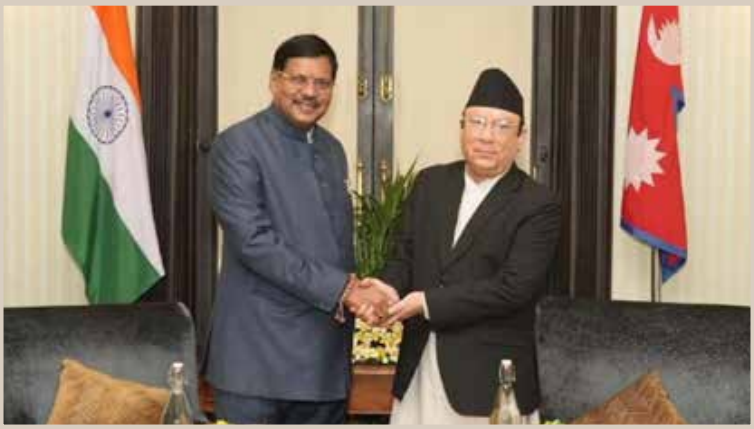
Supreme Court *Chronicle*

Issue XXIV | October 2025 (Covering Events of September 2025)

Highlights

- *Engagements on invitation of the Supreme Court of Nepal*
- *Delhi Arbitration Weekend, 2025*
- *2nd National Mediation Conference, 2025*
- *A Conversation with Justice Sudhanshu Dhulia*









Message from the Secretary General

Dear Readers,

I am pleased to present the latest edition of the Supreme Court Chronicle. Each edition continues our endeavour to document the Court's diverse engagements and its role in advancing dialogue within the judiciary and beyond.

This edition features the visit of the Chief Justice of India to Nepal at the invitation of the Chief Justice of Nepal. The visit, marked by a series of interactions and deliberations, strengthened the bilateral institutional ties between the judiciaries of the two nations and reaffirmed our shared commitment to the rule of law.

The edition also covers the Delhi Arbitration Weekend 2025, organised by the Delhi International Arbitration Centre, which brought together judges, jurists, and arbitration professionals from across jurisdictions. The event underscored India's growing stature as a hub for international arbitration and its commitment to fostering efficient dispute resolution mechanisms.

Another highlight is the 2nd National Mediation Conference, which served as a platform for the exchange of ideas and best practices in mediation. The discussions reflected the judiciary's continuing focus on strengthening alternative dispute resolution frameworks and promoting a culture of dialogue and conciliation. This edition also features a conversation with Justice Sudhanshu Dhulia, former Judge, Supreme Court of India, reflecting on his journey and contributions to the Bench.

As you read this edition, I hope the events and reflections captured here offer insight into the judiciary's ongoing efforts to promote justice, cooperation, and institutional excellence.

Shekhar C Munghate
Secretary General
Supreme Court of India

Editorial Team

Board of Editors
Dr Anurag Bhaskar
Anshuka Bhandari
Apurva Ambasth
Basima P
Sahil Rathee
Srishti Bharti
Vrishti Shami
Z Zakhar Naved

Designed by
Mohd Shafiqullah Arzoo
Md Hasamtullah Ansari
Design Team
Editorial
Supreme Court of India

Published by
Centre for Research and Planning (CRP)
Supreme Court of India
New Delhi-110001

Website
https://www.sci.gov.in/supreme-court-chronicle/

© Supreme Court of India, 2025

All rights are reserved

Contents

1. Global Engagements
2. National Engagements
3. Legal Aid
4. Bar News Bulletin
5. Fresh from the Bench
6. Training Hub
7. A Conversation with Justice Sudhanshu Dhulia
8. Bid Adieu

Global Engagements

Engagements on invitation of the Supreme Court of Nepal



4–7 September 2025: At the invitation of Justice Prakash Man Singh Raut, Chief Justice of Nepal, Justice B R Gavai, Chief Justice of India, made an official visit to Nepal and participated in a series of programmes organised by the Supreme Court of Nepal

The visit reflected the deepening judicial cooperation between the two neighbouring jurisdictions, building on the Memorandum of Understanding signed earlier in April 2025 between the Supreme Court of India and Nepal.



