

**IN THE COURT OF LD. CHIEF JUDICIAL MAGISTRATE,  
PATNA DISTRICT COURT**

Bail Application No. \_\_\_\_\_ of 2025

**IN THE MATTER OF:**

Shubham Rajan, S/o Sh. **Manoj Kumar** Jha, Address: 303, Eklavya  
Tower, Chaputoll, Pundag, Ranchi-834002

Applicant/Accused

Versus

State

Respondent

**FIR No. 5117095250774**

**Dated: 06/12/2025**

**U/s 308(5), 351(2) BNS, 2023**

**PS: Ruspur, Patna**

**Arrested on.12/12/2025**

**J.C. since 13/07.2025**

**BAIL APPLICATION ON BEHALF OF ABOVE-NAMED  
APPLICANT/ACCUSED I.E. SHUBHAM RAJAN UNDER  
SECTION 480 OF BNSS 2023 FOR GRANT OF REGULAR  
BAIL IN FIR NO. FIR NO. 5117095250774, DATED:  
06/12/2025, U/S 308(5), 351(2) BNS, 2023 , REGISTERED AT  
PS: RUSPUR, PATNA**

**MOST RESPECTFULLY SHOWETH;**

- 1 That the present application is being filed on behalf of above-named applicant/accused i.e. Naveen Pratap Singh under section 480 of BNSS 2023 for grant of Regular Bail in **FIR NO. FIR NO. 5117095250774, DATED: 06/12/2025, U/S**

**308(5), 351(2) BNS, 2023 , REGISTERED AT PS:  
RUSPUR, PATNA.**

2 That the above said FIR has been registered at the instance of the informant/ complainant namely Anupam Kumar S/o Sh. Akhileshwar Singh , address: Ganga 3, Jalalpur City, Flat No. 603, Gakhaul Jalalpur City , Ruspur Thana , Patna, Bihar . The allegation of the FIR in brief are as follows:

- (I) It is alleged in the FIR by the informant/ complainant that on 4<sup>th</sup> December 2025 at around 8:10 pm the informant/ complaint received a mobile call on his mobile No. 950700070 from a mobile No. 8709393540 and on asking the name the called told his name as Lali Singh alias Wed Nidhi.
- (II) It is further alleged in the FIR by the informant/ complainant that thereafter the caller asked the complainant/ informant that, if complainant/ informant was buying any land in Ruspur, and when the complainant affirmed that he was buying the property and registry is schedule on the next day, then the caller asked for five crore as ransom.
- (III) It is further alleged in the FIR by the informant/ complainant that, when complainant/ informant outrightly refused to give ransom, the caller threatened that like he got murdered Deepak Mahto at his doorstep, he would also get the informant/ complainant and Vivek murdered in the same way. Further the

called told the informant/ complainant not to take it as mere threat and if complainant/ informant wish he could trace the criminal history of the caller.

3 That the Applicant/ Accused has been falsely been implicated and he has no participation or involvement whatsoever in the mentioned offences as alleged in the said FIR. The applicant/ Accused begs to put-forth the actual and true facts which are as follows:

- (i) That the Applicant/ Accused belongs to very respectable family and is well educated. For the past two and half year the Applicant/ Accused has been employed at Jharkhand State Sports Promotion Society , Ranch which is a joint initiative of Jharkhand State and CCL, as Office Assistant.
- (ii) During course of his duty at the sports complex he got casual acquaintance with one person namely Lali @ Vikas who used to regular visit the sports complex.
- (iii) That on the alleged day Vikas requested the applicant/ accused day that his mobile was switched off and he needed Applicant's mobile to call his family. Since Applicant had casual acquaintance with Lali @ Vikas, the applicant on the request of Vikas gave his mobile phone to him.
- (iv) That on the next day, the applicant/ accused also received call from the complainant/ informant to which

he already disclosed his identity and whereabouts and clarified all the said facts to the complainant and also clarified that he neither had any involvement nor had any interest attached to it.

- 4 That the applicant/accused was arrested on 12/12/2025 from **Ranch**, Jharkhand was thereafter produced before the this Hon'ble Court on 13/07/2025 and was sent to judicial custody. Since thereafter, the applicant/accused has been in judicial custody.
- 5 That the present application seeking regular bail is being filed on the following grounds amongst other

#### GROUND

- (I) FOR that the applicant/accused is innocent and has no role whatsoever in the alleged offences. As apparent from the FIR the name of the caller is Lali Singh being the casual acquaintance of the Applicant/ Accused borrowed the cell phone from the applicant/ accused and misused the same for making call to the informant/ accused.
- (II) FOR that the Applicant Accused is innocent, as no person of a criminal mind could ever commit a blunder of making any extortion call from his/her personal mobile number and keep the same switched-on through-out and expose himself/ herself to the police action. The applicant is innocent rather he himself is victim of the Lali Singh @ Ved Nidhi.

- (III) FOR that the investigation qua the applicant/ accused has already been completed and therefore no police remand was even prayed by the concerned police. No purpose would be served to keep the applicant/ accused in jail, on the contrary it would amount to pre-trial conviction, which is unfounded in law.
- (III) FOR that the Applicant / Accused has clean and unblemished antecedents. The Applicant/ accused has never been implicated in any criminal or civil case earlier nor has ever been held guilty of even petty offences.
- (IV) FOR that the applicant/accused has no role in the alleged offence as the applicant/accused is neither known to the complainant, nor has any knowledge of the locality wherein the complainant is allegedly buying property, nor ever himself made any extortion call to the complainant.
- (V) FOR that there is no chance of tampering with evidences or influencing any witnesses as whoever be the witnesses in the present FIR are either complainant, Police personnel or persons out of reach of the present applicant/accused. The applicant / Accused is a young boy and does not possess/ holds any influential position or status and therefore there is no possibility that Accused/ applicant can in any manner influence any witness or tamper any witness.
- (VI) FOR the applicant/accused being a law- abiding person has already cooperated in investigation to the concerned police in his utmost capacity and further is ready to abide by any just terms and conditions imposed by this Hon'ble Court.

(VII) FOR that the Applicant/ Accused belongs to very respectable family and is well educated and he has been employed at Jharkhand State Sports Promotion Society, **Ranch** which is a joint initiative of Jharkhand State and CCL, as Office Assistant, therefore there is no probability of his fleeing away from the process of the law.

6 That the applicant/accused has not filed any Bail Application prior to the instant Application in the present matter.

7 That the present Petition is being filed bonafide with sanguine belief that this Ld. Court will consider the Bail Application of the applicant/accused and grant him Bail in the aforesaid FIR in the interest of justice.

#### **PRAYER**

In view of the above facts and circumstances of the case, this Hon'ble Court may graciously be pleased to:

(a) Grant bail to the Applicant/Accused namely Shubham Rajan S/o Manoj Kumar Jha in **FIR NO. FIR NO. 5117095250774, DATED: 06/12/2025, U/S 308(5), 351(2) BNS, 2023 , REGISTERED AT PS: RUSPUR, PATNA.**

(b) Pass such other and further orders as this Hon'ble Court deems fit and proper in the interest of justice.

**DELHI**

DATED: .....

Through

## Counsels for the Applicant