Supreme Court *Chronicle*

Issue XXII | August 2025 (Covering Events of July 2025)

Highlights

- *Justice in Full Motion*
- *Training the District Judiciary*
- *North Zone Regional Conference, NALSA: A Deeper Collaboration between the Bench and the Bar*











Message from the Secretary General

Dear Readers,

I am pleased to present the latest edition of the Supreme Court Chronicle. In every edition of the Chronicle, we strive to offer a unique perspective on the functioning of the Court.

This edition attempts to encapsulate the spirit of cooperation, mutual learning, and shared responsibility that defines our judicial system. It highlights how the Bar and the Bench work in unison to uphold constitutional values, ensure access to justice, and extend legal aid to the last citizen of the country. To this end, this edition comprehensively covers the North Zone Regional Conference organised by Jammu & Kashmir High Court in collaboration with NALSA and Jammu & Kashmir Legal Services Authority on the theme 'In Conversation with the Bar: A Shared Vision for Legal Transformation'.

In continuation of our feature "Not Vacations: Justice 24x7" from the July 2025 edition, this edition also provides further insight into the functioning of the partial court working days till mid-July. This edition further dwells on the relevance and vitality of the interaction of the Supreme Court judges with judges of the district judiciary as well as other institutions. These engagements are based on the foundational principle that justice must be dispensed at every level with equal integrity, commitment, and constitutional fidelity.

I hope this edition of the Chronicle inspires the Bar and the Bench to continue embodying the collaborative spirit which is at the very heart of its commitment to justice. I wish this edition keeps you informed and connected until we meet again.

Shekhar C Munghate
Secretary General
Supreme Court of India

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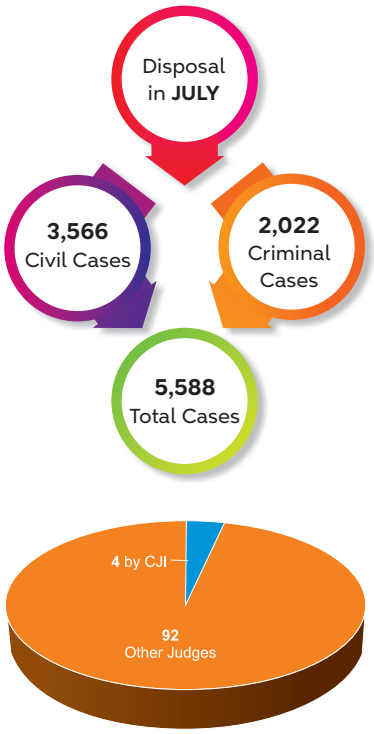
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Justice in Full Motion

As per its practice, the Supreme Court remained open during summer 2025 and operated with a modified schedule to ensure that judicial work continues uninterrupted. The Court returned to its full roster from 14 July 2025. The rotational benches, which functioned from May to mid-July, ensured that urgent matters were heard without delay and judicial output remained steady. Simultaneously, the partial working days enabled the Registry and supporting staff to streamline case management, update records and prepare for heavier rosters ahead.



Judgments Pronounced by Judges of the Supreme Court of India in 2nd Fortnight of July 2025

This transition from its modified summer schedule into full-roster functioning in July 2025 reflects the continuity that defines judicial commitment. Upon the reopening of the Supreme Court after Partial Court Working Days, the Filing Counter on 14 July 2025 remained open beyond officer hours up to 9 p.m. to facilitate the filing of matters involving limitation.[1]

In the month of July 2025, over 7500 matters were instituted in the Supreme Court, and approximately, 5588 matters were disposed of, resulting in a 74.42% disposal rate.[2]

With the reopening of the full calendar, Constitution Bench hearings, final arguments in high-stakes matters, and pronouncements of reserved judgments have taken centre stage. **The second fortnight of July alone saw approximately 96 judgments being pronounced. Of these, four judgments were pronounced by the Court of the Chief Justice.**[3]

This seamless switch, from partial Court working days to full working days, highlights the ethos that justice in the highest court does not rest; instead, it realigns. The summer months serve not as a judicial pause but as a recalibration, enabling judges to balance courtroom hearings with deep judicial writing and case preparation.

Alongside the resumption of the full roster, the Registry has also been actively refining and streamlining its processes for listings, filings, and digitisation to manage the heightened workload effectively. In July alone, 26,444 matters were listed. Each appearance of a matter during the month is counted individually, underscoring both the scale of judicial activity and the precision of the Court's administrative machinery.[4]

Ultimately, what July 2025 affirms is what past years have already hinted at: the Supreme Court's commitment is year-round. From Benches in partial working days to Benches during regular working days , justice is not seasonal, but ceaseless.

1 Circular dated 11.07.2025, Section IB. *Available at:* https://cdnbbsr.s3waas.gov.in/s3ec0490f1f4972d133619a60c30f3559e/uploads/2025/07/2025071113.pdf

2 Instituted/Disposal in last month. *Available at:* https://scdg.sci.gov.in/scnjdg/

3 Judgments, Supreme Court of India. *Available at:* https://www.sci.gov.in/judgements-judgement-date/

4 Source: Computer Cell, Supreme Court of India

Global Engagements





7 July 2025: Justice Surya Kant, Judge, Supreme Court of India delivered a speech on the topic 'Human Rights, the Indian Constitution and India as a Resilient Power', in a special events/lecture series organised by the Institute for Security and Development Policy (ISDP) under the Stockholm Center for South Asian and Indo-Pacific Affairs of the ISDP and in close cooperation with the Embassy of India in Stockholm, Sweden. Further, on 10 July 2025, Justice Surya Kant, delivered a keynote address at the round-table talk on 'Reimagining International Arbitration: India's Emergence as a Global Arbitration Destination' organised by the Sweden-India Business Council in Gothenburg, Sweden

11 July 2025: Justice Surya Kant, Judge, Supreme Court of India, addressed the Indian diaspora at the Swedish Indian Diaspora Association, Gothenburg, Sweden





1 July 2025: Justice Sanjay Karol, Judge, Supreme Court of India, attended the Meeting of the Board of Directors of the International Institute for Justice Excellence, Hague, Netherlands

National Engagements



5 July 2025: Justice BR Gavai, Chief Justice of India, attended the event as keynote speaker to commemorate '90 years since Dr BR Ambedkar was appointed as Principal of Government Law College in 1935', organised by Government Law College, Mumbai

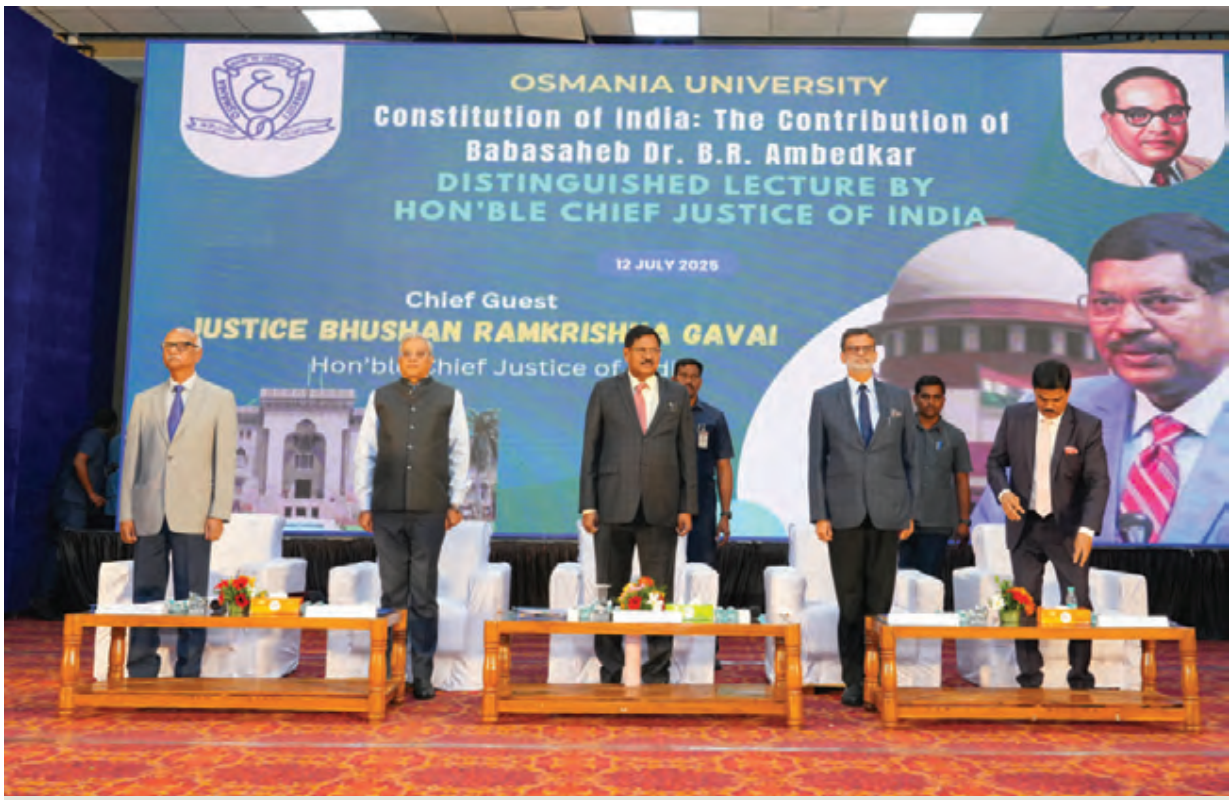


5 July 2025: Justice BR Gavai, Chief Justice of India, attended as the Guest of Honour, his Felicitation Ceremony organised by the Bombay High Court. The event was also attended by Justice Dipankar Datta, Justice Ujjal Bhuyan, Justice Prasanna Bhalachandra Varale and Justice Atul Sharachchandra Chandurkar, Judges, Supreme Court of India wherein Justice Chandurkar delivered a speech at the event. Dr Tejaswini Gavai, spouse of Justice BR Gavai, also accompanied him at the event





