SUPREME COURT *Chronicle*

Issue XXVII | January 2026



Highlights of the Issue:

- Visit of Delegation from Supreme Court of Sri Lanka
- National Conference and Symposium on Mediation
- West Zone-I Regional Conference

Chief Justice's Corner



Dear Readers,

As the Court embarks upon the year 2026, I am pleased to present the January edition of the Supreme Court Chronicle. Each edition records significant developments that underscore the Court's enduring commitment to its institutional values, collaborative engagement, and continuous advancement.

This issue features the visit of a distinguished delegation from Sri Lanka, led by the Chief Justice of Sri Lanka, reflecting a meaningful exchange of legal perspectives and shared traditions that strengthened bonds between the judicial institutions. Such engagements reinforce the importance of meaningful judicial dialogue.

This edition covers the National Conference and Symposium on Mediation convened by the Bar Council of India, which featured plenary sessions, training programmes, panel discussions, and policy roundtables focused on the practical integration of mediation into court processes and the institutional framework under the Mediation Act, 2023.

This edition also features the two-day West Zone–I Regional Conference organised by the National Judicial Academy, in collaboration with the High Court of Rajasthan and the Rajasthan State Judicial Academy, which focused on the role of technology in advancing the rule of law and strengthening institutional coherence within the justice delivery system.

The edition further highlights the Annual Cricket Match between the CJI XI and the SCBA XI at the Arun Jaitley Stadium, where the members of the Bench and the Bar came together beyond the courtroom in a spirited display of sportsmanship and camaraderie.

I hope that the engagements and insights in this edition offer a thoughtful perspective on the judiciary's continued commitment to constitutional principles and cooperation.

Happy reading!

Justice Surya Kant
[Chief Justice of India]

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Global Engagements

Visit of Delegation from Supreme Court of Sri Lanka



11 December 2025: The Indian delegation, headed by Justice Surya Kant, Chief Justice of India, in an interaction with the Sri Lankan delegation, headed by Justice P Padman Surasena, Chief Justice of Sri Lanka, on the theme "Vision of Justice"

11 December 2025: A knowledge exchange and interactive session was held at the Supreme Court of India between Judges of the Supreme Court of India and a delegation from the Supreme Court of Sri Lanka, to strengthen judicial cooperation. The programme was organised by the Supreme Court of India and the National Judicial Academy.

The Indian delegation included Justice Surya Kant, Chief Justice of India; Justice Vikram Nath, Justice J K Maheshwari, Justice B V Nagarathna, Justice M M Sundresh, Justice P S Narasimha, Judges, Supreme Court of India; Justice Aniruddha Bose, Director, National Judicial Academy; and Shri Bharat Parashar, Secretary General, Supreme Court of India.

The delegation of Judges from Supreme Court of Sri Lanka included Justice P Padman Surasena, Chief Justice of Sri Lanka; Justice S Thurairaja, Justice Sampath B Abayakoon, Justice Sobhitha Rajakaruna, Justice Menaka Wijesundera, Justice AHMD Nawaz, Justice Mahinda Samayawardhena, Justice M Sampath K B Wijeratne, Justice Arjuna Obeyesekere, and Justice A L Shiran Gooneratne.



11 December 2025: Justice Surya Kant, Chief Justice of India; Justice Vikram Nath, Justice J K Maheshwari, Justice B V Nagarathna, Justice M M Sundresh, Justice P S Narasimha, Judges, Supreme Court of India; Justice Aniruddha Bose, Director, National Judicial Academy; Shri Bharat Parashar, Secretary General, Supreme Court of India; Ms Aarti Singh, Registrar (J), Supreme Court of India; Ms Shivani Handique, Additional Registrar (J) (Research) and Director, Centre for Research and Planning, Supreme Court of India; Ms Sonal Saroha, Deputy Registrar (J) and Research-Cum-Senior Fellow, Supreme Court of India; along with Justice P Padman Surasena, Chief Justice of Sri Lanka, and other Sri Lankan delegates, at the Supreme Court of India

The Chief Justice of India extended a warm welcome to the Sri Lankan delegation and expressed confidence that the visit would further consolidate the close and historic relationship between the two judicial institutions. He highlighted that India and Sri Lanka share a common colonial past, achieved independence within a short span of each other, and established their Supreme Courts during the same period. He observed that both jurisdictions have witnessed comparable jurisprudential growth, particularly in constitutional law, environmental law, international law, civil law, and commercial litigation.

Justice Surya Kant reflected on shared constitutional values and contemporary judicial challenges, focusing on justice, access, responsiveness, and judicial review. He explained that the Indian Constitution, like that of Sri Lanka, envisions social, economic, and political justice as core State obligations, requiring the Judiciary to dismantle structural barriers and ensure meaningful rights for the vulnerable.

The Chief Justice of Sri Lanka referred to constitutional distinctions relating to judicial review and emphasised purposive statutory interpretation. Further emphasis was laid on the need for a global approach to transboundary environmental issues.

The session featured discussions on various aspects of the "Vision of Justice," focusing on themes



11 December 2025: Justice Surya Kant, Chief Justice of India, and Justice Joymalya Bagchi, Judge, Supreme Court of India, shared the dais with Justice P Padman Surasena, Chief Justice of Sri Lanka, while other members of the Sri Lankan delegation observed Court proceedings in the Chief Justice's Court

such as the social, economic, and political facets of justice, access to justice, enhancing the quality and responsiveness of the justice delivery system, and the judicial review of legislative and executive actions.

Justice B V Nagarathna added that India and Sri Lanka share an Anglo-Saxon jurisprudential heritage, particularly the common law tradition, which provides a strong foundation for their legal systems. She further noted that the two countries are also bound by shared historical and geographical ties.

Justice B V Nagarathna further highlighted the differences in the scope of judicial review in the two jurisdictions. She observed that, in Sri Lanka, legislation cannot be challenged once it has been enacted, whereas in India, both the High Courts and the Supreme Court are empowered to review statutory, administrative, and executive actions. Elaborating on the Indian framework, she noted that Article 226 confers wide-ranging powers on the High Courts, enabling them to



11 December 2025: Justice Surya Kant, Chief Justice of India, presented a token to Justice P Padman Surasena, Chief Justice of Sri Lanka, as a gesture of mutual respect and cooperation

address violations of legal rights, while Article 32 embodies the constitutional commitment to the separation of powers and the system of checks and balances.

During the interaction, Justice Sampath B Abayakoon added that, beyond constitutional and fundamental rights jurisprudence, Sri Lankan courts frequently rely on Indian decisions in several other branches of law, including criminal law, environmental law, and matters relating to the law of evidence.

Justice P S Narasimha highlighted the shared constitutional challenges faced by both countries and stressed the importance of interpretative cooperation. He proposed the establishment of a South Asian Constitutional Academy to institutionalise regional judicial dialogue.

Welcoming the proposal, the Chief Justice of India reiterated the need for sustained engagement between the two judiciaries and recalled his earlier suggestion for an Indo–Sri Lankan Environmental Platform to address cross-border environmental issues. He emphasised that collaborative judicial strategies would enable the region to respond more effectively to shared challenges.

Before the conclusion of the discussion, the Chief Justice of India underscored the importance of sustained institutional engagement, including cooperation on cross-border environmental concerns. The session reaffirmed a shared commitment to collaborative judicial dialogue in the service of justice.

Visit of Mr Thierry Mathou, Ambassador of France to India



18 December 2025: Mr Thierry Mathou, Ambassador of France to India, visited Justice Surya Kant, Chief Justice of India, at the Supreme Court of India. A symbolic exchange of a potted plant took place on the occasion

National Engagements

National Conference and Symposium on Mediation



26-27 December 2025: Justice Surya Kant, Chief Justice of India; Dr Pramod Sawant, Chief Minister of Goa; and Shri Manan Kumar Mishra, Chairman, Bar Council of India and Member of Parliament, Rajya Sabha, at the event, "Mediation: How Far Significant in the Present-Day Context", IIULER, Goa

26-27 December, 2025: The Bar Council of India (BCI) and the BCI Trust organised a National Conference and Symposium on Mediation, at the India International University of Legal Education and Research (IIULER), in Goa. The event, themed *"Mediation: How Far Significant in the Present-Day Context"*, was inaugurated by Justice Surya Kant, Chief Justice of India, in the presence of Dr Pramod Sawant, Chief Minister of Goa.

The event was also attended by Justice J K Maheshwari, Justice P S Narasimha (Chancellor, IIULER Goa), Justice Ahsanuddin Amanullah, Justice Prashant Kumar Mishra, Justice Ujjal Bhuyan, Justice N Kotiswar Singh, Judges, Supreme Court of India, and Shri Devidas J Pangam, Advocate General of Goa.

The proceedings commenced with a symbolic 2 km walkathon on the Mandovi riverfront, joined by over 750 participants, to promote mediation as a preferred, dialogue-based mode of dispute resolution.

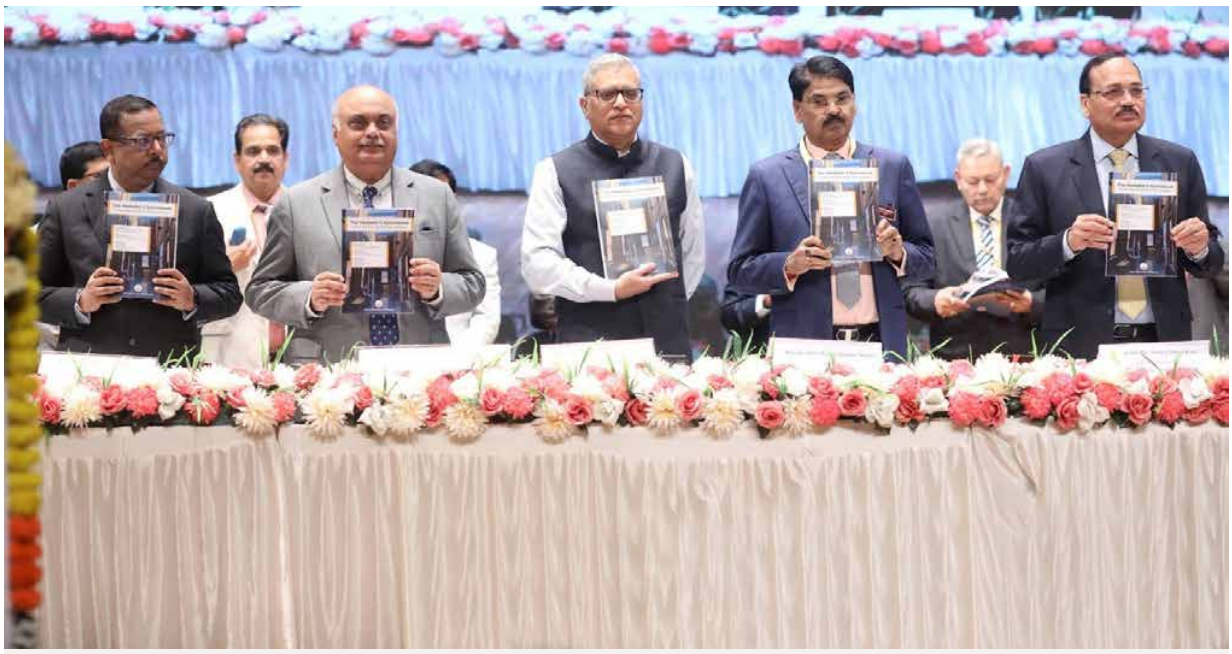
The walkathon was led by the Chief Justice of India, Justice Surya Kant. It witnessed participation from Judges of the Supreme Court and High Courts, State functionaries, the Chairman of the Bar Council of India and the BCI Trust, members and office-bearers of the Bar Council of India, State Bar Councils and Bar Associations, as well as eminent citizens of Goa, including Padma awardees, officers, learned advocates, mediators, athletes, celebrities, faculty members, and students.



26 December 2025: Justice Surya Kant, Chief Justice of India, along with Shri Manan Kumar Mishra, Chairman, Bar Council of India and Member of Parliament, Rajya Sabha, led a symbolic 2 km walkathon on the Mandovi riverfront

The technical proceedings of Day 1 continued with the Plenary Session titled *"Integrating Mediation into Everyday Court Practice"*, chaired by Justice J K Maheshwari and co-chaired by Justice Prashant Kumar Mishra, Justice P Sam Koshy, Judge, High Court of Telangana, and Mr John Abbott, International Mediator, London. The afternoon featured parallel sessions, including Training Session I titled *"Foundation of Effective Mediation: Skills, Stages and Ethics for Mediators & Advocates"* and Training Session II titled *"From Courtroom to Mediation Room: Identifying Mediation-Friendly Matters, Party Interactions, Managing Counsels and Recording Settlements"*. Additionally, Justice Ujjal Bhuyan chaired Panel Discussion I on *"Key Mediation Practices in Other Countries"*, co-chaired by Justice Shree Chandrashekhar, Chief Justice, Bombay High Court. Also, the ADR Society of IIULER hosted Paper Presentation I.

