

**BEFORE THE HON'BLE PESHAWAR HIGH  
COURT,  
MINGORA BENCH**

B.A No. 948 - M of 2022

Muhammad Imran.....Accused/Petitioner

VERSUS

The State..... Respondent

**INDEX**

S. No	Description of documents	Annexure	Pages
1.	Bail Application	...	1-5
2.	Certificate	...	6
3.	Copy of FIR	"A"	7-8
4.	Copies of application and order dated 27.10.2022	"B & C"	9-14
5.	Wakalatnama		15

Petitioner/Accused  
Through counsel

  
**Shabir Ahmad Dawlatkhel**

Advocate High Court

Office at Sultan Tower, Makanbagh,  
Mingora Swat.

Cell No. 0341-5666363

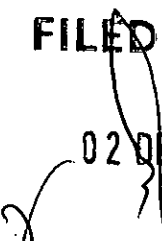
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Sign.....

Date..... 02/12/22

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1

**BEFORE THE HON'BLE PESHAWAR HIGH COURT,**  
**MINGORA BENCH**

B.A No. 948- M of 2022

*Muhammad Imran S/o Bahramand,*  
*R/o Bahar, District Shangla.*

..... **Petitioner/ Accused**

**VERSUS**

*State through Constable Ahmad Farooq, S/o Said Mehmood,*  
*R/o Karin Dara, Martoong, District Shangla.*

..... **Respondents**

Case FIR No. 67                      Dated: 22.09.2022,  
U/Ss: 324, 353, 427 PPC, 4/5 E.S.A, 7ATA  
Police Station CTD Kabal, Malakand Division at Kabal.

**APPLICATION UNDER SECTION 497 READ WITH 21**  
**(D) ATA CR.PC FOR THE GRANT OF POST ARREST**  
**BAIL TO THE PETITIONER /ACCUSED PERSON**  
**TILL THE FINAL DISPOSAL OF THE CASE.**

**Respectfully Sheweth:**

1. That Petitioner has been charged in the above captioned case /FIR, the petitioner has been

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2

arrested by the local police. (Copy of FIR is Annexure "A").

2. That for release on bail the petitioner made an application before the Anti-Terrorism Court-I Malakand at Swat, hence the same was dismissed vide order dated 27.10.2022. (Copies of application and order dated 27.10.2022 is annexure "B & C").
3. That , now the petitioner seeks their release on bail from this Honorable court, through the present application, inter alia, on the following grounds.

**GROUND:**

- A. That the petitioner is innocent he never committed the offence charged and on the false report of the police official has been implicated in the alleged offence for malafide reasons.

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- B. *That after the due deliberation and consultation the petitioner was nominated in the commission alleged offence for the achieving ulterior motives.*
- C. *That neither direct independent, reliable nor any circumstantial evidence against the petitioner is available so as to connect them with offence charged in.*
- D. *That no incriminating material has been recovered from the position or on the pointation of the petitioner. Furthermore the petitioner has made no judicial or non-judicial confession regarding the alleged offence, while the petitioner has no criminal back ground.*
- E. *That no recovery of explosive substances have been made from the direct position of the petitioner hence the so called recovery of explosive is doubtful.*

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F. *That the story of the prosecution is full of serious doubts. Therefore the case of the petitioner from every angle requires further probe and enquiry to connect the petitioner with the alleged offence so and such circumstances no useful purpose can be served while keeping the petitioner behind the bars indefinite period.*

G. *That the petitioner is not desperate or hardened criminal and there is no likelihood of the petitioner going into abscondance. The petitioner is ready to provide surety bonds up to the entire satisfaction of this Honorable court.*

H. *That other ground with the leave of this honorable court, will be raised at the time of hearing.*

*In view of the above, it is therefore, most humbly prayed*

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*[Signature]*  
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5

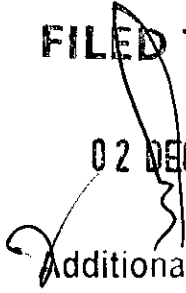
*that, the petitioner/accused  
person may kindly be released on  
bail till the final disposal of the  
above captioned case.*

*Petitioner/Accused  
Through counsel*

  
**Shabir Ahmad Dawlatkhela**  
*Advocate High Court*

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**02 DEC 2022**

  
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6

**BEFORE THE HON'BLE PESHAWAR HIGH COURT,**  
**MINGORA BENCH**

B.A No. 948- M of 2022

*Muhammad Imran.....Accused/Petitioner*


**VERSUS**

*The State..... Respondent*

**CERTIFICATE**

*As per instruction of my client no other such like bail petition has earlier ben filed before this Honorable court or any other competent court. Moreover, Copy of the notice along with relevant necessary documents sent to the complainant. (Receipt of legal notice is attached herewith).*

*Petitioner/Accused  
Through counsel*

  
**Shabir Ahmad Dawlat Khel**  
*Advocate High Court*

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