12 July 2025: Justice BR Gavai, Chief Justice of India, along with Justice PS Narasimha, Judge, Supreme Court of India, attended the 22nd Annual Convocation Programme by NALSAR University, Hyderabad



12 July 2025: Justice BR Gavai, Chief Justice of India, along with Justice PS Narasimha, Judge, Supreme Court of India, attended as Distinguished Guests, the programme on 'Constitution of India: The Contribution of Babasaheb Dr BR Ambedkar' organised by Osmania University, Hyderabad







19 July 2025: Justice BR Gavai, Chief Justice of India, attended the Van Mahotsav 2025, a plantation drive under the initiative 'Ek Ped Maa Ke Naam 2.0' organised by the Government of NCT of Delhi at PBG Ground, Delhi Ridge, Delhi. The event was attended by 20 judges of the Supreme Court of India including Justice Surya Kant and Justice MM Sundresh, Judges, Supreme Court of India







26 July 2025: Justice BR Gavai, Chief Justice of India, along with Justice Atul Sharachchandra Chandurkar, Judge, Supreme Court of India, attended the Inauguration function of 'E-Library' in the memory of Late Advocate TR Gilda at the Amravati District & Sessions Court Building, Amravati



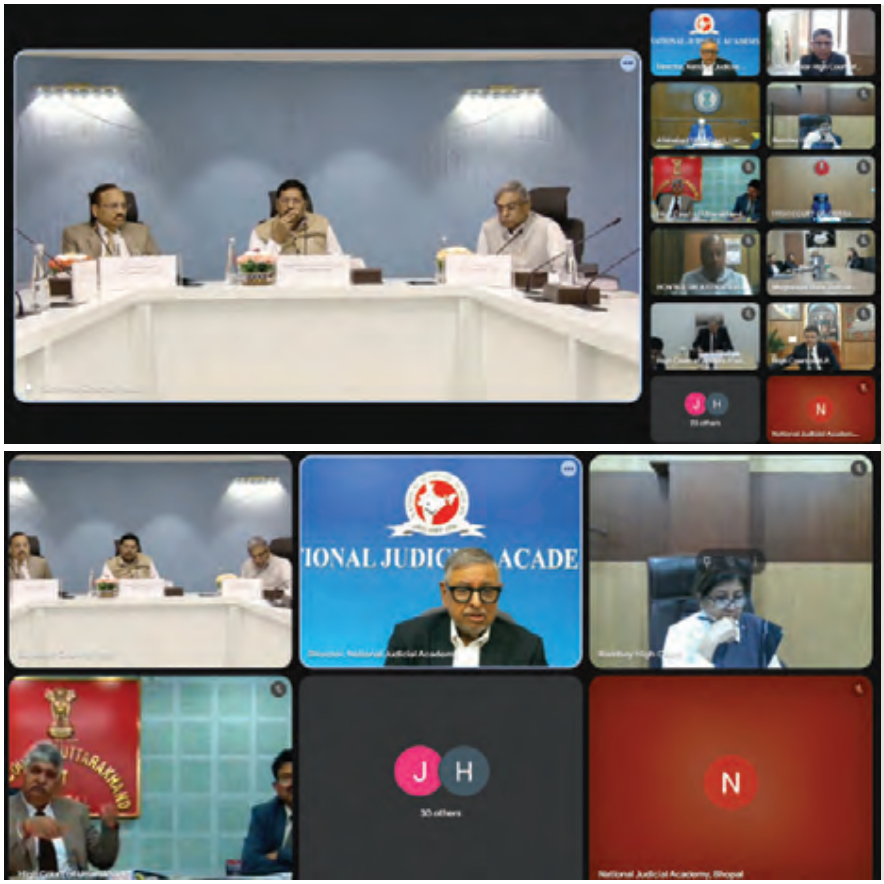


26 July 2025: Justice BR Gavai, Chief Justice of India, along with Justice Atul Sharachchandra Chandurkar, Judge, Supreme Court of India, visited the Sipna Engineering College, Badnera Road, Amravati





27 July 2025: Justice BR Gavai, Chief Justice of India, attended the felicitation ceremony at the Mega Alumni Meet-2025 hosted by the University of Kashmir, Hazratbal, Srinagar. The event was also attended by Justice Surya Kant, Justice Vikram Nath, Justice PS Narasimha, Justice Pankaj Mithal and Justice Rajesh Bindal, Judges, Supreme Court of India. Kiren Rijiju, Union Minister for Parliamentary & Minority Affairs, Justice Arun Palli, Chief Justice of High Court of J&K and Ladakh, Omar Abdullah, Chief Minister of J&K, Justice Ali Mohammad Magrey, Former Chief Justice of J&K and Ladakh High Court, and Prof Nilofer Khan, Vice Chancellor, Kashmir University, also graced the occasion



29 July 2025: Justice BR Gavai, Chief Justice of India and Chairperson, National Judicial Academic Council (NJAC) along with Justice Surya Kant and Justice Vikram Nath, Judges, Supreme Court of India and Members, NJAC attended the 10 th NJAC Meeting through online mode. The meeting was further attended by Justice Aniruddha Bose (Retd) Director, National Judicial Academy India, Mr Raj Kumar Goyal, Secretary (Justice) Department of Justice, Govt of India, Dr Menka Guruswamy, Sr Advocate, Supreme Court of India and Prof (Dr) Sudhir Krishnaswamy, Vice Chancellor of NLSIU along with the President/ Chairman/Judges In- charge of the respective States and members of the NJAC. The academic calendar of NJA and that of all State Judicial Academies was approved in the meeting



6 July 2025: Justice Surya Kant and Justice Vikram Nath, Judges, Supreme Court of India, attended the Valedictory function of the State Level Stakeholders Consultation Meet – 2025 on the topic 'Voice for the Voiceless: Rights and Protection of Children of Sexual Abuse' organised under the aegis of the Women Safety Wing, Telangana State Police, in collaboration with Women Development Camp, Child Welfare Department, Telangana State Legal Services Authority, Hyderabad and UNICEF at Hyderabad, Telangana





26 July 2025: Justice Vikram Nath, along with Justice Sudhanshu Dhulia, Justice Pankaj Mithal and Justice Manoj Misra, Judges, Supreme Court of India, at the Felicitation Ceremony organised by the University of Allahabad Alumni Association, Allahabad





19 July 2025: Justice Sudhanshu Dhulia, Judge, Supreme Court of India, delivered a lecture at the Graphic Era Deemed to be University, Dehradun





23 July 2025: Justice Sudhanshu Dhulia, Judge, Supreme Court of India, attended as Chief Guest, the symposium organised by Federation of Indian Corporate Lawyers (FICL), wherein he delivered the keynote on the topic 'Arbitration in India: The Road Ahead', at the India International Centre, New Delhi







27 July 2025: Justice Sudhanshu Dhulia, Judge, Supreme Court of India, inaugurated the School's Girls hostel at Sainik School, Lucknow and paid floral tributes to all the martyrs at the War Memorial, Lucknow



6 July 2025:
Justice Ahsanuddin Amanullah, Judge, Supreme Court of India, inaugurated the newly built Additional Advocate General's Office in the Patna High Court premises, Patna





18 July 2025: Justice Rajesh Bindal, Judge, Supreme Court of India, delivered a memorial lecture at Shri Anand Swaroop Annual Law Lecture Series on the theme of 'Fundamental Duties in the Constitution – A Step towards Responsible Citizen' organised by Sharda School of Law, Sharda University Campus, Greater Noida. Justice Bindal also inaugurated the newly constructed Anand Swarppo Gupta Moot Court Hall, Sharda School of Law at Sharda University Campus, Greater Noida

18 July 2025: Justice KV Viswanathan, Judge, Supreme Court of India, participated in the '10 years of Friday Group Journey and Celebrations' at Library-II, Supreme Court of India







21 July 2025: Justice KV Viswanathan, Judge, Supreme Court of India, attended a meeting with a three-member delegation from the Law Society of England and Wales, headed by Mr Richard Atkinson, President of the Law Society of England and Wales, during their visit to the Supreme Court of India. The other members of the delegation comprised Ms Donna Evans, International Policy Manager and Ms Preeti Sawhney, International Policy Adviser



13 July 2025: Justice N Kotiswar Singh, Judge, Supreme Court of India, attended the 3rd Convocation of the Lapidary Foundation at the University of Kashmir, Srinagar



15 July 2025: Justice Sandeep Mehta, Judge, Supreme Court of India, attended a meeting with a four-member delegation from the Ministry of Justice, London, UK, headed by Mr Andy Rogers, Director, Operational Security Group, His Majesty's Prison and Probation Service at the Supreme court of India. The other members of the delegation comprised Mr John Sheehan, Deputy Chief Prosecutor and Head of Extradition, Crown Prosecution Service, Ms Sarah Lumsden, Head of International Policy, Crown Prosecution Service, and Ms Grace Karrass, Senior Policy Advisor





