
 **From:** Ashish Jhamb ashishjhambadv@gmail.com   
**Subject:** Advance copy of application in Sumit vs State of Haryana in CRA-S-2077 of 2025  
**Date:** 31 August 2025 at 6:21 PM  
**To:** aghrycrmpphc@gmail.com



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Advance copy of application in Sumit vs State of Haryana in CRA-S-2077 of 2025

**Regards,**

**Ashish Jhamb, Advocate**  
**Office:- H. No. 530, Sector-10,**  
**Ambala City, Haryana**  
**M. No. +919736323412, 9996033309**

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**Sumit Application.pdf**  
165 KB



IN THE HIGH COURT OF PUNJAB AND HARYANA AT  
CHANDIGARH

To,

The Addl. Registrar,

Punjab and Haryana High Court,

Chandigarh

35080

CRM-\_\_\_\_\_ OF 2025

IN CRA-S-2077 OF 2025

Sumit

.....PETITIONER

Versus

State of Haryana & Anr.

...RESPONDENT

Sir,

Will you kindly treat the accompanying petition as an urgent one in accordance with the provision of Rule 9, Chapter 3-A, Rules and Order High Court, Volume V.

The Grounds of urgency are: As prayed for

Yours Faithfully

*Handwritten:*  
Addl. Offence  
By  
Ram  
11/9/25

*Handwritten:* Ashish  
Ashish Jhamb, Advocate, P/7270/2017  
Abhinav Sood, P/2697/2009  
Counsel for Petitioner

Place : Chandigarh  
Dated 01.09.2025

54033-03

IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CRM- 35080 OF 2025

IN CRA-S-2077 OF 2025

Sumit .....PETITIONER

Versus

State of Haryana & Anr. ...RESPONDENT

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Sr. No.	Particulars	Date	Page No.	Court Fees
	Urgent Form	01.09.2025	-----	2.65/-
1.	Application 528 BNSS, 2023	01.09.2025	1-3	2.65/-
2.	Power of Attorney/ Aadhar Card already on record	_____	_____	_____

TOTAL COURT FEES Rs 5.30/-

Note-

- 1. Advance physical copy supplied to State of Haryana and also advance copy sent through E-Mail.
- 2. Whether any sitting/former M.P. / M.L.A is involved: No
- 3. Any such or similar application in present FIR filed by petitioner: None.
- 4. Main petition vide CRA-S-2077 OF 2025 is pending before this Hon'ble Court for dated 08.09.2025

Place: Chandigarh

Dated: 01.09.2025

  
(ASHISH JHAMB & ABHINAV SOOD)

ADVOCATES P-4270/2017

COUNSEL FOR THE PETITIONER

NOR-226048

Duty No 26603  
Date 1-9-25  
Page 1  
Advocate Sumit, Haryana

IN THE HIGH COURT OF PUNJAB AND HARYANA AT  
CHANDIGARH

CRM-35080 OF 2025

IN CRA-S-2077 OF 2025

Sumit

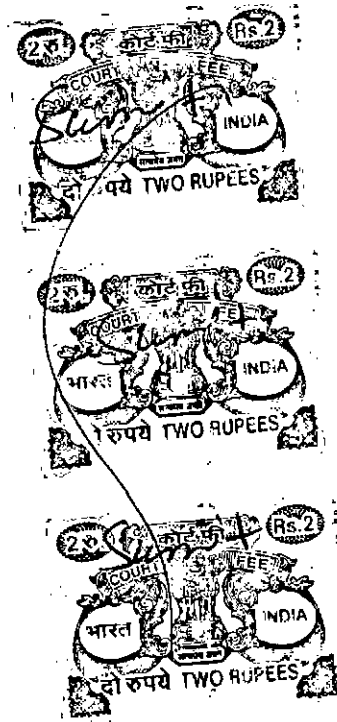
.....PETITIONER

Versus

State of Haryana & Anr.

