

**DRAFT REPLY BY RESPONDENT**

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY**

**CRIMINAL APPELLATE JURISDICTION**

**CRIMINAL ANTICIPATORY BAIL APPLICATION NO.: - OF 2022**

**DISTRICT: THANE**

ABC , ) Applicant

Versus

THE STATE OF MAHARASHTRA )  
[ Ramnagar Police Station] ) Respondent

**AFFIDAVIT IN REPLY ON BEHALF OF WWF , i.e. THE ORI. COMPLAINANT**

I, Smt. wwf, Aged 36 years, residing at xxx, the original complainant, do hereby state on solemn affirmation as under:

- 1) I say that I am the original complainant in the offence registered vide C. R. No. I – 123/2022 by Ramnagar Police Station against the accused / applicant u/s. Section 307, 392, 323, 143, 323, 143, 144, 147, 148, 149 of I.P.C. and 37(1)135 of B. P. Act. I say that I have gone through the applications for Anticipatory bail filed by the Applicant / accused and I am filing the present affidavit in reply for the purpose of opposing the said applications and also for the purpose of narrating few necessary facts, which are suppressed and/or falsely narrated by the Applicant in his Application.
- 2) I say that the true facts of the present case are as under:

- a)
- b)
- c) .....

- 3) I say that in the circumstances I have lodged FIR against the accused. I say that the averments made in the FIR are true and correct and same may be treated as part and parcel of the present affidavit.
- 4) Add - Grounds Justifying how the offence falls within the four corners of the sections
- 5) I say that accused has committed offence punishable u/s. 999 of IPC and other sections as stated in FIR and relief of pre-arrest bail cannot be granted to the accused.
- 6) I say that there is prima facie case against the accused and as such benefit of pre-arrest bail cannot be given to the accused and therefore in the facts and circumstances of the case the applications for anticipatory bail filed by the Accused may kindly be rejected.

**AND FOR WHICH ACT OF KINDNESS AND JUSTICE, THE APPLICANT SHALL AS IN DUTYBOUND EVER PRAY.**

MUMBAI

DATED:        /        / 20

\_\_\_\_\_  
Respondent

**SHRI. SHREEKANT V. GAVAND**  
**Advocate for the Applicant**

**VERIFICATION**

I Shri. WWF, Age - 36 years, the Applicant above named, residing at village Ramnagar, Dist. Thane do hereby state on solemn affirmation that what is stated in the above paragraphs is true & correct to the best of my knowledge & information, which I believe to be true.

Mumbai

Date:    /    / 20

\_\_\_\_\_

**Respondent**

**I know the deponent.**

**Advocate for Applicant**