Justice B R Gavai, Chief Justice of India, addressed the members of the Nepali Judicial and Legal community at the Juridical Dialogue 2025 on the theme "Evolving Role of Judiciary with Particular Focus on Jurisprudential Developments and Justice Sector Reforms Undertaken by the Supreme Court of India"

In his address, the Justice B R Gavai highlighted the landmark developments in Indian jurisprudence, including the evolution of the basic structure doctrine, the recognition of privacy, reproductive and disability rights as facets of Article 21, and the Court's expanding engagement with climate justice and electoral transparency. Referring to institutional innovations, he mentioned the e-Courts Mission Mode Project, the National Judicial Data Grid, and the e-SCR portal, reflecting a judiciary that is responsive, efficient, and inclusive. He further emphasised that *"in today's globalised world, judiciaries are increasingly interconnected, making it essential for them to learn from one another's experiences"*.



Justice B R Gavai, Chief Justice of India, visited Lumbini, the birthplace of Lord Gautama Buddha. He paid homage at the Mayadevi Temple, lit a ceremonial lamp, and offered prayers for peace and harmony

20th Triennial Conference of the Commonwealth Magistrates' and Judges' Association (CMJA) at Banjul, The Gambia



21–26 September 2025: Justice Rajesh Bindal, Judge, Supreme Court of India, participated in the 20th Triennial Conference of the Commonwealth Magistrates' and Judges' Association (CMJA), at Banjul, The Gambia





21–26 September 2025: Justice Rajesh Bindal, Judge, Supreme Court of India, spoke at the 20th Triennial Conference of the Commonwealth Magistrates' and Judges' Association (CMJA) under the theme "Innovations in Judicial Practice: Embracing Change for a Better Future" at Banjul, The Gambia. He delivered lectures on topics 'Digital Transformation of Indian Judiciary' and 'Artificial Intelligence – Can Judges Effectively Monitor Its Ethical Use In The Courtroom?'



24 September 2025: Justice Rajesh Bindal, Judge, Supreme Court of India, interacted with students and faculty members of Faculty of Law, University of Gambia

J20 Summit, 2025 at Johannesburg, South Africa



2–5 September 2025: Justice K V Viswanathan, Judge, Supreme Court of India, participated and delivered his address at the J20 Summit 2025 of Heads of Constitutional Courts and Supreme Courts of the G20 members under the theme "Solidarity, Equality and Sustainability" at Johannesburg, South Africa, organised by the Constitutional Court of South Africa

XIII International Legal Forum of the Asia Pacific at St. Petersburg, Russia







21–24 September 2025: Justice Joymalya Bagchi, Judge, Supreme Court of India, along with Justice A S Kilor, Judge, High Court of Bombay, Justice Purushaindra Kumar Kaurav, Judge, High Court of Delhi, and Shri Shekhar Chudaram Munghate, Secretary General, Supreme Court of India, at the XIII International Legal Forum of the Asia Pacific at St. Petersburg, Russia

World Congress of the International Association for the Protection of Intellectual Property (AIPPI) at Yokohama, Japan





13–16 September 2025: Justice Manmohan, Judge, Supreme Court of India, spoke at the World Congress of the International Association for the Protection of Intellectual Property (AIPPI), held in Yokohama, Japan

National Engagements

Delhi Arbitration Weekend 2025

From September 18 to 21, 2025, the Delhi Arbitration Weekend 2025 was organised by the Delhi International Arbitration Centre (DIAC), established in 2009 as the institutional arbitration centre annexed to the Delhi High Court. The event aimed to provide a common platform for judges, leading practitioners, and arbitration experts from around the world to foster dialogue, exchange best practices, and strengthen India's pivotal role in international arbitration.

On 18 September, 2025, the Supreme Court of India, in collaboration with the High Court of Delhi, and Delhi International Arbitration Centre organised its Inaugural Session at the Administrative Buildings Complex, Supreme Court of India, New Delhi.

