

**IN THE COURT OF HON'BLE 2<sup>ND</sup> ADD. CHIEF JUDICIAL  
MAGISTRATE , NAGPUR**

**R.C.C No. 14/2002**

STATE OF MAHARASHTRA  
//VERSUS//  
SUNIL KEDAR AND OTHERS

**APPLICATION FOR SEEKING DOCUMENTS, ELECTRONICS  
RECORDS , ITEMS, DATA, STATEMENTS, SEIZED DURING  
INVESTIGATION IN VIEW OF ORDER DATED 16/04/26 AND  
20/4/2026.**

1. The applicant/Accused No.3 had filed an application u/s 207 on 12.03.26 with a prayer seeking documents which had not been supplied to him and which were not in the charge sheet .
2. In the above application, Learned state/APP has filed Pursis and ready to supply documents mentioned in Application Para No. 2.3 (A) TO (F) of the application filed.
3. The APP later supplied a Pen Drive with 3.50 GB of data to the applicant.
4. After the perusal of all the documents provided in a pen drive given by the APP and data, documents which is specifically mentioned in PURSIS dated 17/04/2026 is not found and accused intimating the court about the documents not found in the Pen Drive supplied by the APP
5. All the documents which have been seized in Seizure No 10 before the Panch Rajendra Gangaram More and Arun Laxmanrao Deshmukh are not found .
6. The comprehensive list of documents not found in point 2.3 (A)) of the application has been attached in the Annexure 1.
7. The above documents are important for the following reasons :

- i. That the seized documents are not merely documents of the prosecution; The Applicant requires the same to reconcile with his own books of accounts.
- ii. That the above documents and data are necessary to establish that the funds were legitimately used for the purchase of Government Bonds / securities and that the purchases were supported by proper contract notes and banking trails and there was no misuse of funds as alleged.
- iii. That the Applicant is entitled to inspect and obtain copies of such documents which are not found, because the said documents are necessary for preparing an effective defence, for filing appropriate replies / applications, and for placing the correct facts before this Hon'ble Court.
- iv. That the seized documents and data which are not found are also necessary for the purpose of confronting prosecution witnesses during cross-examination. The Applicant is required to confront such witnesses with the very documents and records which have been seized and are presently in the custody of the Court / investigating agency.
- v. That unless the entire copies of seized documents and data are supplied to the Applicant, the Applicant will be seriously prejudiced and will not be able to effectively cross-examine the prosecution witnesses or demonstrate the legitimate nature of the financial transactions.
- vi. The seized record as mentioned in the point 2.3 (A) of the application which contains several important documents must be made available to the Applicant so that the defence is not reduced to a mere formality.
- vii. A fair trial requires equality of opportunity, and the Applicant must be allowed to examine, reconcile and rely upon the seized material which demonstrates the legitimate purchase of Government Bonds and the lawful end-use of funds.

8. It may also be noted that court in its interlocutory order dated 16.04.26 , the Court observed that no details of the documents have been mentioned against point 2.3 ( F - J ) of the application filed u/s 207. Also the court wished to know whether the above documents are a part and parcel of the Charge Sheet .
9. Pursuant to the court's order on 20.04.26 “ *the accused is permitted to inspect the records and proceedings of this case with personally or through his advocate as per proviso of section 207 of CRPC*” , the applicant humbly Prays for inspection such records and proceedings which have not been found as mentioned in point 2.3 ( A ) of the application and details of which have been annexed in annexure 1.

**PRAYER :-** In view of the facts and circumstances stated above, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- i. Direct the prosecution / investigating agency / court record section to provide inspection of all seized documents, records, files, digital data, bank documents, contract notes, transaction records and related materials seized from or concerning the Applicant to find the documents which have not been found as per point 2.3( A) of the application.
- ii. To comply with the interlocutory order on 16.04.26, it is Prayed that this court allows the applicant time to provide a list of specific documents under point 2.3 (F- J) of the application filed u/s 207 on 12.3.26 and Pass any other relief this Hon'ble Court may deem fit and proper in the interest of justice.

COUNSEL FOR ACCUSED