

IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CRM-M No. ____ of 20__

MEMO OF PARTIES

[NAME OF PETITIONER No. 1], [S/o / D/o / W/o] [NAME OF FATHER / HUSBAND], aged about [____] years, resident of [FULL ADDRESS WITH PIN CODE] [and others, with full particulars]... Petitioner(s)

State of [PUNJAB / HARYANA / U.T. CHANDIGARH], through [its Secretary, Department of Home Affairs / Station House Officer, PS ____]... Respondent No. 1

[NAME OF COMPLAINANT], [S/o / D/o / W/o] [NAME OF FATHER / HUSBAND], aged about [____] years, resident of [FULL ADDRESS WITH PIN CODE]... Respondent No. 2

PETITION UNDER SECTION 528 OF THE BHARATIYA NAGARIK SURAKSHA SANHITA, 2023 [SECTION 482 CrPC] FOR QUASHING OF [FIR NO. __ DATED __, UNDER SECTIONS __ OF THE BHARATIYA NYAYA SANHITA, 2023 (OR THE CORRESPONDING IPC SECTIONS FOR OFFENCES BEFORE 01.07.2024), POLICE STATION __, DISTRICT __] (ANNEXURE P-1) AND ALL CONSEQUENTIAL PROCEEDINGS ARISING THEREFROM, ON THE BASIS OF THE COMPROMISE DATED [DATE] (ANNEXURE P-2)

Respectfully sheweth:

1. That the above-noted FIR was registered at the instance of respondent No. 2 against the petitioner(s), alleging that [BRIEF ALLEGATIONS].
2. That the dispute between the parties is [private / personal / matrimonial / commercial] in nature.
3. That with the intervention of respectable persons and well-wishers, the parties have amicably settled their disputes and entered into a written compromise dated [DATE] (Annexure P-2). The compromise is voluntary and without any coercion, pressure or undue influence.
4. That respondent No. 2 has no objection to the quashing of the FIR and the consequential proceedings, and is ready to appear before this Hon'ble Court or before the trial court to make a statement to that effect.
5. That the proceedings are at the stage of [INVESTIGATION / CHARGE / EVIDENCE] before [COURT]. The case-specific grounds for seeking quashing despite the prosecution material are [STATE SUPPORTED GROUNDS]; the compromise is not treated as an automatic ground for quashing.
6. That the petitioner(s) [have / have not] been declared proclaimed offender(s), and [no other case is pending between the parties / details of other cases: ____].
7. That [no earlier petition for the same relief was filed / the earlier petitions, results and material change in circumstances are: ____].
8. That each petitioner's alleged role, the exact offences, injury and weapons if any are [particulars]. The case is at [investigation / charge / evidence / appeal stage]; the challan, charge order and previous relevant orders are annexed as [].

9. That all victims, complainants and accused concerned are identified in [schedule]. The compromise covers [persons and issues]; any person or count not covered, minor victim or third-party/public interest is expressly disclosed as [].
10. That the dispute arose from [specific private transaction or relationship]. Its predominantly private character is shown by [facts], while the seriousness and social impact of the alleged offence are addressed by [facts].
11. That the settlement dated [] was reached through [process] voluntarily. Consideration or obligations are [terms]; performance is evidenced by [receipts / return of property / statements]. Any remaining obligation is [precise term and deadline].
12. That the reasons for submitting that continuation would be unjust despite the prosecution material are [case-specific reasons]. The Court is not asked to treat the compromise as automatic proof that conviction is impossible.
13. That proclamation status, antecedents, other FIRs, prior quashing petitions and bail conditions are fully disclosed as []. The petitioners and affected persons are available for judicial verification of the settlement as directed.
14. That [OPTIONAL: retain only after verifying the cited rule and these facts] the transaction is predominantly [private category] as evidenced by [records], the compromise is voluntary and covers [persons], and the prosecution stage is []. Applying Gian Singh, continuation would defeat the ends of justice because [specific reason]; seriousness, public impact and any excluded category are addressed by [analysis].

PRAYER

It is, therefore, respectfully prayed that the above-noted FIR (Annexure P-1) and all consequential proceedings arising therefrom may kindly be quashed on the basis of the compromise dated [DATE] (Annexure P-2). [If so directed, the parties may be sent to the trial court / Illaqa Magistrate to record their statements on the genuineness of the compromise.] It is further prayed that further proceedings before the trial court may be stayed during the pendency of this petition.

Place: [PLACE] Date: [DATE]

PETITIONER(S) Through [NAME OF ADVOCATE] Advocate Enrolment No. [__]

Note: Annexures usually filed: P-1 FIR, P-2 compromise deed, identity documents of the parties, and any affidavit of respondent No. 2. Follow the High Court's current filing checklist.

IN THE HIGH COURT OF PUNJAB AND HARYANA AT CHANDIGARH

CRM-M No. ____ of 20__

[NAME OF PETITIONER(S)]... Petitioner(s)

Versus

[NAME OF STATE AND ANOTHER]... State and another

AFFIDAVIT

Affidavit of [NAME OF DEPONENT], [S/o / D/o / W/o] [NAME], aged about [____] years,
resident of [FULL ADDRESS WITH PIN CODE].

I, the above-named deponent, do hereby solemnly affirm and declare as under:

1. That the deponent is competent to swear this affidavit and the accompanying [suit / petition / application] has been drafted by counsel on the deponent's instructions. Its contents have been read over and explained in [LANGUAGE], understood by the deponent, and are incorporated as part and parcel of this affidavit; the factual statements are true to the deponent's knowledge or identified records, and legal submissions are based on advice believed to be true.
2. That [no same or similar suit / petition / application on the same cause of action has been filed / the following prior or pending proceedings, outcomes and orders are fully disclosed: ____]. Nothing material has been concealed.

DEPONENT

VERIFICATION

Verified at [PLACE] on [DATE] that paragraphs 1 and 2 above are true and correct to my knowledge and identified records, with legal submissions based on advice believed true. Nothing material has been concealed.

DEPONENT

Note: To be sworn before an Oath Commissioner / Notary Public and stamped as required by the applicable rules.

PREPARATION AND JUDGMENT APPLICATION

Updated 11 October 2026. Complete every material fact, retain only supported alternatives, and renumber before filing. These notes support professional adaptation; they do not supply missing evidence or guarantee relief.

Filing and relief checks. Use Section 528 BNSS or saved Section 482 CrPC as applicable; preserve accurate penal sections based on offence date. Seek Magistrate verification if directed. A settlement is not a general ground to quash heinous offences, corruption or serious offences affecting society.

Fact-specific authority. *Gian Singh v. State of Punjab*, (2012) 10 SCC 303; judgment dated 24 September 2012, concluding principles. Explain why the offence is predominantly private and why the voluntary settlement supports justice. Serious social offences and special-law restrictions require separate scrutiny; agreement alone is insufficient. Read the judgment

Source: <https://indiankanoon.org/doc/69949024/>

Before relying on any authority, compare the material facts, procedural stage, statutory version and precise relief; check subsequent treatment and applicable local practice. Keep the authority note separate from the signed pleading. For criminal procedure, determine Section 531 BNSS savings rather than select the code solely from the alleged offence date.