Justice B R Gavai, Chief Justice of India, graced the occasion as the Chief Guest and delivered the Plenary Address on the topic "Judicial and Institutional Influence on the Evolution of International Arbitration in India". Justice Stephen Gageler AC, Chief Justice, High Court of Australia, was the Guest of Honour and delivered the Keynote Address on the topic "The UNCITRAL Model Law: A Model of Dialogue between the International and the Domestic". Justice Devendra Kumar Upadhyaya, Chief Justice, High Court of Delhi delivered the welcome address.



18 September 2025: Justice B R Gavai, Chief Justice of India, Justice Stephen Gageler AC, Chief Justice, High Court of Australia, and Justice Devendra Kumar Upadhyaya, Chief Justice, High Court of Delhi at the Inaugural Session of the Delhi Arbitration Weekend 2025





19 September 2025: A delegation of participants and speakers of the Delhi Arbitration Weekend 2025 met Justice B R Gavai, Chief Justice of India



21 September 2025: Justice Surya Kant, Judge, Supreme Court of India, along with Shri Arjun Ram Meghwal, Union Minister of State (Independent Charge) of the Ministry of Law and Justice, Justice Devendra Kumar Upadhyaya, Chief Justice, High Court of Delhi and Justice Subramonium Prasad, Judge, High Court of Delhi, at the Closing Session of the Delhi Arbitration Weekend 2025



21 September 2025:
Justice Surya Kant, Judge, Supreme Court of India, delivered the Valedictory Address at the Delhi Arbitration Weekend 2025



20 September, 2025:
Justice Vikram Nath, Judge, Supreme Court of India, presided over a session on "Arbitration 2.0: Integration of Artificial Intelligence and other Technologies to Enhance the Efficiency of Arbitration," during the Delhi Arbitration Weekend 2025

20 September 2025: Justice B V Nagarathna, Judge, Supreme Court of India, attended the Delhi Arbitration Weekend 2025 at the Auditorium, High Court of Delhi and chaired the Session on "Seats of the Future: Actionable steps for enhancing the Indian Arbitration Ecosystem"





20 September 2025: Justice B V Nagarathna, Judge, Supreme Court of India, along with Justice Nikhil S Kariel, Judge, High Court of Gujarat, and Dr S Muralidhar, Senior Advocate and former Chief Justice, High Court of Orissa, at the Delhi Arbitration Weekend 2025







19 September 2025: Justice M M Sundresh, Judge, Supreme Court of India, chaired a panel discussion on International Centre for Dispute Resolution with the theme "Global Deals, Indian Threads: The Next Wave of Cross-Border Disputes", during the Delhi Arbitration Weekend 2025

17 September 2025: Justice K V Viswanathan, Judge, Supreme Court of India, participated as Keynote Speaker, on the topic "IBA Rules on Conflict of Interest for Arbitrators and Expert Evidence", as part of Delhi Arbitration Weekend 2025





15 September 2025: Justice N Kotiswar Singh, Judge, Supreme Court of India, chaired a panel, under the theme "Role of Institutional Arbitration Amidst Bolstering Economic Relations Between India And The CEE Region", as part of the Delhi Arbitration Weekend 2025 at The Oberoi, New Delhi



19 September 2025: Justice Atul S Chandurkar, Judge, Supreme Court of India, chaired the panel, titled "Changing Landscape of India's Bilateral Investment Treaty (BIT) Regime", as part of the Delhi Arbitration Weekend 2025 at The Oberoi, New Delhi

2nd National Mediation Conference



28 September 2025: Shri Dr Hari Babu Kambhampati, Governor of Odisha; Justice B R Gavai, Chief Justice of India; Shri Mohan Charan Majhi, Chief Minister of Odisha; Justice Surya Kant, Judge, Supreme Court of India; Shri R Venkataramani, Attorney General for India; Justice Harish Tandon, Chief Justice, High Court of Orissa; Shri Prithviraj Harichandan, Minister of Law, Works and Excise, Government of Odisha; Justice Manash Ranjan Pathak, Judge, High Court of Orissa; Shri Pitambar Acharya, Advocate General, Odisha, at the Inaugural function of 2nd National Mediation Conference 2025 at Lok Seva Bhawan, Bhubaneswar, Odisha