28 July 2025: Justice Joymalya Bagchi, Justice Nilay Vipinchandra Anjaria, Justice Vijay Bishnoi and Justice Atul Sharachchandra Chandurkar, Judges, Supreme Court of India, were honoured at their Felicitation Ceremony organised by the All India Senior Advocates Association at the Speaker Hall of Constitution Club, Rafi Marg, New Delhi. Justice Rajesh Bindal and Justice Prasanna Bhalachandra Varale, Judges, Supreme Court of India,were also present as guests on the ocassion

Training the District Judiciary

Globally, countries see judicial training as a lifelong professional obligation rather than a preliminary rite of passage. The Council of Europe's Consultative Council of European Judges regards both initial and in-service training as essential to independence, impartiality, and public confidence, placing a duty on every judge to keep knowledge and skills current and up to date.[1] Similarly, several countries have recognised the critical role of language and behaviour in public service delivery and have institutionalised training to promote respectful communication. For instance, the National Judicial Institute (NJI) in Canada, offers professional development for judicial officers with an emphasis on cultural competence, respectful communication, and sensitivity toward marginalised groups. The Civil Service College in Singapore also provides public officers with courses that reinforce the importance of a "citizen-first" approach.[2]

Training judicial officers directly enhances the courtroom's effectiveness and sharpens the judicial officers' assessment, judgment-writing, and stress management skills. Thus, by periodically interacting with Supreme Court's judges, judicial officers' competencies in these fields are continually reinforced.[3] Moreover, these interactions prove fruitful for newly inducted members of the judiciary since it provides them with unparalleled insights into the adjudication process and thought process required to deliver nuanced judgements.[4] Such engagements also provide an opportunity to sensitise Trial Court judges to emerging areas of law that require urgent and consistent attention, including environmental jurisprudence, digital rights, gender-based violence, and economic offences.

Conversely, these interactions create a capillary movement across all the institutions of the judiciary, thereby allowing judges of the Supreme Court to gain insights into the realities on the ground, which ultimately strengthens the machinery of the judiciary.

Hence, district judges, as the first line of interaction between the judicial system and the public, should not be viewed merely as executors of directives but as autonomous constitutional actors in their own right. In turn, it is the district judges who must also ensure that they remain untouched by even the faintest trace of a colonial hangover, shun any echo of a feudal approach in their dealings with their court staff, litigants, advocates or the public in general. An attitude must be cultivated where justice is perceived as a service, leading to an approach not just humanistic but also humble.

Reframing this dynamic is essential not only for maintaining institutional integrity, but also for promoting a culture of mutual learning and constitutional conversation within the judiciary. The Supreme Court, and National and State Judicial Academies, have always held themselves responsible for shaping the intellectual and ethical

1 The changing face of disputes involving Indian parties, the changing face of disputes involving Indian parties, the changing face of disputes involving Indian parties Consultative Council Of European Judges, Strasbourg, 27 November 2003 CCJE (2003) Op. N° 4, accessible at <https://rm.coe.int/1680747d37>

2 Rajesh Ranjan, "Why Public Servants Need to Be Polite", The Wire, 18 May, 2025. *Available at:* https://thewire.in/government/why-public-servants-need-to-be-polite

3 Sharma, S. K., & Batra, B. (2023). Justice and Judicial Education: An Unbreakable Bond Cemented by the Rule of Law. *Asian Journal of Legal Education, 11(1)*, 36-43. https://doi.org/10.1177/23220058231206953 (Original work published 2024)

4 Livingston Armytage, *Educating Judges: Towards Improving Justice, A Survey of Global Practice,* Brill 2015. See also https://ejtn.eu/wp-content/uploads/2023/12/EJTN_catalogue_training_activities_2024.pdf



5-6 July 2025: Justice BV Nagarathna and Justice N Kotiswar Singh, Judges, Supreme Court of India, attended the National Conference on 'Effective implementation of the POSH Act, 2013', at the National Judicial Academy, Bhopal, organised by Gender Sensitization and Internal Complaints Committee (GSICC) in association with National Judicial Academy, Bhopal

temperament of the trial judiciary, which often operates in conditions of resource constraint and systemic pressure.

The month of July witnessed meaningful interactions between the higher judiciary and members of the district judiciary across various forums and training academies. The Judges of the Supreme Court visited several State Judicial Academies and District Courts, engaging directly with trial court judges, judicial officers in training, and administrative staff.

Legal Aid

Drug-Free Future & Reformative Justice





4 July 2025: Justice Surya Kant, Judge, Supreme Court of India and Executive Chairman, National Legal Services Authority (NALSA), at the inaugural ceremony of the dedicated De-Addiction Centre at Chanchalguda Central Prison, Hyderabad. The landmark initiative was launched to provide medical treatment, psychological counselling, and holistic rehabilitative support for inmates battling substance abuse, marking it a significant step towards rehabilitation, social reintegration, and reducing recidivism

National Virtual Consultative Meeting



23 July 2025: Justice Surya Kant, Judge, Supreme Court of India and Executive Chairman, National Legal Services Authority (NALSA), along with Justice Vikram Nath, Justice, Justice BV Nagarathna, Justice JB Pardiwala, Justice Dipankar Datta, Justice KV Viswanathan and Justice Joymalya Bagchi, Judges, Supreme Court of India, at the National Virtual Consultative Meeting convened by NALSA to deliberate on key themes central to the functioning of the legal services institutions

NALSA scheme to strengthen legal aid to defence personnel's families











26 July 2025: Justice Surya Kant, Judge, Supreme Court of India and Executive Chairman, National Legal Services Authority (NALSA) presided the event for the launch of 'Veer Parivar Sahayata Yojana', a scheme to strengthen legal aid for defence personnel and their families, during the North Zone Regional Conference organised by NALSA in Srinagar. The theme of the conference was 'Reaffirming the Constitutional Vision of Justice for Defence Personnel and Tribals'. The event was also attended by Justice PS Narasimha, Justice Rajesh Bindal, and Justice N Kotiswar Singh, Judges, Supreme Court of India, Mr Arjun Ram Meghwal, Minister of State (Independent Charge) for Law and Justice, Justice Arun Palli, Chief Justice of the High Court of J&K and Ladakh, Mr Omar Abdullah, Chief Minister of the UT of J&K and other judges of the High Court of J&K





05 July 2025: Justice Ahsanuddin Amanullah, Judge, Supreme Court of India, attended the Sensitisation Programme titled 'The Role of Permanent Lok Adalat' at the Bihar Judicial Academy. He, as a mentor, distributed certificates to the newly recruited Chairpersons and Members of Permanent Lok Adalat and Secretaries, District Legal Services Authority of Bihar at Gaighat, Patna

NORTH ZONE REGIONAL CONFERENCE, NALSA:

A Deeper Collaboration Between the Bench and the Bar

The National Legal Services Authority (NALSA) has, over the years, institutionalised regional conferences as vital platforms to advance its mandate of ensuring access to justice for all, particularly for marginalised and vulnerable communities. These conferences bring together members of the Bench and the Bar to deliberate on region-specific challenges and to strengthen the legal aid framework under the Legal Services Authorities Act, 1987.

In a remarkable display of unity and commitment to justice, the National Legal Services Authority (NALSA), in collaboration with the High Court of Jammu & Kashmir and Ladakh, and the J & K Legal Services Authority, convened the North Zone Regional Conference on 27 July 2025. The gathering at the Sher-i-Kashmir International Conference Centre, Srinagar, brought together distinguished members of the Judiciary and the Bar, reinforcing the collective vision of transforming the legal landscape of the region. Hosting the 2025 North Zone Regional Conference in Srinagar underscored the commitment to addressing the distinct needs of the three districts that is Jammu, Kashmir and Leh, including legal assistance for defence personnel posted in inhospitable terrains and for tribal communities residing in remote regions. The Conference further elaborated on the unique challenges faced in each of these regions.

The Chief Justice of India, Justice BR Gavai, presided over the Conference, which was attended by seven eminent Supreme Court Judges, including Justice Surya Kant, Justice Vikram Nath, Justice PS Narasimha, Justice Pankaj Mithal, Justice Rajesh Bindal, and Justice N Kotiswar Singh. The High Court of Jammu & Kashmir and Ladakh was represented by its fiveesteemed judges, including Justice Arun Palli, Chief Justice, Justice Sanjeev Kumar, Justice Sindhu Sharma, Justice Rajnesh Oswal and Justice Rahul Bharti. With the theme ***"In Conversation with the Bar: A Shared Vision for Legal Transformation,"*** the conference focused on forging a deeper collaboration between the Bench and the Bar, especially in the region's unique socio-legal landscape.

The event began with inaugural remarks by **Justice Rajnesh Oswal,** where he highlighted the spiritual and historical significance of the event. He discussed the convergence of the Bar and Bench, and lauded the Bar for its continued dedication to the pursuit of justice. He further remarked that justice was a joint moral enterprise between the Bar and the Bench, not an isolated burden to be carried by either the Judiciary or the Bar. Following Justice Oswal's remarks, **Justice Arun Palli,** Chief Justice of the High Court of Jammu & Kashmir and Ladakh, traced the rich legacy of the Court. He noted that the Court was established in 1928, making it one of India's oldest constitutional courts. While paying tribute to legal stalwarts from the region, such as Justice Raja Jaswant Singh and Justice TS Thakur, he celebrated the intellectual rigour and resilience of the Jammu & Kashmir Bar. He placed special emphasis on the role of the women advocates, who, he observed, "are not waiting for space, [but] are creating it."

