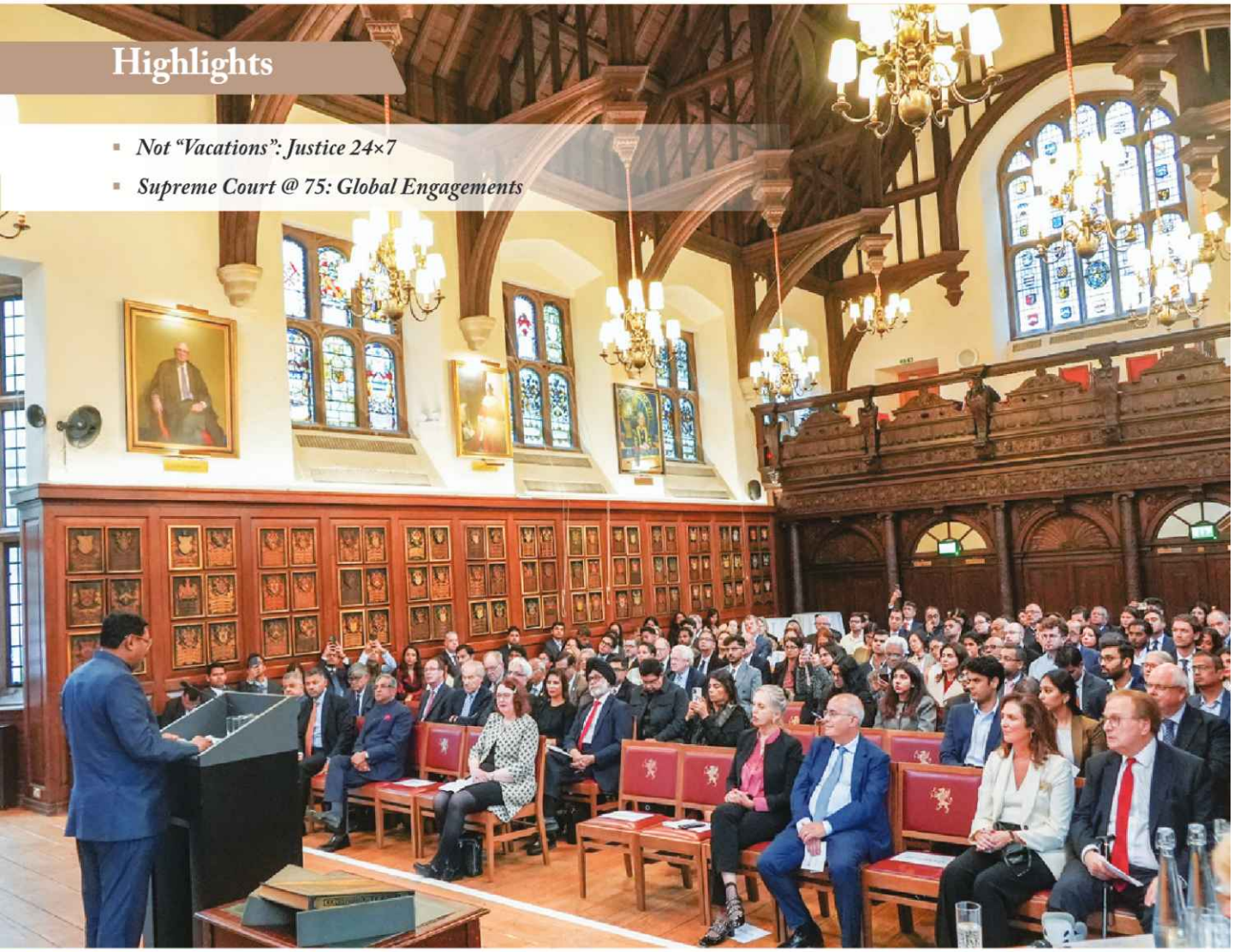
Supreme Court *Chronicle*

Issue XXI | July 2025

Highlights

- *Not "Vacations": Justice 24×7*
- *Supreme Court @ 75: Global Engagements*











Message from the Secretary General

Dear Readers,

I am pleased to present the latest edition of the Supreme Court Chronicle for the month of July. The Supreme Court Chronicle keeps readers updated on the activities of this Court, both within and beyond the courtroom.

This edition offers a unique insight within the court premises during partial court working days reporting on the efforts made by the court in upholding the dispensation of justice. This edition provides an insight into the partial court working days, as well as the interaction of the judges of the Supreme Court with other institutions, academia and judges of the district judiciary. The newsletter aims to inform the reader on the pertinence of participation in discussions, academic exchanges and legal diplomacy which is accorded through international conferences. These ultimately shape the judicial footprint of a nation among different jurisdictions, while also enriching the judges with insights on a variety of topics, ranging from laws, courts, culture, social structure and the ways in which they interact.

It remains my hope that this newsletter continues to retain the collaborative spirit that lies underneath the object of its very conception. As we take on new challenges and adopt novel methods to enhance transparency and drive progress for the Court within the justice delivery system, I believe that through this newsletter, new avenues of collaboration and cooperation will increasingly present themselves.

As the Court gears up to fall back into full working days, I hope this edition keeps the reader informed and engaged until we meet again with our next edition.

Shekhar C. Munghate
Secretary General
Supreme Court of India

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Not "Vacations": Justice 24×7

There is a widespread misconception that the Supreme Court of India goes on an extended summer vacation, resulting in a slowdown of judicial activities. In reality, the Supreme Court functions with a modified work schedule during the summer months, ensuring that its judicial responsibilities are upheld without unnecessary interruptions.

This year, for example, **the Supreme Court operated on partial working days from Monday, May 26, 2025, to Sunday, July 13, 2025. During this period, the Court continued to hear cases. The judges worked in rotation, sitting in different benches in turn. By this, judges also got time to work on finalising several important judgments that they had reserved.**

This practice is not a new development. It is an arrangement that happens every year, ensuring that cases are heard and decisions continue to be made. While the summer period may seem like a break, it is in fact a well-coordinated, efficient system that allows the Supreme Court to balance its extensive workload with the necessary time for its judges to work on the pending judgments.

Writing a judgment is a comprehensive and meticulous task that often requires days of careful thought and analysis. It involves a thorough examination of the facts of the case, an in-depth analysis of the applicable legal principles, and the application of the law to those facts in a way that is both just and consistent with existing legal standards. Beyond this, it also requires the judge to reflect on the broader development of the law, considering not just the specifics of the case at hand but also how the decision may contribute to or affect the evolving landscape of legal jurisprudence.

In many ways, writing a judgment can be compared to composing a Ph.D. thesis. Both tasks demand a deep understanding of the subject matter, a careful structuring of arguments, and a critical examination of existing literature or case law. However, the key distinction between the two lies in the time frame and urgency. While a Ph.D. thesis is often the result of years of research and reflection, a judgment must be written in a much shorter time span, sometimes under tight deadlines, while still maintaining the same level of intellectual rigour and clarity.

The judgment-writing process is akin to a legal scholar distilling complex issues into concise and well-reasoned conclusions. It requires a balance of legal analysis, factual accuracy, and the ability to articulate nuanced ideas clearly and effectively. Just as a thesis aims to contribute to academic knowledge, a judgment aims to contribute to the body of legal precedent, influencing future cases and shaping the direction of legal thought. Thus, while the task of writing a judgment is more time-constrained, the intellectual rigour and responsibility it entails are on par with those required for scholarly work, making it an equally demanding and profound exercise.

During the partial working days, the Supreme Court continued to facilitate a hybrid mode of hearing, allowing parties in person and members of the Bar to appear via video conferencing. The Chief Justice of India announced the formation of 21 benches to manage the workload during this period. Thousands of cases were listed for hearing

during these partial working days (vide circulars dated 15.04.2025 and 03.05.2025).

In June 2025, the Supreme Court disposed of 465 civil and 382 criminal cases, totalling 847 disposals for the month (as per National Judicial Data Grid). At least two benches were sitting every day to hear urgent matters, with some weeks seeing as many as five benches working daily.

The Registry remained fully operational during the entire period, functioning from 10:00 a.m. to 5:00 p.m. Revised guidelines for adjournments were introduced during this time to ensure efficiency and prevent unnecessary delays. Requests for adjournment were allowed up to 11:00 a.m. on the preceding working day. Reasons for adjournments had to be specific. The Court limited the grounds to bereavement, medical or health issues of the parties or advocates, to grant an adjournment (as per circular dated 19.05.2025).

During this period, three new appointments were made to the Supreme Court, with Justice N.V. Anjaria, Justice Vijay Bishnoi, and Justice A.S. Chandurkar taking oath. The Supreme Court Collegium was also active, making several recommendations for the appointments in the High Courts.

The Advocates-on-Record (AOR) Examination was conducted on June 16, 17, 20, and 21, 2025. This examination, held annually by the Supreme Court of India, serves as a gateway for advocates aspiring to file cases before the Court. Only Advocates-on-Record are authorised to file cases and pleadings in the Supreme Court.

The partial working days also allowed Judges of the Supreme Court to actively engage in international judicial conferences, academic lectures, and interactions with foreign judiciaries and international legal institutions.

TO BE PUBLISHED IN PART III SECTION 1 OF THE GAZETTE OF INDIA

SUPREME COURT OF INDIA

F.No.44/PCWD Benches/2025/ SCA(G)
Date : May 16, 2025.

NOTIFICATION

In pursuance of Rule 4 of Order II of the Supreme Court Rules, 2013 [as amended], Hon'ble the Chief Justice of India has directed that there will be partial Court working days from Monday, 26th May, 2025, to Sunday, 13th July, 2025 (both days inclusive), and the Courts will function regularly from Monday, 14th July, 2025.