26–27 September: Justice B R Gavai, Chief Justice of India, along with Justice Surya Kant, Justice J K Maheshwari, Justice B V Nagarathna, Justice Ahsanuddin Amanullah, Justice N Kotiswar Singh, Justice Vipul M Pancholi, Judges, Supreme Court of India, at the 2nd National Mediation Conference held at Lok Seva Bhawan, Bhubaneswar, Odisha



26–27 September:
Justice B V Nagarathna, Judge, Supreme Court of India, attended the Inaugural Session of the 2nd National Mediation Conference 2025 and chaired Session-II on the theme "Enhancing the Eco-system for Mediation in India", organised by the Office of the Advocate General and Department of Law, Government of Odisha, at Lok Seva Bhawan, Bhubaneswar, Odisha

28 September 2025: Justice M M Sundresh, Justice Sanjay Karol and Justice Ahsanuddin Amanullah, Judges, Supreme Court of India, alongside Shri Arjun Ram Meghwal, Union Minister of State (Independent Charge) of the Ministry of Law and Justice; Justice Harish Tandon, Chief Justice, High Court of Orissa and Shri Tushar Mehta, Solicitor General of India at the 2nd National Mediation Conference at Lok Seva Bhawan, Bhubaneswar, Odisha





28 September 2025: Justice Ahsanuddin Amanullah, Judge, Supreme Court of India, delivered a keynote address in the Valedictory Session of the 2nd National Mediation Conference organised at Lok Seva Bhawan, Bhubaneswar, Odisha



27 –28 September 2025: Justice Prashant Kumar Mishra, Judge, Supreme Court of India participated in the 2nd National Mediation Conference 2025 organised by the Office of the Advocate General and Department of Law, Government of Odisha at Lok Seva Bhawan, Bhubaneswar, Odisha, and also chaired an Interactive Session on "Development of Institutional Mediation"

Convocations by Law Institutions





7 September 2025: Justice Surya Kant, Judge, Supreme Court of India, presided over 33rd Annual Convocation of the National Law School of India University (NLSIU), Bengaluru



7 September 2025: Justice Surya Kant along with Justice B V Nagarathna, Justice Ahsanuddin Amanullah, Justice Aravind Kumar, Justice N Kotiswar Singh, Judges, Supreme Court of India, at the 33rd Annual Convocation of the National Law School of India University (NLSIU), Bengaluru



5 September 2025:
Justice Surya Kant along with Justice J K Maheshwari and Justice P S Narasimha, Judges, Supreme Court of India; Justice D S Thakur, Chief Justice, High Court of Andhra Pradesh and Chancellor, DSNLU; Sri Nara Lokesh, Minister for Human Resource Development, Information Technology, Electronics and Communication and RTG, Government of A.P. attended the Combined Convocation (8th, 9th, 10th, 11th, and 12th Convocations) Ceremony, 2025 of Damodaram Sanjivayya National Law University (DSNLU)



6 September 2025: Justice B V Nagarathna, Judge, Supreme Court of India along with Shri Ashish Sood, Minister, GNCT of Delhi and Justice Devendra Kumar Upadhyaya, Chief Justice, High Court of Delhi and Chancellor NLU Delhi at the 12th Convocation of National Law University, Delhi



6 September 2025:
Justice B V Nagarathna, Judge, Supreme Court of India, delivered a Convocation Address at the 12th Convocation of National Law University, Delhi, on the topic "Officers of the Court and Stewards of the Constitution" at the Auditorium, National Law University, Delhi





5 September 2025: Justice P S Narasimha, Judge, Supreme Court of India, attended the Convocation Ceremony and also delivered the Justice E Venkatesam Endowment Lecture on "Climate Change and Law" at Damodaram Sanjivayya National Law University, Visakhapatnam

Opening Ceremonies and Inauguration Events





26-27 September 2025:
Justice B R Gavai, Chief Justice of India, in presence of Justice Shree Chandrashekhar, Chief Justice, High Court of Bombay, attended the Opening Ceremony of New Court Building of Nashik District Court at District Court Premises, Nashik, Maharashtra



