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IN THE HIGH COURT OF PUNJAB AND HARYANA
AT CHANDIGARH

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CRM-M-34414-2025
Decided on : 10.11.2025

Usha Bhatti . . . Petitioner
Versus
State of Haryana . . . Respondent

CORAM: HON'BLE MR. JUSTICE SANJAY VASHISTH

PRESENT: Mr. Abhijeet Sharma, Advocate
for the petitioner.

Mr. Jasdeep Singh, Addl. AG, Punjab.

SANJAY VASHISTH, J. (Oral)

1. Prayer in this petition, filed under Section 482 of the BNSS, 2023 (earlier Section 438 Cr.P.C.), is for grant of anticipatory bail to the petitioner, who has been booked in a criminal case arising out of First Information Report, as detailed here-under:-

Name of Petitioner (s)	FIR No.	Date	Section(s)	Police Station	District
Usha Bhatti	568	03.09.2024	408, 420 & 120B, 467,468,471 &201 IPC	Sadar Gurugram	Gurugram

2. On 20.08.2025, this Court, passed the following order:-
“Present petition has been filed by the petitioner, seeking anticipatory bail in case bearing FIR No.568, dated 03.09.2024, under Section(s) 408, 420, 120-B of IPC, registered at Police Station Sadar, District Gurugram.
2. Court has been informed by learned State counsel, on the basis of instructions received from ASI Parminder, that the main accused, namely Amit Punia, was arrested on 23.07.2025. Upon his arrest, it was discovered that the receipts purportedly issued by the company and relied upon by Amit Punia were forged and had been created using his personal laptop, which has since been recovered by the investigating agency.



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It is further submitted that, subsequent to the filing of the present petition and arrest of the main accused, additional offences under Sections 467, 468, 471, and 201 of the Indian Penal Code, have been invoked. In view of this development, petitioner is required to carry out necessary amendments in the title and prayer clause of the present petition to reflect the updated charges.

3. On the other hand, counsel for the petitioner submits that the required exercise would be done before the next date of hearing. However, petitioner be permitted to join the investigation, by protecting her from arrest.

4. Since the main accused has already been arrested, who probably was active in committing the crime, petitioner is directed to join the investigation as and when required to do so by the Investigating Agency. In the event of her arrest, the petitioner shall be released on ad-interim bail, subject to her furnishing bail bonds to the satisfaction of the Arresting Officer. The petitioner shall also be abide by all the conditions laid down under Section 482(2) of BNSS, 2023 (earlier Section 438(2) Cr.P.C.).

5. Besides, it is directed that petitioner would hand over her passport to the Investigating Agency or to Court concerned, if she possesses. Otherwise, would submit an affidavit, disclosing the fact that she does not possess any passport.

It is also directed that before leaving country any time during trial, petitioner would seek prior permission of the Court.

6. List again on 10.11.2025.”

3. On application i.e. Cr.M-M-39466-2025 filed by the petitioner for adding offence of Sections 467, 468, 471 and 201 IPC (added later on) in the headnote as well as prayer clause of main petition CRM-M-34414-2025, following order was passed on 14.10.2025 which is reproduced as under:-

“1. Prayer in the present application under Section 528 of BNSS is for adding the offence of Sections 467, 468, 471 and 201 IPC (added later on) in the heading as well as in prayer clause of the main petition CRM-M34414-2025. Further prayer has been made for incorporating the



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said offence in the order dated 20.08.2025 passed by this Court, whereby concession of interim bail has been granted to the applicant-petitioner.

2. *Learned counsel for the applicant-petitioner submits that initially, the FIR was registered for the offences punishable under Sections 408, 420 and 120-B IPC. However, later on Sections 467, 468, 471 and 201 IPC were also added by the prosecution, which fact was not in the knowledge of the applicant-petitioner. Due to this reason, while filing the main petition, Sections 467, 468, 471 and 201 IPC could not be mentioned/incorporated in the head note and prayer clause. Thus, prays for carrying out necessary correction in the head note and prayer clause of the main petition as well as in the order dated 20.08.2025 passed by this Court.*

3. *Notice of the application.*

4. *On advance notice, Mr. Kanwar Sanjiv Kumar AAG, Haryana, and Mr. Ankit Aggarwal, Advocate (through video Conferencing), accept notice of respondent/State and complainant respectively and do not raise any objection to the prayer made*

5. *Having considered the submissions made by respective counsel and gone through the prayer made in the present application, the same is allowed.*

6. *Accordingly, Registry is directed to take all the required steps for carrying out the necessary correction in the head note and prayer clause of the main petition i.e. CRM-M-34414-2025, by incorporating Sections 467, 468, 471 and 201 IPC. Similarly, in the order dated 20.08.2025 in paragraph No.1, the words “under Sections 408, 420, 120-B IPC”, be read as “ under Sections 408, 420, 120-B, 467, 468, 471 and 201 IPC”. Criminal Misc. application stands disposed.”*

4. Continuing his submissions, learned counsel for the petitioner contends that in compliance of the order dated 20.08.2025,



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passed by this Court, petitioner has joined the investigation, and has fully co-operated. Therefore, he prays for confirmation of the said interim anticipatory bail order.

5. Learned State counsel on instructions, confirms the said averment made by learned counsel for the petitioner of joining the investigation on 13.10.2025, by the petitioner, and submits that as of now, custodial interrogation of the petitioner is not required for the purpose of investigation.

6. Heard learned counsel for the parties.

7. Since, petitioner has already joined the investigation and custodial interrogation is no more required; ad-interim bail order dated 20.08.2025, passed by this Court is hereby made absolute. Accordingly, present petition is allowed.

However, petitioner shall continue to join the investigation as and when required to do so and abide by all the terms and conditions laid down under Section 482(2) of BNSS, 2023.

8. **Accordingly, petition stands disposed of.**

(SANJAY VASHISTH)
JUDGE

November 10, 2025
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Whether speaking/reasoned: *Yes/No*
Whether Reportable: *Yes/No*