Under Rule 6 of Order II of the Supreme Court Rules, 2013 [as amended], Hon'ble the Chief Justice of India has been pleased to constitute the following Benches for the partial Court working days, 2025:

Period	Benches
26.05.2025 to 01.06.2025	Hon'ble the Chief Justice of India and Hon'ble Mr. Justice Augustine George Masih
	Hon'ble Mr. Justice Surya Kant and Hon'ble Mr. Justice Dipankar Datta
	Hon'ble Mr. Justice Vikram Nath and Hon'ble Mr. Justice Sanjay Kumar
	Hon'ble Mr. Justice J.K. Maheshwari and Hon'ble Mr. Justice Aravind Kumar
	Hon'ble Mrs. Justice B.V. Nagarathna and Hon'ble Mr. Justice Satish Chandra Sharma
02.06.2025 to 08.06.2025	Hon'ble Mr. Justice Sanjay Karol and Hon'ble Mr. Justice Satish Chandra Sharma
	Hon'ble Mr. Justice Ahsanuddin Amanullah and Hon'ble Mr. Justice S.V.N. Bhatti

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Period	Benches
	Hon'ble Mr. Justice Prashant Kumar Mishra and Hon'ble Mr. Justice Augustine George Masih
09.06.2025 to 15.06.2025	Hon'ble Mr. Justice Prashant Kumar Mishra and Hon'ble Mr. Justice Manmohan
	Hon'ble Mr. Justice S.V.N. Bhatti and Hon'ble Mr. Justice Prasanna Bhalachandra Varale
16.06.2025 to 22.06.2025	Hon'ble Mr. Justice Ujjal Bhuyan and Hon'ble Mr. Justice Manmohan
	Hon'ble Mr. Justice Sandeep Mehta and Hon'ble Mr. Justice Prasanna Bhalachandra Varale
23.06.2025 to 29.06.2025	Hon'ble Mr. Justice K.V. Viswanathan and Hon'ble Mr. Justice N. Kotiswar Singh
	Hon'ble Mr. Justice Ujjal Bhuyan and Hon'ble Mr. Justice K. Vinod Chandran
	Hon'ble Mr. Justice Sandeep Mehta and Hon'ble Mr. Justice Joymalya Bagchi
30.06.2025 to 06.07.2025	Hon'ble Mr. Justice M.M. Sundresh and Hon'ble Mr. Justice K. Vinod Chandran
	Hon'ble Mr. Justice Pamidighantam Sri Narasimha and Hon'ble Mr. Justice R. Mahadevan
	Hon'ble Mr. Justice Manoj Misra and Hon'ble Mr. Justice N. Kotiswar Singh
07.07.2025 to 13.07.2025	Hon'ble Mr. Justice Sudhanshu Dhulia and Hon'ble Mr. Justice Joymalya Bagchi

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Period	Benches
	Hon'ble Mr. Justice Pankaj Mithal and Hon'ble Mr. Justice K.V. Viswanathan
	Hon'ble Mr. Justice Rajesh Bindal and Hon'ble Mr. Justice R. Mahadevan

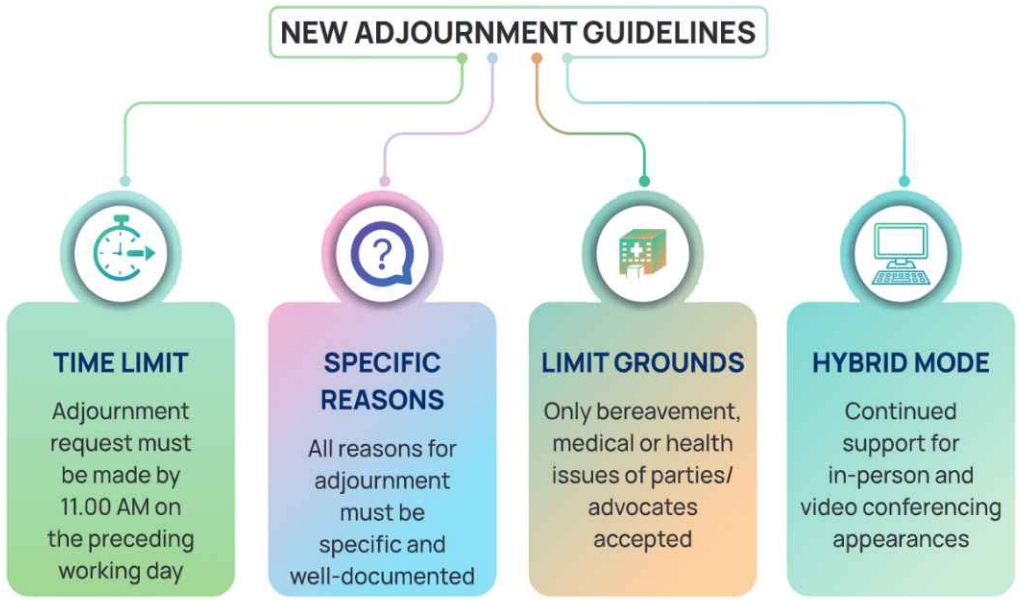
During the partial Court working days, the Registry will remain open from 10.00 a.m. to 5.00 p.m. for all the officers and staff members of the Registry, except Group-C (non-clerical) staff in whose case timings will be from 9.30 a.m. to 5.30 p.m. on all the days, except Saturdays (other than 12th July, 2025), Sundays and holidays when it shall remain closed.

Sd/-
(T.I. Rajput)
Registrar (Court & Building)
Tel : (O) 011-23112550

Copy to : **All concerned**.







* Source : National Judicial Data Grid as on date 25th July 2025

Supreme Court of India @ 75: Global Engagements

In 2025, the Supreme Court of India is celebrating the 75th year of its establishment, a milestone that not only marks the Court's enduring legacy but also reflects the successful functioning of the Indian Constitution. This anniversary is a significant moment in the Court's history, underscoring its crucial role in shaping India's legal landscape and its remarkable journey in upholding the principles of justice, fairness, and equality. The Supreme Court has evolved into a global leader in many aspects of judicial practice, and this year's commemoration highlights its enduring influence both domestically and internationally.

The number of cases heard daily by the Supreme Court of India is unmatched, surpassing that of any other judicial institution across the world. The sheer volume of legal matters handled by the Court demonstrates its efficiency and the trust that citizens place in it to provide justice in a timely manner. In June 2025, the senior judges of the Court were invited by various judiciaries and academic institutions around the world to share the unique story of India's judicial system and the successes and challenges it has faced over the decades. These invitations, extended by prominent international institutions, represent not just a recognition of the Supreme Court's status but also its growing global influence in shaping legal principles and standards.

Such partnerships and academic exchanges symbolise the increasing respect and recognition that the Supreme Court of India commands worldwide. The very fact that India's highest judicial authority is invited to share its experiences on the global stage is indicative of the Court's expanding role in international legal discourse. **Historically, during the drafting of India's Constitution, constitutional adviser B.N. Rau travelled to various countries to study their constitutions and legal systems. Fast forward to today, and the judges of the Supreme Court are now being invited to share the rich experiences of India's own jurisprudence. This is a clear reflection of the Supreme Court's ascent to a position of global prominence.**

The judgments of the Supreme Court have also gained global attention, with many of its rulings being cited and adopted by courts in various countries around the world. This is a testament to the universal appeal of the Court's reasoning and the universal relevance of the legal principles it upholds. These global citations underscore the fact that the Supreme Court's decisions do not just have a national impact but contribute to the global understanding of constitutional law and human rights.

Furthermore, academic exchanges, legal dialogues, and institutional collaborations are indispensable for ensuring continuous judicial education. They provide an opportunity for judges, legal professionals, and scholars to engage with evolving legal trends, refine their understanding of constitutional values, and discuss the latest developments in international law. International events, particularly those organised by universities and academic institutions, serve as a crucial

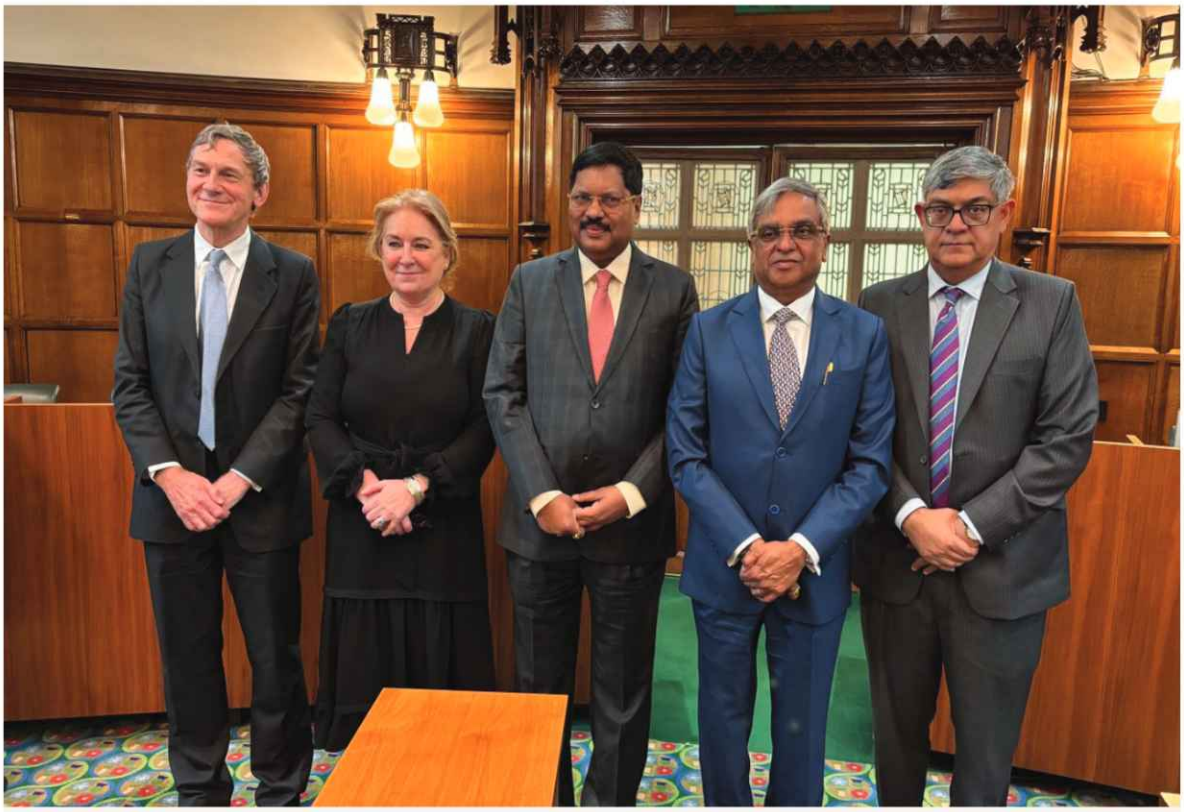
platform for such discussions. These gatherings foster vital bridges between the judiciary and academia, where legal scholars, students, and judges can engage in meaningful conversations about the evolving interpretations of law and the way forward for the global legal community.