4 September 2025: Smt Rekha Gupta, Chief Minister of Delhi; Justice Vikram Nath, Judge, Supreme Court of India; Justice Devendra Kumar Upadhyaya, Chief Justice, High Court of Delhi, along with Justice Pratibha Singh, Justice Sanjeev Narula, Judges, High Court of Delhi, at the inauguration of the Delhi High Court Mobile App and e-HRMS portal for Judicial Officers, the e-Office Pilot Project, the onboarding of the MCD Appellate Tribunal and Juvenile Justice Boards on e-Courts, and the Digital Preservation of Judicial Records initiative



4 September 2025: Justice Ahsanuddin Amanullah, Judge, Supreme Court of India, attended the Inauguration Function of Delhi High Court Mobile App, e-HRMS Portal for Judicial Officers, e-Office Project and Onboarding of MCD Appellate Tribunal/JJBs on e-Courts, Digital Preservation of Judicial Records organised by Information and Artificial Committee along with the Accessibility Committee of the High Court of Delhi



5 September 2025:
Justice P S Narasimha, Judge, Supreme Court of India, inaugurated New Buildings, in the presence of Justice D S Thakur, Chief Justice, High Court of Andhra Pradesh and Chancellor, DSNLU, at Damodaram Sanjivayya National Law University, Visakhapatnam



21 September 2025:
Justice N Kotiswar Singh, Judge, Supreme Court of India attended the Inauguration of the Decennial Year Celebration of Vels Institute of Science, Technology and Advanced Studies (VISTAS) at Chennai

Book Release Ceremonies

9 September 2025:
Justice Surya Kant along with Justice K V Viswanathan, Judges, Supreme Court of India, participated in the book release of "Commentary on Mediation Act 2023", authored by Nandini Gore at Neeti Bagh Club, New Delhi

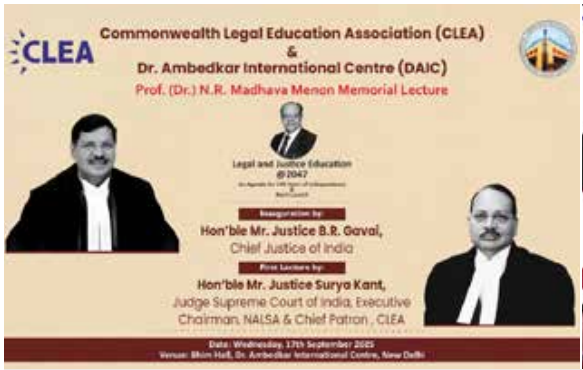




30 September 2025:
Justice K V Viswanathan participated in the book release of "Gender Justice: Contemporary Developments" at the Indian Law Institute (ILI), New Delhi

10 September 2025:
Justice N Kotiswar, Judge, Supreme Court of India, attended the book release of "Artillery's Thunder: The Untold Kargil Story" by Maj Gen Lakhwinder Singh at New Delhi







17 September 2025: Justice B R Gavai, Chief Justice of India, along with Justice Surya Kant, Judge, Supreme Court of India, and Shri R Venkataramani, Attorney General for India, attended First Prof (Dr) N R Madhava Menon Memorial Lecture on "Legal and Justice Education @ 2047: An Agenda for 100 Years of Independence"

20–21 September 2025: Justice B R Gavai, Chief Justice of India, visited Bikaner, Rajasthan to attend a seminar on "75 years of Constitution and Role of Dr Baba Saheb Bhim Rao Ambedkar" at Maharaja Ganga Singh University Auditorium, and to review activities of e-Court and NALSA







5 September 2025: Shri N Chandrababu Naidu, Chief Minister of Andhra Pradesh; Justice Surya Kant and Justice P S Narasimha, Judges, Supreme Court of India; and Justice D S Thakur, Chief Justice, High Court of Andhra Pradesh attended the International Mediation Conference 2025, organised jointly by the the National Law Institute University (NLIU), Bhopal and Asia Centre for International Arbitration and Mediation (ACIAM) at Visakhapatnam



5 September 2025:
Justice Vikram Nath, Judge, Supreme Court of India, attended as Chief Guest, a function hosted by the Supreme Court Bar Association in collaboration with the Orissa High Court Bar Association at Cuttack, Odisha, and delivered a Special Address on "Media, Artificial Intelligence and Law". In the address, he noted the growing concerns surrounding the rapid adoption of AI across media and legal practice, clarifying that reliance on AI was not proscribed, and emphasised that the human element must remain central to the administration of justice