Day 2 focused on legislative institutionalisation and specialised skill development through a Policy Roundtable titled *"Mediation For the Nation, Mediation Act 2023 and Viksit Bharat"*. This session, chaired by Justice Ahsanuddin Amanullah and co-chaired by Justice Ashutosh Kumar, Chief Justice, Gauhati High Court, critically analysed the Mediation Act, 2023, and its potential to reduce judicial backlogs and foster constitutional values. Training Session III, titled *"Mediation Skills In Sensitive Disputes: Family, Child, Labour, Negligence, IPR and Environment etc."*, featured the



26 December 2025: Justice Surya Kant, Chief Justice of India; Justice P S Narasimha, Justice Ahsanuddin Amanullah and Justice Ujjal Bhuyan, Judges, Supreme Court of India; and Shri Manan Kumar Mishra, Chairman, Bar Council of India and Member of Parliament, Rajya Sabha, attended the Inaugural Session of National Conference and Symposium at IIULER Goa, organised by the Bar Council of India

participation of Justice Purnendu Singh and Justice Dr Anshuman, Judges, High Court of Patna. These sessions were conducted by senior Mediation and Conciliation Project Committee (MCPC) trainers from the Supreme Court, including Mr Surender Singh, Ms Pusshp Gupta, Ms Monika Jalota, and Mr Sachin Jain. Additionally, Panel Discussion II on *"Understanding Culture, Society, Behaviour and Ground Realities in Mediation"* was chaired by Justice N Kotiswar Singh and co-chaired by Justice Suman Shyam, Judge, Bombay High Court.

In his keynote address, Justice Surya Kant emphasised that mediation should be viewed as an evolution of adversarial litigation rather than a sign of legal weakness. While noting that over 39,000 mediators have been trained, he cautioned that the nation requires at least 2.5 lakh more mediators to meet demand.

Tracing mediation's institutional evolution from Section 89 of the CPC and judicial endorsement by the Supreme Court to the enactment of the Mediation Act, 2023, Justice Surya Kant highlighted its growing centrality within India's justice system, including community, online, and international mediation initiatives. He further envisioned a future "multi door courthouse" where parties are guided to the most appropriate mode of resolution and called upon the Bar to lead this transformation.

> *"That is the mathematics of mediation—it subtracts bitterness, divides burdens, and adds hope to the broken equations of human relationships."*
>
> Justice Surya Kant

West Zone-I Regional Conference



14 December 2025: Justice Surya Kant, Chief Justice of India; Justice B V Nagarathna, Justice Dipankar Datta, Justice Pankaj Mithal, Justice Ahsanuddin Amanullah, Justice Rajesh Bindal, Justice Prashant Kumar Mishra, Justice A G Masih, Justice Sandeep Mehta, Justice N Kotiswar Singh, Justice Vijay Bishnoi, Justice A S Chandurkar, Judges, Supreme Court of India at the West Zone-I Regional Conference. The conference was on "Advancing the Rule of Law through Technology: Challenges and Opportunities", organised by the Rajasthan High Court and the Rajasthan State Judicial Academy in collaboration with the National Judicial Academy at Jaisalmer, Rajasthan

13–14 December 2025: The National Judicial Academy, in collaboration with the High Court of Rajasthan and the Rajasthan State Judicial Academy, organised a two-day West Zone–I Regional Conference on *"Advancing the Rule of Law through Technology: Challenges & Opportunities"* at Jaisalmer, Rajasthan.

The conference comprised five thematic sessions, namely: Session 1: *"Bridging the Digital Divide: Role of e-Services";* Session 2: *"Electronic and Digital Media: Role of Courts";* Session 3: *"Effective use of Technology in Alternate Dispute Resolution";* Session 4: *"Cybercrimes and Digital Forensics";* and Session 5: *"Improving Quality of Adjudication: Emerging and Future Technologies"*.

The conference provided a valuable platform for exchange of views among participants on contemporary issues relating to the justice delivery system. It facilitated meaningful engagement and sharing of experiences, while contributing to a broader understanding of emerging trends and developments in the field.

During the inaugural ceremony, Justice Surya Kant highlighted the need for a Unified Judicial Policy, and called for institutional convergence across India's diverse courts through harmonised procedures, shared digital infrastructure, coherent judgment formats, and intelligent case management. He stressed that predictability of outcomes is central to public confidence and can be strengthened through data-driven judicial administration.



14 December 2025: Justice Rajesh Bindal, Justice N Kotiswar Singh, and Justice Manmohan, Judges, Supreme Court of India, along with Justice Anoop Chitkara, Judge, High Court of Punjab and Haryana, attended 'Session-5: Improving Quality of Adjudication: Emerging and Future Technologies', at the West Zone-I Regional Conference

The conference served as an important platform for judicial officers to engage in meaningful deliberations on the evolving role of technology in the justice delivery system. It facilitated an exchange of ideas and best practices on the adoption of digital tools, while also addressing the challenges associated with their implementation. By bringing together stakeholders from different jurisdictions, the conference contributed to strengthening institutional capacity and promoting a more efficient, accessible, and responsive judicial system. It also underscored the importance of continued collaboration to ensure the sustainable integration of technology in the administration of justice.



14 December 2025: Justice Vikram Nath, Judge, Supreme Court of India, delivered the Valedictory Address at the West Zone Regional Conference

Regional Conference on Environment – 2025



06 December 2025: Justice M M Sundresh and Justice Aravind Kumar, Judges, Supreme Court of India, attended the Inaugural Session of the Southern Regional Conference on Environment, 2025 at Kalaivanar Arangam, Chennai, as the Chief Guest and Special Guest, respectively. The conference was organised by the National Green Tribunal, Southern Zone Bench, Chennai in collaboration with Southern State Pollution Control Board

06–07 December 2025: The Zonal Bench of the National Green Tribunal (NGT), Chennai, organised the *Regional Conference on Environment – 2025*.

The two-day conference was inaugurated by Justice M M Sundresh, Judge, Supreme Court of India, who graced the occasion as the Chief Guest, in the presence of other distinguished dignitaries, including Justice Aravind Kumar, Judge, Supreme Court of India (Special Guest), Justice Manindra Mohan Shrivastava, Chief Justice of the High Court of Madras (Guest of Honour), and Shri Thangam Thennarasu, Minister, Government of Tamil Nadu, along with Justice Prakash Shrivastava, Chairperson, NGT.

The conference convened judicial officers, environmental experts, administrators, academicians, and representatives of civil society to promote institutional collaboration and further a shared vision for environmental protection and sustainable development.

The conference comprised three technical sessions. The first session addressed "Environmental Law Enforcement and Biodiversity Conservation: Role of Regulatory Authorities" and was chaired by Justice A Muhamed Mustaque, Judge, High Court of Kerala. The second session focused on "Solid Waste and Biomedical Waste Management: Policy Overview" and was chaired by Justice D Bharatha Chakravarthy, Judge, High Court of Madras. The

third session examined "Challenges in Protecting Coastal Zones" under the chairmanship of Justice Suraj Govindaraj, Judge, High Court of Karnataka.

The conference concluded with a valedictory session graced by Justice R Mahadevan, Judge, Supreme Court of India. In his address, Justice Prakash Shrivastava, Chairperson, NGT, referred to Justice R Mahadevan's notable judgment, which underscores the principle that industries bear full responsibility for ecological restoration, thereby setting a significant precedent.

The conference served as an important forum for advancing dialogue on contemporary environmental challenges and strengthening institutional responses to them. By bringing together key stakeholders from the judiciary, administration, and expert community, it reinforced the need for a coordinated and informed approach to environmental governance.





06 December 2025: Justice M M Sundresh, Judge, Supreme Court of India, addressed the gathering at the Regional Conference on Environment – 2025

> *The earth provides enough to satisfy every man's needs but not every man's greed.*
>
> Mahatma Gandhi

Convocation Ceremonies



23 December 2025: Justice Surya Kant, Chief Justice of India; Justice Pankaj Mithal, Justice Rajesh Bindal, Justice A G Masih, Judges, Supreme Court of India; and Justice Sheel Nagu, Chief Justice of High Court of Punjab and Haryana, with the graduating students at the Seventh Convocation of Rajiv Gandhi National Law University, Punjab



28 December 2025: Justice Surya Kant, Chief Justice of India, attended the First Convocation of Dr B R Ambedkar National Law University, Sonipat, at Dr Ambedkar International Centre, New Delhi, as the Chief Guest. The event was also attended by Justice Rajesh Bindal and Justice A G Masih, Judges, Supreme Court of India; Shri Mahipal Danda, Education Minister, Haryana; and Justice Ashwani Kumar Mishra, Judge, High Court of Punjab and Haryana

Public Events, Speeches and Other Engagements



06 December 2025: Justice Surya Kant, Chief Justice of India, at the 23rd Edition of the Hindustan Times Leadership Summit at Taj Palace, New Delhi

19 December 2025: Justice Surya Kant, Chief Justice of India, attended the NDTV Indian of the Year, 2025 as the Chief Guest. He highlighted the power of recognition in honouring excellence across diverse fields, emphasising that awards acknowledge not just visible success but years of perseverance, unseen labour, and unwavering commitment





07 December 2025: Justice P S Narasimha and Justice P B Varale, Judges, Supreme Court of India; Justice Shree Chandrashekhar, Chief Justice of the High Court of Bombay; and Justice Revati Mohite Dere, Judge, High Court of Bombay, attended the Inauguration Programme of the Orientation Training/Seminar for Empanelled Mediators across the State of Maharashtra at the Maharashtra Judicial Academy, Uttan



09 December 2025: Justice P S Narasimha, Judge, Supreme Court of India, attended the launch of the India International Arbitration Centre (IIAC) Magazine in New Delhi, along with Justice Hemant Gupta, former Judge, Supreme Court of India and Chairperson, IIAC, and Shri Anant Vijay Palli, Member, IIAC



29 December 2025: Justice P S Narasimha, Judge, Supreme Court of India, addressed and interacted with members of the Telangana High Court Advocates' Association during his visit to the High Court of Telangana

07 December 2025: Justice Rajesh Bindal, Judge, Supreme Court of India, at the 3rd Brig (Justice) D M Sen Memorial Lecture – 2025 on the topic "75 years of the Army Act - Evolution, Endurance & Future of Military Justice in Swarnim Bharat," as the Chief Guest, at Surya Auditorium, Lucknow, Uttar Pradesh





19 December 2025: Justice K V Viswanathan, Judge, Supreme Court of India, and R Venkataramani, Attorney General of India, participated in the Panel Discussion on Comparative Constitutional Law, organised by the Delhi Centre of the University of Chicago

21 December 2025: Justice K V Viswanathan, Judge, Supreme Court of India, participated in Shri D V Subba Rao Memorial Lecture at Visakhapatnam



> *Constitution is not a mere lawyers' document, it is a vehicle of Life, and its spirit is always the spirit of Age*
>
> Dr B R Ambedkar

Sports and Recreation: Annual Cricket Match between CJI XI and SCBA XI



10 December 2025: A group photograph of Justice Surya Kant, Chief Justice of India, with Justice Vikram Nath, Justice M M Sundresh, Justice P S Narasimha, Justice Dipankar Datta, Justice Ahsanuddin Amanullah, Justice Rajesh Bindal, Justice Aravind Kumar, Justice K V Viswanathan, Justice P B Varale, Justice N Kotiswar Singh, Justice Manmohan, Justice Joymalya Bagchi, Justice A S Chandurkar, and Justice Vipul Manubhai Pancholi, Judges, Supreme Court of India, taken during the Annual Day/Night Cricket Match

10 December 2025: The Supreme Court Bar Association (SCBA) hosted the Annual Day/Night Cricket Match between the Chief Justice of India (CJI) XI and the SCBA XI at the Arun Jaitley Stadium, New Delhi. Justice Surya Kant observed that both the Bar and the Bench had undertaken extensive preparations for the match, highlighting the spirit of sportsmanship and camaraderie.

Such events play a significant role in fostering a sense of fellowship and mutual respect between members of the Bar and the Bench, beyond the formal confines of the courtroom. They provide an informal platform for interaction, helping to strengthen professional relationships, promote well-being, and reinforce the shared commitment to the administration of justice.



