**Petition for bail under section 389, Cr PC**

In the Court of the Sessions Judge at Alipore, 24-Parganas

Case No. … of …… under s. 379, IPC

The State

versus

Accused AB ………………… Son of MN, Village: …………, Thana: ……………

In the matter of petition for bail of the accused-petitioner pending the hearing of the appeal.

The humble petition of the accused in the above case

MOST RESPECTFULLY SHEWETH:

That your petitioner was convicted by the Sub-Divisional Judicial Magistrate of Alipore under s. 379, IPC on 5th March 2010 and sentenced to undergo three months Rigorous Imprisonment.

That your petitioner has this day filed an appeal before Your Honour against the said order of conviction and sentence.

That the cycle alleged to have been stolen by the petitioner was purchased by him at an auction held by court on 28th February 2010 for Rs. 300 and that the fact was proved by no less than six witnesses.

That your petitioner was a bona fide purchaser of the cycle for value and had no knowledge or even suspicion that the cycle was a stolen property.

That your petitioner is a newspaper hawker of fairly good means and he has a stall at …………… and there is no apprehension of your petitioner absconding pending the hearing of the appeal.

Your petitioner states that bail be granted to your petitioner pending disposal of the appeal in which your petitioner has a good chance of success.

Unless bail is granted your petitioner will lose all the regular customers and the main source of livelihood.

Your Petitioner prays that Your Honour may be pleased to grant ad interim bail to your petitioner pending the hearing of the appeal.

And your petitioner, as in duty bound, shall ever pray.

Verification

I, AB, son of MN, by occupation business, residing at ……………, do hereby solemnly affirm and say as follows:

I am the accused petitioner above-named and I know the facts and circumstances of this case.

The statements in paragraphs 1 to 7 hereinabove petition are true to my knowledge and belief.

I sign this verification on this 3rd April 2010 at Alipore.

Solemnly affirmed by the said AB on this 3rd day of April 2010 at the Court House in Alipore.

Before me

Notary/Magistrate