**Anticipatory Bail in Family Case**

IN THE COURT OF HON’BLE SESSIONS JUDGE, \_\_\_\_\_

1- \_\_\_\_ S/o \_\_\_\_\_ R/o \_\_\_\_\_  
2- \_\_\_\_ S/o \_\_\_\_\_ R/o \_\_\_\_\_

…..Applicants/Petitioners

Versus  
State of \_\_\_\_

     …..Respondent.

First Application Under Section \_\_\_\_ Cr. P.C.    For Grant of Anticipatory Bail in Case FIR No. \_\_\_\_Under Section \_\_\_\_IPC

Sir,

The applicants/petitioners most respectfully submit as under: –   
1- That the applicants are innocent persons and they have reasonable apprehension in their mind that they can be arrested by the police of \_\_\_\_ on the basis of a false complaint  filed by \_\_\_\_ S/o, D/o  \_\_\_\_ resident of \_\_\_\_  
2- That the applicants/petitioners are innocent persons and they have no nexus or connection with the above-mentioned offence. The applicants/petitioner No.1 is the \_\_\_\_ of \_\_\_\_  
3- That the \_\_\_\_ was from the very beginning had shown an indifferent attitude against the petitioner and his family member. He used to quarrel on petty matters and used to make hue and cries without any reasonable cause.  
4- That the applicant No.1 is doing the job  and his job timings from \_\_\_\_ to \_\_\_\_. It is not possible for him to interfere in life of any one. He is always busy with his own work /job.  
5- That \_\_\_\_ used to make false allegations against the applicants and against their family members. If there was a dispute between the \_\_\_\_ and \_\_\_\_ i.e. their personal affair. The applicants have no relation with their matter. \_\_\_\_ has signed the compromise /settlement under the pressure of the police but again the complainant has filed a complaint before the \_\_\_\_ and the applicants received summon to appear before the \_\_\_\_ fo r\_\_\_\_ where the matter could not be settled this time, the \_\_\_\_ has referred the matter to the concerned police Station for registration of the FIR.  
6- That the applicants have reasonable apprehension in their mind that a case may be registered against them and they could be arrested in that case by the police.         
7- That the applicants/petitioners undertake to join the investigation as and when required by the police of police station \_\_\_\_  
8- That there is no apprehension for absconding or evading of taking trial.  
9- That the applicants/petitioners are well reputed and well educated and prestige of the applicants/petitioners will be reduced in the society if they are arrested.  
10- That the applicants/petitioners undertake not to temper with the evidence or witnesses.  
11- That the applicants/petitioners undertakes for not to leave India without the prior permission and consent of the Hon’ble court.  
12- That the applicants/petitioners undertakes to abide by all the terms and conditions as imposed by the Hon’ble court in the event of granting bail in favour of the petitioners.   
13- That in such type of false cases the bail is rule and refusal of the bail will not serve any purpose.  
14- That the applicant/petitioners does not possess any goods/articles of the complainant rather it is submitted that the petitioners are well off and they have sufficient income to purchase each and every article for themselves

PRAYER   
It is, therefore prayed that the applicants/petitioners may kindly be released/granted anticipatory bail and the \_\_\_\_ concerned of concerned police station \_\_\_\_ may kindly be directed to release the applicants/petitioners on bail in the event of their arrest .  
It is further prayed that interim bail may also kindly be granted to the applicants/petitioners till the final disposal of the application.

Dated: \_\_\_\_

Applicants/Petitioners

1- \_\_\_\_ S/o \_\_\_\_ R/o \_\_\_\_  
2- \_\_\_\_ S/o \_\_\_\_ R/o \_\_\_\_

Through counsel:

\_\_\_\_\_ Advocate, \_\_\_\_