



**HIGH COURT OF JUDICATURE FOR RAJASTHAN
BENCH AT JAIPUR**

S.B. Criminal Misc. 2nd Bail Application No. 14499/2026
CNR: RJHC020892812026 | URN: CRLMB / 26789U / 2026

Naveen Singh S/o Laxman Singh, Aged About 34 Years, R/o 50 Flat No. S-2, Arun Vihar, Niwaru Road, Police Station Kardhani, Jaipur. (Accused Petitioner Presently Confined In Central Jail Jaipur).

-----Petitioner

Versus

State Of Rajasthan, Through Pp

-----Respondent

For Petitioner(s) : Mr.Ved Prakash Tripathi
For Respondent(s) : Mr.J.S.Rathore-PP

HON'BLE MR. JUSTICE FARJAND ALI

Order

REPORTABLE
18/09/2026

1. The jurisdiction of this Court has been invoked by way of filing the second application under Section 483 BNSS at the instance of accused-petitioner. The requisite details of the matter are tabulated herein below:

S.No.	Particulars of the Case	
1.	FIR Number	960/2025
2.	Concerned Police Station	Kardhani
3.	District	Jaipur(West)
4.	Offences alleged in the FIR	Under Section 103(1) of BNS
5.	Offences added, if any	-
6.	Date of passing of impugned order	12.05.2026



2. It is borne out from the record that the accused-petitioner had earlier approached this Court by way of S.B. Criminal Miscellaneous Bail Application No.13026/2026, which came to be dismissed on 02.09.2026. The present second bail application has been instituted thereafter, within a short interval. However, conspicuously, the factum of dismissal of the earlier bail application has not been disclosed in the present application. Such material fact, having a direct bearing upon the maintainability and consideration of the successive prayer for bail, ought to have been candidly brought to the notice of the Court.
3. There is no absolute embargo in law against entertaining a successive bail application. However, a subsequent application cannot be permitted to become a means of circumventing or unsettling an earlier judicial determination rendered on consideration of the material available on record. The subsequent application must, therefore, disclose some substantial change in the circumstances, emergence of new material, a material development having a bearing upon the earlier consideration, or any other circumstance which may justify reconsideration of the prayer for bail.
4. In the case at hand, upon a careful perusal of the material placed before this Court, no such subsequent circumstance or material change has been brought on record which may persuade this Court to take a different view from the one already taken on 02.09.2026. The earlier bail application was





not dismissed for any technical or procedural reason; rather, the prayer for bail was considered on merits after examining the allegations and the material collected during investigation. The Court had, inter alia, taken note of the gravity of the alleged offence, the relationship between the petitioner and the deceased and the prima facie material indicating the involvement of the petitioner.

5. It is a settled principle that although successive bail applications are not barred, the consideration of a subsequent application is necessarily circumscribed by the changed circumstances, if any, since the passing of the earlier order. A successive application cannot ordinarily be utilised as an occasion for a fresh appreciation or reappraisal of the very same material which had already been considered by the Court, particularly when the subsequent application is moved within a short span of time and does not disclose any intervening circumstance warranting a different approach.
6. The judicial discipline governing successive bail applications also requires that the earlier order be treated as the starting point for consideration of the subsequent prayer. Unless the petitioner is able to demonstrate a material change in circumstances or place before the Court some fresh circumstance which was not available for consideration earlier, the same grounds cannot be permitted to be re-agitated merely by presenting them in a different form. To permit such repeated reconsideration would effectively



amount to reviewing or sitting in appeal over the earlier order in the absence of any legally cognizable change in circumstances.

7. In the present case, apart from the non-disclosure of the dismissal of the earlier bail application, there is no circumstance apparent from the record which may be said to have intervened after 02.09.2026 so as to materially alter the complexion of the case or render the earlier assessment unsustainable. The mere passage of a short period, in the absence of any consequential development having a bearing upon the petitioner's entitlement to bail, cannot by itself constitute a change of circumstance sufficient to warrant a fresh adjudication on the same material.
8. Consequently, this Court finds no justification to undertake a further appreciation or reappraisal of the facts and material which already stood considered while deciding the earlier bail application. The successive bail jurisdiction is not intended to provide repeated opportunities for re-arguing the same case in the absence of any intervening circumstance warranting reconsideration. The petitioner having failed to demonstrate any such change in circumstance, the earlier order dated 02.09.2026 continues to hold the field and there is no basis to take a different view at this stage.
9. Accordingly, the second bail application is dismissed.

(FARJAND ALI),J