10 December 2025: Justice M M Sundresh and Justice Dipankar Datta, Judges, Supreme Court of India, participated in the Annual Day/Night Cricket Match



10 December 2025: A glimpse from the Annual Day/Night Cricket Match, featuring Judges of the Supreme Court of India and members of the Supreme Court Bar Association

Legal Aid

Skill Development Initiative in Jails



06 December 2025: Justice Surya Kant, Chief Justice of India; Justice Rajesh Bindal, Justice Ahsanuddin Amanullah, Justice A G Masih, Judges, Supreme Court of India, at the Inaugural Ceremony of the Skill Development Initiative in Jails, under the visionary project titled "Empowering Lives Behind Bars, Real Change – The New Paradigm of Correctional Justice"

06 December 2025: Haryana marked a significant milestone in correctional reform with the inauguration of Skill Development Centres, Polytechnic diploma programmes, and ITI-level vocational courses for inmates across the State's prisons under the initiative *"Empowering Lives Behind Bars, Real Change: The New Paradigm of Correctional Justice"*. The programme was inaugurated by Justice Surya Kant, Chief Justice of India, at District Prison, Bhondsi, Gurugram, in the presence of Judges of the Supreme Court of India and Justice Sheel Nagu, Chief Justice of the High Court of Punjab & Haryana, along with other Judges of the High Court and senior dignitaries.

The Chief Justice of India underscored that the moral strength of a justice system lies not in the severity of its punishments, but in the possibilities for transformation it creates. Drawing from judicial experience, the Chief Justice of India noted that cycles of recidivism are broken not by punishment alone, but by skills, structure, and self-worth. He highlighted how vocational training can convert confinement into preparation, enabling safer communities through meaningful reintegration.



06 December 2025: Justice Surya Kant, Chief Justice of India, during the inaugural ceremony of the Skill Development Initiative in Jails at District Prison, Bhondsi, Gurugram

Under this initiative, inmates will be provided access to a broad range of vocational and technical education programmes, including ITI courses in trades such as Computer Operator and Programming Assistant, Welder, Plumber, Dress Making, Electrician, Wood Work Technician, Sewing Technology, and Cosmetology, as well as a three-year Polytechnic Diploma in Computer Engineering.

On the same occasion, the Chief Justice of India also launched a month-long Statewide Anti-Drug Awareness Campaign across Punjab, Haryana, and U.T. Chandigarh. The campaign seeks to address the growing incidence of drug abuse affecting communities by promoting sustained behavioural change through targeted outreach and community-driven awareness initiatives.

It aims to sensitise students, parents, teachers, and the wider public to the dangers of substance abuse, including its psychological and long-term consequences. The initiative also underscores the legal framework under the Narcotic Drugs and Psychotropic Substances (NDPS) Act, raising awareness about the legal repercussions of drug trafficking and consumption, while highlighting the availability of rehabilitation services and support mechanisms.



06 December 2025: Justice Surya Kant, Chief Justice of India, during the Inaugural Ceremony of the Skill Development Initiative in Jails, also launched a month-long Statewide Anti-Drug Awareness Campaign across the States of Punjab and Haryana and the Union Territory of Chandigarh, aimed at addressing the growing challenge of substance abuse. The event was also marked by the presence of Justice Rajesh Bindal, Justice Ahsanuddin Amanullah, and Justice A G Masih, Judges, Supreme Court of India; and Justice Sheel Nagu, Chief Justice, High Court of Punjab and Haryana

Strengthening Legal Services and Awareness



26 December 2025: Justice Surya Kant, Chief Justice of India; Dr Pramod Sawant, Chief Minister of Goa; Justice P S Narasimha, Justice Ahsanuddin Amanullah, Justice N Kotiswar Singh, Judges, Supreme Court of India; Justice Shree Chandrashekhar, Chief Justice of the High Court of Bombay, attended the Inauguration of 30 Days Special Awareness Campaign on Drug Abuse organised by Goa State Legal Services Authority at Goa

04 December 2025: Justice Surya Kant, Chief Justice of India, addressed the gathering at the event "Strategic Role of Para Legal Volunteers & Panel Lawyers: Future of Legal Aid & Mediation" at Maharaja Chhatrasal Convention Centre, Khajuraho, Chhatarpur, Madhya Pradesh





03 December 2025: Justice Vikram Nath, Judge, Supreme Court of India, and Executive Chairman, National Legal Services Authority (NALSA), delivered the keynote address at a webinar organised by NALSA to mark the International Day of Persons with Disabilities, focusing on "Fostering Disability-Inclusive Societies"

4th National Lok Adalat of 2025



13 December 2025: Glimpses of the Fourth National Lok Adalat, 2025, across Taluks, Districts, and High Courts in all 37 States and Union Territories (except Rajasthan, Delhi & Telangana)

13 December 2025: The National Legal Services Authority (NALSA) conducted the fourth and final National Lok Adalat of 2025, across Taluks, Districts, and High Courts in 37 States and Union Territories, excluding Rajasthan, Delhi, and Telangana. This nationwide initiative underscored the efficacy of alternative dispute resolution mechanisms by resolving a total of **4,32,43,590 cases**. Notably, **3,79,23,664 pre-litigation matters** were settled, thereby preventing their entry into the formal judicial process, while **53,19,926 pending cases** were disposed of, substantially reducing the burden on courts. The aggregate settlement value of the cases resolved during this Lok Adalat is estimated at ₹16,211.21 crore.

The results of this Lok Adalat reflect the increasing public confidence in collaborative and consensual dispute resolution frameworks that provide expeditious and amicable alternatives to traditional litigation. Through such initiatives, NALSA continues to fulfil its constitutional mandate by advancing inclusive access to justice, particularly for marginalised and underserved sections of society, and by fostering a sustained culture of peaceful dispute resolution through alternative mechanisms.

Panel Discussion: WE – (Women Empowerment in Law): Strength, Struggle and Success



03 December 2025: Justice Surya Kant, Chief Justice of India, attended the panel discussion titled 'WE – (Women Empowerment in Law): Strength, Struggle and Success' as the Chief Guest, organised by the Supreme Court Bar Association, along with Justice B V Nagarathna and Justice P B Varale, Judges, Supreme Court of India; Shri R Venkataramani, Attorney General for India; Justice Prathiba M Singh, Judge, High Court of Delhi; and Professor Rashmi Salpekar, at the Auditorium, C-Block, Administrative Buildings Complex, Supreme Court of India

03 December 2025: The Supreme Court Bar Association (SCBA) recently organised a panel discussion titled *"WE—Women Empowerment in Law: Strength, Struggle, and Success"*. The event featured a panel, comprising Justice Surya Kant, Chief Justice of India, Justice B V Nagarathna, Judge, Supreme Court of India, Shri R Venkataramani, Attorney General for India, Justice Prathiba M Singh, Judge, Delhi High Court and Professor Rashmi Salpekar.

A key highlight was the presentation of a first-of-its-kind pilot survey documenting the professional journeys and structural hurdles faced by over 300 women advocates. The survey titled *"Documenting Voices of Women Advocates in Delhi-NCR"*, revealed several important insights, including that 84% of the surveyed women are first-generation lawyers. The SCBA further noted that, while the present survey is confined to the Delhi-NCR region, a nationwide study is underway to capture the experiences of women lawyers across India, reflecting a broader shift towards evidence-based reform of gendered structures within the legal profession.

Justice Surya Kant reflected on his journey as a first-generation lawyer, describing it as gradual, uncertain, and shaped by patience, adaptability,

and trust in sustained effort rather than rigid planning. He traced the evolution of women's participation in the legal profession, contrasting historical exclusion in many Western jurisdictions with India's constitutionally grounded commitment to gender equality, shaped by women members of the Constituent Assembly. He noted the significant expansion of women's presence at the Bar, on the Bench, and in public law roles, expressing optimism about the growing number of first-generation women lawyers. Looking ahead, he articulated a vision of an inclusive legal profession that rejected outdated presumptions, supported caregiving responsibilities, and enabled women's leadership. He emphasised institutional reforms such as equitable briefing, mentorship, gender-sensitive infrastructure, and expanded legal aid, including initiatives to empanel women lawyers. Concluding, he stressed that sustained institutional effort was essential to realise gender justice by 2047.

In this context, Justice B V Nagarathna underscored that the exclusion of women in the profession does not arise from a lack of talent, but from a lack of structured opportunity. While acknowledging that a substantial number of women have entered the Bar, she emphasised that the core challenges lie in retention and advancement. She observed that women advocates are often confined to limited domains such as domestic violence or family court matters, and urged seniors at the Bar to consciously provide women lawyers with opportunities in complex criminal, civil, constitutional, and commercial litigation, thereby enabling them to fully demonstrate their capabilities.



03 December 2025: Justice Surya Kant, Chief Justice of India, inaugurated the National survey titled "Documenting the Voice of Women in the Legal Profession", in the presence of Justice B V Nagarathna, Judge, Supreme Court of India

Felicitation of Newly Appointed Supreme Court Judges



17 December 2025: Justice Surya Kant, Chief Justice of India, at the Felicitation Function organised by the Supreme Court Bar Association (SCBA) in honour of the newly appointed Judges of the Supreme Court of India—Justice K Vinod Chandran, Justice Joymalya Bagchi, Justice N V Anjaria, Justice Vijay Bishnoi, Justice A S Chandurkar, Justice Alok Aradhe, and Justice Vipul M Pancholi



Justice K Vinod Chandran was born on 25 April 1963. He graduated from Kerala Law Academy Law College, Thiruvananthapuram, and commenced practice in 1991. He served as Special Government Pleader (Taxes) for the State of Kerala. He was appointed as an Additional Judge of the High Court of Kerala in 2011. Thereafter, he was appointed as the Chief Justice of the Patna High Court in March 2023. He was elevated as a Judge of the Supreme Court of India in January 2025.



Justice Joymalya Bagchi was born on 3 October 1966. He graduated in law from the University of Calcutta and enrolled as an advocate in 1991. He practised criminal and constitutional law across various courts. He was appointed as a Judge of the Calcutta High Court in 2011, and was subsequently transferred to the Andhra Pradesh High Court in 2021. He was later repatriated to the Calcutta High Court. In March 2025, he was elevated as a Judge of the Supreme Court of India.



Justice Nilay Vipinchandra Anjaria was born on 23 March 1965. He obtained his LL.B. from H.L. College of Commerce and his LL.M. from Sir L.A. Shah Law College. He commenced practice at the High Court of Gujarat in 1988, specialising in constitutional, civil, labour, and service law. He was appointed as a Judge of the High Court of Gujarat in 2011, and later served as the Chief Justice of the High Court of Karnataka from February 2024. Subsequently, in May 2025, he was elevated as a Judge of the Supreme Court of India.



Justice Vijay Bishnoi was born on 26 March 1964 in Jodhpur. He enrolled as an advocate in 1989 and practised civil, criminal, constitutional, and service law. He was appointed as Additional Central Government Standing Counsel from 2000 to 2004. He was appointed as a Judge of the High Court of Rajasthan in 2013, and later served as the Chief Justice of the High Court of Gauhati from February 2024. He was elevated as a Judge of the Supreme Court of India in May 2025.



Justice Atul Sharachchandra Chandurkar was born on 7 April 1965. He obtained his law degree from ILS Law College and joined the Bar in 1988. He primarily practised in civil law. He was appointed as a Judge of the High Court of Bombay in 2013, and was elevated as a Judge of the Supreme Court of India in May 2025.



Justice Alok Aradhe was born on 13 April 1964. He enrolled as an advocate in 1988 and was designated as a Senior Advocate in 2007. He practised civil, constitutional, arbitration, and company law. He was appointed as a Judge of the High Court of Madhya Pradesh in 2009. He served as the Acting Chief Justice of the High Court of Jammu and Kashmir in 2018 and of the High Court of Karnataka in 2022. He later assumed charge as the Chief Justice of the High Court of Telangana in July 2023 and of the High Court of Bombay in January 2025. He was elevated as a Judge of the Supreme Court of India in August 2025.



Justice Vipul Manubhai Pancholi was born on 28 May 1968. He obtained his law degree from Sir L.A. Shah Law College, Ahmedabad. He enrolled as an advocate in 1991 and practised in diverse fields. He served as Assistant Government Pleader and Additional Public Prosecutor at the High Court of Gujarat. He was appointed as a Judge of the High Court of Gujarat in 2014, and later served as the Chief Justice of the High Court of Patna from July 2025. He was elevated as a Judge of the Supreme Court of India in August 2025.

Fresh from the Bench

Manojbhai Jethbhai Parmar (Rohit) v. State of Gujarat (2025 INSC 1433)

"When investigations are carried out in a manner that betrays their foundational purpose, and trials become mechanical exercises divorced from the quest for truth, the resulting miscarriage of justice reverberates far beyond the confines of the courtroom"

Coram: Justice Vikram Nath and Justice Sandeep Mehta

In a judgment delivered on **15 December 2025**, a two-judge bench dealt with a grave and distressing incident of brutal sexual assault upon a four-year-old girl. The case required the Court to carefully examine the evidentiary basis of a conviction resting largely on circumstantial evidence.

