

**BEFORE THE PESHAWAR HIGH COURT MINGORA**  
**BENCH/ DAR UL QAZA SWAT**

B.A No. 281 -M/2024

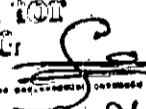
*Hidayat Ullah* ..... *Accused/Petitioner*

V/S


*Syed Wazeer Badshah & another* ..... *Respondents*

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Noted for  
AAG:   
Date: 1-6-2024

Accused/Petitioner  
Through



Abdul Jalil  
Advocate High Court

Office: DBA Mardan

Cell No:0346-8008499

**Filed Today**

**01 JUN 2024**

  
Additional Registrar

(1)

BEFORE THE PESHAWAR HIGH COURT DARUL QAZA  
BENCH, MINGORA

B.A. Petition No. 291-M/2024

Hidayat Ullah son Sami Ullah R/o Landi Shah Taza Gram, Dir  
lower .....Accused/ petitioner

VERSUS

1. Syed Wazeer Badshah son of Syed Dildar Bacha R/o Jango  
Tazagram, District Dir.
2. The State .....(Respondents)

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Case F.I.R. No. 137  
U/S-302-ppc/15-AA

Dated 01/08/2023  
P.S Oach Dir Lower

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Prayer for grant of post Bail of the accused/  
petitioner till the final decision of case U/S- 497  
Cr.PC.

RESPECTFULLY SHEWETH

- 1) That, the accused/ petitioner is charged in the above cited  
case and since his arrest, is behind the bars. (Copy of FIR is  
hereby attached as Annex: "A", along with better copy A-1).
- 2) That, the accused/ petitioner has moved his first bail  
application on merit before the learned Additional Sessions  
Judge Dir (Lower) at Chakdara which was declined vide  
order dated 08/05/2024. (Attested Copy of bail petition and  
that of the order are attached as Annex: "B").

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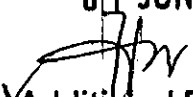
- 3) That, now the accused/ petitioner constrains to move the instant bail petition before this Hon'able court on the following grounds.

GROUNDS

- A. That the accused/ petitioner is innocent and has falsely been implicated in the instant case by the complainant party.
- B. That, the accused/ petitioner has neither any connection with the occurrence nor he was present at the spot but the complainant has illegally with malafide intention, dragged him in the instant case.
- C. That there is no impartial or circumstantial evidence which could connect the accused/ petitioner with the commission of the offence.
- D. That the investigation is completed in the instant case and the accused is no more required to the local police for further investigation and reasonable grounds exist for further inquiry hence, entitled for the concession of bail.
- E. That the accused/ petitioner has not confessed the guilt before any court of law
- F. That the case of prosecution story is highly doubtful and the benefit of doubt can even a single reasonable doubt if created about the guilt of accused.
- G. That the case against accused/petitioner is with the malafide intention of the complainant party just to harass and humiliate him.
- H. That the petitioner/Accused is related to a noble family and he has not committed the above mentioned offence.
- I. That during interrogation nothing has been recovered from the accused/ petitioner by the investigation staff in the instant case.

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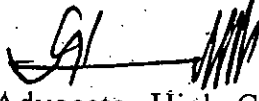
- J. That there is no eye witness of the occurrence and the accused/ petitioner has falsely been implicated on personal grudge
- K. That the petitioner is ready to furnish bail bonds to the satisfaction of this Hon'able Court.
- L. That beside the above, any other grounds is to be raised during the course of arguments with prior permission of this Hon'able court.

It is therefore respectfully prayed that on acceptance of this petition, the accused/petitioner may kindly be released on bail till the final decision of the case.

Date: 17/05/2024

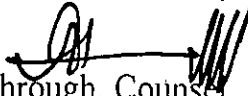
Accused /petitioner

Through, Counsel

  
Abdul Jalil Advocate, High Court,  
DBA Mardan.

Certificate

As per instructions of my client, no such bail petition has earlier been filed before this Hon'able court. The instant petition is first one before this Hon'able court

  
Through, Counsel

**Filed Today**

**01 JUN 2024**

  
Additional Registrar