The conference was further adorned by learned members of the Bar, including **Advocate Haji Mohammad Amir** from Ladakh who addressed the audience and expounded how the conference proved to be a reaffirmation of the constitutional commitment of access to justice for all. Followed by Advocate **Ghulam Ahmad Lone** from Kashmir, who highlighted the challenges faced by lawyers in Jammu & Kashmir. He mentioned the limited number of lawyers elevated to the High Court Bench in the past 33 years but expressed optimism about working harmoniously to uphold the law. Also, **Senior Advocate Vikram Sharma** from Jammu further expressed how this occasion serves as an opportunity for deliberating towards revitalising India's justice system. Mr Sharma suggested that to ensure timely and equitable justice, India must undertake comprehensive reform-led transformation to continuously revamp the system, addressing resource crunch, structural complexities and enhancing institutional capacities.

Justice N Kotiswar Singh, in his address, expressed that he shared a deep emotional connection with the region and conveyed his gratitude for the affection he received across Jammu, Srinagar, and Ladakh during his tenure as the Chief Justice of the Jammu & Kashmir High Court. He suggested the establishment of a permanent High Court Bench in Leh and reserving Bar chambers for women advocates, recognising their increasing leadership in the profession.

Justice Rajesh Bindal spoke about the intersection of technology and justice, noting the digital divide which affected remote districts. He warned against overdependence on artificial intelligence and called for a return to the fundamentals of human cognition and legal reasoning.

Justice PS Narasimha drew on his 33 years in the legal profession and recalled fond memories of practising alongside colleagues who are now fellow judges. He claimed the legal profession thus resembled a close-knit family. He also underscored adaptability and technological prowess as essential traits for modern lawyers.

Justice Vikram Nath praised the energy and presence of advocates from across the state, particularly the growing participation of women.

Justice Surya Kant, Executive Chairman of NALSA, captured the fraternal bond among Jammu, Srinagar, and Ladakh, describing them as "three brothers." He encouraged initiating legal empowerment within the profession, especially through the promotion of women. He proposed declaring young women as legal aid counsels under NALSA and DLSA schemes, ensuring increased inclusion and dedicated funding.

The event concluded with **Chief Justice BR Gavai's** keynote address, where he reflected on Kashmir's 3,000-year tradition of secularism, spirituality, and unity: values enshrined in the Constitution. He reminded the audience of Dr BR Ambedkar's vision of bridging the chasm between political equality and socioeconomic justice. Stressing that lawyers and judges are "wheels of the golden chariot of justice," he called for a united effort to reach the last citizen, particularly those in remote areas and marginalised communities. He concluded with verses from poet **Prem Dhawan,** encapsulating the forward-looking spirit of the conference:

"Chhodo kal ki baatein, kal ki baatein purani,
Naye daur mein likhenge, milkar nayi kahaani…
Hum Hindustani!"

Justice Rahul Bharti, Judge of Jammu & Kashmir High Court, delivered the vote of thanks, where he conveyed gratitude for the overwhelming presence of members of the Bar, who attended at their own cost from over 20 districts of Jammu & Kashmir and Ladakh.

The National Zone Regional Conference 2025 in Srinagar was thus more than a ceremonial occasion; it was a powerful reaffirmation of the Bench and Bar's shared responsibility to reimagine and renew India's legal system.

Highlights of the Event








National
Legal Services
Authority
National
Legal Services
Authority





Key Decisions at the Registry

OBCs to receive Reservations in Direct Recruitment[1]

In a significant update to the Supreme Court Officers and Servants (Conditions of Service and Conduct) Rules, 1961, Justice BR Gavai, Chief Justice of India in exercise of his powers under Clause (2) of Article 146 of the Constitution, amended Rule 4A to provide reservation to the Other Backward Classes in Direct Recruitment.

The substituted Rule 4A now reads as:

"4A. Reservation in direct recruitment to various categories of posts specified in the Schedule, for the candidates belonging to Scheduled Castes, Scheduled Tribes, Other Backward Classes, Physically Challenged, Ex-servicemen and dependant of Freedom Fighters shall be in accordance with the Rules, orders, and Notifications issued from time to time by the Government of India in respect of posts carrying the pay scale corresponding to the pay scale prescribed for the post specified in the Schedule, subject to such modification, variation or exception as the Chief Justice may, from time to time, specify."

This amendment ensures that the recruitment practices in the Supreme Court remain aligned with constitutional principles while providing flexibility for necessary institutional adaptations.

The notice dated **03 July 2025** has been issued by Mr TI Rajput, Registrar (Recruitment).

Week commencing 14 July 2025 was a Miscellaneous Week[2]

The week commencing 14 July 2025 worked as *Miscellaneous Week*. This scheduling ensured that fresh matters, admissions, and urgent listings received dedicated attention immediately upon the Court's return to its full roster. Further, in an important procedural change, the Court designated every Wednesday, in addition to Thursday, as the fixed day for Regular hearings. This measure is expected to ease the calendar pressure, facilitate better allocation of judicial time and help in the timely conclusion of part-heard and final hearing matters.

The notice dated **09 July 2025** has been signed by Mr Rajesh Sharma, OSD (Registrar) (J A-II), Mr Samarendra P Naik Nimbalkar, OSD (Registrar) (J A-I) and Mr Pavanesh D, Registrar (JL).

Urgent Matters – Vacation Officer Rosters Announced[3]

Reaffirming the Supreme Court's commitment to uninterrupted access to justice, the Registry issued detailed instructions for handling urgent matters arising on Court holidays or after Court hours. Advocates seeking urgent relief have been directed to first approach the Senior Registry Officer designated as the vacation officer. The Vacation Officer will examine the papers, obtain directions from the Competent Authority and promptly convey the decision to the concerned Advocate.

1 F. No. 34/2025-SC (RC), *Available at:* https://cdnbbsr.s3waas.gov.in/s3ec0490f1f4972d133619a60c30f3559e/uploads/2025/07/2025070519.pdf

2 F. No. 15/Judl./2025, *Available at:* https://cdnbbsr.s3waas.gov.in/s3ec0490f1f4972d133619a60c30f3559e/uploads/2025/07/2025070912.pdf

3 F.No. 16/Judl./2025. *Available at:* https://cdnbbsr.s3waas.gov.in/s3ec0490f1f4972d133619a60c30f3559e/uploads/2025/07/2025072418.pdf

S. No.	Officer on Duty	Period	Address	Tel Nos.
1	Mr. Chetan Kumar Deputy Registrar	**01.08.2025 To 31.08.2025**	B-4/5, MS Flats, Peshwa Road, New Delhi-110001	9810996145 (M)
2	Mr. Jagmohan Singh Addl. Registrar	**01.09.2025 To 30.09.2025**	Block 21, H.No. 124, Lodhi Colony, New Delhi- 110003	011-23115775 (O) 9810433908 (M)
3	Mr. Vipin Kumar Mittal Addl. Registrar	**01.10.2025 To 31.10.2025**	B-1/118, Second Floor, Ashok Vihar, Phase-2, New Delhi-110052	011-23115898 (O) 9810267531 (M)
4	Mr. Kamal Kumar Deputy Registrar	**01.11.2025 To 30.11.2025**	98-D, GH-2, Ankur Apartment, Paschim Vihar, New Delhi-110063	011-23115788 (O) 9899230207 (M)

To ensure smooth coordination, the following officers have been deputed as Vacation Officers for the upcoming months:

The notice dated **23 July 2025** has been signed by Mr Shekhar C Munghate, Secretary General, Supreme Court of India.

Special Benches for Old MACT Cases and Criminal Appeals[4]

In a move aimed at expediting the resolution of long-pending matters, the Supreme Court constituted a Special Bench comprising Justice K Vinod Chandran and Justice NV Anjaria. The Bench will convene every Monday and Friday at 2:00 p.m. to exclusively hear old Motor Accident Claim Tribunal cases and Criminal Appeals.

This dedicated schedule, effective from 1 August 2025, reflects the Court's commitment to reducing pendency and ensuring timely justice in cases that have been awaiting resolution for years. Members of the Bar, parties-in-person, and all the stakeholders have been urged to support this initiative by refraining from seeking adjournments. Through this targeted listing, the Registry underscored its focus on efficiency, prioritising cases that impact victims, families and the entire justice system, while also streamlining the judicial docket.

The notice dated **29 July 2025** has been signed by Mr Rajesh Sharma, OSD (Registrar) (J A-II), Mr Samarendra P Naik Nimbalkar, OSD (Registrar) (J A-I) and Mr Pavanesh D, Registrar (J L).

4 F.No. 13/Judl./2025. *Available at:* https://cdnbbsr.s3waas.gov.in/s3ec0490f1f4972d133619a60c30f3559e/uploads/2025/07/2025072953.pdf

Fresh from the Bench

Shivangi Bansal v Sahib Bansal
2025 INSC 883

"No arrest in Section 498A, IPC cases for two months"

CORAM: Chief Justice BR Gavai and Justice Augustine George Masih

In a judgment dated **22 July 2025,** a two-judge bench of the Supreme Court, while dealing with a matrimonial dispute, ordered the implementation of the guidelines issued by the Allahabad High Court in *Mukesh Bansal v. State of UP* (Criminal Revision No. 1126/2022)in order to prevent misuse of section 498A of the Indian Penal Code, 1860 (hereinafter 'IPC').

In the present case, the petitioner-wife and respondent-husband married on 5 December 2015 and had a minor daughter. They have been living separately since 4 October 2018 and have been involved in multiple litigations against each other and their respective families in various courts across the country. Both sides had filed numerous criminal and civil cases, such as those under domestic violence and dowry harassment laws, breach of trust, defamation, custody, maintenance, and property disputes.