Context/Background

The girl was discovered in a denuded state, bleeding profusely. Medical examination confirmed that the child had been brutally sexually assaulted. The appellant was subsequently arraigned as the accused primarily on the "last seen together" theory involving four boys and the recovery of blood-stained articles from his residence. The Trial Court convicted the appellant under the IPC and POCSO Act which was subsequently affirmed by the High Court of Gujarat. Aggrieved by the decision of the High Court, the present appeal was preferred.

Court's Reasoning and Observations

The Supreme Court highlighted a significant miscarriage of justice caused by investigative apathy and procedural infirmities and observed the following:

- The Court emphasised that for a conviction based on circumstantial evidence, the facts established must be consistent only with the hypothesis of guilt and exclude every possible hypothesis of innocence. The Court noted that there is a sharp legal distinction between what "may be" proved and what "must be" proved.
- Despite the informant claiming to have complete knowledge of the incident at the time of reporting, the FIR was bereft of the accused's name and the names of the purported "last seen together" witnesses. The Court held that the omission of such essential, known facts creates a grave cloud of doubt and suggests the crime may have been staged or the story cooked up after later deliberations.
- There was no evidence regarding the sealing, safe-keeping, or transmission of seized blood-stained articles to the Forensic Science Laboratory (FSL). A critical observation was that the child victim could not identify the appellant as her assailant during the trial and stated she had been tutored by her mother.

Thus, the Supreme Court observed that the Trial and High Courts conducted the trial with

a pedantic rigidity and performed a mechanical exercise that ignored these glaring shortcomings.

Furthermore, the Supreme Court issued specific mandatory directions to institutionalise a standardised format for trial court judgments across the country. The specific directions are as follows:

1. Mandatory Tabulated Charts

All trial courts dealing with criminal matters must incorporate three tabulated charts at the conclusion of their judgments:

- **Standardised Chart of Witnesses:** This chart must include columns for the Serial Number, Name of the Witness, and a Brief Description/Role (e.g., Informant, Eye-witness, Medical Jurist, or Investigating Officer). The goal is to provide a succinct description that indicates the evidentiary character of the witness.
- **Standardised Chart of Exhibited Documents:** This chart must catalog all documents exhibited during the trial, specifying the Exhibit Number, a Description of the document (such as FIR, panchnamas, or FSL reports), and the Witness who proved or attested it. This ensures the traceability of proof and compliance with the Indian Evidence Act or Bharatiya Sakshya Adhiniyam.
- **Standardised Chart of Material Objects:** Whenever physical objects are produced as exhibits, a third chart is required containing the Material Object Number, a Description of the Object, and the Witness who proved the object's relevance.

2. Special Provisions and Applicability

The Court further provided guidelines for the practical application of these charts:

- **Voluminous Evidence:** In complex cases involving an unusually large number of witnesses or documents, the trial court may limit the charts to material, relevant, and relied-upon items to ensure they remain functional reference tools rather than unwieldy compilations.
- **Defence Evidence:** These directions apply equally (mutatis mutandis) to all witnesses examined and all evidence adduced by the defence.
- **Standardised Format:** The Court provided specific specimen formats within the judgment that are intended to serve as the standard for trial courts nationwide.
- **Civil Proceedings:** While these directions are primarily for criminal trials, High Courts may consider adopting similar formats for civil matters involving voluminous evidence to promote clarity and uniformity.

Outcome

The Court held that the prosecution failed to prove an unbroken chain of incriminating circumstances necessary for a conviction based on circumstantial evidence. The Supreme Court allowed the appeal, setting aside the judgment of conviction and the order of sentence. The appellant was acquitted and ordered to be released forthwith.

Mission Accessibility v. Union of India & Ors. (2025 INSC 1376)

"The rights guaranteed to persons with disabilities are not acts of benevolence, but expressions of the constitutional promise of equality, dignity, and non-discrimination enshrined in Articles 14, 19, and 21 of the Constitution of India"

Coram: Justice Vikram Nath, Justice Sandeep Mehta

In a judgment dated **03 December 2025**, a two-judge bench disposed of a Writ Petition filed by Mission Accessibility seeking modification of UPSC Civil Services Examination rules for scribe changes and screen reader software use.

Context/Background

In this case, Mission Accessibility challenged UPSC's requirement for visually impaired candidates to furnish scribe details at application stage and sought permission for laptops with screen readers plus accessible digital papers. The court initially directed UPSC to consider scribe change requests till 18 May 2025. Further, UPSC agreed in-principle to introduce screen readers but cited infrastructural or logistical dependence on states.

Court's Reasoning and Observations

The Supreme Court observed that the UPSC has adopted a progressive policy decision to provide screen reader software to visually impaired candidates across its examinations, thereby upholding their rights to equal opportunity and accessibility.

The Court further held that while the policy commitment exists, effective implementation remains pending due to the absence of streamlined mechanisms and modalities. It highlighted UPSC's reliance on external infrastructure from state authorities and the lack of a defined roadmap or timeline for technological deployment at examination centers.

The Court emphasised the necessity of institutional coordination, phased execution, concrete planning, inter-agency collaboration, and uniform standards to operationalise accessibility measures. It stressed that these steps are essential to convert the accessibility objective from mere policy on paper into practical reality for future examination cycles.

Outcome

In response, the Court issued the following directions:

- **Scribe Flexibility:** The UPSC must incorporate provisions in all examination notifications allowing candidates to request a change of scribe up to seven days before the exam, with such requests decided by a reasoned order within three working days.
- **Implementation Roadmap:** The UPSC shall file a comprehensive compliance affidavit within two months, detailing the action plan, timeline, and modalities for deploying screen reader software. It shall also specify the steps proposed for testing, standardisation, and validation of softwares across examination centres.
- **Standardisation:** The UPSC, in coordination with the Department of Empowerment of Persons with Disabilities (DEPwD) and

National Institute for the Empowerment of Persons with Visual Disabilities (NIEPVD), must formulate uniform guidelines for assistive technologies to ensure security and accessibility.

- **Administrative Support:** The court also directed the Union of India, through the Department of Personnel and Training (DoPT) and the Ministry of Social Justice and Empowerment, to provide all necessary technical and administrative support to facilitate these measures.

Accordingly, the writ petition was disposed of with directions and the matter has been relisted for UPSC compliance affidavit.

Dr. Sohail Malik v. Union of India & Anr. (2025 INSC 1415)

"...the intent of the legislature behind giving such a wide meaning to the word 'workplace' to go beyond the bounds of the traditional meaning implying location of the office, cannot be brushed aside by narrow construction of other provisions of the POSH Act"

Coram: Justice J K Maheshwari and Justice Vijay Bishnoi

In a judgment pronounced on **10 December 2025**, a two-judge bench considered an appeal arising from allegations of workplace sexual harassment made by a senior bureaucrat against another bureaucrat serving in a different department of the Government of India. The central issue before the Court was whether the Internal Complaints Committee (ICC) of the complainant's department had jurisdiction to inquire into the complaint despite the respondent being employed in a separate department.

Context/Background

The "aggrieved woman", a 2004 batch Indian Administrative Service (IAS) officer, was posted as Joint Secretary, Department of Food and Public Distribution. She alleged that the appellant sexually harassed her at her workplace. Following the incident, the aggrieved woman registered an FIR and presented a complaint under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) before the Internal Complaints Committee (ICC) constituted at her own department, i.e., the Department of Food and Public Distribution.

The appellant raised a jurisdictional challenge, contending that since he was employed by a different department (Department of Revenue), the ICC of the aggrieved woman's department had no jurisdiction to entertain the complaint. He argued that only the ICC of his own department could institute proceedings against him. Both the Central Administrative Tribunal (CAT) and the High Court of Delhi dismissed his challenge, leading to the present appeal before the Supreme Court.

Court's Reasoning and Key Observations

The Court observed that the POSH Act is a social welfare legislation intended to uphold women's fundamental rights to equality and dignity under Articles 14, 15, and 21 of the Constitution. The

Court also engaged in an extensive interpretation of the POSH Act, focusing on whether the respondent must be an employee of the same workplace as the aggrieved woman.

- **Interpretation of "where" in Section 11:** The appellant heavily relied on Section 11(1), arguing that the phrase "where the respondent is an employee" limits jurisdiction to the respondent's workplace. The Court rejected this, clarifying that the word "where" is used as a conditional conjunction (meaning "if" or "in that case") rather than a locational term. Section 11(1) serves as a procedural trigger, directing the ICC on which service rules to apply, not as a jurisdictional restraint.
- **Neutrality of Definitions:** The Court noted that the definitions of "employee" and "workplace" in Section 2 of the Act are completely neutral. The term "respondent" refers to "a person" against whom a complaint is made and does not mandate that the individual work at the same location as the complainant. Furthermore, the definition of "workplace" under Section 2(o)(v) is expansive, including any place visited by an employee during the course of employment.
- **Removal of Barriers:** The Court reasoned that a narrow interpretation would create procedural and psychological barriers, forcing an aggrieved woman to pursue remedies at an "alien workplace", which would defeat the remedial intent of the Act.

Outcome

The Supreme Court dismissed the appeal, upholding the jurisdiction of the ICC at the aggrieved woman's workplace. The Court held that the ICC constituted in one department has the jurisdiction to entertain a complaint against an employee of a different department if the alleged incident occurred within the scope of the complainant's workplace or during the course of employment. The phrase "where the respondent is an employee" in Section 11 does not restrict jurisdiction to the respondent's own department.

M.K. Ranjitsinh & Others v. Union of India & Others (2025 INSC 1472)

"By categorising these ecological activities as "social" responsibility, the law acknowledges that as human beings, we cannot "own" or "use" environment for "our purpose". The corporate duty must evolve from merely protecting the shareholders to protecting the ecosystem that we all inhabit"

Coram: Justice P S Narasimha and Justice A S Chandurkar

In a judgment delivered on **19 December 2025**, a two-judge bench adjudicated a matter originating from a writ petition filed in 2019 by environmentalists seeking urgent judicial intervention to prevent the extinction of the Great Indian Bustard (GIB) and the Lesser Florican (LF).

Context/Background

These species, particularly the GIB (affectionately known as the ***Godawan***), are "critically endangered" due to habitat loss, predation, and most significantly, collisions with overhead power transmission lines. In April 2021, the Court initially imposed a blanket restriction on overhead power lines across approximately

99,000 sq. km. However, this order was later modified in March 2024 following submissions by the Union Government regarding the adverse implications for India's energy transition and international climate commitments. The Court subsequently constituted a high-level Expert Committee to recommend balanced measures that would ensure the non-negotiable survival of the GIB while facilitating renewable energy generation.

Court's Reasoning and Key Observations

The Court emphasised that conservation and climate mitigation must proceed together rather than in opposition. A significant portion of the judgment was dedicated to recalibrating the scope of corporate accountability, particularly regarding Corporate Social Responsibility (CSR).

- **Integration of Environmental Responsibility:** The Court held that Corporate Social Responsibility cannot be divorced from Corporate Environmental Responsibility. It was observed that companies cannot claim to be socially responsible while disregarding the protection of fragile ecosystems and endangered wildlife affected by their commercial operations.
- **From Philanthropy to Statutory Obligation:** The Court traced the evolution of CSR under Section 135 of the Companies Act, 2013, noting a paradigm shift from voluntary philanthropy to an enforceable statutory obligation. It clarified that corporate profits are not solely private entitlements but are partly owed to society, viewing private property as a trust.
- **Fiduciary and Constitutional Duties:** Under Section 166(2) of the Companies Act, directors are legally bound to act in the best interests of not only shareholders but also the community and for the protection of the environment. Furthermore, the Court noted that corporations, as legal persons and key organs of society, share the fundamental duty under Article 51A(g) of the Constitution to protect the natural environment and show compassion for living creatures.
- **CSR Funds as Tangible Expressions of Duty:** CSR funds serve as the tangible expression of this duty, representing a paradigm shift from voluntary philanthropy to a statutory obligation. Consequently, the allocation of funds for environmental protection is not a discretionary act of charity but the fulfillment of a constitutional obligation.
- **Legal Standards for Conservation:** The Court invoked the Species Best Interest standard and the Polluter Pays principle, asserting that where corporate activity contributes to habitat degradation, the obligation to fund conservation efforts flows directly to the corporation. CSR funds must be directed toward both ex-situ and in-situ conservation efforts to prevent species extinction.
- **The "Guest" Analogy:** In a poignant observation, the Court reminded non-renewable power generators that they are merely guests in its [the Godawan's] abode and must conduct their activities with that shared environmental reality in mind.

Outcome

The Court accepted the Expert Committee's recommendations and issued several binding directions to balance the competing interests:

- **Revised Priority Areas:** The Court approved a Revised Priority Area for conservation, totaling 14,013 sq km in Rajasthan and 740 sq km in Gujarat.

