

**6. Application for stay of execution of the Order against
panjarapole / AWO**

CRIMINAL CASE NO. OF 2008

COMPLAINANT : 1.
v/s

ACCUSED : 1.

APPLICANT : Panjarapole / Animal Rights Protection Worker
Re : Application for stay of execution
of the Order dated _____

MAY PLEASE THE HONOURABLE COURT :

In the above matter, the applicant above-named, most respectfully prays before this Hon'ble Court as under:-

1. That in the above matter, this Hon'ble Court, vide order dated _____ has ordered to hand over the custody of those animals to the accused persons which have been originally ordered to be handed over to the applicant/ panjarapole by this Hon'ble Court vide earlier order. That the applicant is going to file Criminal Application and/or Criminal Revision Application against the said order before the higher forum. However, such exercise is likely to consume some time because for engaging an advocate, preparing case, filing the case and for placing the same before the higher forum for hearing, at least 15 days time would be consumed. Under the circumstances, in view of the ratio laid down by the decisions referred to herein below, the impugned order is required to be stayed for a period of 21 days. If the said order is not stayed, it would cause irreparable loss to the applicant which can not be compensated in terms of money :-
 - (1) Criminal Revision Application No.2992/1996 dated 18.03.1996 (Nirmalkumar Shantilal v/s Jamkhan Bhupendrakhan Sindhi)
 - (2) Criminal Revision Application No.98/2001 dated 08.03.2001 (Dilipkumar Ratilal Mehta v/s State of Gujarat).
2. Taking into consideration the ratio laid down in the aforesaid decisions as well as the facts and reasons of the case stated above, it is respectfully prayed to stay the execution and implementation of the order passed by this Hon'ble Court dated _____ for a period of 21 days in the interest of justice.

AHMEDABAD _____

DATE :