

2067/BATX

IN THE HON'BLE COURT OF JUDICIAL MAGISTRATE FIRST CLASS

Rly COURT AT Andheri

C.R. NO. 357/25

Andheri Rly police station Complainant

V/s.

Suresh Dinkar Shinde Accused

APPLICATION FOR BAIL

CHARGE UNDER SECTION 305(C) BNS

MAY IT PLEASE YOUR HONOUR: -

It is most respectfully submitted on behalf of the accused abovenamed:

1. That the accused have been arrested by the above-mentioned police station on _____ for the alleged offence.
2. That the said accused is falsely implicated in this crime and have nothing to do with the alleged offence.
3. That the investigation is practically done by the investigation officer of the concerned police station and the custodial interrogation of the accused is not required at all.
4. That the accused person has fixed place of residence in Mumbai and there is no question of absconding from trail of the case.
5. That the accused person is not habitual offender. That the police have falsely implicated the applicant, the applicant is the respectable citizen of the society.
6. The accused undertakes that he shall make himself available for interrogation by the police officer, in connection with this offence as and when required.

Accused be Released
on PB and SB of
Rs 15,000/-
11/2/25

7. That the accused undertakes that he shall not hamper or tamper with the evidences and witness of this case, nor will he make any attempt to contact the informant.
8. That there is no useful purpose would be served by continuing with his detention. The basic rule laid down by the Hon'ble Apex court that grant of bail is rule and its denial is exception.
9. That the Applicant/accused person is ready to abide all the terms and condition imposed by this Hon'ble Court.
10. The Applicant has not filed any other Application or Petition in Hon'ble Session court or Hon'ble High Court or in the Hon'ble Supreme Court of India touching the subject matter of this Application.
11. Under, the circumstances above mentioned, the accused therefore prays that your honour may kindly release the accused on bail on reasonable terms and conditions which your Honour may deem fit and proper in the interest of Justice.

For this act of kindness, the accused shall as in duty bound ever pray.

Dated: 11/12/2025

Mumbai



Advocate for Accused

Adv. D - D Karkar

R/s,

The accused has committed a serious, cognizable & non-bailable offence.

The chargesheet has been filed against the accused. Mudtama is received from the accused. It shows that, the prima facie evidence, against the accused.

If he released on bail there is a possibility to tamper prosecution witnesses. Hence it is prayed that the bail application may kindly be rejected.


01/12/2025