...RESPONDENT

**TOTAL COURT FEES**



Place: Chandigarh

Dated: 01.09.2025

  
(ASHISH JHAMB & ABHINAV SOOD)

ADVOCATES P-4270/2017

COUNSEL FOR THE PETITIONER

NOR-226048

IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CRM- 35080 OF 2025

IN CRA-S-2077 OF 2025

Sumit

.....PETITIONER

Versus

State of Haryana & Anr.

...RESPONDENT

Application under Section 528 BNSS, 2023 for adding Section 117(4) of BNS and 3(2)(VA) of the SC/ST Act in the present FIR No. 626 dated 27.11.2024 which was initially registered under Section 115(2), 191(3), 190) 117(1), 60, 76, 351(2) Bharatiya Nyaya Sanhita & 3 (1) (5) SC/ST Act lodged at Police Station Saran, District Faridabad, in the head note as well as prayer clause of the aforesaid petition, in view of facts and circumstances as submitted herein below in the interest of justice.

**RESPECTFULLY SHOWETH:-**

1. That the aforesaid anticipatory bail petition is pending before this Hon'ble Court in which next date of hearing is fixed for dated 08.09.2025
2. That it is respectfully submitted that the present FIR No. 626 dated 27.11.2024 which was initially registered under Section 115(2), 191(3), 190) 117(1), 60, 76, 351(2) Bharatiya Nyaya Sanhita & 3 (1) (5) SC/ST Act lodged at Police Station Saran, District Faridabad. That during the pendency of present petition, complainant have moved application for alteration of charge which was allowed in 11.08.2025 and subsequently Section 117(4) of the BNS

and Section 3(2)(VA) of the SC/ST Act was added instead of 117(1) BNS and 3 (1) (5) SC/ST Act in the present FIR

3. That subsequently, pursuant to the application dated 11.08.2025 filed by the complainant for alteration of charges, the Ld. Court has also added Sections 117(4) of BNS and 3(2)(VA) of the SC/ST Act.
4. That the inclusion of the aforesaid additional provisions is a subsequent development, which could not be reflected in the appeal at the time of filing.
5. That the present application is bona fide and seeks to bring the memo of appeal in conformity with the amended charges so as to avoid any technical objection and for proper adjudication of the bail application.
6. That if the present application is not allowed and Section 117(4) of the BNS and Section 3(2)(VA) of the SC/ST Act is not allowed to be added in the head note as well as prayer clause of the aforesaid, the petitioner will suffer irrefutable loss and prejudice which could not be compensated at any costs.
7. That it is respectfully prayed that present application may kindly be allowed and petitioner may kindly be permitted to add Section 117(4) of the BNS and Section 3(2)(VA) of the SC/ST Act in the in the head note as well as prayer clause of the aforesaid anticipatory bail petition in the interest of justice.
8. That no prejudice would be caused to the respondent State if the present application is allowed and permission is granted to the petitioner to add the aforesaid Section in the prayer clause of the present FIR.

9. That the petitioner has not filed any such or similar application either before this Hon'ble Court or Hon'ble Supreme Court of India.

It is therefore most respectfully prayed that present application may kindly be allowed and petitioner may kindly be permitted to add Section 117(4) of BNS and 3(2)(VA) of the SC/ST Act in the present FIR No. 626 dated 27.11.2024 which was initially registered under Section 115(2), 191(3), 190) 117(1), 60, 76, 351(2) Bharatiya Nyaya Sanhita & 3 (1) (5) SC/ST Act lodged at Police Station Saran and District Faridabad, in the head note as well as prayer clause of the aforesaid bail petition, in view of facts and circumstances as submitted herein above, in the interest of justice.

**Place: Chandigarh**

**Dated: 01.09.2025**

  
**(ASHISH JHAMB & ABHINAV SOOD)**

**ADVOCATES P-4270/2017**

**COUNSEL FOR THE PETITIONER**

**NOR-226048**