23 September 2025:
Justice Vikram Nath, Judge, Supreme Court of India graced the Deeksharambh Samaroh, 2025 as Chief Guest and delivered an inspirational address to incoming law students at the Law Centre-II, University of Delhi, marking the commencement of their academic journey in law







21 September 2025: Justice M M Sundresh, Judge, Supreme Court of India, and Justice Manindra Mohan Shrivastava, Chief Justice, High Court of Madras, attended N Natarajan Charitable Trust Moot Court Competition, 2025, at the Madras High Court Campus, Chennai



20 September 2025:
Justice M M Sundresh and Justice R Mahadevan, Judges, Supreme Court of India, attended Annual Day Celebrations of the Women Lawyers Association, High Court of Madras, at the Auditorium Madras High Court





27 September 2025: Justice P S Narasimha, Judge, Supreme Court of India, along with Justice Nitin W Sambre, Judge, High Court of Delhi and Justice Anil S Kilor, Judge, High Court of Bombay, attended the felicitation programme of Justice Atul S Chandurkar, Judge, Supreme Court of India, organised by Nagpur High Court Bar Association at Nagpur



13 September 2025:
Justice Pankaj Mithal, Judge, Supreme Court of India, attended the Annual Day Function of the Prayagraj Senior Citizens Council at Hotel Rama Continental, Prayagraj, as Chief Guest



14 September, 2025: Justice Pankaj Mithal, Judge, Supreme Court of India, attended the 49th Foundation Day of the Lokayukta Office, Uttar Pradesh, at the Lokayukta Office, Uttar Pradesh, as Chief Guest



19 September 2025:
Justice Pankaj Mithal, Judge, Supreme Court of India, attended the event on "Reimagining India's Legal Foundations for Viksit Bharat @ 2047" organised by General Counsels' Association of India at Bharat Mandapam, New Delhi

19 September 2025:
Justice Manmohan, Judge, Supreme Court of India, attended the event on "Reimagining India's Legal Foundations for Viksit Bharat @ 2047" organised by General Counsels' Association of India at Bharat Mandapam, New Delhi







15 September 2025: Justice Prashant Kumar Mishra, Judge, Supreme Court of India, attended a symposium of the Indian Council of Arbitration as a Chief Guest and delivered a keynote address on "ADR Tapestry: Weaving a Resilient Arbitration and Mediation Ecosystem in India" at the Commission Hall, New Delhi





27 September 2025: Justice Prashant Kumar Mishra, Judge, Supreme Court of India, attended the Silver Jubilee Celebration of the High Court of Chhattisgarh at Bilaspur, as a Guest of Honour, and delivered a Special Address

19 September 2025: Justice K V Viswanathan, Judge, Supreme Court of India, participated as Keynote Speaker for the 5th India ADR Week at The Oberoi, New Delhi







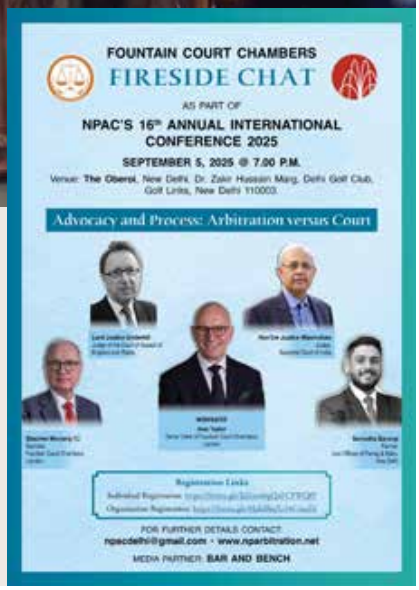
3 September 2025: Justice N Kotiswar Singh, Judge, Supreme Court of India, attended Swadesh Conclave 2025, organised by Balaji Foundation at Bharat Mandapam, New Delhi