The Court noted that the parties were now ready to amicably settle all disputes, including child custody, to end their protracted legal battles and maintain long-term peace. In pursuance of the same, the Court gave the following directives:

a. The custody of the minor daughter would remain with the mother, while the father and his family would have supervised visitation rights.

b. The wife voluntarily gave up any claim to alimony or maintenance from the husband or his family, both for herself and for the child, and undertook to bear all expenses for the daughter. Consequently, the earlier maintenance order of Rs 1,50,000 per month passed by the Allahabad High Court was quashed.

c. All pending civil, criminal, and incidental matters filed by parties were quashed or directed to be withdrawn, wherein the parties also undertook not to file any future litigation or complaints against each other or their families.

d. The petitioner-wife, on behalf of herself and her parents, was directed to issue an unconditional apology to the husband's family in a newspaper and on social media.

e. The Court directed that all negative statements, allegations, or posts about each other on social media or in public must be deleted, and neither party may make disparaging or damaging comments about the other in the future. The husband and his family were also to receive police protection.

f. The Court, exercising its powers under Article 142 of the Constitution, dissolved the marriage and directed that a decree of divorce be drawn up.

g. The guidelines of the Allahabad High Court in *Mukesh Bansal v State of UP* for tackling misuse of Section 498A of the IPC shall remain in effect and be implemented by the appropriate authorities. The guidelines mandate that, once an FIR or complaint under Section 498A is lodged, there is a compulsory two-month "cooling-off" period during which no arrest or coercive action is taken, except in grievous offences carrying a punishment of more than 10 years. During this cooling-off period, the complaint is referred to the Family Welfare Committee set up in every district by the District Legal Services Authority.

Consequently, the Supreme Court ordered the final closure of all disputes between the parties, with the aim of securing peace for both families and ensuring the welfare of the minor child.

Sukdeb Saha v The State of Andhra Pradesh & Others
2025 INSC 893

"Failure of local investigation is an extraordinary circumstance to invoke the power of the court to transfer the case to the CBI"

CORAM: Justice Vikram Nath and Justice Sandeep Mehta

In a judgment dated **25 July 2025**, a two-judge bench of the Supreme Court, dealing with an appeal with special leave against the order passed by the High Court of Andhra Pradesh, addressed the broader societal issue of growing student suicides in the contemporary education system.

The unfortunate incident occurred on 14 July 2023 when Ms X, the appellant's 17-year-old daughter, who was undergoing coaching for the National Eligibility-cum-Entrance Test (NEET) examination at Aakash Byju's Institute, Vishakhapatnam, allegedly fell from the 3rd floor of the building of Sadhana Hostel and passed away while undergoing medical treatment. The First FIR was registered on 17 July 2023 by the police (the day she passed away) in Andhra Pradesh. The second formal FIR under Sections 302 and 120 of IPC was lodged by the appellant on 20 August 2023 in Kolkata, West Bengal, against Aakash Institute, Sadhana Hostel, the hospital and others.

The present matter arose when the appellant filed a writ before the Andhra Pradesh High Court seeking directions to transfer the investigation of the case to the CBI. However, the Andhra Pradesh High Court vide the impugned order dated 14 February 2024, held that since there are two FIRs registered in two different States i.e., State of Andhra Pradesh and State of West Bengal, the prayer seeking transfer of the case to CBI was beyond the jurisdiction of the Court. Aggrieved by the High Court's order, the appellant approached the Supreme Court.

The main contentions of the appellant was the lack of proper and fair investigation by the police authorities into the unnatural and suspicious death of the appellant's daughter, Ms X. The hasty determination to classify the case as suicide, the gross dereliction of their duty by the doctors, the inadequacy in the process of collection of forensic samples, the grave discrepancy in the CCTV footage, the biased conduct of police officials favouring respondents, deliberate withholding of these vital forensic reports, the lack of independent medical investigation etc, were the grounds raised by the appellant to urge the transfer of matter to the CBI.

The respondents, on the other hand, opposed all the allegations laid down by the appellant,

claiming a proper investigation took place and there was no medical negligence involved in the present case. Further, they contended that mere dissatisfaction or suspicion on the part of the appellant does not constitute a valid ground to invoke the extraordinary jurisdiction of this Court so as to transfer the investigation to the CBI.

The Supreme Court, in delivering its judgment, made the following observations:

a. The Court relied on the precedents laid down in *State of West Bengal & Others v. Committee for Protection of Democratic Rights, West Bengal (CPDR) & Others*, (2010) 3 SCC 571 and *Arnab Ranjan Goswami v. Union of India*, (2020) 14 SCC 12 to reiterate that the extraordinary jurisdiction of this Court to transfer the investigation to the CBI is to be invoked only in rare and compelling circumstances and not passed as a matter of routine. There are no fixed parameters to invoke this power, but it can be used when the State police appear biased, ineffective, or complicit, when there is a delay or suppression of evidence, or in cases involving complexities with inter-state or national ramifications. The Court aims to ensure a fair and impartial investigation, safeguard fundamental rights, and preserve public confidence in the justice system.

b. The Court identified compelling factors that conclusively demonstrated the failure of the local investigation, thereby underscoring the urgent need for an impartial investigation by the CBI. The glaring inconsistencies in the medical records, the autopsy report indicating suspicious contents of the stomach despite the deceased allegedly being on ventilatory support, the unexplained lapses in seizure and preservation of critical forensic evidence, and the contradictory statements by authorities, when taken together, are rare and compelling circumstances to invoke the extraordinary jurisdiction of the Court.

c. The Court held that 'Mental Health' is an integral part of Article 21 of the Constitution of India. The Court, while awaiting the final report of the National Task Force on Mental Health Concerns of Students and the Prevention of Suicides in Higher Educational Institutions, under the chairpersonship of Justice (Retd.) Shri Ravindra Bhat, as directed in *Amit Kumar v. Union of India*, 2025 SCC OnLine SC 631, laid down comprehensive guidelines to deal with the crisis of student suicides, for mental health promotion, and student well-being in all educational institutions, including schools, colleges, coaching centres, and hostels. They mandated counsellor appointments, staff training, anti-bullying measures, career guidance, safe infrastructure, and monitoring mechanisms to reduce academic stress and protect students' psychological health.

d. The Court prescribed guidelines applying to all educational institutions across India. All educational institutions were directed to adopt and annually review a public mental health policy, appoint trained counsellors (or establish referral systems), maintain optimal student-counsellor ratios, avoid academic segregation or shaming, and display suicide helplines. They must have referral protocols, biannual staff training, and mechanisms to address harassment, discrimination, and bullying, with accountability for neglect. Parent sensitisation, mental health literacy in student orientation, annual wellness reports, extracurricular promotion, career counselling, and safe residential environments are mandatory. Hostels must install safety devices and restrict high-risk areas, while high-suicide hubs like Kota and Hyderabad require heightened protections, structured academics, and continuous psychological support.

Consequently, the Supreme Court quashed the order passed by the High Court and directed the transfer of the investigation into the unnatural death of Ms X to the CBI.

Kum Shubha @ Shubhashankar v State of Karnataka & Anr
2025 INSC 830

"Society, through its systemic failures, often plays a role in shaping criminal behavior, and in such cases, the offender becomes a victim requiring compassionate correction"

Coram: Justice MM Sundresh and Justice Aravind Kumar

In a judgment dated **14 July 2025**, a two-judge bench of the Supreme Court of India convicted and upheld the life sentence imposed on the appellants by the High Court of Karnataka for the offense punishable under Section 302 of the Indian Penal Code, 1860 (hereinafter 'IPC').

In December 2003, Accused-4 (hereinafter 'A-4'), a 20-year-old law student, was involved in a relationship with Accused-1 (hereinafter 'A-1'), another student from her college. A-4's parents, however, arranged her engagement to the deceased, a 26-year-old software engineer. This coercive engagement took a toll on A-4's mental stability, and she conspired to kill the deceased. A-4 communicated her grievance to A-1, who engaged his cousin, Accused-3 (hereinafter 'A-3'), a 28-year-old man, into the plan. A-3 then enlisted Accused-2 (hereinafter 'A-2'), a 19-year-old teenager from an impoverished background, to carry out the murder.

The Trial Court, on 13 July 2010, convicted the appellants under Section 120-B of the IPC and sentenced them to undergo life imprisonment. A-2 alone was convicted and sentenced to life under Section 302 of the IPC. Additionally, A-4 was convicted under Section 201 of the IPC and sentenced to undergo simple imprisonment for a period of 3 years, with the sentences imposed to run concurrently.

Against the order of the Trial Court, the State as well as the appellants appealed before the High Court. While dismissing the appeals filed by the appellants, the High Court, vide judgment dated 04 November 2010, confirmed the convictions and sentences and modified the conviction of A-2 under Section 302 and instead convicted him under Section 120-B. Assailing the aforesaid decision of the High Court, the appeal was filed in the Supreme Court.

The Supreme Court conducted a detailed analysis of the evidence. The Court acknowledged that the testimonies of eye-witnesses were not entirely clear on the identification of A-1 and A-2, and that the plea of alibi by A-1 was false. The Court's interpretation of the Call Detail Records (hereinafter 'CDRs'), including records from October to December 2003, confirmed the conspiracy that had been carried out among the accused. The motive for the crime was established through the evidence of witnesses who substantiated the relationship between A-1 and A-4. The recovery of the steel rod and the scooter, traced to A-2 and A-1, was deemed admissible despite delays in sending them to FSL. The Court used the opportunity to address the broader societal issues that led to the crime, emphasising the need for understanding and reformation.

