IN THE COURT OF PESHAWAR HIGH COURT MINGORA BENCH (DARUL-QAZA SWAT)

CR. Misc.No. 212 1	2023
Liaqat Khan S/O Gu	ıl Rehan R/O Hamlet Topi, District
Swabi.	(Petitioner / Accused)
	VERSUS
1. The State Through Ad	lditional Advocate General.
2. Mst. Nageena D/O K	Khan Muhammad R/O Bena, Maira,
Totalai, District Buner	(Respondents)

F.I.R No. 35, Dated: 11-01-2023, U/S 302,324,449,201/34 PPC 15AA P.S Totalai

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S.No	Description of Documents	Annex	Pages
1	Bail Petition	_	01-02
2	Certificate	_	63
3	Attested copy of FIR with better copy.	A	04-07
4	Copy of Bail Application and Order of Sessions Judge Buner at daggar	B & C	08-14
5	Wakalat Nama	_	15

FILED TODAY 2 0 MAR 2023

INCHARGE. SUB REGISTRY PESHAWAR HIGH COURT. MIngora BenchiDar-ul-Qaza. Swut BUNER Accused / petitioner

Through

Muhammad Israr

Advocates, High Court At Distt courts Daggar Buner

Cell No. 0336-9672033

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IN THE COURT OF PESHAWAR HIGH COURT MINGORA BENCH (DARUL-QAZA SWAT)

CR. Misc.No. 212 M 2023	
Liaqat Khan S/O Gul Rehan R/O Hamlet	Topi, District
Swabi(Petition	oner / Accused)
VERSUS	
1. The State Through Additional Advocate Gene	eral.
2. Mst. Nageena D/O Khan Muhammad R/O	Bena, Maira,
Totalai, District Buner	(Respondents)
F.I.R No. 35, Dated: 11-01-2023, U/S 302,324,44 15AA P.S Totalai	
Bail Petition U/S 497 Cr. P.C For The Release Of The a	ccused/ Petitioner
On Bail Till Final Disposal Of The Case.	
espectfully Sheweth!	,
1. That the accused / Petitioner has been arrested in th	e above noted case,
DDAY and is in the judicial lockup. (Copy of FIR ar	nd better copy is
AR 2023 Annexure "A").	
sub registry. HIGH COURT. Dar-ul-Qara-Swall hat the petitioner applied for her bail to the Session NER.	s Judge / Zilla

Qazi Buner At Daggar who vide his order dated 14-03-2023 dismissed the same. (Copy of the order & bail application are attached is annexure "B & C")

FILED

3. That the petitioner is entitled to the concession of bail on the following Grounds amongst others.

GROUNDS:

- A. That the accused /petitioner is innocent and falsely implicated in the above mentioned case.
- B. That there is no disinterested ocular or circumstantial evidence against accused / petitioner.
- C. That no recovery has been affected from the possession or on the pointation of the petitioner Inspite of the fact that the petitioner remained in Police custody for sufficient long time.
- **D.** That medical report does not support the prosecution version.
- E. That the report of FSL regarding the 30 bore pistol received in negative.
- F. That there is further scope of inquiry into the guilt of the accused / petitioner, moreover the petitioner is no more required for further investigation.
- G. That there is no apprehension of the abscondance of the accused / petitioner or tampering with the prosecution evidence.

It is therefore, prayed that by accepting this petition the petitioner may be released on bail till final disposal of the case.

FILED ODAY

2 0 MAR 2023

INCHARGE, SUB REGISTRY PESHAWAR HIGH COURT. Minpora Bench/Dar-ul-Qaza, Swa BUNER Accused / petitioner

Through

Muhammad Israr Advocates, High Court At Distt courts Daggar Buner Cell No. 0336-9672033

Note:-

As per instruction of my client, no such like petition has earlier bee filed by the Petitioner in this Honourable Court.

Advocate.

IN THE COURT OF PESHAWAR HIGH COURT MINGORA BENCH (DARUL-QAZA SWAT)

CR. Misc.No	212.M	_2023				
Liaqat Khan	S/O Gul	Rehan	R/O	Hamlet	Topi,	District
Swabi.				_(Petitio	ner / A	(ccused

VERSUS

- 1. The State Through Additional Advocate General.
- 2. Mst. Nageena D/O Khan Muhammad R/O Bena, Maira,

 Totalai, District Buner (Respondents)

F.I.R No. 35, Dated: 11-01-2023, U/S 302,324,449,201/34 PPC

15AA P.S Totalai

CERTIFICATE

It is certified that as per information of my client no such like petition for the accused / petitioner has been presented in this Hon'ble court before this bail petition.

FILED TODAY

INCHARGE, SUE: REGISTRY PESHAWAR HIGH COURT. Mingora Bench/Dar-ul-Qaza; Swat BUNER Accused / petitioner
Through

Muhammad Israr
Advocates, High Court
At Distt courts Daggar Buner
Cell No. 0336-9672033