

The petitioner most respectfully states and submits as follows :-

1. The petitioner, who is arrayed as accused No.5 as per report dated 7-3-2020 in Crime No.1 of 2019 of VACB Police station, Ernakulam, of which the FIR was registered on 3-6-2019 for offences punishable under Section 13 (2) r/w 13 (1) (d) PC Act and 120 B IPC, was arrested on 18-11-2020.
2. This Hon'ble Court by order dated 8-1-2021 passed in B.A. No. 100/2021, which was his 2nd bail application before this Hon'ble Court, was pleased to order the release of the petitioner on bail on conditions. The true copy of the said bail order is produced herewith as **Annexure -1**.
3. At the time of his arrest as well as at the time of Annexure -1 order the petitioner has been under treatment at Lake Shore Hospital, Ernakulam for multiple myeloma stage-III and many other serious ailments including Coronary Artery decease.
4. The bail bond in terms of condition No.1 was executed on 11-1-2021. Till then the petitioner was under custody of Superintendent, Sub Jail, Muvattupuzha, in the hospital.

5. Even after executing the bail bond on 11-1-2021, the petitioner was constrained to remain in the hospital for continuing the treatment of his serious ailments including Chemotherapy. At last he was discharged on 25-1-2021. Even after his discharge he has been continuing his treatment for his ailments.

6. The petitioner has been scrupulously complying with all the conditions stipulated by this Hon'ble Court in Annexure-1, since the date of execution of the bail bond by him. After his release on bail the investigating officers had not sought his presence before them for further interrogation or for any other purpose.

7. In the meantime the petitioner has approached this Hon'ble Court praying for deleting condition No.6 in Annexure-1, which prohibits him from leaving " the jurisdictional limits of Ernakulam District without prior permission of the Court below" as Crl.M.A.No.2 of 2021. As this Hon'ble Court at the very inception expressed that the said application cannot be entertained, the said Crl.M.A was withdrawn. Accordingly Crl.M.A.2/2021 was dismissed as withdrawn by order dated 3-3-2021. The true copy of the said order is produced herewith and marked as **Annexure-2.**

8. It is understood that the investigation in the above case is already completed and the factual report was forwarded to the VACB directorate they in May 2021, for obtaining Sanction for prosecution.
9. It is respectfully submitted that in the above premises the continuation of condition No.6 in Annexure-1, appears to be not required, for investigation or for any other purpose.
10. It is now more than 7½ months, since the petitioner was arrested and 6 months since this Hon'ble Court was pleased to grant bail to the petitioner, by stipulating the above condition.
11. The petitioner is being subjected to great hardship due to the continuation of the said condition of restriction of his movement beyond the limits of Ernakulam District. It is respectfully submitted that no prejudice would be caused to the prosecution by deleting condition No.6 in Annexure-1 order.
12. It is respectfully submitted that it will take years, for completion of trial in this case.

For these and other grounds permitted to the urged at the time of hearing it is most humbly prayed that this Hon'ble Court may in the interest of justice be pleased to delete condition No.6 in the order dated 8-1-2021 in B.A.No.100 of 2021.

Dated this the 1st day of July, 2021.

R.ANIL

M/s.B.Raman Pillai & Associates
Counsel for the petitioner