



In,

The court of District and Sessions Judge,

Muzaffarpur

A.B.P. No. ....1968..... of 2023

Reference :- Paroo P.S. Case No. 231/2023, u/s. 342, 323, 364/34 IPC pending in the Court No. -02, learned Judicial Magistrate, 1<sup>st</sup> Class (w), Muzaffarpur awaiting for F.F.

**Raju Singh alias Raju Kumar Singh, aged about 53 years (M),**

*Filed by  
Shikha Kumari  
Adv.  
30/05/23*

S/o UdayPratap Singh, resident of  
at - AnandpurKharauini (Bara  
Daud), P.S. Paroo, District -  
Muzaffarpur

----- Petitioner

**Versus**

**The State of Bihar**

----- Opp. Party

The humble bail petition on  
behalf of above named  
petitioner Most Respectfully

**Sheweth:-**

1. That the prosecution case is that the informant Tulsi Prasad Yadav gave written statement before the SHO, Paroo alleging that on dt. 25.05.2023 at about 8 :15 PM, he was returning from the house of Suresh Upadhyay after attending Tilak Ceremony that in the mean time, the accused persons came and stopped their four wheeled vehicle in front of him and came near him, surrounding with arms and in the meantime, this petitioner showed pistol at his head and all together kidnapped him and brought at the Cold Storage. It is further alleged that this petitioner told to bring a sack and after killing him they would throw him in Gandak River that in the meantime, the police party reached there and recovered him from his illegal custody.
2. That the petitioner has not moved for bail before this learned court or other superior court at any point of time in connection with this case.
3. That by the press release of the SSP, Muzaffarpur, The petitioner has got knowledge that there is Paroo P.S. Case No.

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136/1999, Paroo P.S. Case No.115/2015, Paroo P.S. Case No. 116/2015 ,Paroo P.S. Case No. 179/2023, and Paroo P.S. Case No. 235/2023 and Sahebganj P.S Case No 231/2016 .

4. That infact Paroo P.S Case No 136/1999, Paroo P.S. Case NO 115/2015 Paroo P.S. Case No 116/215 are old cases and as yet the Police have not completed the investigation because the petitioner have not received any informantion, notice regarding the above noted cases. The petitioner is on bail in Sahebganj P.S Case No 231/2016 and the investigation of same is still pending.

5. That after charge of state government within six month three case Paroo P.S. Case No 179/2023, Paroo P.S. Case No 231/2023, Paroo P.S. Case No 235/2023 have been lodged only to harass the petitioner by the police at the instance of state government.

6. That all the cases agsint the petitioner is totally false and concocted Paroo P.S. Case 235/2023~~no~~ is an example that the arms is a licence arms of Patidar of the petitioner namely

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Anup Kumar Singh that was seized by the police from the house of Anup Kumar Singh but in Case No 235/2023 it has been mentioned by for police that the arms is illegal and the case has been instituted against the petitioner.

7. That the petitioner is quite innocent and has not committed any offence as alleged.
8. That due to political rivalry and ill will, this false case has been instituted against the petitioner.
9. That as a matter of fact, the informant is a history-sheeter and there are about 20-25 criminal cases related to murder, robbery, kidnapping and under excise act and are pending under various police stations of the District.
10. That the petitioner is a Member of Legislative Assembly, Bihar from Sahebganj Legislative Assembly and is a member of Bhartiya Janta Party.
11. That in fact, there had been some scuffle between Basudev Ram and this informant of this case at the Tilak Ceremony and the informant brutally assaulted Basudev Ram and insulted with abuses as well as caste name due to which

there was public outrage and only to suppress this incident, he lodged this false case against the petitioner who was not at all involved in any illegal activity and acted only to pacify the whole affair.

12. That there had not been any previous enmity of the petitioner with the informant of the case and this petitioner had no motive or cause to kidnap him for the purpose of murder as alleged.

13. That the petitioner is a four times MLA from Sahebganj Vidhan Sabha Constituency and his political opponent from RJD had been Mr. Ram Bichar Rai who also had been four times MLA from the same constituency. Unfortunately, Ram Bichar Rai died one year ago and now there is competition amongst second line RJD leaders to obtain ticket from RJD in coming Assembly Election 2025 and thus, taking advantage of the whole affair, he has conspired to implicate and to come in tussle with this

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petitioner to gain limelight and to be front runner to obtain ticket from RJD against this petitioner.

14. That it is stated that there has not been any injury to the informant and the whole matter is concocted and because the petitioner belongs to opposition party, he is being oppressed and harassed at the hands of the local police and the informant has been taking advantage of government in order to create pressure.

15. That it is stated that in case of this petitioner, police is behaving like a party and most roughly and is also harassing his supporters, relatives as well as workers and violating all norms under Criminal Procedure Code and rules of civic society only because of political reasons.

16. That the petitioner is apprehending arrest by police in connection with this case without his complicity in this case.

17. That the petitioner is a man of means and a reputed person and being Member of Legislative Assembly is very

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responsible person of society and there is no chance of his absconding.

18. That it is stated that the petitioner is ready to furnish sufficient surety to the satisfaction of the learned Court and he shall abide by all condition / conditions for grant of bail.

It is therefore, prayed that Your Honor may graciously be pleased to grant anticipatory bail to the petitioner in connection with Paroo P.S. Case No. 231/2023. And for this, the petitioner shall ever pray.

Shilpa Kumari  
Adv.  
30/05/23