- **Infrastructure Restrictions:** Within these revised priority areas, the Court prohibited the installation of new wind turbines and new solar parks/plants exceeding 2 MW capacity. Expansion of existing solar parks was also barred.
- **Power Line Mitigation:** No new overhead power lines (except those 11 kV and below) are permitted in these areas, except through dedicated power corridors. The Court mandated the immediate undergrounding of 80 km of 33 kV lines in Rajasthan and approximately 250 km of critical power lines identified by the Wildlife Institute of India (WII) within a two-year timeframe.
- **Scientific Validation of Diverters:** While not mandating a blanket deployment of Bird Flight Diverters (BFDs), the Court directed WII and an independent agency to conduct further scientific studies and pilot projects to assess their durability and effectiveness before making final policy decisions.

Danesh Singh & Ors. v. Har Pyari (Dead) Thr. LRs. & Ors. (2025 INSC 1434)

"If the approach taken by the impugned decision i.e., that fraud vitiates everything, is endorsed, especially in the context of an auction sale conducted by the executing court, then Rule 90 of Order XXI CPC which is time-bound... would be rendered obsolete"

CORAM: Justice J B Pardiwala and Justice R Mahadevan

In a judgment delivered on **15 December 2025**, a two-judge bench allowed the appeal, clarified the scope of the doctrine of *lis pendens* in execution proceedings, and directed the appellants to pay monetary compensation to the respondents to settle the equities, despite ruling in favour of the appellants on the legal question.

Context/Background

The dispute arose from agricultural land mortgaged to New Bank of India, which obtained a recovery decree in 1984. Pending the satisfaction of the decree, Respondent Nos. 1 and 2 purchased part of the land from a judgment-debtor (*pendente lite*). In 1988, the bank auctioned the property, which was purchased by the appellants (sons of another judgment-debtor). Aggrieved by the sale and subsequent denial of access to suit property, the Respondents filed a separate civil suit before the Civil Judge (Jr. Div.), Faridabad. The Trial Court decreed the suit, declaring the sale void. This was affirmed by the appellate court. In a Regular Second Appeal, the High Court of Punjab and Haryana (2019) upheld the decree, ruling that fraud vitiated the sale and a separate suit was maintainable despite Section 47 CPC.

Court's Reasoning and Key Observations

- ***Lis Pendens* (Section 52 TPA):** The Court held that the doctrine of *lis pendens* applies even to money suits if the plaintiff specifically seeks the sale of mortgaged property. Thus, the transfer to the respondents during the pendency of the suit was voidable and

subservient to the rights of the decree-holder and auction purchaser.

- **Bar on Separate Suit (Section 47 & Rule 92(3)):**
  - **Representatives under Section 47:** The Court ruled that the respondents, being pendente lite transferees, stepped into the shoes of the judgment-debtor. Therefore, they were "representatives" under Section 47 of the CPC, which mandates that questions relating to execution must be determined by the executing court and not by a separate suit.
  - **Specific Bar under Rule 92(3):** Since the respondents failed to file an application under Order XXI Rule 90 (to set aside the sale due to irregularity or fraud) within the 60-day limitation period, they were barred from filing a separate suit by Order XXI Rule 92(3).
- **Exclusivity of Rule 90 vs. "Fraud":** The Court clarified that allegations of fraud or irregularity in publishing or conducting the sale (e.g., secrecy, undervaluation) fall strictly under Order XXI Rule 90. A party cannot bypass the strict limitation period of Rule 90 by filing a separate civil suit alleging general fraud.
- **"Third Party" Status (Rule 92(4)):** The Court rejected the argument that the respondents were "third parties" entitled to file a separate suit under Rule 92(4).
  - A "third party" under this rule refers to a stranger to the decree (e.g., a bona fide purchaser prior to the suit) whose rights were not adjudicated.
  - Since the respondents were pendente lite transferees (representatives), they did not qualify as third parties.
- **Remedy for Dispossession (Rules 99 & 102):** The proper remedy for dispossession during execution is an application under Order XXI Rule 99. However, the Court noted that even if the respondents had filed under Rule 99, they would have been barred from relief by Order XXI Rule 102, which specifically denies protection to transferees pendente lite.
- **Substantial Justice:** While the Court held the separate suit was not maintainable, it noted the peculiar facts: the appellants were nephews of the vendor, and the auction was conducted in a manner that raised questions. To balance equities and avoid further litigation, the Court exercised its powers to do substantial justice.

Decision/Directions

The Supreme Court allowed the appeal and set aside the lower courts' judgments but issued directions to balance the interests of justice:

- **Monetary Compensation:** The appellants were directed to pay ₹75,00,000/- (Rupees Seventy-Five Lakhs) to the respondents (Nos. 1 and 2) within six months.
- **Default Clause:** Failure to pay within the stipulated period would attract an interest rate of 12% per annum until the date of payment.

Rajasthan High Court & Anr. v. Rajat Yadav & Ors. (2025 INSC 1503)

"The premise underlying the argument of potentially conferring 'double benefit' to the candidates of the reserved category proceeds on an erroneous assumption that a reserved category candidate is necessarily availing the benefit of reservation at more than one/every stage of a multi-tier process"

CORAM: Justice Dipankar Datta and Justice Augustine George Masih

In a judgment delivered on **19 December 2025**, a two-judge Bench dismissed the appeals filed by the Rajasthan High Court administration, upholding the decision that meritorious reserved category candidates who secure marks higher than the General/Open category cut-off in a screening test must be treated as Open category candidates for the purpose of shortlisting for the next stage of selection.

Context/Background

The case arose from a recruitment process initiated by the Rajasthan High Court for 2756 posts of Junior Judicial Assistant/Clerk Grade-II. The selection process comprised two stages: a Written Test (300 marks) and a Computer Typewriting Test (100 marks). Upon declaration of the written test results, it was observed that the cut-off marks for reserved categories (SC, OBC-NCL, MBC-NCL, and EWS) were higher than the cut-off marks for the General category. The recruiting authority treated the "General" category as a reservoir exclusively for unreserved candidates, thereby excluding reserved category candidates (who had scored higher than the General cut-off) from the Open list. Consequently, these candidates were confined to their respective reserved categories, where the higher cut-offs led to their exclusion from the Typewriting Test.

Aggrieved candidates filed writ petitions before the Rajasthan High Court, which allowed their pleas and directed the recruiters to redraw the lists by including meritorious reserved candidates in the Open category. The High Court administration challenged this decision in the Supreme Court, arguing that the rule of "migration" (shifting reserved candidates to Open category based on merit) applies only at the final selection stage, not at the preliminary shortlisting stage.

Court's Reasoning and Key Observations

- **Nature of "Open" Category:** The Supreme Court clarified that "Open", "Unreserved", or "General" posts are not a quota reserved for non-reserved candidates. They are open to all, regardless of caste, tribe, or class, based solely on merit. Treating the Open category as an exclusive compartment for general candidates violates Articles 14 and 16 of the Constitution.
- **Rejection of "Migration" at Shortlisting Stage:** The Court rejected the appellant's contention that "migration" is only permissible at the final merit list stage. It held that if a reserved category candidate outscores General candidates in the screening test without availing specific concessions, they automatically belong in the Open category list based on merit. No "shift" or "migration" is actually required; it is a natural placement based on performance.
- **Distinguishing *Chattar Singh*:** The Court distinguished the precedent in *Chattar Singh*

v. State of Rajasthan (1996), which held that migration does not apply at the preliminary stage. The Court noted that in *Chattar Singh*, preliminary marks were not counted for the final ranking. In the present case, the written test marks constituted 75% of the final merit (300 out of 400 marks). Therefore, excluding meritorious candidates at this stage would irreversibly prejudice their final selection chances.

- **"Double Benefit" Fallacy:** The Court dismissed the argument that allowing reserved candidates into the Open list at the screening stage confers a "double benefit". It held that a candidate securing a place on pure merit does not draw upon the benefit of reservation.
- **Estoppel:** The Court rejected the plea of estoppel against the candidates. It held that while candidates usually cannot challenge a process after participating, they could not have foreseen that the recruiters would adopt a method in violation of constitutional norms of treating the Open category as a reserved compartment.

Decision/Directions

The Supreme Court dismissed the appeals and upheld the impugned order of the Division Bench of the Rajasthan High Court.

- **Redrawing of Lists:** The Court affirmed the High Court's direction to revise the category-wise lists. The Open/General category list must first be prepared strictly on merit, including all reserved category candidates who secured higher marks than the General cut-off.
- **Timeline:** The Court extended the time to comply with the High Court's directions by two months.

State of UP v. Ajmal Beg etc.
(2025 INSC 1435)

"Thus, eliminating dowry is not only a matter of enforcing the DPA 1961 but a constitutional imperative. It fulfills the Republic's promise that every woman should enter marriage as an equal citizen and not as the bearer of an unjust financial burden"

CORAM: Justice Sanjay Karol and Justice N Kotiswar Singh

In a judgment delivered on **15 December 2025**, a two-judge bench heard the appeals preferred by the State of Uttar Pradesh against a judgment of the Allahabad High Court, which had acquitted the respondents, Ajmal Beg (husband) and Jamila Beg (mother-in-law).

Context/Background

The case arose from the death of Nasrin, a young woman around twenty years old, who had been married to Ajmal Beg for just over a year. The prosecution alleged that the respondents consistently demanded a colour television, a motorcycle, and ₹15,000/- from the deceased and her father. On June 4, 2001, Ajmal reiterated these demands, and upon her father's expressed

inability to comply, the deceased was allegedly assaulted the following day. On June 5, 2001, the accused persons set Nasrin on fire resulting in her death. The Trial Court originally convicted the respondents under Sections 498-A (cruelty), 304-B (dowry death) of the Indian Penal Code (IPC), and Sections 3 and 4 of the Dowry Prohibition Act (DPA), 1961.

Court's Reasoning and Key Observations

The Court emphasised that the eradication of dowry is a constitutional and social necessity, as the practice treats women as sources of financial extraction and reinforces structural discrimination. It observed the following:

- **Presumption of Dowry Death:** Relying on the case of Devender Singh v. State of Uttarakhand (2022) 13 SCC 82, the Court noted that under Section 304-B IPC read with Section 113-B of the Evidence Act, once it is shown that a woman was subjected to cruelty or harassment in connection with dowry soon before her death, the court shall presume the person caused the dowry death.
- **Reliability of the Witnesses:** The Court held that the High Court was not justified in disregarding the evidence of the maternal uncle of the deceased (PW2). While the father of the deceased had described PW2 as an eyewitness, PW2 himself categorically stated that he only saw the deceased set ablaze and the accused fleeing, never claiming to have seen the act of burning itself. The Court observed that this contradiction was not material and did not bear on the overall value of his testimony.
- **Fallacious Reasoning on Poverty:** The Supreme Court dismissed the High Court's reasoning that because the respondents were poor, they could not have demanded such items as they would be unable to maintain them. The Court stated this logic does not appeal to reason and does not negate the factum of the demand.

Furthermore, the Supreme Court, recognising that the malpractice of dowry remains rampant and that the Dowry Prohibition Act (DPA), 1961 often suffers from ineffective implementation, issued the following comprehensive directions to further social and legal change:

1. **Educational Curricula Reform:** The Court directed both State and Union Governments to consider necessary changes to educational curricula across all levels. This initiative aims to inform the future generation about the evils of dowry and reinforce the constitutional position that parties to a marriage are equals, ensuring that neither is viewed as subservient through the exchange of money or articles.

2. **Deputation of Dowry Prohibition Officers:** The Court directed the appointment of the Dowry Prohibition Officers who must be duly deputed, made aware of their responsibilities, and provided with the necessary wherewithal to perform their duties.

3. **Training and Sensitisation of Officials:** Police and judicial officers tasked with handling dowry-related cases are to be provided with periodic training. This training is intended to equip them to appreciate the social and psychological implications of these cases and to develop a sensitivity that allows them to distinguish between genuine cases versus those which are frivolous and abusive of the process of law.

4. **Expeditious Disposal of Pending Cases:** Noting that the instant case took 24 years to conclude, the Court requested all the High Courts to ascertain the number of other such pending cases, from the earliest to the latest, and ensure their expeditious disposal.

5. **Grassroot Awareness and Workshops:** To reach those outside the formal education

system, the District Administration and District Legal Services Authorities are requested to conduct regular workshops and awareness programmes.

Outcome

The Supreme Court concluded that the High Court erred in setting aside the judgment of conviction. The judgment of the Trial Court was restored, and the respondents were found guilty under Sections 498-A and 304-B IPC, and Section 3 and 4 of the DPA, 1961. The respondent Ajmal Beg was directed to surrender within four weeks to serve the sentence awarded by the Trial Court. Although Jamila Beg's conviction was restored, the Court took note of her advanced age of 94 years. Citing humanitarian considerations and physical frailty, the Court refrained from incarcerating her, noting that imprisonment at such an age may be inhumane.

