

IN THE MATTER OF:

FIR No.XX

MOST RESPECTFULLY SHOWETH:

1. That the abovesaid case is pending trial before this Hon'ble Court and the charge sheet in the abovesaid case has not been filed before this Hon'ble Court.
2. That the Hon'ble Court of {name of judge}, at the time of hearing of the anticipatory bail application had granted 7 days notice to the present applicant and further imposed a condition that the applicant have to seek permission from the Ld. Trial Court to visit abroad and further directed the applicant to deposit the passport with the investigation officer.
3. That then as per the order of the Sessions Court, the applicant had deposited the passport with the said investigation officer and then since the applicant had to make an official trip {place and date}, he had moved an application before the Ld. Trial Court for release of passport and the Hon'ble Court of {Judge and date of order} had released the passport of the applicant. Copy of the said order is annexed herewith. ANEEXTURE A
4. That the applicant again as per the order of the Ld. M.M. deposited the said passport with the investigation officer on {date} and now again the applicant has to travel to {place and date} on official visit.
5. That the job of the applicant was such that he needed to frequently travel abroad for official trip and the applicant is ready to furnish an affidavit to the effect that he is in Indian Citizen and does not hold any citizenship, so chances of absconding or leaving India permanently does not arise.

6. That this application has not been filed with any ill motive and this application is again moved as the applicant had to travel abroad in the month of {define month} but all the visa formalities would take time and hence the passport is required for the same now. Hence this application has been moved now.
7. That the applicant is ready to produce any surety which this Hon'ble Court deem fit and proper for releasing the passport permanent to the applicant as every time the applicant has to seek permission from this Hon'ble Court for travelling abroad and the job profile of the applicant is such, that the applicant inform about the same at a very short period.
8. That the said application is moved in bonafide and does not have any ill motives from the side of the applicant and the applicant is a permanent resident of the address stated above and is lawful citizen of India with no case upon him as on date except the FIR in question.

It is, therefore, respectfully prayed that this Hon'ble Court may permanently release the passport of the applicant, so that the applicant can perform his duties dutifully and on time.

Any other order which this Hon'ble Court deem fit and proper under the facts and circumstances of the case be passed in favour of the applicant.

Delhi

Applicant

Dated

Through

Counsel