The Court, in its judgment, observed that:

a. A crime is a mental rebellion against societal norms, often triggered by distant and immediate causes. It noted that factors such as family, economy, education, and social mores influence an individual's behavior and that alienation is a major cause for criminal acts.

b. The Court noted that external elements and societal prejudices can contribute to a woman's victimisation, pushing her into a "dark corner" precisely how a young woman's professional

ambitions are curtailed by a forced marriage, which could lead to a variety of reactions, including violence.

c. Social constraints like stigma, lack of education, and financial support can distort a woman's perception of freedom, making resistance seem impossible. Similarly, A-4 was unable to make a decision for herself despite being a major, and this unfortunate event would not have occurred if her family had been more sympathetic to her mental disposition.

d. Mere punishment is not sufficient to address the root cause of an offender's actions, and this is needed for reformation and rehabilitation in order to reintegrate a deviant person into society, especially when the offender is not entirely responsible for the causes that led to the crime.

e. The Court observed that Article 161 of the Constitution empowers the Governor to grant pardons and encourages the reformation of individuals and that this constitutional power is broader than statutory powers and is a "constitutional duty of great significance" to be exercised in the aid of justice.

Consequently, the Supreme Court dismissed the appeals, confirming the conviction under Section 302 read with Section 120-B of the IPC for all appellants and additionally under Section 201 of the IPC for A-4 alone.

Vijay Kumar v Central Bank of India & Ors
2025 INSC 848

"Pension is an employee's right to property, which is a constitutional right, that cannot be denied without the authority of law, even if an employee was compulsorily retired on account of misconduct"

CORAM: Justice PS Narasimha and Justice Joymalya Bagchi

In a judgment dated **15 July 2025**, a two-judge bench of the Supreme Court, by way of an appeal dealt with the interpretation of Regulation 33 of the Central Bank of India (Employees') Pension Regulations, 1995 (hereinafter 'Pension Regulations').

The present case arose when the appellant, while working as Chief Manager, a scale IV officer in the respondent No.1-bank, was served with a Memorandum of Charge alleging that, during his tenure as Branch Manager, Dhanbad Branch, he sanctioned loans in respect of 12 accounts, inter alia, without proper appraisal of income, nonverification of KYC compliance, without post-sanction inspections etc. exposing the bank to potential financial loss of huge amount. An inquiry was initiated, and the appellant attained superannuation on 30 November 2014. The inquiry continued under Regulation 20(3)(iii) of the Central Bank of India (Officers') Service Regulations, 1979.

The inquiry authority found that the appellant had failed to discharge his duties with integrity and honesty, and his actions led to a huge financial loss for the bank for his pecuniary gain. The disciplinary authority, a Deputy General Manager, upheld the findings and imposed the major penalty of compulsory retirement under Rule 4(h) of the Central Bank of India Officer Employees' (Discipline and Appeal) Regulations, 1976, effective from the date of superannuation. The appellant then filed an appeal with the appellate authority, a Field General Manager.

While the appeal was pending, a Regional Manager recommended a minimum pension of two-thirds of the full pension for the appellant, which was concurred with by the Field General Manager. Subsequently, the same Field General Manager, acting as the appellate authority, dismissed the appellant's appeal and confirmed the penalty of compulsory retirement.

The appellant then approached the Patna High Court, challenging the validity of the regulation allowing disciplinary proceedings after superannuation, but later limited his challenge to the disbursal of full retiral benefits. The High Court, while directing the release of gratuity, upheld the decision of the Bank to reduce one-third of the pension payable to the appellant. It reasoned that a compulsorily retired employee is not entitled to a pension unless an order is passed under Regulation 33(1) of the Pension Regulations.

The appellant argued that a pension is a constitutionally protected right under Article 300A, and it cannot be taken away without a clear legal provision. He contended that Regulation 33(1) and (2) must be read together, and any deduction from a pension for a compulsorily retired employee requires prior consultation with the Board of Directors, a requirement that was not met in this case. The respondent contended that Regulation 33(1) and (2) are mutually exclusive and apply in different circumstances. It was claimed that since the pension was reduced by an authority higher than the disciplinary authority, no prior consultation with the Board of Directors was necessary.

The Supreme Court, in its final judgment, observed that:

a. The Court examined Regulation 33 of the Pension Regulations, which allows awarding not less than two-thirds and not more than a full pension to an employee compulsorily retired as a penalty. Clause (2) mandates that before granting less than a full pension, whether in original, appellate, or review jurisdiction, the Board of Directors must be consulted.

b. The Court held that 'Competent Authority' in Clause (2) is not limited to the disciplinary authority but includes higher authorities like the Field General Manager. While rejecting the bank's argument that no consultation was needed when a superior authority reduces pension under Clause (1), the Court ruled that Clauses (1) and (2) must be read together. Prior consultation with the Board is a mandatory safeguard before curtailing an employee's right to pension; *ex-post-facto* approval is insufficient. Pension is a valuable right and can be reduced only by strictly following the procedure.

c. It was held that the High Court erred in interpreting the word 'may' in Clause (1) as giving discretion to deny pension; it only clarifies that pension is payable if the employee is otherwise eligible.

d. The Court observed that although it was alleged the appellant's misconduct had resulted in an estimated loss of about Rs. 3.26 crores to the bank, neither the disciplinary authority nor the appellate authority examined any evidence supporting this calculation. Moreover, the appellant was not afforded an opportunity to be heard before his pension was reduced.

e. The Court also found no exceptional circumstances warranting the exercise of its extraordinary powers under Article 142.

Consequently, the Supreme Court allowed the appeal and set aside the High Court's order and directed the bank to make a new decision regarding the pension reduction, provided it gave the appellant an opportunity to be heard and held a prior consultation with the Board, within two months. Failure to do so would entitle the appellant to his full pension from the date of superannuation.

SN Vijayalakshmi & Ors v State of Karnataka & Anr
2025 INSC 917

"If the complaint is filed without an affidavit, it cannot be declared invalid on that count, noting that the defect was curable as it is permissible to submit affidavit after the complaint but before magistrate's order directing FIR"

CORAM: Justice Sudhanshu Dhulia and Justice Ahsanuddin Amanullah

In a judgment dated **31 July 2025**, a two-judge bench of the Supreme Court dealt with an appeal filed by the Appellants/Accused against the final judgment of the High Court, dismissing the petition filed by the Appellants' seeking quashing of an FIR against them for offences punishable under Sections 405, 406, 415, 417, 418, 420, 504, 506, 384 and 120B read with 34 of the Indian Penal Code (hereinafter 'IPC').

The matter arose when a property in Bangalore became the subject of a dispute. The family members of the original owners of this subject property are the accused-appellants in this case. The Bangalore Development Authority (hereinafter 'BDA') had acquired the property in the 1970s and 1980s. However the BDA de-notified the property in 1992, which was challenged by the allottees. While the litigation was pending, the original owners and a rival claimant entered a mutual agreement in 1996, and possession was handed over to an arbitrator, Ravishankara Shetty. The High Court subsequently quashed the de-notification order. This led to extensive litigation. During the litigation, the accused sought help from Ravishankara Shetty, promising to sell him the property once the title was cleared. Later, Ravishankara Shetty's nominee, the complainant, entered into an Agreement to Sell (hereinafter 'ATS') with the accused and was granted a General Power of Attorney (hereinafter 'GPA').

After further legal proceedings, the land acquisition was declared to have lapsed, and the title became marketable. However, the accused refused to honour the ATS. The complainant later discovered that the accused had revoked the GPA and had executed a series of deeds, i.e., a Release Deed and Gift Deed, to transfer the property to one of the appellants. Consequently, the complainant initiated legal action by filing a private complaint, which led to the registration of an FIR. Concurrently, a civil suit was filed to challenge the deeds and enforce the ATS. The accused appellants attempted to quash the FIR by filing a criminal petition, which the High Court rejected. This rejection is the subject of the present appeal.

The appellants argued that the case was a civil dispute being wrongly framed as a criminal matter, and that the essential ingredients for offenses like cheating and criminal breach of trust were not present. They pointed to the complainant's own statement, which suggested any alleged deception occurred after the property's value increased, rather than from a dishonest intent at the time of the initial promise. The appellants further claimed that the complainant failed to take timely action after the litigation was resolved in 2016, compelling them to take protective measures, including issuing a prior notice before revoking the GPA and transferring the property. They also asserted that they never received the Rs 2 crore payment, as it was paid to a now-deceased family member through a separate entity, and that the key witness statements against them were from individuals siding with the complainant in a civil suit.

The respondent-complainant contended that the FIR was properly registered after all legal procedures were followed, and the High Court had rightly

decided not to interfere. They argued that the complaint, on its face, disclosed the commission of cognizable offenses. The complainant asserted that the accused, fully aware that the property's title was still not clear, had a clear intention to defraud them. This intent, they claimed, was demonstrated by the accused's actions of revoking the GPA and transferring the property through various deeds. The complainant emphasised that they had taken substantial steps over a long period to make the land saleable and that time was never the essence of the ATS. They stated that they had paid Rs 2 lakhs directly to the accused, and that the accused had also received Rs 2 crores from a third party through their efforts.