These engagements are invaluable because they offer a space for judges to reflect on their own legal cultures and consider alternative judicial philosophies from around the world. This cross-border dialogue is especially significant in our increasingly interconnected and globalised world. The sharing of judicial doctrines and jurisprudence fosters greater understanding among judges of different countries, enhancing their ability to interpret and apply the law in ways that are sensitive to the evolving global context. Furthermore, attending such events enables judges to gain insights into different judicial systems and cultures, enriching their own understanding and approach to the law.

The exposure to diverse perspectives not only helps judges interpret the law in more globally relevant ways but also nurtures judicial thinking that is both progressive and well-rounded. Engaging with global academic institutions also has the added benefit of inspiring the next generation of legal professionals. Students and young lawyers benefit from hearing directly from judges who are at the forefront of legal innovation and constitutional interpretation. These interactions serve to inspire legal innovation, promote creativity, and encourage the development of new ideas and solutions within the legal profession. In this way, these exchanges strengthen the global judicial discourse and contribute to a shared understanding of justice that transcends borders.

During the Court's partial working days, judges at the Supreme Court of India continue to enhance the Court's influence on the global stage. Despite operating on a modified schedule, the Court's judges remain engaged in international dialogues, academic exchanges, and legal discussions that bolster its reputation and reinforce its position as a global leader in jurisprudence. By attending these events and engaging in scholarly and judicial interactions, the judges contribute to the ongoing development of legal practices worldwide. This not only strengthens the global judicial community but also ensures that the Supreme Court of India continues to play a central role in shaping global legal thought.

In conclusion, the 75th anniversary of the Supreme Court of India is a momentous occasion, highlighting the Court's tremendous contributions to both Indian and global legal systems. Its role as a leader in legal thought, its influence on global judicial practices, and its commitment to engaging with international legal scholarship are all integral to its continued success. Through its continued participation in global academic and judicial dialogues, the Supreme Court of India is not just reinforcing its own legacy but also shaping the future of global jurisprudence.



Left to Right: Lord Leggatt, Justice of the Supreme Court of the United Kingdom; Baroness Sue Carr, Lady Chief Justice of England and Wales; Justice B R Gavai, Chief Justice of India; Justice Vikram Nath, Judge, Supreme Court of India; and Gourab Banerji, Senior Advocate, Supreme Court of India, at the Roundtable discussion on the theme of 'Maintaining Judicial Legitimacy and Public Confidence' organised by the UK Supreme Court on 3 June 2025



4 June 2025: Justice B R Gavai, Chief Justice of India, along with Kevin Nash, Director General, London Court of International Arbitration (LCIA) and Sherina Petit, Member of the LCIA Board, at the LCIA International Arbitration Symposium - Fireside Conversation on 'Evolution of Dispute Resolution, Judicial Perspectives on International Arbitration, and India's Role in the Global Legal Landscape'



4 June 2025: Justice B R Gavai, Chief Justice of India, along with Justice Vikram Nath, Judge, Supreme Court of India, participated in a panel discussion conducted in collaboration with Centre for International Legal Studies, on 'Arbitrators, Fraud Concerns and the Courts' at Edwardian I, St James Court, Taj Hotel, London



4 June 2025: Justice B R Gavai, Chief Justice of India, at the British Institute of International and Comparative Law (BIICL), delivered the keynote speech on the theme 'Contemporary Issues in International Law'



5 June 2025: Justice B R Gavai, Chief Justice of India, inaugurated the 3rd International Conference on 'Arbitrating Indo-UK Commercial Disputes' during London International Disputes Week 2025. Mr Arjun Ram Meghwal, Union Minister of State (I/C) for Law & Justice, and Parliamentary Affairs, also attended the event The conference emphasised 'Synergising India UK Arbitration Practices' with dedicated panel discussions on 'Hybrid Dispute Resolution Models in Indo-UK Commercial Conflicts' and 'Bridging Dispute Resolution Mechanisms in India-UK to Enhance Trade & Investment'



5 June 2025: Justice B R Gavai, Chief Justice of India, delivered a lecture at Gray's Inn reflecting on 'The Living Document: 75 Years of the Constitution of India, and the Enduring Relevance of Dr Ambedkar'. Chief Justice of India was joined by Mr Arjun Ram Meghwal, Union Minister of State (I/C) for Law & Justice, and Parliamentary Affairs, and Justice Vikram Nath, Judge, Supreme Court of India



6 June 2025: Justice B R Gavai, Chief Justice of India, delivered a keynote address at London International Disputes Week (LIDW) 2025 in London, focusing on 'Navigating the Evolving Landscape: The Impact of the 7th Edition of SIAC Rules on India-Related Arbitrations' at St James Court, London



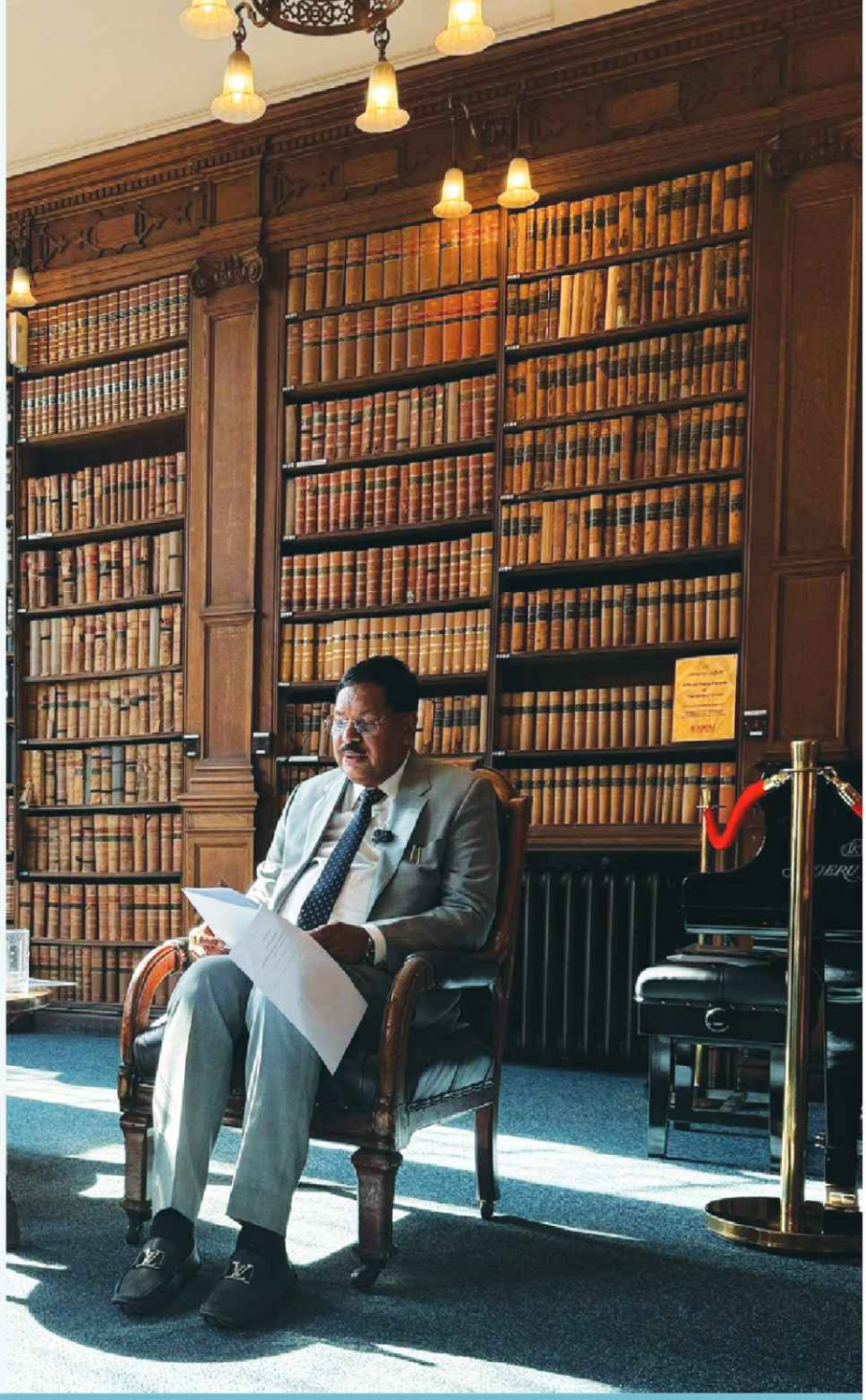
6 June 2025: Justice B R Gavai, Chief Justice of India, delivered keynote addresses on 'Role of Technology to improve Access to Justice' and 'AI and Information Technology in the Indian Legal System' organised by The School of Oriental and African Studies (SOAS) University of London. Justice Vikram Nath, Judge, Supreme Court of India, also participated in the Panel Discussion



7 June 2025: Justice B R Gavai, Chief Justice of India, and Justice Vikram Nath, Judge, Supreme Court of India, along with Mr Arjun Ram Meghwal, Union Minister of State (I/C) for Law & Justice, and Parliamentary Affairs, paid tribute to Dr B R Ambedkar at Ambedkar House, 10 King Henry's Road, London



Justice B R Gavai, Chief Justice of India during his official visit to Milan, Italy



10 June 2025: Justice B R Gavai, Chief Justice of India, delivered the address 'From Representation to Realization: Embodying the Constitutional Promise' at Oxford Union, St Michael's Street, Oxford

"Many decades ago, millions of citizens of India were called untouchables.
They were told they were impure.
They were told that they did not belong.
They were told that they could not speak for themselves.
But here we are today -
where a person belonging to those very people is speaking openly,
as the holder of the highest office in the judiciary of the country."



