

(Example taken from Bombay High Court, Mumbai – Criminal Appellate Jurisdiction. This is only a sample format for understanding. Details will vary case to case.)

IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CRIMINAL APPELLATE JURISDICTION
CRIMINAL ANTICIPATORY BAIL APPLICATION NO. ____ OF 2025
DISTRICT: THANE

ABC,
Age: 45 years,
Occ: Business,
Residing at Navin Ali, Ramnagar, District Thane.

... Applicant

VERSUS
THE STATE OF MAHARASHTRA
(Through Ramnagar East Police Station)

... Respondent

TO,
THE HON'BLE THE CHIEF JUSTICE AND THE OTHER HON'BLE COMPANION JUDGES OF THIS
HON'BLE COURT

THE HUMBLE APPLICATION OF THE APPLICANT ABOVE NAMED

MOST RESPECTFULLY SHEWETH:

1. The Applicant apprehends arrest in connection with C.R. No. I-123/2025 registered at Ramnagar East Police Station for offences alleged under Sections 109, 111, 115, 117, 118, 125, 126, 187, 309, 326, 332, and 334 of the Bharatiya Nyaya Sanhita, 2023 (BNS) and Section 37(1) r/w 135 of the Maharashtra Police Act.
2. The Applicant has reason to believe that his arrest is sought though he is innocent, falsely implicated due to political rivalry and local disputes, and custodial interrogation is not required.
3. The Applicant submits that the FIR allegations are exaggerated and inconsistent with medical and circumstantial evidence. Weapons allegedly used are already recovered; the complainant is discharged from hospital; and the investigation is substantially complete.

4. The Applicant has deep roots in society, permanent residence in Ramnagar, no criminal antecedents, and no likelihood of absconding.
5. The Applicant undertakes to:
 - appear before the Investigating Officer whenever called;
 - not tamper with evidence or influence witnesses;
 - not leave India without prior permission of this Hon'ble Court.

GROUND

A. Section 482, BNSS permits this Hon'ble Court to grant anticipatory bail where a person has reason to believe he may be arrested for a non-bailable offence.

B. The allegations under BNS Sections invoked do not prima facie establish the element of intent required for Section 109 (attempt to murder equivalent to old IPC 307).

C. Injuries are simple/caused by a blunt object, as per the medical report, contradicting allegations of sharp-edged weapon use.

D. Applicant is active in a local civic body; false implication is evident from the sequence of FIRs lodged between both parties.

E. Custodial interrogation is unnecessary; liberty can be safeguarded by imposing conditions under Section 482(2) BNSS.

PRAYER

The Applicant therefore prays that this Hon'ble Court may be pleased to:

1. Grant anticipatory bail to the Applicant under Section 482 BNSS, 2023 in connection with C.R. No. I-123/2025 at Ramnagar East Police Station;
2. Direct that in the event of arrest, the Applicant be released on bail on such terms and conditions as this Hon'ble Court may deem fit;
3. Pending final disposal, grant interim protection from arrest;
4. Pass such other orders as may be deemed just and proper.

VERIFICATION

I, ABC, Age 45 years, residing at Ramnagar, Thane, do hereby verify that the contents of paragraphs 1 to ___ are true to my knowledge and belief.

Place: Mumbai

Date: ___ / ___ / 2025

Applicant

Through

Advocate for the Applicant