Syed Shahnawaz Ali v. The State of Madhya Pradesh and Ors. (2025 INSC 1484)

"However, where the revision is at the instance of an informant or a complainant, on his death, the proceedings will not abate and, therefore, revisional court may exercise its discretion and proceed to test the correctness, legality or propriety of an order passed by the court subordinate to it"

Coram: Justice Sanjay Karol and Justice Manoj Misra

In the judgment dated **19 December 2025**, a two-judge bench allowed an appeal and addressed the procedural nuances of criminal revisions following the death of the original petitioner, emphasising the High Court's discretionary and supervisory role in the administration of justice.

Context/Background

In this case, Shamshad Ali, the father of the appellant, filed an application under Section 156(3) of the CrPC. against respondents, which led to an FIR for offences under Sections 419, 420, 467, 468, 471, 120-B and 34 of IPC, 1860. Although the police report indicted the respondents for multiple serious offences, the trial court discharged them from most charges, directing the trial to proceed only under Section 420 of the IPC.

The appellant's father challenged this discharge via a Criminal Revision in the High Court but died while the matter was pending. The appellant, who was a witness and a legal heir to the property involved in the alleged fraud, applied to continue the proceedings. The High Court rejected the application and dismissed the revision, holding that criminal revisions abate upon the death of the petitioner due to a lack of specific provisions for substitution.

Court's Reasoning and Key Observations

The Supreme Court decided the issue of whether, upon death of the revisionist, the revision proceedings under Section 397 read with Section 401 of CrPC would abate. The court held that the High Court's decision to treat the revision as abated was unsustainable based on the following reasons:

- **Absence of Abatement Provision:** The Court noted that while Section 394 of the CrPC specifically provides for the abatement of appeals upon the death of an appellant, there is no corresponding provision for the abatement of a criminal revision. The court clarified that when the revisional proceedings are at the instance of an accused/convict, the revisional court may refuse to continue the proceedings on his death. However, if it is at the instance of an informant, the proceedings will not abate and the court can exercise its discretion.
- **Supervisory Function:** Relying on the decision in *Praban Kumar Mitra v. State of West Bengal and Another*, the Court noted that revisional power is discretionary and intended to ensure subordinate courts do not abuse their power. The court held that whether the High Court should exercise its revisional jurisdiction depends upon the facts and circumstances of that case and once the High Court issues a Rule, it must be determined on its merits regardless of whether the petitioner is alive or dead.
- **Locus Standi and Suo Motu Power:** Citing *Honnaiah T.H. v. State of Karnataka and Others and K. Pandurangan v. SSR Velusamy and another*, the Court observed that because the High Court can exercise revisional powers *suo motu*, there is no bar on the third party in inviting the Court's attention. Thus, a third party or legal heir can validly invite the Court to exercise its jurisdiction.
- **Discretion to Allow Assistance:** The court also held that while there is no legal right to substitution in a revision, the Court has the discretion to allow an interested party, such as a victim, to assist the Court to further the cause of justice.
- **Definition of Victim:** Under Section 2(wa) of the CrPC, a "victim" includes the legal heirs of the person who suffered loss. The court held that the appellant, as the son who inherited an interest in the property allegedly targeted by the fraud, was deemed a victim with a vital interest in the outcome.

Outcome

The Supreme Court allowed the appeals and set aside the High Court's orders. Accordingly, Criminal Revision was restored to the file of the High Court to be decided on its merits and the appellant was granted the liberty to assist the revisional court in the capacity of a victim of the crime.

State of U.P. & Anr. v. Mohd Arshad Khan & Anr. (2025 INSC 1480)

"Timelines are therefore imposed at a point where not doing so would have adverse consequences i.e., there is material on record demonstrating undue delays, stagnation, or the like. In sum, timelines are imposed reactively and not prophylactically"

Coram: Justice Sanjay Karol and Justice N Kotiswar Singh

In a judgment dated **19 December 2025**, a two-judge bench allowed the appeals and addressed the legality of High Courts imposing time-bound investigation limits and granting protection from arrest while simultaneously refusing to quash a First Information Report (FIR).

Context/Background

In this case, the State of Uttar Pradesh appealed against orders from the Allahabad High Court involving an investigation into the fraudulent procurement of arms licenses. The Special Task Force (STF) conducted an inquiry based on an anonymous petition and found that several individuals, including Zaid Khan and Arshad Khan, had used forged documents and false affidavits to obtain licenses. Specifically, allegations involved discrepancies in dates of birth and the use of forged identity cards to import arms from abroad. Sanjay Kapoor, a retired Arms Clerk, was also implicated for his alleged role in facilitating the forgery and concealment of facts during the licensing process.

The High Court refused to quash the FIR but directed the investigating officer to complete the probe within 90 days and ordered that the respondents should not be arrested until the Trial Court took cognizance.

Court's Reasoning and Key Observations

- **Personal Liberty Protections:** The Court noted that writ jurisdiction, such as *habeas corpus*, is a vital tool for addressing illegal detention and enforcing procedural safeguards during arrest. It referred to *Sunil Batra v. Delhi Administration and D.K. Basu v. State of West Bengal* to emphasise the role of High Courts in protecting fundamental rights alongside statutory processes.
- **Unpredictability of Investigations:** The Court reasoned that criminal investigations are complex, unpredictable processes influenced by changing witness statements and intersecting legal proceedings. Citing *Union of India v. Prakash P. Hinduja*, the Court held that the manner and pace of an investigation ordinarily lie within the investigator's domain rather than the court's.
- **Constitutional Right to Speediness:** Referring to *Hussainara Khatoon (1) v. State of Bihar and Abdul Rehman Antulay v. R.S. Nayak*, the Court affirmed that the right to a speedy trial and timely investigation is an integral part of Article 21. It balanced this right by stating that while investigations cannot remain open-ended, courts must avoid routine or mechanical interventions into the timeline of a probe.
- **Criteria for Judicial Timelines:** The Court held that prolonged and unexplained delay between the registration of an FIR and the filing of a chargesheet itself infringes Article 21. It reasoned that such delay keeps an individual under a continuing cloud of suspicion without meaningful progress. The court further held that timelines are imposed reactively and not prophylactically.
- **Contextual Application of Precedents:** The Court criticised the High Court for mechanically applying *Shobhit Nehra v. State of U.P.* without evaluating the specific material facts of the case at hand. Invoking *Quinn v. Leathem*, it reasoned that every judgment must be read as applicable to the particular facts proved or assumed.
- **Prohibition of "Not to Arrest" Orders:** Relying on the three-judge bench decision in *Neeharika Infrastructure Pvt. Ltd. v. State of Maharashtra*, the Court reiterated that High Courts should not pass "no arrest" orders while simultaneously declining to quash an FIR. It reasoned that such directions effectively bypass the statutory requirements for anticipatory bail and are legally unacceptable.

Outcome

The Supreme Court concluded that directing a time-bound investigation and granting protection from arrest while refusing to quash an FIR in a mechanical manner is legally unsustainable. Consequently, the court allowed the State's appeals and set aside the High Court's directions regarding the 90-day investigation timeline and the protection from arrest.

Central Bureau of Investigation v. Dayamoy Mahato etc (2025 INSC 1418)

"The rights enshrined under Article 21 and their application to undertrials has often been the subject of consideration before this Court and, in one voice it has been held that the rights of fairness, dignity and liberty apply to each and every prisoner, irrespective of the nature of offence that they stand charged for"

Coram: Justice Sanjay Karol and Justice N Kotiswar Singh

In a judgment delivered on 11 December 2025, a two-judge bench heard the matter wherein the appeals were preferred by the Central Bureau of Investigation against the High Court of Calcutta's orders granting bail to the respondents, and while the Supreme Court set aside the High Court's findings regarding the applicability of Section 436-A CrPC, it declined to cancel the bail granted to the respondents. The Supreme Court observed that while Article 21 rights are sacrosanct, in cases affecting national security, individual liberty is not the sole consideration, yet interference with the respondents' liberty was not justified at this advanced stage given their conduct while out on bail.

Context/Background

The case originates from an FIR registered on 9th June 2010 concerning the derailment of the Jnaneshwari Express on 28.05.2010, which resulted in the death of 148 persons and injury to 170 others. Investigation revealed a criminal conspiracy by accused persons to pressurise the Government to withdraw Joint Forces from the Jhargram area by damaging railway tracks. The respondents were allegedly involved in the conspiracy through constant telephonic coordination and mobilisation on the night of the incident. Charges were framed under various sections of the IPC, the Indian Railways Act, and Sections 16/18 of the UAPA. Despite an earlier rejection of bail in 2016 and directions for an expedited trial, the High Court of Calcutta granted bail in 2022 and 2023, citing Section 436-A of the CrPC and the prolonged incarceration of the accused.

Court's Reasoning and Key Observations

The Court addressed four vital aspects in its analysis:

1. **Applicability of Section 436-A CrPC:** The Court noted that Section 436-A specifically excludes offences for which the punishment of death is specified. Since the respondents are being tried for Section 302 IPC and Section 16 UAPA, where death is a possible punishment, the section is inapplicable.
2. **Article 21 and National Security:** The jurisprudence of Article 21 recognises rights

such as speedy and fair trial as intrinsic to liberty, applying to every prisoner regardless of the offence. However, individual liberty must be balanced against the paramount considerations of national interest and sovereignty.

3. **Reverse Burden of Proof:** Under UAPA, a reverse burden of proof is imposed by Section 43E, requiring the accused to rebut the presumption of guilt. The Court reasoned that the judiciary must ensure incarcerated and socio-economically disadvantaged accused are meaningfully equipped to discharge this burden, as procedural delays in such regimes can make liberty hostage to "clogged dockets" and "lax prosecution".

4. **Trial Delay:** The Court lamented the "glacial pace" of the trial, noting that 28 witnesses remained to be examined 15 years after the incident. It observed that the High Court had directed the trial to be completed within a year back in 2016, a goal that remained unachieved by 2022.

Outcome

The Supreme Court allowed the criminal appeals to the extent of finding that the High Court erred in its legal interpretation of Section 436-A CrPC and issued the following directions:

1. Directions in personam

To address the "glacial pace" of the ongoing trial, the Court directed the Trial Court to immediately take stock of the matter and record a formal order explaining the specific reasons why the trial has remained pending for so many years. Following this assessment, the trial is mandated to proceed on a day-to-day basis. The Court explicitly ordered that the granting of adjournments shall be eschewed unless "exceptional circumstances" are clearly demonstrated. Furthermore, to ensure strict compliance, the Administrative Judge of the High Court is requested to seek a progress report from the Trial Judge every four weeks.

2. Directions in rem

Acknowledging that thousands of cases under the UAPA remain pending across India, the Court issued systemic mandates to safeguard the rights of those facing a reverse burden of proof.

a. **Legal Representation:** The State Legal Services Authority must take active steps to ensure every undertrial is aware of their right to representation, with legal aid counsel assigned expeditiously to prevent further delay.

b. **High Court Oversight:** The Chief Justices of all High Courts are requested to examine the volume of pending cases involving a reverse burden of proof and ascertain whether the number of Special Courts, judicial officers, and staff members is sufficient.

c. **Prioritisation and Prosecutors:** High Courts are to prepare lists organised by the date of registration, ensuring that the earliest cases are taken up first.

d. **Specific Mandate for Old Cases:** For any case pending for more than five years, the Court directed that the concerned judicial officer must record the reasons for previous adjournments, refrain from granting routine requests for more time, and conduct the trial on a day-to-day basis.

Rousanara Begum v. S. K. Salahuddin @ SK Salauddin & Anr. (2025 INSC 1375)

"The construction of this [Muslim Women (Protection of Rights on Divorce) Act, 1986] Act, therefore, must keep at the forefront equality, dignity and autonomy and must be done in the light of lived experiences of women where particularly in smaller towns and rural areas, inherent patriarchal discrimination is still the order of the day"

CORAM: Justice Sanjay Karol and Justice N Kotiswar Singh

In a judgment delivered on **02 December 2025**, a two-judge bench of the Supreme Court allowed the appeal and set aside the judgment and order of the Calcutta High Court. The appeal was preferred against the High Court's decision to overturn lower court findings that had granted the recovery of matrimonial properties to the appellant. The Supreme Court held that the Muslim Women (Protection of Rights on Divorce) Act, 1986 must be given a purposive construction to secure the dignity and financial protection of a Muslim woman post-divorce, which aligns with her rights under Article 21 of the Constitution of India.

