

IN THE HIGH COURT OF SINDH AT KARACHI

Cr. Misc. Application No. _____ of 2024

[Applicant name]
[Father name]
[Address]

Applicant

V E R S U S

1. The State through P.S [Area], [City].

2. Learned Additional Sessions Judge, [City]

3. Learned Judicial Magistrate [City]

Respondent(s)

F.I.R. No. _____/20__

U/S. _____

P.S. [Area, city]

APPLICATION UNDER SECTION 561-A Cr.P.C

Being aggrieved and dissatisfied with the order dated [_____] (hereinafter “**Impugned Order**”) passed by the Learned Additional District and Sessions Judge, [city] (hereinafter “**Respondent No.2**”) whereby the Respondent No.2 was pleased to dismiss Criminal Revision Application No. ____ of 20__, and order dated [_____] (hereinafter “**Impugned Order**”) passed by Learned Judicial Magistrate, [city], (hereinafter “**Respondent No.3**”) whereby, the Respondent No.3 dismissed the Cr. Misc. Application for recalling of order dated [_____]. Hence, the Applicant prefers this Cr. Misc Application on the consideration of following facts and grounds. Copy of Impugned orders and Memo of Applications is collectively placed as **Annex A.**

FACTS;

1. That the Applicant is a respectable, law-abiding citizen of Pakistan.
The Applicant lives with his family members.
2. That the Applicant has no previous criminal record, nor convicted by any Court of Law. The Applicant has not committed any offence which would disentitle him to the grant of relief sought by this Hon'ble Court.
3. [All relevant facts which need to be mentioned].

GROUND

- A. That the impugned order dated [_____], passed by Respondent No.2, is non-speaking, illegal, unlawful and against the Constitution.
- B. [The grounds supporting the Application]
- C. That other grounds will be urged at the time of arguing this Application, with the permission of this Honorable Court.
- D. Hence, this Cr. Misc. Application with following prayers,

PRAYER

It is, therefore, prayed that this Honorable Court may graciously be pleased to allow the Application for recalling of orders dated [_____], passed by Respondent No.2 and order dated [_____], passed by Respondent No.3, otherwise the Applicant will be seriously prejudiced.

This prayer is made in the larger interest of Justice.

Applicant

Karachi
Dated: _____.

Advocate for the Applicant

IN THE HIGH COURT OF SINDH AT KARACHI

Cr. Misc Application No. _____ of 2024

Applicant Name

Applicant

VERSUS

The State and Others

Respondents

AFFIDAVIT IN SUPPORT OF APPLICATION

I, _____ S/O _____, Adult Resident of
[address] holding CNIC No. _____, do hereby state on oath
as under: --

1. That I am the Applicant in this instant case and as such am fully
conversant with the facts thereof and able to depose the same.
2. That the accompanying application has been drafted and filed under my
instructions.
3. That the Applicant has a good *prima facie* case and balance of
inconvenience is also in his favour.
4. That until and unless the application is granted, the Applicant shall be
seriously prejudiced and suffer irreparable loss.
5. That whatever has been stated herein above is true and to the best of my
knowledge and belief.

DEPONENT