27-08-

09Annex as B)

5.That nothing incrimination and substantial material available on record, connecting the petitioners with the commission of the alleged offence in this way way the complainant of the case did high handedness and tried to involve the petitioners in this false and frivolous case.

6.That the petitioners are respected law abiding citizen. The local police is bent upon to arrest the petitioners and they will suffer irreparable loss to his respect and family honour.

7.That there is no apprehension of abscondance of the petitioners or to temper with the prosecution evidence.

8. That the petitioners are ready to submit bail bonds to the entire satisfaction of this honourable court.

***Prayer***

It is therefore respectfully prayed that the petitioners may very kindly be granted ad– interim pre arrest bail, till the final disposal of this petition and oblige.

Petitioners   
Through : -

***<<advocate\_name>>***  
 Advocate High Court,  
 <<advocate\_license>>

**IN THE LAHORE HIGH COURT LAHORE.**

1.Mohammad Rasheed son of Mohammad Ramzan Caste Arain Resident of Fatah Wala Post Office Khuddian Khas tehsil and district Qasoor.

2.Ijaz Hussain Abdul Rehman Reident of Abubakar Town Post Office Khuddian Khas tehsil and district Qasoor.

(petitioners) **Vresus**

The …………………………………………….….………..State.

(Respondant) ***FiR No P.SOffence*** 502 /09 Khuddian 324/148/149 P.P.C

BAIL APPLICATION U / S 498 CR.P.C FOR THE GRANT OF PRE ARREST BAIL.

MAY IT PLEASE YOUR HONOUR:-  
**Affidavite of**Mohammad Rasheed son of Mohammad Ramzan Caste Arain Resident of Fatah Wala Post Office Khuddian Khas tehsil and district Qasoor,do hereby solemnly declare and affirm as under:-

1 That the accused petitioners were involved in the above mention case due to the malafide intention of the complainant as well as local police, otherwise the accused / petitioner is quite innocent.

2 That the above mentioned case has been got Registered against the petitioners is false frivolous baseless and concocted, with malafide intentions and ulterior motives of the complainant and police.

3 That the allegations leveled against the petitioners are totally false and petitioner has no concern with the commission of the alleged offence .

4 That the complainant under ulterior motive and with Malafide intention to harass and black mail the Petitioners, has got registered the above noted false case, no such incident as alleged in the F I R had ever took place.

5 That nothing incrimination and substantial material Available on record, connecting the petitioner with the commission of the alleged offence .

6 That the petitioner is respected law abiding citizen.

The local police is bent upon to arrest the petitioners and they will suffer irreparable loss to his respect and family honour.

7 That there is no apprehension of abscondance of the petitioners or to temper with the prosecution   
 evidence

8 That the petitioners are ready to submit bail bonds

to the entire satisfaction of this honourable court.

**Deponent**

**Vereification :** -

Verified on oath at <<verification\_location>> On <<verification\_date>> that the contents of the said petition are correct to the best

of my knowledge and belief .

**Deponent**