Context/Background

The appellant and respondent were married in 2005 and divorced in 2011. Following the divorce, the appellant initiated proceedings under Section 3 of the 1986 Act seeking the recovery of a total of ₹17.67 lakh, including ₹7 lakh in cash and 30 *bhori* gold ornaments recorded in the *qabilnama* (marriage register) as having been given by her father. While the Trial Court and Sessions Court found the respondent liable to return these amounts based on the original marriage register, the Calcutta High Court set aside these orders. The High Court's reasoning was based on a discrepancy between the testimony of the Marriage Registrar (*Kazi*) and a previous statement made by the appellant's father.

Court's Reasoning and Key Observations

- **Purposive Construction v. Civil Dispute:** The Court observed that the High Court "missed the purposive construction goalpost" by treating the matter purely as a civil dispute. It held that judicial reasoning must be grounded in social justice adjudication to fulfill the Act's protective intent.
- **Entitlement under Section 3(1)(d):** In determining the object and purpose of the 1986 Act, the Court relied on the Constitution Bench decision in *Daniel Latifi v. Union of India (2001) 7 SCC 740*, which established that Section 3 clears the way for a woman to claim back properties from her husband to secure her future. The Court emphasised that Section 3(1)(d) of the 1986 Act entitles a divorced woman to "all the properties given to her before or at the time of marriage". It affirmed that goods given to a daughter or the bridegroom at the time of marriage are recoverable by the daughter after divorce.
- **Evidentiary Value of Marriage Records:** The Court rejected the High Court's reliance on the father's statement from a separate criminal trial, noting that an acquittal in a Section 498A-IPC case does not diminish the evidentiary value of the Marriage Registrar's testimony. It held that a registrar's statement, backed by the production of the original document, could not be discarded on mere suspicion of overwriting.

Decision/Directions

The Supreme Court allowed the appeal, restored the claim of the appellant, and directed the Respondent to remit the amount directly to the appellant's bank account. The Court further ordered that non-compliance with this direction within the stipulated time would attract interest at the rate of 9% per annum.

Smt. Bolla Malathi v. B. Suguna and Ors. (2025 INSC 1391)

"It is to provide for these very situations where a subscriber neglects to or fails to make such changes, that Rules have been prescribed, laying down how the money is to be distributed amongst survivors"

CORAM: Justice Sanjay Karol and Justice N Kotiswar Singh

In a judgment delivered on **05 December 2025**, a two-judge bench allowed the appeal and set aside the Bombay High Court's order, thereby upholding the Central Administrative Tribunal's (CAT) direction to distribute funds equally. The Supreme Court observed that a nomination made by a subscriber becomes invalid upon the subscriber "acquiring a family" through marriage, even if the deceased had not made changes to the nomination for GPF.

Context/Background

The appeal involved a dispute between the wife (appellant) and the mother (respondent no. 1) of a deceased employee of the Defence Accounts Department regarding General Provident Fund (GPF) proceeds. When the deceased joined service in 2000, he nominated his mother as the recipient of his GPF; however, he married the appellant in 2003 and, while updating other service benefits in her favour, failed to update the GPF nomination before his death in 2021. The CAT ordered that the funds be split equally because the original nomination had become invalid upon marriage, but the High Court reversed this, ruling that the nomination remained valid because the subscriber had not followed the formal procedure for cancellation.

Court's Reasoning and Key Observations

- **Nomination vs. Succession:** Relying on *Shakti Yezdani v. Jayanand Jayant Salgaonkar*, the Court reaffirmed that a nomination does not confer absolute title upon the nominee; it merely identifies the person authorised to receive the amount, while the actual entitlement is governed by the law of succession.
- **Automatic Invalidation by Rule:** The Court held that the GPF(CS) Rules and the specific conditions in the nomination form stipulate that a nomination becomes invalid the moment a subscriber acquires a family (marriage). And since, the original nomination in favour of the mother became void by function of the marriage in 2003, and no new valid nomination subsisted at the time of death, the funds must be distributed to all eligible family members in equal shares as per GPF(CS) Rules and the Official Manual (Part V) for CDA (Funds).
- **Subscriber Negligence:** The Court noted that the Rules are specifically designed to provide for situations where a subscriber neglects or

fails to update nominations, ensuring the money is distributed among survivors rather than remaining with an invalid nominee.

Decision/Directions

The Supreme Court allowed the appeal and set aside the High Court's judgment, ruling that the GPF proceeds must be distributed between the wife and the mother in equal shares. As the appellant (wife) had already received her half-share per the CAT's order, the Court directed that the remaining half-share currently held by the High Court Registrar be released to the mother upon her application.

Kiran v. State of Karnataka (2025 INSC 1453)

"Balancing, the need to provide proportionate punishment at least in crimes which shocks human society, with the need to avoid death; an irreversible penalty, a middle ground was found… this Court considered the possibility of expanding the options so as to cover the 'vast hiatus between 14 years imprisonment of life and death"

Coram: Justice Ahsanuddin Amanullah and Justice K Vinod Chandran

In a judgment delivered on **18 December 2025**, a two-judge Bench upheld the conviction of the accused under Section 302 of IPC 1860, while modifying the sentence from *"till the end of his natural life"* to imprisonment for life only.

Context/Background

In the present case, the accused set ablaze the victim (*a widow*) and later she succumbed to her injuries due to 60% burns. The trial court convicted the accused and sentenced him to life imprisonment, *meaning for the rest of his natural life,* and directed that he not be granted remission.

Court's Reasoning and Key Observations

A. On Conviction (Upheld): The Court upheld the conviction to be proper after reviewing the evidence and finding compelling circumstances, including the testimony of witnesses which stands corroborated accompanied by two dying declarations made by the deceased in addition to the medical evidence confirming death due to burns.

B. On Sentencing Powers of Sessions Courts: The Supreme Court held that the Sessions Court exceeded its jurisdiction while imposing a *"till the end of natural life"* sentence without remission:

- **Exclusive Jurisdiction of Constitutional Courts:** The Court reiterated that the power to impose life imprisonment without remission punishment for certain crimes that are not "rarest of the rare" enough for the death penalty, but warrant more than the standard 14-year interpretation of life imprisonment, is vested only upon the Constitutional Courts, i.e. High Courts and the Supreme Court.
- **Statutory Limits:** The Sessions Court, *being a creation of CrPC*, itself cannot curtail the statutory powers of remission and commutation provided to the State Government as envisaged under the

CrPC or the Constitutional powers under Articles 72 and 161.

C. On Set-Off (Section 428 CrPC)

- Mandatory Provision: The Court ruled that Section 428 CrPC mandates that the period of detention undergone during investigation and trial *must* be set off against the term of imprisonment.
- No Discretion: The Sessions Court is not empowered to deny this statutory right. Accordingly, the direction to prohibit set-off was deleted.

Outcome

The Supreme Court ***partly allowed*** the appeal by modifying the sentence to imprisonment for life under Section 302 IPC, removing the *"till natural life"* condition and entitling the accused to set-off under Section 428 CrPC and may avail the remission or commutation, subject to government policy.

K.P. Kirankumar @ Kiran v. State by Peenya Police (2025 INSC 1473)

"Child trafficking and commercial sexual exploitation - offence that strikes at the very foundations of dignity, bodily integrity and the State's constitutional promise of protection to every child against exploitation leading to moral and material abandonment"

Coram: Justice Manoj Misra and Justice Joymalya Bagchi

In a judgment delivered on **19 December 2025**, a two-judge bench dismissed the appeal and upheld the High Court's order of conviction and sentence. The Supreme Court observed that judicial appreciation of a minor sex trafficking victim's evidence must be marked by sensitivity and realism, and a conviction may be maintained on her sole testimony if it appears credible and convincing.

Context/Background

The appeal challenged the Karnataka High Court judgment which dismissed the appellant's appeal against the Trial Court's conviction. The appellant (A1) and his wife (A2) were accused under Sections 366A, 372, 373, and 34 of the IPC read with Sections 3, 4, 5, and 6 of the Immoral Traffic (Prevention) Act (ITPA). On 22.11.2010, a raiding party, acting on information from an NGO, sent a decoy witness (PW-8) to a rented house in Bangalore where he offered money to the appellant for sex with a minor victim (PW-13); the police subsequently rescued the minor and recovered the money and incriminating articles.

Court's Reasoning and Key Observations

- **Standard for Appreciating Victim Evidence:** The Court emphasised that a minor victim of sex trafficking is not an accomplice and her deposition is to be given due regard and credence as that of an injured witness. If the version appears credible, a conviction may be maintained on her sole testimony.

- **Age Determination:** The Court held that the age of the victim on the date of the incident was proved as 16 years and 6 months based on the letter issued by the School Headmaster recording her date of birth as 24.04.1994. Rebuffing the appellant's submission that the evidence was unreliable due to the absence of an ossification test, the Bench observed that such a test is a mere approximation and cannot have better probative value than a certificate issued by the school. Drawing upon *Jarnail Singh v. State of Haryana (2013) 7 SCC 263*, the Court affirmed that the date of birth recorded in the school first attended by the victim takes precedence over medical opinion and acts as the highest rated option to conclusively determine the age of a minor.

- **Search and Substantial Compliance (Section 15(2) ITPA):** Regarding the procedural challenge under Section 15(2) of the ITPA, the Court clarified that an infraction of such provision is an irregularity and does not per se vitiate the trial unless it results in failure of justice. The Bench concluded there was substantial compliance with statutory requirements as the search was witnessed by respectable and independent persons.

Moreover, the Court established four specific guidelines to be followed when appreciating the evidence of a minor victim of trafficking:

1. **Socio-Economic Vulnerability:** Courts must bear in mind the victim's inherent socio-economic and, at times, cultural vulnerability, especially when the minor belongs to a marginalised or socially and culturally backward community.

2. **Complexity of Organised Crime:** Trafficking involves a complex and layered structure of organised crime networks where activities like recruiting, transporting, and exploiting operate as apparently independent verticals veiled through subterfuges and deception. Because of this disjointed structure, a victim's failure to promptly protest should not be used as a ground to discard her version as improbable or against ordinary human conduct.

3. **Secondary Victimisation and Sensitivity:** Narration of sexual exploitation is an unpalatable experience leading to secondary victimisation, exacerbated by threats, fear of retaliation, and social stigma. Consequently, judicial appreciation of the victim's evidence must be strictly marked by sensitivity and realism.

4. **Weight of Sole Testimony:** If the victim's version is credible and convincing, a conviction may be maintained on her sole testimony. A minor victim of sex trafficking is not an accomplice, and her deposition must be given the same regard and credence as that of an injured witness.

Outcome

The Supreme Court affirmed the lower courts' findings, stating that the prosecution had proven its case beyond reasonable doubt. Consequently, the Bench dismissed the appeal and upheld their conviction under Sections 366A, 373, and 34 of the IPC as well as Sections 3, 4, 5, and 6 of the ITPA.

Ranjeet Baburao Nimbalkar v. State of Maharashtra & Anr. (2025 INSC 1460)

"The power under Section 51(3) of the States Reorganisation Act, 1956 is an independent and continuing power vested in the Chief Justice of a High Court to appoint additional places of sitting for the more convenient transaction of judicial business, subject to the approval of the Governor"

Coram : Justice Aravind Kumar and Justice N V Anjaria

In a judgment dated **18 December 2025**, a two-judge bench upheld an administrative notification designating Kolhapur as an additional place of sitting for the High Court of Judicature at Bombay, clarifying the scope of the Chief Justice's power under the States Reorganisation Act, 1956.

Context/Background

The petitioner filed a writ petition under Article 32 of the Constitution challenging an administrative notification issued by the Bombay High Court on 01 August 2025. This notification appointed Kolhapur as a place where Judges and Division Courts of the High Court may sit, specifically to handle cases arising from the districts of Kolhapur, Sangli, Satara, Ratnagiri, and Sindhudurg. The notification was issued under Section 51(3) of the States Reorganisation Act, 1956, with the approval of the Governor of Maharashtra.

The petitioner sought to quash this notification, arguing that Section 51(3) was intended only for temporary exigencies rather than permanent institutional arrangements, which the petitioner claimed should require a Presidential Order under Section 51(2). Additionally, the petitioner contended that the decision was arbitrary because it ignored other regional demands, lacked Full Court consultation, and reversed several decades of past administrative rejections without a demonstrated change in circumstances

Court's Reasoning and Key Observations

ISSUE I - Construction and Scope of Section 51(3) of the States Reorganisation Act, 1956

- **Independent Statutory Power:** The Court held that Section 51(3) provides the Chief Justice with an independent and continuing power to appoint places of sitting to ensure the convenient transaction of judicial business. According to Section 14 of the General Clauses Act, this statutory power is not exhausted by a single use and may be exercised repeatedly as circumstances demand.

- **Doctrine of Territorial Bifurcation:** Citing *State of Maharashtra v. Narayan Shamrao Puranik*, the Court distinguished between a permanent bench under Section 51(2), which requires territorial bifurcation, and a sitting under Section 51(3), which is a purely internal administrative matter. It observed that judges sitting at an additional place remain part of the same High Court and continue to exercise its unified jurisdiction.