13 June 2025: Justice B R Gavai, Chief Justice of India, accompanied by Justice Vikram Nath, Judge, Supreme Court of India, delivered a guest lecture at the Playfair Library, Edinburgh Law School, at Old College, South Bridge, The University of Edinburgh



18 June 2025: Justice B R Gavai, Chief Justice of India, delivered keynote address on 'Role of Constitution in delivering Socio-Economic Justice in a Country: Reflections From 75 years of Indian Constitution' at Palazzo di Giustizia di Milano, Milan, Italy



3 June 2025: Justice Surya Kant, Judge, Supreme Court of India, visited headquarters of Gates Foundation in Seattle, USA



4 June 2025: Justice Surya Kant, Judge, Supreme Court of India, visited Seattle University School of Law to speak at Fireside Chat on the theme, 'Judicial Independence, the Role of Courts in Democratic Societies and Transnational Legal Dialogue'



Justice Surya Kant, Judge, Supreme Court of India, at the Consulate General of India, Seattle, Washington during his official visit to the United States of America



6 June 2025: Justice Surya Kant, Judge, Supreme Court of India, visited the Microsoft Cybercrime Centre at Redmond, Washington for an engaging discussion about the transformative role Artificial Intelligence plays in the courts worldwide, and to exchange ideas and share knowledge on the Intersection of AI and the Global Justice System



10 June 2025: Justice Surya Kant, Judge, Supreme Court of India, delivered the keynote speech at the annual 'Envision India Conference,' organised by Asia Society Northern California, at San Francisco, California, USA



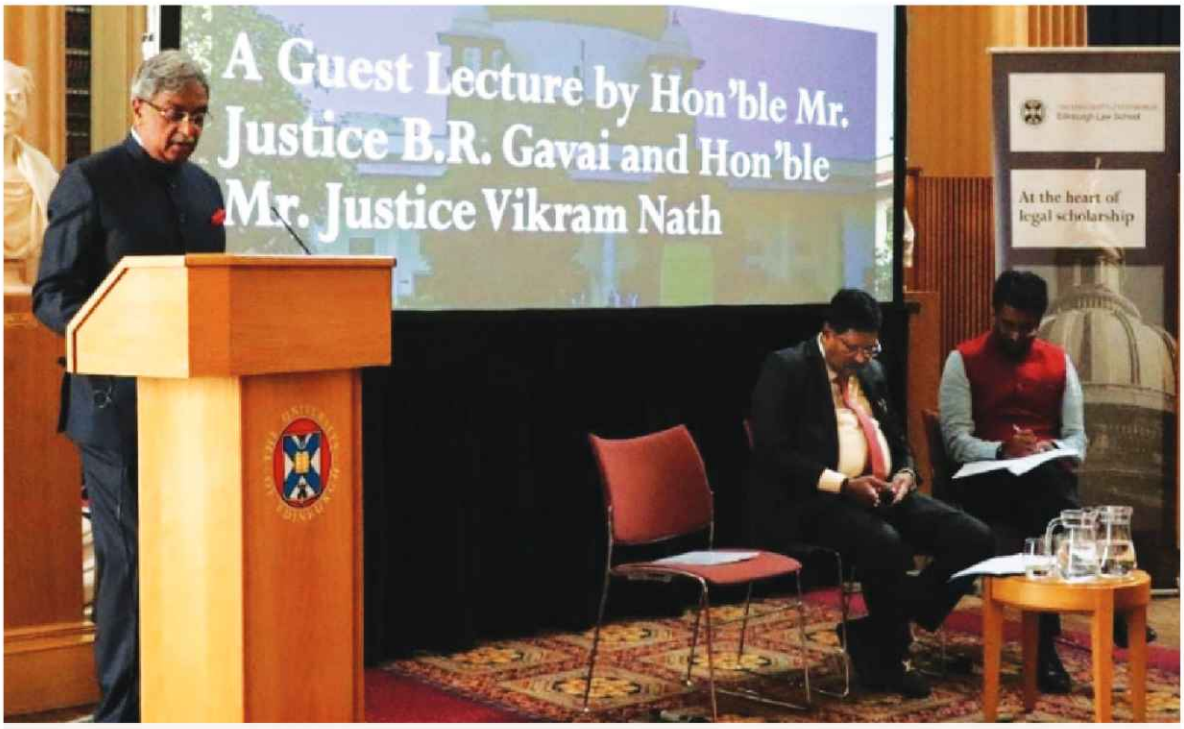
11 June 2025: Justice Surya Kant, Judge, Supreme Court of India, delivered a speech at the Washington Telangana Association in Washington D.C., USA



5 June 2025: Justice Vikram Nath, Judge, Supreme Court of India, delivered an introductory address at Gray's Inn, reflecting on 'The Living Document: 75 Years of the Constitution of India, and the Enduring Relevance of Dr Ambedkar'



6 June 2025: Justice Vikram Nath, Judge, Supreme Court of India, participated in a session during London International Disputes Week on 'Judicial Perspectives, Institutional Practice, and Practitioner Realities: Evolving Standards in International Arbitration', organised by the Quadrant Chambers at Quadrant House, London. Justice Vikram Nath also delivered the keynote address on the topic, 'The Indian Dispute Extravaganza: The Changing Face of Disputes Involving Indian Parties' at Fieldfisher LLP, Riverbank House, London



13 June 2025: Justice B R Gavai, Chief Justice of India and Justice Vikram Nath, Judge, Supreme Court of India, delivered a guest lecture at the Playfair Library, Edinburgh Law School, at Old College, South Bridge, The University of Edinburgh



20 June 2025: Justice Pankaj Mithal, Judge, Supreme Court of India, participated and delivered a message of support on the occasion of the 30th Anniversary of the Establishment of the Constitutional Court of the Republic of South Africa in Johannesburg



20 June 2025: Justice Pankaj Mithal, Judge, Supreme Court of India with Justice Mandisa Maya, Chief Justice of the Republic of South Africa and Head of the Constitutional Court of South Africa, on the occasion of the 30th Anniversary of the Establishment of the Constitutional Court of the Republic of South Africa in Johannesburg



Left to right: Justice I Lenaola, the Supreme Court of Kenya; Justice Owen Rodgers, Constitutional Court of South Africa; Justice Albie Sachs, Constitutional Court of South Africa (Retired); Justice Jody Kollapen, Constitutional Court of South Africa; and Justice Pankaj Mithal, Judge, Supreme Court of India at the 30th Anniversary of the Establishment of the Constitutional Court of the Republic of South Africa in Johannesburg on 20 June 2025

Fresh from the Bench

In Re: TN Godavarman Thirumulpad
I.A. Nos. 117782, 117783 and 117785 of 2025 in W.P.(C) No 202/1995

CORAM: Chief Justice B R Gavai, Justice Augustine G Masih and Justice Atul S Chandurkar

In response to an application seeking urgent directions to the State of Rajasthan and the Central Government to regulate and restrict public access and vehicular traffic to the Trinetra Ganesh Temple and other religious sites located within the Critical Zone of the Ranthambore Tiger Reserve, the Supreme Court passed an order dated **30 May 2025** and constituted a three member committee consisting of the Collector, Sawai Madhopur, Field Director, Ranathambore Tiger Reserve and a member of the Central Empowered Committee to examine the issue and recommend phased solutions.

In the present interlocutory application, the petitioner had highlighted the issues regarding religious gathering in Trinetra Ganesha Temple which is situated inside the historic Ranthambore Fort approximately five kilometers within the National Park. The petitioner contended that the temple recorded a regular footfall of more than 2,500 visitors on a daily basis and since the road leading to the temple lies entirely within the core zone of the Tiger Reserve, it had become a massive spot for congestion due to private vehicles brought by these pilgrims. As per the petitioner, such congestion exposes high density tiger zones to intrusive human presence resulting in multiple direct and indirect harms to the already fragile ecosystem of the Ranthambore Tiger Reserve. Additionally, since a large number of pilgrims were visiting the temple, the nearby area had become a hub of plastic waste causing anthropogenic disturbances to the wildlife, particularly tigers and other keystone species.

Further, the petitioner also raised concerns regarding the illegal mining activities and commercial construction taking place with the critical tiger habitat (CTH) area of the Ranthambore Tiger Reserve. It was contended that despite prohibition by the State of Rajasthan, illegal constructions have continued unabated. The petitioner highlighted that it was because of a delay in declaration of an Eco Sensitive Zone around the Tiger Reserve on part of the State of Rajasthan that commercial constructions such as hotels, farm houses and residential colonies were growing inside the Tiger Reserve.