The Supreme Court, in delivering its judgment, made the following observations:

a. The Court observed that purely from a legal standpoint, the same person cannot be simultaneously charged under Sections 406 (criminal breach of trust) and 420 (cheating) of the IPC with regard to a single transaction.

b. The Court found that the essential ingredient of 'entrusted' for a charge under Section 406 of the IPC was absent. The appellants owned the property, and it was never entrusted to them by the complainant. Therefore, the foundation for this charge fell apart.

c. The Court, with respect to the charge under Section 415, concluded that the appellants did not induce the complainant to deliver property through deception. The Court highlighted a discrepancy in the complainant's claim. While the complainant alleged that Ravishankara Shetty had possession since 1996, the ATS itself stated that possession would only be handed over upon the execution of a sale deed, which falsified the claim of prior possession.

d. The Court noted that while there is no strict legal bar to simultaneous civil and criminal proceedings on the same facts, allowing them to continue constitutes an abuse of the court's process if the allegations lack a strong element of criminality. In this case, the Court determined that the allegations, despite having a civil flavor, did not have the overwhelming element of criminality required to sustain the criminal proceedings.

e. The Court upheld the High Court's view that the procedural defect of not filing an affidavit at the initial stage of the private complaint was a curable defect, as the affidavit was filed before the Magistrate's referral order for the FIR was passed. The Court affirmed that the directions in *Priyanka Srivastava v State of Uttar Pradesh, (2015) 6 SCC 287* are mandatory but that non-compliance can be cured before a substantive order is passed.

f. The Court also raised a serious concern about a potential miscarriage of justice and the compromise of public interest. It observed that the BDA's acquisition of the property was challenged after a 33-year gap and noted the BDA's "surprisingly (nay, shockingly)" withdrawal of an appeal, which led the Court to suspect "collusive litigation" between the BDA and the appellants. The Court felt its "judicial conscience" was "ill at ease" and that it could not ignore this blatant misuse of the law by statutory authorities, and was compelled to intervene by exercising its powers under Article 142 of the Constitution to ensure "complete justice."

Consequently, the Supreme Court allowed the appeal, quashing the criminal proceedings against the Appellants, including the FIR, chargesheet, and cognizance orders, concluding that the case was a civil dispute disguised as a criminal matter.

L Murugnantham v State of Tamil Nadu & Others
2025 INSC 844

"All prisoners, including those with disabilities, have the Right to life under Article 21 but it does not confer a right to demand personalised or luxurious food choices "

CORAM: Justice JB Pardiwala and Justice R Mahadevan

In a judgment dated **15 July 2025**, a two-judge bench of the Supreme Court by way of an appeal dealt with broader question of disability rights and issued directions for timely and effective implementation of Rights of Persons with Disabilities Act, 2016 (hereinafter 'RPwD Act').

The present matter arose when the appellant, suffering from Becker Muscular Dystrophy, was arrested based on an FIR on 29 February 2020 and was kept in prison until 10 March 2020, when he was released on bail. He alleged torture and harassment on the hands of a police officer (Respondent no. 2) and further alleged the failure of prison authorities (Respondent no. 3) to provide proper food, medical treatment, and care as required under the RPwD Act.

The appellant approached the State Human Rights Commission (hereinafter 'SHRC') to seek compensation of Rs. 50,00,000 for the deprivation of life and liberty during incarceration. The SHRC granted a compensation of Rs. 1,00,000 and directed to initiate disciplinary action against the police officer. It recommended the Government of Tamil Nadu to make all the prisons in the State accessible for persons with disabilities as per the RPwD Act.

Aggrieved by the order of the SHRC, the appellant filed a writ petition before the High Court, demanding compensation of Rs. 50,00,000. The High Court partly allowed the writ petition, enhancing the compensation amount from Rs. 1,00,000 to Rs. 5,00,000. The police officer also filed a writ petition before the High Court to quash the order of SHRC, but his petition was dismissed. Aggrieved, the appellant moved the Supreme Court.

The contentions of the appellant were that he was illegally arrested, in collusion of the police officer and his uncle (on whose behest the FIR was filed) with the ulterior motive of coercing him to transfer his valuable properties. Further, the enhanced compensation of Rs. 5,00,000 has been granted only for human rights violations committed by the police but progressive deterioration of the appellant's disability caused by inhumane prison conditions was not taken into consideration while assessing the compensation amount. The appellant alleged the denial of proper medical care, food, and basic amenities as statutorily mandated by the RPwD Act.

The Respondent, on the other hand, contended that the arrest of the appellant could amount to human rights violations, for which the compensation has already been awarded by the High Court. However, there was no violation on the part of prison authorities as the appellant, during the period of incarceration, was in the prison hospital, and the prison authorities took all possible steps to address the specific needs of the appellant. It was also submitted that the prisons in the state of Tamil Nadu are accessible to the needs of the disabled inmates.

The Supreme Court, in delivering its judgment, made the following observations:

a. The Court agreed with the findings of the SHRC and the High Court that the arrest of the appellant was illegal and did not comply with the safeguards laid by this Court. The FIR was carried out with an ulterior motive of usurping the appellant's property, and his

disability status was not considered by the authorities while dealing with him in the process of arrest and incarceration.

b. The Court observed that non-supply of non-essential or indulgent items does not amount to a constitutional or human rights violation unless it results in demonstrable harm to health or dignity. The Right to life under Article 21 of the Constitution undoubtedly extends to all prisoners, including those with disabilities, but this does not confer a right to demand personalised or luxurious food choices. The fact that the appellant did not receive certain medical and dietary facilities, apart from the basic amenities provided to him, was not a deliberate neglect or malice on the part of the prison authorities; rather, it was institutional limitations within the prison system.

c. The Court took notice of the systemic neglect in prison infrastructure, specifically the inaccessibility and denial of basic care to disabled inmates. The Court observed that these are not merely administrative lapses, but rather they amount to violations of fundamental rights enshrined under Articles 14 and 21 of the Constitution of India and also the provisions of the RPwD Act and mandate under the UN Convention on the Rights of Persons with Disabilities. It approved the judgment laid down by Madras High Court in *People's Watch v. The Home Secretary, Home Department, Prison Secretariat and others* (2023) 2 MLJ 478, which elaborated on the urgent need for prison reforms. The Court finally laid down directives to uphold the dignity and healthcare rights of prisoners with disabilities in all custodial settings.

Consequently, the Supreme Court dismissed the appeals and upheld the order of the High Court as fair, just, and reasonable in awarding the enhanced compensation.

Anurag Bhatnagar v State (NCT of Delhi) 2025 INSC 895

"Magistrate ought not to ordinarily entertain an application under section 156(3) of the Code of Criminal Procedure directly unless the informant has exhausted his remedies provided under Section 154(3)."

CORAM: Justice Pankaj Mithal and Justice SVN Bhatti

In a judgment dated 25 July 2025, a two-judge bench of the Supreme Court, while hearing a batch of Special Leave Petitions, dealt with the broader question of whether the Magistrate could entertain an application under section 156(3) of the Code of Criminal Procedure (hereinafter 'CrPC') without parties, first approaching the police, and whether the FIR, arising from an Memorandum of Understanding (hereinafter 'MoU') was quashable on grounds of being civil in nature, a successive FIR, or redundant since investigations and charge sheets were already complete.

The dispute arose from an MoU dated 11 March 1995 between M/s Sunair Hotels Ltd. (hereinafter 'SHL') and VLS Finance Ltd. (hereinafter 'VLS') for financing a hotel project. VLS agreed to invest Rs. 7 crores as equity and Rs. 10 crores as security deposit, while SHL was to contribute Rs. 22 crores, with VLS also promising a public issue of 10 lakh equity shares at a premium of Rs. 100.

SHL later discovered this was legally impossible under Securities Board of India guidelines and alleged concealment by VLS. Arbitration ensued, and by an award dated 18 July 2015, SHL was directed to refund Rs. 10 crores with interest to VLS, which award is under challenge before the Delhi High Court.

Meanwhile, VLS lodged multiple complaints: FIR No. 90/2000 under Sections 406, 409, 420, 421, 422, 467, 468, 471, 477-A of the Indian Penal Code (hereinafter 'IPC'); FIR No. 99/2002 under Sections 406, 420, 424, 467, 468, 471, 477, 120-B of IPC alleging siphoning of Rs. 15 crores; and FIR No. 148/2002 under sections 384, 406, 409, 467, 471, 120-B of IPC. SHL filed a complaint under Section 156(3) of CrPC, resulting in FIR No. 326/2004 under sections 406, 409, 420, 424, 120-B of IPC against VLS for non-fulfilment of MoU obligations; its investigation was stayed by the Delhi High Court in 2004, and the stay was made absolute in 2009. Later, SHL filed another application under section 156(3), leading to FIR No. 380/2005 under Sections 420, 120-B, 34 of IPC.

Investigations in this FIR were completed, and charge sheets were filed in 2020-21. VLS and its officials sought quashing of FIR No. 380/2005, arguing it was civil in nature and a successive FIR, but the Delhi High Court dismissed their petitions, holding that the Magistrate's order was a speaking one, the allegations revealed criminal elements, and with investigations concluded and charge sheets filed, there was no basis to quash the proceedings.