18–19 September 2025: Justice Manmohan, Judge, Supreme Court of India, attended the 11th edition of "MASCRADE 2025: Movement against Smuggled & Counterfeit Trade", organised by FICCI-CASCADE





5 September 2025:
Justice Manmohan, Judge, Supreme Court of India, along with Lord Justice Underhill, Judge, Court of Appeal of England and Wales, attended the NPAC's 16th Annual International Conference 2025, on the theme "Advocacy and Process: Arbitration versus Court"





28 September 2025:
Justice Atul S Chandurkar, Judge, Supreme Court of India, attended as the Chief Guest, the Valedictory Ceremony of the Space Law Moot Court Competition, 2025, organised by Symbiosis Law School, Nagpur, in collaboration with Antrix Corporation Ltd (commercial wing of ISRO, Department of Space, Government of India)

Judges' Retreat



13–14 September 2025: Twenty Judges of the Supreme Court of India, along with Justice B R Gavai, Chief Justice of India, visited Ranthambhore National Park

Legal Aid

3rd National Lok Adalat, 2025

The National Legal Services Authority (NALSA) successfully conducted the 3rd National Lok Adalat of 2025 on 13 September 2025, across Taluk, District, and High Court levels in all 37 States and Union Territories. The Lok Adalat once again demonstrated the strength of alternative dispute resolution mechanisms by disposing of 4,18,03,816 cases in total. Of these, 3,50,29,644 were pre-litigation matters, thereby preventing them from entering the judicial system, while 67,74,172 were pending cases, effectively reducing the caseload of the courts. The total settlement value of the cases reached approximately ₹21,374.81 crores.

These outcomes underscore the increasing public confidence in collaborative and conciliatory modes of dispute resolution that ensure faster, amicable, and cost-effective justice. Through such initiatives, NALSA continues to advance its constitutional mission of ensuring inclusive and equitable access to justice, especially for vulnerable and marginalised groups, while nurturing a culture of peaceful conflict resolution through sustained ADR initiatives.



13 September 2025: National Legal Services Authority (NALSA) successfully organised the 3rd National Lok Adalat of 2025 across Taluks, Districts, and High Courts in all 37 States and Union Territories

Inauguration of the "Dashboard for Claimant Reimbursement and Deposit System for Motor Accident Claims Tribunal (MACT)"

During the launch of the dashboard, Justice Surya Kant emphasised that the platform will make the process of justice "faster, simpler, and more accessible" for citizens, while also reducing procedural delays for families affected by motor accidents. It has been developed in compliance with a Supreme Court directive mandating the creation of a digital repository for motor accident compensation data. The initiative marks a step toward greater efficiency and transparency in the administration of motor accident compensation claims.



21 September 2025: Justice Surya Kant, Executive Chairman, National Legal Services Authority (NALSA) and Judge, Supreme Court of India, along with Justice J K Maheshwari and Justice Alok Aradhe, Judges, Supreme Court of India, and also Justice Sanjeev Sachdeva, Chief Justice, High Court of Madhya Pradesh, and Justice Vivek Rusia, Judge, High Court of Madhya Pradesh, inaugurated "Dashboard for Claimant Reimbursement and Deposit System for Motor Accident Claims Tribunal (MACT)" for the Madhya Pradesh Judiciary at NALSA, New Delhi

SCBA Lecture Series – "BNS 2023 and IPC 1860: Continuity, Change and Challenges"

The Supreme Court Bar Association (SCBA) organised the latest instalment of its SCBA Lecture Series on 24 September 2025, featuring an insightful lecture delivered by Justice Uday Umesh Lalit, former Chief Justice of India. The lecture was titled *"BNS 2023 and IPC 1860: Continuity, Change and Challenges*" and focused on the transition from the Indian Penal Code, 1860 (IPC) to the newly introduced Bharatiya Nyaya Sanhita, 2023 (BNS).

Justice Lalit's address highlighted several conscious departures in the BNS from the IPC. He commended the omission of Sedition (IPC 124A), noting that the new section aligns with the *Kedar Nath Singh* judgment, requiring an act to incite armed rebellion against the State for the offence to be established. Similarly, he welcomed the BNS's rejection of the vast police powers found in anti-terror laws (such as TADA/MCOCA), specifically excluding police-recorded confessions as admissible evidence in cases involving Organised Crime and Terrorism. This step restores the standard Evidence Act principle that a confession to a police officer is inadmissible.