The Supreme Court, while directing the formation of a three member committee as discussed above, also stressed upon considering the rights of the devotees of the Trinetra Ganesha Temple and called for a solution which could balance the interest of the Tiger Reserve as well as the devotees. The Bench also directed the State of Rajasthan to ban mining in the core area of the Tiger Reserve.

Nagarajan v State of Tamil Nadu, 2025 INSC 802

"High Court cannot act as a revisional court, particularly when no appeal or revision has been filed either by the State, victim or complainant for seeking enhancement of sentence against accused"

CORAM: Justice B.V. Nagarathna and Justice S C Sharma

In a judgment dated **4 June 2025**, a two-judge bench of the Supreme court dealt with an appeal filed by an Appellant/convict against the suo moto Criminal Revision Petition by the High Court, whereby the High Court convicted the Appellant under Section 306 and 448 of IPC, overturning the conviction of the Trial Court under sections 354 and 448 of IPC.

The matter arose when the Appellant, a neighbor of the deceased, trespassed in the deceased's room and attempted to sexually assault her, but fled when her mother-in-law intervened. The next morning, the deceased and her infant daughter went missing. Before the incident, the deceased had tried to take her elder daughter from school but was refused by teachers, after which she went to a nearby field with her 1.5 year old infant, where both consumed oleander seeds in a murder-suicide incident. A cattle grazer found them and alerted authorities, and although the child was initially alive, she died after being taken to the hospital.

The incident was reported by the watchman, who registered the FIR in Kannivadi Police Station under Section 306 of the Indian Penal Code against the Appellant. A chargesheet was filed against the Appellant under 306 IPC, which was altered to Sections 354 and 448 of IPC and *vide* order dated 29.05.2015, acquitted the Appellant of the charge under Section 306 of IPC. The Appellant was convicted under Sections 354 and 448 of IPC and was sentenced to undergo simple imprisonment for three years and one month and to pay a fine of Rs. 25,000, and in default whereof to undergo simple imprisonment for three months for the offence under Section 354 of IPC, and a further sentence of simple imprisonment for three months for the offence under Section 448 of IPC.

Aggrieved by the order of the Trial Court, the Appellant filed a criminal appeal before the High Court, which upon a *prima facie* appraisal of the Trial Court's reasoning, formed the view that the Appellant's acquittal under section 306 may require further examination and suo moto directed the registration of a criminal revision case to examine the propriety of the acquittal.

Thereafter, by common impugned judgment dated 29.11.2021, the High Court dismissed the Criminal Appeal and allowed the suo moto Criminal Revision Petition, thereby convicting the Appellant under Section 306 and 448 of IPC and sentenced him to undergo rigorous imprisonment for five years and to pay a fine of Rs. 5,000, and in default, to undergo simple imprisonment for three months for the offence under Section 306 of IPC, and sentenced him to undergo simple imprisonment for three months for the offence committed under Section 448 of IPC.

Aggrieved by the order of the High Court, the Appellant moved the Supreme Court.

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

a. The appeal was being disposed of by following the judgment in *Sachin v. State of*

*Maharashtr*a (Criminal Appeal Nos. 2073-2075 of 2025 dated 21st April 2025), and noted that the question for consideration was whether, in an appeal against conviction, the appellate court could have directed enhancement of the sentence in an appeal filed by the accused.

b. Under clause (b) of Section 386 CrPC, the appellate court can alter the findings and sentence and acquit or discharge the accused, or order retrial, or alter the findings but maintain the sentence, or alter the nature or extent of the sentence but not so as to enhance the same and that in an appeal filed by the Appellant/accused against the judgment of conviction and sentence, the accused cannot be left worse off while the conviction is affirmed by the appellate court exercising appellate jurisdiction by enhancing the sentence.

c. The right to prefer an appeal is not only a statutory right but also a constitutional right in the case of an accused and that the appellate court in an appeal filed by the accused cannot, while maintaining the conviction, enhance the sentence, and that while exercising its appellate jurisdiction, the High Court cannot act as a revisional court, particularly when no appeal or revision has been filed either by the State, victim or complainant for seeking enhancement of sentence against the accused.

d. Regarding Section 401 of CrPC, Sub-section (4) states that where under the CrPC an appeal could have been filed and has not been filed, then no proceeding by way of revision could be entertained at the instance of the party who could have appealed and that under Section 401 of CrPC, the High Court is not authorised to convert the findings of acquittal into one of conviction by exercise of revisional jurisdiction, and this principle can be extended to mean that the High Court cannot enhance the sentence imposed by a Trial Court on conviction in an appeal filed by the accused/convict.

e. That in an appeal filed by the accused/convict and in the absence of any appeal filed by the victim, complainant or the State, the High Court cannot exercise suo motu revision either to enhance the sentence or to convict the Appellant on any other charge.

The Court, in delivering the judgment, referenced the latin maxim *reformatio in peius* meaning a change for the worse, noting that in many jurisdictions this practice is forbidden, ensuring that an Appellant cannot be placed in a worse position as a result of filing an appeal.

Consequently, the Supreme Court allowed the appeals in parts and set aside the conviction and sentence of the Appellant under Section 306 of IPC, and confirmed the judgment of the Trial Court as affirmed by the High Court regarding the offences punishable under Sections 354 and 448 IPC. The Court directed that the Appellant undergo the sentence and pay the fine as imposed by the Sessions Court, and in case the accused had not yet completed the sentence, he was directed to surrender before the jurisdictional Chief Judicial Magistrate or the concerned Police Station.

Machhindranath v Ramchandra Gangadhar Dhamne
2025 INSC 795

"A loanee cannot take advantage of their own breach to nullify a transaction. Only the aggrieved party could seek to set aside such a sale"

CORAM: Justice Sudhanshu Dhulia and Justice Ahsanuddin Amanullah

In a judgment dated **2 June 2025**, a two-judge bench of the Supreme Court dealt with an appeal against the order of the Bombay High Court. The High Court order overturned a Trial Court's decision favouring the plaintiff in a civil suit filed under the Maharashtra Co-operative Societies Act, 1960 (hereinafter the Act). The plaintiff by way of the present appeal sought the Court to declare the sale of the disputed land deed void in the light of a subsisting private agreement which stipulated that the land would be returned to the third party who originally gave the plaintiff a loan.

In the present case, the suit land was the ancestral property of the original plaintiff -Machhindranath, who obtained a loan from a Society in 1971 that he enrolled as a member of in 1955. In obtaining the loan, the plaintiff had created a charge on the suit land in favour of the Society, subsequent to which a declaration was made and a mutation entry came to be recorded in 1969 mentioning the declaration.

Thereafter, the plaintiff raised another loan from Defendant No. 1, who was also his nephew, and to that end as security the plaintiff executed a Registered Sale Deed in 1971 of the suit land in his favour. Alongside the sale deed, a private agreement styled as 'Ram Ram Patra' or the Reconveyance Deed was also executed by Defendant No. 1 undertaking to reconvey the suit land upon repayment of the loan. Later in 1972, Defendant No. 1 executed a sale deed in favour of Defendant No. 2 in respect of 10 acres of the suit land. Consequently, the land was divided into two parts, namely Survey No. 30/1 and 30/2. Against the sale deed executed by Defendant No. 1 in favour of Defendant No. 2, the Plaintiff moved the Trial Court seeking possession of both portions of the land and a direction to reconveyance of the same along with *mesne profits.* After the institution of the suit, Defendant No. 2 filed an application to the Society to strike off its charge on the suit land. Vide a Resolution dated 03.04.1973, the Society resolved that the charge would be struck off only after a compromise takes place in respect of the land. However, subsequently, by a resolution dated 27.08.1973 passed by the Society, the suit land came to be released by the Society from its charge, on account of repayment of the loan by the plaintiff.

The Trial Court vide order dated 27.03.1980 held the sale deed void under Section 48 of the Maharashtra Cooperative Societies Act observing that Defendant No. 2 had failed to prove that he was a bonafide purchaser for the value without notice. Alongside on the question of bar under the Prevention of Fragmentation and Consolidation of Holdings Act, 1947 (hereinafter referred to as the 'Fragmentation Act'), the Trial Court found that the alienation was in pursuance of the certificate granted under the Fragmentation Act. As a result, the Trial Court passed a decree for possession of the suit land with direction to Defendant No. 1 to execute the deed of reconveyance of the suit land in favour of the plaintiff after receiving Rs.5,000 from him.

Against the order of the Trial court, Defendant No. 2 approached the High Court of Judicature at Bombay, wherein a Single Judge bench of the HC, vide order dated 14.10.1988 remanded the matter back to the Trial Court after framing four additional issues, which the Trial Court considered with fresh evidence from the parties. The Trial Court found that the Society was registered as a

Registered Resource Society, having majority of its members as agriculturists, and that the Society was sub-classified as Service Resource Society. After receipt of the decision of the Trial Court on the four additional issues, the Single Judge dismissed the appeal and confirmed the decree of possession. Against this, Defendant No. 2 filed a letter petition, which was allowed by a division bench and the matter was remanded to the single judge for fresh reconsideration on all issues. Pursuant thereto, the single judge reconsidered the evidence and allowed the first appeal, thereby setting aside the decree of possession and dismissing the suit brought by the plaintiff. Aggrieved by these findings, the original plaintiff (predecessor-in-interest of the Appellants) filed LPA No.33/1998 before the division bench, dismissal whereof has been occasioned vide the Impugned Order.

The Supreme Court in dealing with the matter observed it to be falling under a 'unique category', where a person on the one hand comes before a court seeking that his own actions be nullified on the ground that it was void, and on the other hand wants relief in his favour, which is consequential to and traceable to his own wrong.