ISSUE II - Administrative Authority of the Chief Justice and the Question of Consultation

- **Chief Justice as Master of the Roster:** Relying on *State of Rajasthan v. Prakash Chand*, the Court reaffirmed that the Chief Justice is the "master of the roster" and the sole authority for the allocation of judicial work. This administrative primacy extends to determining where the court sits to best manage its docket and serve regional needs.

- **Institutional Opinion and Precedent:** The Court referenced *Federation of Bar Associations in Karnataka v. Union of India* to emphasise that when a Chief Justice expresses an administrative opinion, it constitutes the institutional view of the High Court. Consequently, no bench or sitting should be established contrary to the Chief Justice's specialised understanding of the court's requirements.

- **Validation of Statutory Framework:** Drawing on the Madras High Court judgment in *R. Suresh Kumar v. Union of India*, the Court noted that Section 51 provides a complete framework for High Courts to function away from their principal seats. Such arrangements are intended to reduce hardship for litigants and do not fragment the court's constitutional identity.

- **Consultation Requirements:** The Court clarified that while Section 51(2) mandates a complex consultative process, Section 51(3) explicitly requires only the approval of the Governor. It reasoned that judges cannot judicially impose a requirement for Full Court approval when the legislature deliberately chose to omit it from the statute.

ISSUE III - Effect of Past Administrative Decisions and Subsequent Change in Approach

- **Rejection of Administrative Estoppel:** The bench ruled that past rejections of similar proposals by earlier committees do not bar a successor Chief Justice from taking a different view. Administrative decisions are inherently contextual and must remain open to reconsideration as litigation patterns and infrastructure evolve.

ISSUE IV - Limits of Judicial Review in Matters of Judicial Administration

- **Limits of Judicial Review:** The Court noted that judicial review is concerned with the legality of the decision-making process rather than the merits of policy choices. Since the notification was within jurisdiction and free from mala fides, the Court exercised restraint to preserve the High Court's administrative autonomy.

ISSUE V - Challenge under Articles 14 and 21: Arbitrariness and Access to Justice

- **Article 14 and Rational Nexus:** Regarding the challenge of arbitrariness, the Court held that Article 14 does not require the State to address all regional demands simultaneously. It found a clear rational nexus in selecting Kolhapur as a central location for a specific cluster of distant districts to facilitate better judicial access.

- **Access to Justice under Article 21:** Invoking *Anita Kushwaha v. Pushap Sudan*, the Court affirmed that the right of access to justice is a fundamental facet of the right to life. Decentralising sittings brings the judiciary closer to litigants who would otherwise face undue hardship, thereby advancing constitutional guarantees.

- **Absence of Territorial Division:** Citing the Karnataka High Court in *E. Ram Mohan Chowdry v. Registrar General,* the Court held that circuit benches established for the convenience of litigants do not constitute an impermissible division of the High Court. It reiterated that the paramount consideration in such administrative sittings must always be the convenience of the public.

Outcome

The Supreme Court concluded that the Chief Justice acted within the scope of his statutory powers and that the notification facilitated the constitutional goal of access to justice. The exercise of administrative power by the Chief Justice under Section 51(3) does not denude or dilute the Union Government's power to establish permanent benches under Section 51(2). Accordingly, the writ petition was dismissed.

Training Hub

Induction Training Programme for Newly Recruited Junior Court Assistants (Batch-2)





01- 03 December 2025 : The Training Cell organised a three-day Induction Training Programme for the second batch of newly recruited Junior Court Assistants. The programme provided participants with a comprehensive overview of the Supreme Court Rules, 2013, Supreme Court Officers and Servants Rules, 1961, along with an introduction to Civil and Criminal matters, the principles of Noting and Drafting, functioning of the administrative side of the Supreme Court and other topics essential for their roles. Shri Bharat Parashar, Secretary General, Supreme Court of India, addressed the participants during the Valedictory Session, emphasising the critical role played by dealing assistants in the smooth functioning of the Court

Visit of Military Officers from the Institute of Military Law to the Judges' Library



09 December 2025: Ms Gracy L. Bawitlung (Registrar[J], Library), Dr Jyotsna Eveline Reuben (Director, Library) and Shri Brij Bhooshan Khare (Chief Librarian) along with the group of Military Officers from the Institute of Military Law at the Judges Library

Workshop on Right to Information



05 December 2025 : The Training Cell conducted a Workshop on the Right to Information for the Branch Officers of the Registry to enhance their understanding of its statutory responsibilities and compliance requirements. The session was conducted by resource persons Ms Himani Sarad, Additional Registrar, and Mr Ravi Shanti Bhushan, Deputy Registrar, who shared valuable insights on the RTI framework, practical application handling, timelines, exemptions, and the best practices observed within the Registry. Additionally, Ms Kaveri, Registrar (J), Training Cell, addressed the participants, stressing the significance of clear communication and meticulous record management for the efficient resolution of RTI matters

Training Programme on Gender Sensitisation for Senior Court Attendants and Junior Court Attendants



05 December 2025: The Training Cell organised a programme on gender sensitisation for Senior Court Attendants and Junior Court Attendants, encompassing awareness sessions on gender sensitivity and the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013, as part of the institution's efforts to promote gender awareness, inclusivity, and a respectful working environment

Training Programme on CPP Portal and Central Government Rules/ GFR rules



12 December 2025: A Training Programme on CPP Portal and Central Government Rules/GFR Rules was conducted for staff of Admn Materials Branch. The Resource persons from NIC enlightened the trainees with Bid Creation (including BOQ), Procurement Cycle (Technical Evaluation, Financial Evaluation, Bid Opening), BOQ Creation on CPPP , Practical usage-based queries on CPP Portal based on Central Govt Services (GFR) Rules

Workshop on Financial Management



13 December 2025:
The Training Cell organised a Workshop on Financial Management for the Additional Registrars, Deputy Registrars, and Assistant Registrars of the Registry. The programme was facilitated by a team led by Shri Vijayant Verma, Chief General Manager and Regional Director of the Securities and Exchange Board of India (SEBI), who provided in-depth insights into savings, investments and financial management principles

Training on Working of Courts



22 December 2025: A Training on 'Working of Courts' was held for the concerned officers/officials (non-shorthand), who are deputed/posted in Court Masters' Wing and Registrar Courts 1 & 2. The session was conducted by the resource persons, Ms Preethi TC and Mr Nand Kishor, encompassing modules on enhanced understanding of Court procedures, and developing proficiency in digital tools including ICMIS

Workshop on Income Tax Provisions

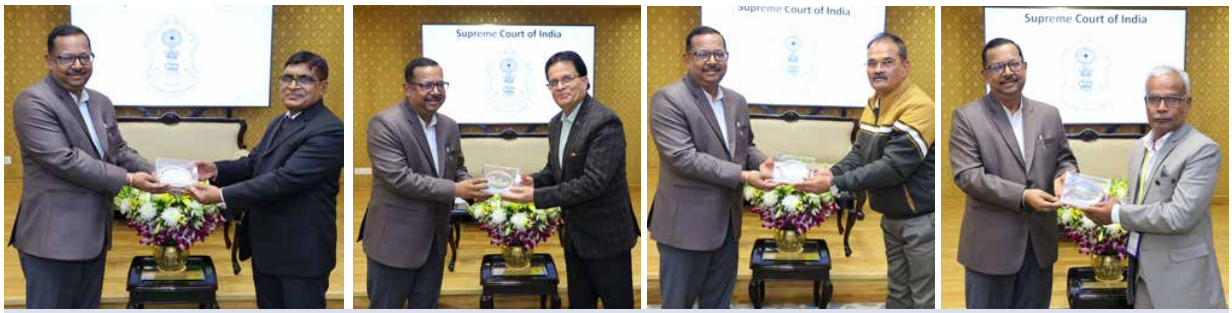


20 December 2025: The Training Cell organised a Workshop on 'Income Tax Provisions' for the Branch Officers and Officers holding equivalent designation of the Registry. The programme was conducted by the resource person, Mr Vijay Kumar Gupta, Chartered Accountant from the Institute of Chartered Accountants of India (ICAI), providing an overview of the Income Tax Act, including the distinctions between the Old and New Tax Regimes

Bid Adieu



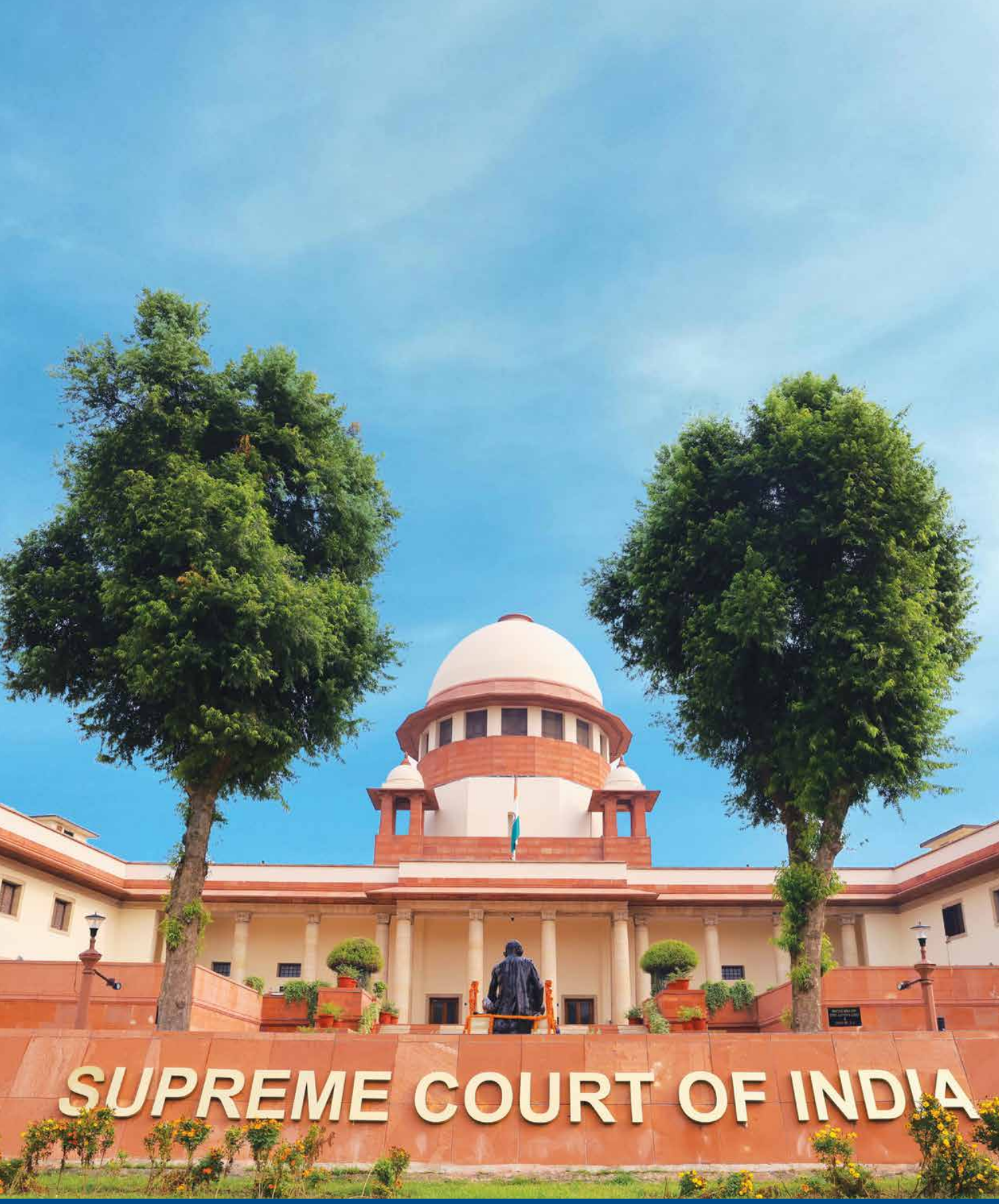
31 December 2025 : Justice Ujjal Bhuyan, Judge, Supreme Court of India, attended the retirement function held to felicitate the retiring employees (L–R) – Shri Ajay Kumar Sharma, Restorer (Lib) Grade II; Shri Dayal Singh Negi, Restorer Grade-I; Shri Tasavvar Husain, Branch Officer and Shri Pooran Singh Chauhan, Senior Chauffeur



31 December 2025: Justice Ujjal Bhuyan, Judge, Supreme Court of India, presented a memento to felicitate the retiring employees

31 December 2025: Justice Ujjal Bhuyan, Judge, Supreme Court of India, interacted with the families of the retiring employees at their retirement reception





Supreme Court of India
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