

IN THE HON'BLE COURT \_\_\_\_\_,  
\_\_\_\_\_ COURT, <CITY>

IN THE MATTER OF:-

STATE \_\_\_\_\_ V/S \_\_\_\_\_

F.I.R NO : \_\_\_\_\_  
U/S : \_\_\_\_\_  
P.S. : \_\_\_\_\_

**APPLICATION ON BEHALF OF APPLICANT NILANJAN  
SARKER FOR SEEKING PERMISSION TO GO ABROAD**

MOST RESPECTFULLY SHOWETH:

1. That the above noted matter is pending investigation and this Hon'ble Court has territorial jurisdiction about the same/ pending in this court and NDOH is \_\_\_\_\_.
2. That the parents of the applicant are settled at \_\_\_\_\_, India i.e. \_\_\_\_\_.
3. That the applicant is working in \_\_\_\_\_, \_\_\_\_\_ and the applicant is currently in India and he could not go abroad due to the pending criminal case/ as per the bail conditions/ bond under Section 170 Cr.P.C made to be filled by the Investigating Officer in the said crime.
4. That during the pendency of the said complaint case, the applicant accused has been cooperating with the investigating agency and appearing in the concerned court on \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.
5. That the applicant accused is a law abiding citizen of this country who is in \_\_\_\_\_ only for gainful employment/ has to visit \_\_\_\_\_ for \_\_\_\_\_ purpose.
6. That the applicant accused is working for a reputed company \_\_\_\_\_ and his job requires him to be in the <location> for discharging his duties. A letter from the company in this effect is annexed with the application and marked as Annexure A.

7. That the applicant has been giving full cooperation to the investigating agency and this court for running of the trial and no delay has ever occurred because of non-cooperation of the applicant.
8. That police officials would take some time before they file a challan in the said case after conducting the thorough investigation before this Hon'ble Court/ completion of this trial shall take long time.
9. That the applicant shall not change his mobile number and the applicant shall attend the hearing as and when directed by this Hon'ble Court/ the investigating agency to do so.
10. That right to life means and include right to go abroad also and right to life means and include right to earn livelihood also through which a person satisfy the basic necessities of his life and lead the life with dignity, honour and reputation and any procedural and substantive law which deprive the person from earning his livelihood and right to go abroad for earning his livelihood is absolutely, unjust, unwarranted, unfair and uncalled for and contrary to the spirit of Article 21 of Constitution of India.
11. That the applicant has no objection, if the charge is signed through counsel and proceedings is conducting through counsel.
12. That the applicant cannot be denied his fundamental right to go abroad merely on the ground that he gainfully employed \_\_\_\_\_.
13. That the applicant has blind faith, respect and regard towards the proceedings of this Hon'ble Court and applicant shall not keep away himself from the process of law.
14. That no prejudice is going to cause to the Complainant, if the applicant go abroad for earning his livelihood.
15. That if the present application is not allowed, then the applicant shall suffer irreparable loss and injury which cannot be compensated in terms of money and no useful purpose would be

served now by detaining him in India as the matter has been settled.

16. That the applicant has right to lead the life with dignity, honour and reputation and the same depends upon right to earn livelihood through which the basic necessities of the life are fulfilled.
17. That the applicant is ready to abide by any condition laid down by this Hon'ble Court .
18. That the applicant had moved an application for seeking the permission to go abroad and the same was granted by this Hon'ble Court vide order dated XX.XXX.XXXX and the applicant had complied with the terms and conditions of the leave and still ready and willing to abide by the such terms and conditions as this Hon'ble Court deems fit, just and proper.

It is, therefore, most respectfully prayed that this Hon'ble Court may kindly be pleased to:

- a. allow the applicant to travel abroad for earning his livelihood.
- b. direct the investigation officer to give prior 30 days notice for joining the investigation.
- c. Pass any other order which this Hon'ble Court deem fit and proper under the abovesaid facts and circumstances of the case.

DELHI.  
DATED

THROUGH

Applicant

(\_\_\_\_\_)  
ADVOCATE

IN THE HON'BLE COURT OF \_\_\_\_\_, \_\_\_\_\_,  
\_\_\_\_\_ COURT, \_\_\_\_\_

IN THE MATTER OF:

STATE V/S \_\_\_\_\_

**A F F I D A V I T**

I, \_\_\_\_\_, S/O  
\_\_\_\_\_  
\_\_\_\_\_, aged XX years, do hereby solemnly  
affirm and declare as under:-

1. That I am the applicant in the above noted case and am well conversant with the facts and circumstances therefore.
2. That the contents of accompanying application has been drafted by counsel, the contents whereof may be read as part and parcel of the present affidavit as the same are not repeated here in for the sake of brevity.
3. That I have read and understood the accompanying application to the interim application, the contents whereof are true and correct to the best of my knowledge.

DEPONENT

**VERIFICATION:**

I, the above named deponent do hereby states solemn affirmation and declare that the contents of aforesaid affidavit are true and correct to the best of my knowledge and belief and nothing material has been concealed therefrom.

Verified at \_\_\_\_\_ on this \_\_\_ day of <MONTH>, <YEAR>.

DEPONENT