

**BLAPL No.** \_\_\_\_\_ **of 2023**

An application under section 483 of Bharatiya  
Nagarika Suraksha Sanhita,2023

AN application for Bail in CT Case No-924/2024, arising out of Saheednagar P.S Case No.370 /2024, which is now pending in the court of the learned J.M.F.C (Cog taking -3) , Bhubaneswar for awaiting trial.

Pratap Pattanaik, aged about 32years, S/O:-Pradeep Pattanaik,Residing at-Room no-03,Tower-03,Santipalli Basti, Ps-Saheednagar, BBSR Dist- Khurdha.

(The matter out of Bail Application arises was never before this Hon'ble Court in this form what-so-ever as per the instruction of the Petitioner.)

The Petitioner named above.

**MOST RESPECTFULLY SHEWETH:**

1. That, the Petitioner has been falsely implicated in a case for commission of offences punishable under sections 309(4) & 3(5) of BNS,2024 in connection with Saheednagar PS Case No-370 dtd.04/08/2024, corresponding to [CT Case No-924 /2024](#), which is now pending in the Court of the learned JMFC-3, Bhubaneswar.
2. The prosecution story nutshell that on dtd.04/08/2024 near about 11.05 AM while the informant have took his food at Acharjyabihar square with his friend ,at that time two unknown person came and snatched his gold chain which is weighting of 12 g.m. and fled away from the spot.Hence the prosecution case.
3. That, during the course of investigation, the petitioners has been remanded by the Saheednagar ps on dtd.13/08/2024 in this case to the court of JMFC -3 , Bhubaneswar and afterwards he was praying for bail before the hon'ble court of SDJM which stands rejected and the free copy of rejection order has been attached here with as annexure 1.
4. That not a single incriminating article has been seized from the possession of the present petitioner.
5. That respectfully submit here that the investigation has been progressed in substantial manner and most of the witnesses has been examined by the IO so further detainment is no more beneficial to the prosecution.
6. That, surprisingly the Io has neither conducted a TI parade nor seized any cctv footage from the place of the occurrence .
7. That, the petitioner is languishing inside custody since 13.08.2024 in view of the period of detention coupled with facts of the present case there is no legal bar to release the present petitioner on bail.
8. That, the present petitioner is only earning member of his family if he detained more days in custody, the family member will lead to death with starvation and his future will severely affect which cant not be compensated.
9. That, the petitioner is currently residing under the ample jurisdiction of this hon'ble court with his family so there is no chance of absconding and ready to abide all terms and conditions imposed by this hon'ble court.
10. That, in view of submission made above it is expedient in the interest of justice the petitioner may kindly be released on bail with any suitable terms and conditions.

### **PRAYER**

Under the aforesaid facts and circumstance, it is humbly prayed that, this Hon'ble Court may graciously be pleased to:

- I. Direct/ order that the petitioner shall be released on bail in CT Case No- 924 /2024, arising out Saheednagar PS. Case No- 370/2024, which is now pending in the Court of the learned JMFC-3 , Bhubaneswar, under any terms and conditions as may be deemed fit and proper in the interest of justice;
- II. Pass such other order(s)/ direction(s) as would be deemed fit and proper in the interest of justice.

And for which act of kindness, the petitioner as in duty bound shall ever pray.

BHUBANESWAR

By the petitioner through

Dt:

Advocate

### **CERTIFICATE**

Certified here that there is no such bail application is not filing or pending before any court or High court of Orissa, Cuttack except this present one.

BHUBANESWAR

By the petitioner through

Dt:

Advocate