The Court, in addressing the question of validity of the conveyance, the rights of Defendant No. 2 as bonafide purchaser, observed that:

a. Section 48 of the Act creates an embargo on alienating property when a charge exists due to a loan, unless the loan is fully repaid or a part of the property is specifically released. In this case, the charge existed before the sale deed, and no repayment or release occurred. Thus, at first glance, the sale deed appeared void under Section 48(e) of the Act, and the subsequent sale to Defendant No. 2 on July 15, 1972, would also be void. However, a deeper probe was necessary to determine the extent to which the *void ab initio* theory applied, depending on specific facts, which addresses the question of whether the conveyance of the suit land by the original plaintiff on November 2, 1971, in favor of Defendant No. 1 was legally sustainable, given the existing charge under Section 48 of the Act.

b. Section 48(d) and (c) of the Act allow for the release of charged land upon full repayment, which occurred on 27.08.1973, indicating the Society's interests were not harmed.

c. The primary purpose of Section 48(e) is to safeguard the Society's interest that advanced the loan. Therefore, the right to challenge such an alienation rests solely with the Society. The member-loanee, who is in breach, cannot take a stand that their own act should be declared void, without the Society initiating such action and that the law does not reward a person for their own wrong. Since the society never challenged the deeds, the alienation is voidable, not void ab initio.

d. The 'Ram Ram Patra' reconveyance deed, alleged to have been executed on 2.11. 1971, for Rs. 5,000, was inadmissible as it was neither stamped nor registered, was also by a different scribe, and contradicted the registered sale deed's statement of no encumbrances.

e. The absence of a specified time period for reconveyance and in the absence of any provisions for escalation in the amount to be returned in the alleged 'Ram Ram Patra' was implausible for a genuine reconveyance deed and would be inequitable.

f. The Plaintiff's claim was diluted by the absence of an averment that he was ready, willing, and offered to pay the amount, and that Defendant No. 1 refused, meaning no cause of action arose for the Plaintiff.

g. Defendant No. 2 was a bona fide purchaser on 15.07. 1972, as the transaction was based on the apparent title from 2.11.1971, sale deed to Defendant No. 1, with no reason for Defendant No. 2 to know of any encumbrance.

h. It was improper to assist a person who seeks to set aside their own wrong and then be granted relief, asserting that the court would not allow the plaintiff to benefit from his own wrong (*ex injuria sua nemo habere debet*) or perpetuate illegality.

The Court dismissed the appeal finding no errors in the judgments by the single judge and the division bench of the High Court of Judicature of Bombay.

The Court further observed that it would not be proper for a court of law to assist or aid such a person who states that the wrong he committed be set aside and a relief be granted *de hors* the wrong committed, after condoning the same. The Court, in dismissing the case, observed that the Plaintiff cannot be allowed to benefit from his own wrong and the Court will not be a party to a perpetuation of illegality.

Greater Mohali Area Development Authority (GMADA) v Anupam Garg & Ors., 2025 INSC 808

"Developers not liable to pay interest on personal loans taken by buyers"

CORAM: Justice Sanjay Karol and Justice Prasanna B Varale

In a judgment dated **4 June 2025**, a two-judge bench of the Supreme Court by way of an appeal dealt with the issue of the extent of compensation that can be awarded to aggrieved property buyers when developers fail to deliver possession within the specified timeframes.

In this case, the Appellant, GMADA, launched a residential scheme called 'Purab Premium Apartments' in Sector 88, Mohali in 2011 and the Respondent, Anupam Garg, applied for a 2 BHK apartment priced at Rs. 55 lakhs, paying Rs. 5.5 lakhs as earnest money (10 percent of total cost) after which through a draw of lots, the Respondent was allotted a flat and received a Letter of Intent (LoI) on 21 May 2012.

The said LoI specified a payment schedule requiring 30 percent initially, 65 percent in installments and the 5 percent upon possession. The possession was thereafter to be delivered within 36 months from the LoI date, i.e., by 21 May 2015. The contract also included a specific clause stating that if the Appellant failed to deliver possession within the stipulated period, allottees could withdraw and receive a full refund with 8 percent compound interest annually, with no other liability on the authority.

Upon the arrival of the possession date, the Respondent observed minimal development at the site of the project and decided to withdraw his money, which the Appellant allegedly confirmed with a promise to the deposited amount with 8 percent interest from the due date. However, in June 2016, the Appellant issued a belated offer of possession, but by then the respondent had already opted out.

The Respondent filed a consumer complaint seeking refunds, contending that they had paid substantial amounts towards their flats and had taken bank loans to finance these investments, paying interest on those loans while they awaited for possession.

The State Commission allowed the complaint, making reference to *Greater Mahali Area Development Authority v. Priyanka Naiyyar* (SLP no. 13578/2017), and directed the Appellant to refund the whole amount that was deposited along with the 8 percent interest from the due date as was deliberated under the LoI. The Commission also directed the Appellant to pay a compensation of Rs. 60,000 to the complainant for mental tension and harassment suffered by him and Rs. 30,000, as

costs of litigation. The Appellant, thereafter, moved to the National Commission, which found no merit in the appeal, and making similar reference, upheld the finding and the relief granted by the State Commission.

Aggrieved by the order of the State and the National Commission, the Appellant moved the Supreme Court. The Supreme Court, in its judgment, observed:

a. That compensation in real estate disputes cannot be uniform and must be determined based on specific facts and circumstances and that when possession is delayed or denied, allottees are entitled to refund with reasonable interest plus compensation for harassment and losses suffered.

b. Acknowledging that compensation can take various forms, the Court held that requiring the Appellant to pay the entire interest on loans taken by buyers was excessive and without proper legal basis and that how buyers finance their purchases, whether through savings, loans, or other means, is irrelevant to the developer's obligations.

c. The 8 percent compound interest already provided in the contract, along with the refund of the principal amount, adequately compensated the investors for being deprived of their investment and that this interest adequately represents compensation for the time value of money and the loss of investment opportunity.

d. Awarding compensation under different heads for the same default which encompasses delay in possession is not sustainable and that the contractual 8 percent interest already compensates for the deprivation of investment and additional loan interest payments would constitute double compensation for the same breach.

Consequently, the Supreme Court partially allowed Appellant's appeals, specifically, striking down the requirement to pay the Respondents' loan interest costs. The Court, in allowing the appeal, held that the existing deposits before the State Commission that do not include the amount of interest were sufficient and no further amounts needed to be paid by the Appellant.

Union of India v M/S Kamakhya Transport Pvt Ltd 2025 INSC 805

"Railways can recover misdeclaration penalties post-delivery"

CORAM: Justice Sanjay Karol and Justice Prashant Kumar Mishra

In a judgment dated **5 June, 2025**, a two-judge bench of the Supreme Court dealt with the issue of whether railway authorities can raise demand notices alleging misdeclaration post delivery of the goods.

In the present case, the Railway authorities issued demand notices on various dates in 2011-2012 against four respondents alleging misdeclaration of goods in consignments sent through Indian Railways. The respondents paid the demanded amounts and then filed claim petitions before the Railway Claims Tribunal, Guwahati Bench, seeking refunds on the ground that demand notices issued after delivery of goods were illegal under Sections 73 and 74 of the Railways Act, 1989. The Respondents also contended that the demand was raised for misdeclaration, but the incident fell in the category of overloading and not misdeclaration.

The Railway Claims Tribunal allowed the claim petitions vide common order dated January 19,

2016 and directed refund of amounts paid by respondents along with interest at 6 percent per annum. Against the order of the Tribunal, the Appellant moved the High Court of Guwahati which dismissed the appeal and affirmed the Railway Claims Tribunal's order.

Aggrieved by the order of the High Court, the Appellant moved the Supreme Court, which considered the issue of whether the Appellant was right in raising the demand notice for the good after the delivery of the goods, and in doing so examined the provisions of Railway Commercial Manual II, 1991 and Railways Act, 1989.

The court, in its judgment, observed that:

a. Section 66 of the Railway Act empowers railway authorities to charge appropriate rates when goods are misdeclared and that no reference is made to the stage at which such a charge can be made, i.e., either before or after delivery. Consequently, the legislative intent had to be, to permit levy of charge under this Section, at either stage and not at a specific one.

b. It is evident that the demand was raised for misdeclaration by the respondents and no reference was made to the overloading of wagon, to which Section 73 applies, therefore, Section 66 applies to the present list.

c. Submission of the respondents that the demand notices annexed to the petition are not genuine in nature cannot be agreed to since no evidence has been led to that effect. Therefore, in the absence of evidence to the contrary, the demand notices were found to be genuine.

d. Found the approach taken by the court in contravention to the *Jagjit Cotton Textile Mills v. Chief Commercial Superintendent N.R. and Ors.*, wherein it was held that punitive charges are required to be raised by the Railway authorities before delivery is caused. The High Court's holding that penal charges can only be applied prior to delivery are erroneous as the observation in the abovementioned judgment was made in the context of Section 54 only, while the facts of this case pertain to Section 66 of the Act.

The court set aside the order of the High Court and allowed the appeal by the Appellant, holding that the Appellant (Railways) can recover misdeclaration penalties post-delivery.

Dhanyam v State of Kerala
2025 INSC 809

"Preventive detention cannot be used as an alternative to seeking cancellation of bail by the State"

CORAM: Justice Sanjay Karol and Justice Manmohan

In a judgment dated **6 June 2025**, the Supreme Court set aside a preventive detention order passed by the Ernakulam Bench of the Kerala High Court. The order had directed that the Appellant's husband be detained under Section 3 of the Kerala Anti-Social Activities (Prevention) Act, 2007 (KAAPA). The Court reaffirmed that preventive detention is an exception to the fundamental right guaranteed under Article 21 of the Constitution and must be invoked only in the rarest of circumstances.

