

IN THE COURT OF HON'BLE 2nd ADD. CHIEF JUDICIAL
MAGISTRATE NAGPUR

Reg. Cri. Case No. 147/2002

STATE OF MAHARASHTRA

//VERSUS//

SUNIL & OTHERS

APPLICATION FOR DIRECTING TO STATE CID TO
RELEASE ALL DATA , DOCUMENTS, FILES, SOFTWARE ,
HARDWARE AND ALL OTHER MATERIAL AND ITEMS
SEIZED DURING THE INVESTIGATION AND NOT A PART
OF CHARGE SHEET.

The Accused No.3 name above most respectfully submits as under:-

1. That the applicant/accused is prosecuted by the Ganeshpeth Police Station, Nagpur on the basis of complaint filed by the Nagpur District Central Co-Op.Bank through its auditor against the present applicant alongwith other several accused persons for the alleged offence punishable under several section of Indian Penal Code. The applicant/ accused submits that the Ganeshpeth Police Station initially registered Crime No. 97/2002 for the offences punishable under section 406, 420, 34 of I.P.C. Thereafter on the basis of some other complaint registered another crime vide Crime No. 101/2002 for the offences punishable under section 406, 409, 468, 471, 120B read with 34 of I.P.C. accordingly the investigation agency submitted the charge sheet in the said matter on 21/11/2002 against the present

applicant/accused along with other ten accused persons clubbing both the crimes in the single charge sheet vide Charge Sheet No.150/2002 on 21/11/2002. The trials of other 9 accused are already concluded and this Hon'ble Court was passed judgment on 23/12/2023.

2. It is submitted that accused is facing present trail under section 406, 209, 468, 471, 120B read with 34 of I.P.C and other 21 similar criminal cases which are pending before Wardha, Amravati, and Mumbai Courts. That during investigation state CID has seized Data, Software, Hardware, Bank statements, Accounts Data and several legal and Statutory and Legal documents and other items, which are not part of current charge sheet. And all the above now in the custody of state CID since long period. It may be mentioned here that this Hon'ble court or State CID is not required those Data, Software, Hardware, Bank statements, Accounts Data and several legal and Statutory and Legal documents which were seized during investigation of present crime. It may be stated that accused no.3 requires these data, statements, software, hardware and other items for defending himself not only in present case but also in other pending cases.

In view of facts and circumstances mention above this Hon'ble Court pleased to direct to State CID to release all the Data , Software , Hardware , Bank statements , Accounts Data and several legal and Statutory and Legal documents and other items seized during investigation which are not part of charge sheet in the interest of justice.

PRAYER:- A. It is therefore most respectfully prayed that this

Hon'ble Court pleased directing to State CID to release Data , Software , Hardware , Bank statements , Accounts Data and several legal and Statutory and Legal documents and other items seized during investigation which are not part of charge sheet in the interest of justice.

B. Any other relief may kindly be granted as per fact and circumstances of case.

ACCUSED NO.3

COUNSEL FOR ACCUSED NO.3

SOLEMN AFFIRMATION

I SANJAY HARIRAM AGRAWAL, Age 59 years, Occ: Business
Residing at 7 Hari Sava Street, Kidderpore, Kolkata, 700023 do
hereby takes an oath and states on this Solemn Affirmation that the
contents of the above said paras of Revision are true and correct to the
best of my knowledge and belief, it read over to me in a vernacular
language known to me. Hence, signed on this 14 February 2025 at
Nagpur .

DEPONENT

I know and identify the deponent

PANKAJ A. TAMBOLI
(ADVOCATE)