The Supreme Court, in its final judgment, observed that:

a. The Court held that although the informant should ordinarily exhaust remedies under Section 154 of CrPC before approaching the Magistrate, direct recourse to Section 156(3) was at best a procedural irregularity and not illegal. The Magistrate's order, having recorded satisfaction of a cognizable offence, could not be interfered with.

b. The Court observed that the Magistrate ought not to ordinarily entertain an application under section 156(3) of CrPC directly unless the informant has availed and exhausted his remedies provided under Section 154(3) of CrPC.

c. The Court held that the powers under Section 482 of CrPC or Article 226/227 of the Constitution of India are discretionary in nature… Thus, in a case where pursuant to the order of the Magistrate, which is not illegal or without jurisdiction, an FIR has been registered which discloses a cognizable offence, and that since investigations had been completed and charge sheets filed, discretionary powers to quash FIRs ought not to be exercised.

d. On the issue of successive FIRs, the Court observed that while FIR No. 326/2004 and FIR No. 380/2005 were based on similar allegations, they were not identical in parties and content, and since no trial had resulted from the earlier FIR, the subsequent FIR could not be quashed.

Consequently, the Supreme Court dismissed the appeal and upheld the impugned order, finding no reason to interfere.

Daivshala & Others v Oriental Insurance Company Ltd. & Another 2025 INSC 904

"Accidents occurring to an employee in commuting between residence and place of employment are covered under the Employee's Compensation Act"

CORAM: Justice Manoj Misra and Justice KV Viswanathan

In a judgment dated **28 July 2025**, a two-judge bench of the Supreme Court, by way of an appeal, dealt with the question of whether the death of an employee while commuting to and from work could be said to have arisen out of and in the course of employment.

In the present matter, Shahu Sampatrao Jadhavar (deceased), employed as a watchman in the Respondent's Sugar Factory, met with a fatal accident while he was commuting to the factory on his motorcycle to report for duty. He left his family behind, comprising a widow, four children and his mother. A claim was filed under the Employees' Compensation Act, 1923 (hereinafter the 'EC Act') and the Commissioner for Workmen's Compensation and Civil Judge, Senior Division awarded a sum of Rs. 3,26,140 alongwith interest @ 12 p.a. to the family members, which was to be paid by the insurance company, overruling the defence of the insurance company that accident occurred outside the precincts of the factory, thereby it has not arisen out of or in the course of his employment and not making a valid claim under the EC Act.

The Respondent filed an appeal before the High Court of Bombay, whereby the High Court reversed the findings of the Commissioner. Aggrieved by the order of the High Court, the family members of the deceased employee approached the Supreme Court in appeal by way of special leave.

The Appellant, relying on the theory of notional extension, contended that there is a causal connection between the employment and the accident, as the nature of work that the deceased did and the commute to the factory was not something personal rather it was incidental to his employment. Further, it was argued that the EC Act is beneficial legislation and it should tilt towards the welfare of the employees.

The Respondent, on the other hand, placed reliance on the case of *Regional Director, E.S.I. Corporation & Another vs. Francis De Costa and Another*, (1996) 6 SCC 1 (hereinafter, "Francis De Costa") to argue that the employment cannot commence until the employee has reached the place of work and what happened before that could not be said to be in the course of employment. The judgment in *General Manager, B.E.S.T. Undertaking, Bombay vs. Mrs. Agnes*, (1964) 3 SCR 930 was distinguished to argue that the theory of notional extension was applied herein as the employee was given the facility to travel back home in the bus by the employer, but that is not the facts in hand.

The Appellant challenged the application of *Francis De Costa* to the present matter as it arose under the Employees' State Insurance Act, 1948 (hereinafter, 'ESI Act') and by virtue of the introduction of Section 51E in the ESI Act, the holding in the case has been neutralised.

The Supreme Court, in delivering its judgment, made the following observations:

a. The Court held that Section 51E, introduced on 1 June 2010, which deems commuting accidents (from residence to place of employment or vice versa) as arising out of and in the course of employment (subject to nexus of time, place, and circumstances), was enacted to remove longstanding doubts and

conflicting judicial interpretations regarding such accidents. It thereby neutralised the restrictive interpretation in *Francis De Costa* and is clarificatory, thus operating retrospectively to cover accidents occurring even prior to its enactment, including the one on 22 April 2003.

b. The Court interpreted the expression "deemed to have" in Section 51E as not merely creating a legal fiction, but as being used to put beyond doubt a particular construction that was otherwise uncertain. This legislative deeming assures that commuting accidents are legally recognised as employment-related if the nexus requirement is met.

c. The Court held that the identical phrase "accident arising out of and in the course of employment" used in Section 3 of the EC Act and Section 51E of the ESI Act should receive the same interpretation for commuting accidents. As both the Acts are beneficial social welfare legislations with a common object of employee protection, the *pari materia* principle allows harmonised interpretation of both statutes, in the absence of contrary legislative intent.

d. The Court laid down that an accident while commuting will be covered under the statute if there exists a clear nexus between the circumstances, time, and place of the accident and the employment, and thus the theory of notional extension can extend the course of employment beyond the physical confines of the workplace, depending on facts and circumstances. The Court found that there was a clear nexus between the circumstances, time and place in which the accident occurred and his employment as a watchman. The accident therefore arose "out of and in the course of employment" under section 3 of the EC Act.

Consequently, the Supreme Court allowed the appeal, setting aside the judgment of the High Court and restoring the Commissioner's award.

Training Hub













11 July 2025: Training Cell, in association with the Parliamentary Research and Training Institute for Democracies (PRIDE), Lok Sabha Secretariat, Parliament of India, organised a Workshop on Security Management for officers and officials of the Security Branches of the Supreme Court of India at the Parliament of India, New Delhi to enhance institutional security awareness, broaden understanding of operational safety measures, and familiarise with the specialised protocols followed in the functioning of parliamentary security




Training Cell organised an Orientation Session for the Group 'C' non-clerical cadre staff members appearing for the Departmental Examination for Junior Court Assistant, by resource person Mr Bal Krishan Dubey, Assistant Registrar, Ms Geetika Grover, Branch Officer and Mr Jaidev Joshi, Branch Officer to strengthen the understanding of the participants relating to Supreme Court procedures, drafting, computer skills, and examination readiness




19 July 2025: Training Cell organised a training session on First Aid, CPR (Cardio-Pulmonary Resuscitation) and operation of AED (Automated External Defibrillator) Machines for Registry officials to equip the staff with essential life-saving skills and emergency response preparedness




25 July 2025: Training Cell organised a training programme on Noting and Drafting for Dealing Assistants of the Registry by resource person Ms Padma Sundar, Deputy Registrar, Mr Pradeep Kumar, Deputy Registrar and Mr Harsh Kumar, Branch Officer, to boost drafting proficiency, standardise procedures, and enhance accuracy and efficiency in work processes

Bid Adieu



Ms Indu Marwah, a resident of Delhi, began her career at the Supreme Court of India in November 1989. Over the next 35 years, she served in various departments. While her initial 3-4 years were spent in the Admin. department, the majority of her service was with the residences, where she worked closely with several distinguished judges. She fondly recalls her time with Justice GP Mathur, Justice SJ Mukhopadhaya and Justice UU Lalit. She credits the Supreme Court with not only shaping her professional journey but also giving her and her colleagues a strong identity. To her, this institution has been nothing short of life-changing. While acknowledging that the work demands commitment and hard work, Ms Indu advises the younger generation to commit fully and work harder, and the rewards, both professional and personal, will be immeasurable. At the time of her retirement in July 2025, Ms Indu was posted as a courtmaster at the court of Justice PS Narasimha.



Mr Jai Narain, a resident of Delhi, joined the Supreme Court in May 1990. Over the years, he worked in various departments, assuming responsibility as needed. He spent a considerable part of his service in the Receiving Issue Branch and later in Section I-A at the time of his retirement. He fondly recalls that his overall experience at the Supreme Court was nothing short of amazing, not just because of the nature of the work, but also because of the professional yet supportive environment. As he retires from the post of Restorer (Library) Grade-II, in July 2025, Mr Jai Narain advises those entering service to put in more effort and work harder. However, even after retirement, Mr Jai Narain is not ready to hang up his boots with his strong dedication to the institution.



Ms Anita Rani Bawa, a long-time resident of Delhi, joined the Supreme Court in August 1989. As she looks back on her journey, she fondly recalls countless memories and speaks warmly of her experience. The majority of her service was with the Editorial Department. For her, one of the most remarkable aspects of the Supreme Court has been its commitment to offering employment to those in need, including widows, as well as the younger generation. She reflects on how much the workplace has transformed over the years. When she began, technology was limited, and employees had far fewer opportunities. Today, she observes, the institution not only keeps pace with modern advancements but also provides facilities like a gym and recreational games, ensuring that even amidst the pressure of work, employees can enjoy moments of relaxation. At the time of her retirement in July 2025, Ms Anita was posted as PS to Additional Registrar.



Mr Raj Kumar, a resident of Delhi, began his journey in the Supreme Court in January 1985. Over the course of four decades, he gathered a wealth of experience and cherished memories. He started his service in Section 14, which handles filings for Delhi, before moving to another section. In 1999, he took on the role of an usher, a position he held for the longest. Now, as he prepares to retire in July 2025, he looks forward to a new chapter in life, marked by rest and relaxation. For Mr Raj, his time in the Supreme Court has been deeply fulfilling and well spent.



Mr Mahipal Singh Rawat, hailing from Pauri Garhwal, Uttarakhand, joined the Supreme Court in 1984. Over the span of more than 40 years, he has served in various departments, including Section II-A, Section 16 and the Library, forging countless memories. Mr Mahipal retired from the post of Restorer (Library) Grade-I in July, 2025. Reflecting on his journey, he describes it simply as a great experience. Among the many facets of the Supreme Court, he holds a special appreciation for the Museum, admiring its preservation for the institution's rich history.



Photo credit: Bhoomika Babbar



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