In the present case, the detenue was operating a registered money-lending business under the name 'Rithika Finance'. On June 20, 2024, the District Magistrate of Palakkad, acting on a report from the Palakkad District Police Chief, issued a detention order under Section 3(1) of KAAPA. The police

report described the detenue as a "notorious goonda" and a threat to public safety. The detenue was already facing prosecution under multiple statutes, including Sections 3 and 9(1)(a) of the Kerala Prohibition of Charging Exorbitant Interest Act, 2012; Section 3 read with Section 17 of the Kerala Money Lenders Act, 1958; and Sections 294(b) and 506 of the Indian Penal Code, 1860 and was subsequently granted bail by the Trial Court.

While examining the legality of the preventive detention, the Supreme Court emphasised that although Article 22(3)(b) of the Constitution recognises preventive detention, its use results in the curtailment of personal liberty in anticipation of a possible offence. As such, it must be exercised with great restraint and cannot become a routine measure. The Court underscored that preventive detention, being an exception to the right to personal liberty under Article 21, must remain a narrowly tailored and sparingly used remedy, strictly reserved for rare and compelling cases.

Reviewing the order issued by the District Magistrate, the Court noted that under Section 3 of KAAPA, only the government or an authorised District Magistrate can detain a "known goonda," defined under Section 2(j) of the Act as someone whose actions are prejudicial to the maintenance of public order. However, the Supreme Court found that the detention order failed to specify how the detenue's conduct endangered public order. The absence of any cogent reasoning undermined the justification for invoking preventive detention.

The Court also addressed the allegation that the detenue had violated the bail conditions imposed by the Trial Court. It observed that the State had not filed any application seeking to cancel the bail in any of the pending cases, nor had it raised any formal complaint regarding breach of bail terms. In this context, the Court held that resorting to preventive detention rather than seeking bail cancellation was unjustified and improper.

Accordingly, the Supreme Court quashed the detention order, reiterating that the extraordinary power of preventive detention must not be used as a substitute for ordinary criminal law processes, particularly when sufficient legal remedies already exist.

Amlesh Kumar v The State of Bihar
2025 INSC 810

"The right to request a narco-test is not indefeasible and the Court must consider the totality of circumstances surrounding the matter, such as free consent, appropriate safeguards, etc."

CORAM: Justice Sanjay Karol and Justice Prasanna B Varale

In a judgment dated **9 June 2025**, a two-judge bench of the Supreme Court addressed whether the acceptance of submission by law enforcement to the High Court to conduct the narco analysis test of accused during investigation is in direct contravention of the exposition of law laid down by this Court in *Selvi and Ors. v. State of Karnataka, 2010 (7) SCC 263*. The court, in the said case, observed that forceful subjection of an individual to techniques, such as the narco-analysis test, violates personal liberty enshrined under Article 21 of the Constitution of India

In the present matter, a missing person complaint was filed in 2022 wherein the complainant alleged that her sister who had married the Appellant in December 2020, had been subjected to repeated dowry demands and physical abuse by the Appellant and his family members which led the complainant's sister to allegedly run from the matrimonial home. The Appellant on the other hand contended that while he was travelling to Ayodhya, his wife had alighted from the bus at Baabali Chawk for a nature's call but never returned subsequent to which he filed a complaint on August 28, 2022. In the meanwhile, against the complaint, the Appellant filed for a bail. While the case was going on, the co-accused allegedly made

confessional statements claiming they had thrown the missing person into the river Saryu on the intervening night of August 21-22, 2022, based on which the Sessions Judge at Vaishali rejected the Appellant's regular bail application in August 2023.

Against the order of the Sessions court, the Appellant moved to the High Court for regular bail application, which through an interim order dated November 9, 2023, during the pendency of the bail application, accepted the submission of the Sub-Divisional Police Officer, Mahua, who assured the court that she would conduct narco-analysis tests of all accused persons and other witnesses if required for the investigation.The Appellant's mother, father and brothers were granted bail by the High Court of Judicature at Patna.

The Appellant then filed the present Appeal before the Supreme Court challenging the order of the High Court, especially the acceptance of the narco-analysis test submission, which the Appellant contended directly contravened the exposition of law laid down by the Supreme Court in *Selvi and Ors. v. State of Karnataka (2010) 7 SCC 263*, where the court had observed that the forceful subjection to narco-analysis violates the right to personal liberty under Article 21 of the Constitution of India.

The Supreme Court, in its judgment, dealt with issues pertaining to the acceptance of submission by the High Court to conduct narco-analysis tests on accused persons, the evidentiary value of voluntary narco-analysis test reports as the sole basis for conviction and whether an accused possesses an indefeasible right to voluntarily undergo such a test.

The court, in its judgment, observed that:

a. Involuntary administration of narco-analysis and similar tests is unconstitutional, violating Articles 20(3) and 21 and, that the results of such involuntary tests are not considered material evidence and conducting them without consent violates substantive due process and breaches personal privacy.

b. For voluntary tests, while safeguards must be in place, the results cannot be directly admitted as evidence, though information discovered subsequently with the aid of such results may be admissible under Section 27 of the Indian Evidence Act, 1872.

c. The acceptance of the High Court about conducting narco-analysis test on all accused persons directly contravened with the judgment delivered by the Supreme Court under *Selvi*, and the constitutional protection, and noting the judgment delivered in *Sangitaben Shaileshbhai Datana v. State of Gujarat, 2018 SCC OnLine SC 2300* highlighted that in considering a bail application, a court should not order specific tests, thereby converting a bail application in a 'mini trial' and ultimately dismissed the Respondent's argument that modern investigative techniques justify such tests at the cost of constitutional guarantees.

d. Referencing the observation made in *Vinobhai v. State of Kerala*, *2025 INSC 119* which relied on *Manoj Kumar Soni v. State of M.P., 2023 INSC 705,* the court, on the question of request of narco-analysis, held that disclosure statements alone, without supporting evidence, are insufficient to secure a conviction beyond reasonable doubt.

e. Undergoing a narco-analysis test is not an indefeasible right to lead evidence, given its "suspect nature" and its conflict with the principles laid down in *Selvi* and that even voluntary consent must be carefully examined for coercion, deception or false promises.

The court, through its judgment, allowed the appeal by the Appellant and set aside the order of the High Court, thereby directing the High Court to decide the pending bail application of the Appellant in accordance with the law. The Court, in conclusion, reiterated the National Human Rights Commission's guidelines for such tests, noting that no lie detector test should be administered without the consent of the accused and consent must be recorded before a Judicial Magistrate with legal representation and full disclosure of implications.

Sanjay Rathore v State (Govt of NCT Delhi)
SLP(Crl) No 8930/2025

"Majority of judicial officers in Delhi are women and that they will not be able to function like this- if somebody can get away like this"

CORAM: Justice Prashant Kumar Mishra and Justice Manmohan

In an order dated **10 June 2025**, a two-judge bench of the Supreme Court dealt with the appeal against the order of the Delhi High Court whereby the court had confirmed the conviction and imprisonment of an advocate for using derogatory and sexually coloured remarks against a female judicial officer in open court. The Petitioner, through the Special Leave Petition, approached the court to minimise the sentence.

The Petitioner, a practising lawyer, in 2015, after learning that the case had been adjourned, allegedly forced his way into the courtroom. He then accused the female magistrate of arrogance and made inappropriate and abusive remarks about the judicial officer.

Upon being asked to exit the courtroom, the Petitioner refused to follow directions. Consequently, an FIR was lodged against him under Sections 186 (obstructing public servant in public duty), 189 (threat of hurt to public servant), 228 (insult or interruption to public servant sitting in judicial proceeding), 509 (word, gesture or act intended to insult the modesty of a woman), and 353 (assault or criminal force to prevent public servant from performing duty) of IPC. The Trial Court found the Petitioner guilty under five sections and sentenced him to a total of two years of simple imprisonment, with the terms to be served consecutively, along with a fine. Aggrieved by the order of the Trial Court, the Petitioner filed a revision petition against the conviction in the Delhi High Court, seeking that the sentence be cut short. The Delhi High Court, while reducing the sentence which was to be served concurrently (thus reducing it to 18 months of simple imprisonment), declined to further reduce the sentence, observing that the act of outraging the modesty of judicial officers attacks the foundation of judicial decorum and institutional integrity. The Delhi High Court upheld the conviction and sentence with modification, directing the Petitioner to surrender within 15 days.

The Supreme Court, while addressing the case, noted that the case was one involving egregious misconduct of an advocate against a judicial officer directly affecting the integrity and functioning of the judicial system and further observed that upon pursuing the inspection report, the language used cannot be even spoken in open court.

The court further observed that *'majority of judicial officers in Delhi are women and that they will not be able to function like this- if somebody can get away like this.'*

The Court, while addressing the issue of the propriety of the sentence and the request for leniency, modified the order on sentence to the limited extent that all the sentences awarded to the lawyer shall run concurrently and not consecutively.

The Supreme Court dismissed the SLP, finding no infirmity in the judgment of the Delhi High Court and allowed the petitioner two weeks to surrender.

National Engagements



26 June 2025: Justice B R Gavai, Chief Justice of India, honoured at a felicitation ceremony organised by the Advocates' Association of Bombay High Court Bench at Aurangabad, Maharashtra



27 June 2025: Justice B R Gavai, Chief Justice of India, was felicitated during a program organised by the District Bar Association (DBA) at the District Court premises, in Nagpur, Maharashtra



28 June 2025: Justice B R Gavai, Chief Justice of India honoured at a felicitation ceremony by the Nagpur High Court Bar Association (HCBA). The event was attended by Judges of the Supreme Court, Justice Dipankar Datta, Justice P B Varale, Justice A S Chandurkar. Justice Alok Aradhe, Chief Justice of Bombay High Court and Justice U U Lalit, Former Chief Justice of India, also attended the event



28 June 2025: Justice N Kotiswar Singh, Judge, Supreme Court of India attended the Valedictory Ceremony of the Parul University Law Conclave 2025 as Chief Guest in New Delhi, on the theme 'Navigating Legal Frontiers: Innovation, Integration and Impact'

Key Decisions at the Registry

Model Reservation Roster and Register

In a significant move reflecting the commitment to social equity, the Supreme Court of India has implemented a formal policy on reservation for Scheduled Caste (SC) and Scheduled Tribe (ST) staff in direct appointments and promotions. This policy, which became effective from June 23, 2025, covers a wide range of posts within the Court's administration, including registrars, senior personal assistants, and junior court assistants. This was announced via a circular on June 24, 2025 and introduces a model roster classifying employees under SC, ST, and unreserved categories, with SC employees receiving a 15% quota and ST employees a 7.5% quota in promotions. This development, overseen by the Chief Justice of India, aims to make the judiciary's internal actions consistent with its pronouncements on affirmative action. The policy's implementation includes the establishment of a model roster and updated register.

These guidelines were prepared by Registrar P Y Ladekar under the guidance of the Ld. Secretary General.

Guidelines for Retention and Destruction of Records

The Supreme Court of India has issued the Guidelines for Retention and Destruction of Records - 2025 to streamline the management of administrative records across the Registry. The guidelines address the need for a standardized framework for non-judicial records. While judicial records continue to be governed by Order LVI of the Supreme Court Rules, 2013, and Chapter XXI of the 2017 Handbook on Practice and Office Procedure, these new guidelines focus on administrative documents such as institutional policies, recruitment records, finance files, audit registers, and interdepartmental correspondence.

Notably, original submissions bearing the signatures of Hon'ble Judges, service books, and pension files are to be preserved permanently, while obsolete documents are to be destroyed following due approval from the concerned Registrar. The guidelines specify that destruction exercises are ideally to be conducted during summer vacations or periods of partial court functioning, ensuring that no related court matter is pending. The initiative is intended to enhance clarity, consistency, and compliance with audit standards.

These guidelines were prepared by Registrar P Y Ladekar under the guidance of the Ld. Secretary General.

Shifting of the Confidential Cell

The Confidential Cell of the Supreme Court was moved from its old office at 7, Krishna Menon Marg to the Main Building of the Supreme Court of India.

Legal Aid

Plane Crash Legal Support Helpdesk

In the wake of the tragic plane crash in Ahmedabad, which has resulted in an immense loss of lives and brought untold suffering to the victims and their families, the National Legal Services Authority (NALSA) expresses its deepest condolences and solidarity with all those affected. In this hour of grief, the legal services institutions of the country reaffirm their commitment to serving the people in times of crisis.

Under the guidance of the Chief Justice of India & Patron-in-Chief of NALSA Justice B R Gavai and Justice Surya Kant, Judge, Supreme Court of India & Executive Chairman of NALSA, the Gujarat State Legal Services Authority (SLSA) has launched an emergency response mechanism titled: Plane Crash Legal Support Helpdesk.

This support system has been instituted to ensure accessible, immediate, and comprehensive assistance to the victims and their families. A fully functional 24x7 Helpdesk has been set up, providing continuous legal assistance and walk-in support. This help desk is manned by trained legal aid lawyers who are offering guidance on essential legal matters, including assistance with documentation, identity verification, and claims.

To strengthen on-ground support, qualified advocates have been deployed to offer direct legal counselling to the affected families. These advocates are providing real-time legal advice and helping individuals navigate the procedural aspects of loss and recovery.

Recognising the emotional and psychological trauma resulting from the tragedy, dedicated Trauma and Grievance Redressal Support have also been made available. Psychological counselling is being provided through the Victimology Centre "Sangathi" for victims and their families.

All services under this initiative are being provided free of cost, in keeping with NALSA's mission to ensure justice and support to every individual in need. For further assistance, affected victims/families may also contact the NALSA Helpline: 15100, a toll-free number available nationwide, or reach out to the Gujarat State Legal Services Authority (SLSA) at 6357981044 or 07922850999.

This initiative exemplifies NALSA's continuing commitment to ensure access to justice in times of crisis and to uphold the rights and dignity of every individual, especially in the face of national tragedies. The legal services institutions of India remain steadfast in their mission of support, compassion, and service to stand by those in distress, offering a hand of support when it is needed most.

40-Hour Advanced Mediation Training Conducted for NALSA Law Interns

As part of its ongoing efforts to promote alternative dispute resolution mechanisms and build capacity among future legal professionals, the National Legal Services Authority (NALSA), in collaboration with the Mediation and Conciliation Project Committee (MCPC) of the Supreme Court of India, organised an intensive 40-hour Advanced Mediation Training Programme for 5-days in the month of June on 3rd - 6th and 9th June, 2025.

The training was conducted for 35 law interns who were associated with NALSA, offering them in-depth knowledge and practical skills in mediation as a constructive and non-adversarial method of dispute resolution. The curriculum, designed in

accordance with international best practices and guidelines set by MCPC, included theoretical foundations, simulation exercises, role-plays, and real-time feedback from experienced mediators and legal professionals.

This initiative reflects NALSA's commitment to equipping the next generation of legal practitioners with essential tools to resolve disputes amicably, reduce litigation burden, and strengthen access to justice through peaceful conflict resolution.



20 June 2025: Justice Surya Kant, Judge, Supreme Court of India and Executive Chairman, National Legal Services Authority (NALSA), along with Justice Dipankar Datta, Judge, Supreme Court of India and Patron of the Andaman and Nicobar State Legal Services Authority, at the Presidential Session on Drug Abuse, Suicide, POCSO Act, and Mental Health Issues in the Dolphin Conference Hall, Swaraj Dweep Island, Andaman and Nicobar Islands



21 June 2025: Justice Surya Kant, Judge, Supreme Court of India and Executive Chairman of NALSA, delivered a speech at the State Level Conference on Child Protection, organised by the State Legal Services Authority in association with NALSA, at Dr. B R Ambedkar Institute of Technology, Sri Vijaya Puram, Andaman and Nicobar Islands, along with Justice Dipankar Datta, Judge, Supreme Court of India and Patron of the Andaman and Nicobar State Legal Services Authority. Justice T.S. Sivagnanam, Chief Justice, High Court at Calcutta & Patron-in-Chief, A&N SLSA; and Justice Sabyasachi Bhattacharyya, Judge, High Court at Calcutta & Executive Chairman, A&N SLSA were also in attendance.

Bar News Bulletin

















June 2025: SCAORA conducted AOR Lecture Series, on the themes of Rights of Arrestees, Leading Cases on Curative Petition, Anti Defection Laws, Right to Privacy, Criminal Laws, and Professional Ethics



Training Hub







18 June 2025: Training Cell organised an Advanced Judicial Training on Criminal Matters for Dealing Assistants by resource persons Anshul Tanwar, Branch Officer and Harsh Kumar, Senior Court Assistant, to enhance procedural efficiency and institutional integrity within the Supreme Court





19 June 2025: Training Cell organised an Advanced Judicial Training on Civil Matters for Dealing Assistants by resource persons Nidhi Bhardwaj, Assistant Registrar and Jai Dev Joshi, Branch Officer, to aid in procedures, protocols of matters and uphold the procedural integrity with file management and updation







20 June 2025: Training Cell in collaboration with the Gender Sensitization and Internal Complaints Committee (GSICC), organised a training programme on 'Gender Sensitisation' for Officers above the Branch Officer rank, with resource person Kalpana Yadav to enhance awareness of gender-related issues, promote workplace inclusivity, and reinforce the principles of equality and respect within the judicial system

Bid Adieu



Ms Seema Soni joined the Registry of the Supreme Court of India on September 1, 1989 as a Junior Court Assistant, which was then known as the post of 'Junior Clerk'. Born and brought up in New Delhi, Ms Seema recalls her journey of coming to the Supreme Court as truly meaningful, noting how the experience instilled in her the value of discipline, attention to details and the ability to make careful, timely decisions when faced with responsibilities. She says she carries this professional and personal growth with immense pride. Post retirement, Ms Soni plans to delve deeper into her long standing interest in astrology and with more time available, intends to immerse herself in this field and practice it. A suggestion she holds for the Court is the establishment of a soundproof meditation room for employees, believing that even shorter periods of quiet reflections can enhance mental clarity and productivity. She retired as an Assistant Registrar on June 30, 2025.



Mr Mellumpada Sambaiah joined the Supreme Court as an attendant in 1989. Coming from Mellumpada in Andhra Pradesh, from a humble background, the job at the Supreme Court, as he now recalls, was a big deal providing the foundation for his life in Delhi, which he now attributes to creating a well-settled life for his children. During his time at the Supreme Court of India, Mr Sambaiah worked in different departments, but he spent most of his time working at the judges' residences, dealing with judicial assistance work and paper books handling. He fondly remembers his time with Justice Bhanumathi and Justice AK Ganguly. Upon his retirement, he plans to split his time between three places, Visakhapatnam, where his daughter resides, his hometown, and the USA with his son. Mr Mellumpada retired as the usher to Justice Sandeep Mehta in June 2025.



Ms Rani, a resident of Bulandshahr in Uttar Pradesh, joined the Supreme Court in 2014 as a Chamber Attendant. She joined the service in place of her husband who passed away in 2012. Ms Rani recalls her time at the Supreme Court as a huge part of her life. Over her ten years at the Supreme Court, Ms Rani was posted in different departments. At first, she was part of the general group, from where she got the opportunity to work in the translation department and sections IIB and IIC. After retirement, Ms Rani plans to move to Dehradun with her daughter where she wants to be closer to her relatives. She retired as a Chamber Attendant on June 30, 2025.



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