Furthermore, he supported the BNS's response to the *Mithu Singh* judgment, specifying that a life sentence for a life convict committing murder now means imprisonment for the remainder of his life. Addressing everyday crimes, Justice Lalit noted the increase in punishment for rash and negligent acts, as well as the introduction of a severe penalty for hit-and-run cases.

However, he also highlighted a missed opportunity regarding gender by failing to make the core sexual offence provisions (Sections 63-72 BNS) gender-neutral. Furthermore, the complete omission of Section 377, IPC (unnatural offences) creates a "vacant idea", leaving the adult male victims of non-consensual sexual assault completely remediless. Finally, he flagged the ambiguity surrounding the new punishment of Community Service (eg, in defamation), pointing out that the absence of clear statutory guidelines leaves the measure and duration of this alternative penalty entirely to the arbitrary discretion of the convicting judge. In conclusion, Justice Lalit's address offered a balanced appraisal of the Bharatiya Nyaya Sanhita, recognising its progressive reforms while underscoring the need for greater inclusivity, clarity, and consistency in the evolving framework of criminal law.



24 September 2025: Justice Uday Umesh Lalit, former Chief Justice of India, delivered a lecture on "BNS 2023 and IPC 1860: Continuity, Change and Challenges" as part of the SCBA Lecture Series



24 September 2025: Justice B R Gavai, Chief Justice of India along with Justice Dipankar Datta, Justice Ahsanuddin Amanullah, Justice P B Varale and Justice N Kotiswar Singh, Judges, Supreme Court of India at the SCBA Lecture Series

Fresh from the Bench

In Re: The Waqf Amendment Act, 2025 (2025 INSC 1116)

"A statute enacted by Parliament or a State Legislature cannot be declared unconstitutional lightly"

CORAM: Chief Justice B R Gavai and Justice Augustine George Masih

In a judgment dated **15 September 2025**, a two-judge bench of the Supreme Court declined to grant a blanket stay on the operation of the Waqf (Amendment) Act, 2025. While upholding the "presumption in favour of constitutionality of an enactment", the Court exercised its powers to issue a series of interim directions to balance the equities and protect the interests of all parties pending a final decision on the Act's validity.

The ruling came on a batch of writ petitions challenging the constitutionality of the 2025 amendment, which introduced changes to waqf administration in India. The petitioners argued that the amendments were discriminatory and violated Articles 14, 15, 25, and 26 of the Constitution. The primary challenges were against provisions that prospectively abolished 'waqf by user', altered the composition of the Central Waqf Council and State Waqf Boards to include non-Muslim members, and established a new mechanism for the government to review and de-notify properties previously declared as waqf.

After considering the extensive legislative history of waqf law since 1923, the Court made several key *prima facie* observations:

- The Court refused to stay the prospective abolition of 'waqf by user', noting the legislature's long-standing concern that the concept had been misused as a "clever device" for encroaching on government and private properties. It held that if the legislature acts to stop such a "menace", the amendment cannot, prima facie, be held to be arbitrary.
- The most significant intervention came against Section 3C, which empowers a government-designated officer to inquire into and correct revenue records if a property is determined to be government property. The Court found the provisions allowing an executive officer to unilaterally alter a property's status before a final judicial determination to be "prima facie arbitrary". It stayed the provisions that would change a property's status or revenue records based solely on the officer's report, directing that the final determination must be made by the Waqf Tribunal.
- Regarding the amendments to the composition of the Central Waqf Council and State Waqf Boards, the Court took note of the submission by the Solicitor General. To allay the petitioners' fears of a non-Muslim majority, the Court directed that for the time being, the number of non-Muslim members shall be capped at four (out of 22) in the

Council and three (out of 11) in the State Boards.

- The Court also stayed the new requirement that a person must demonstrate they have been "practising Islam for at least five years" to create a waqf, holding that it cannot be given effect "until the rules are framed by the State Government for providing a mechanism" for its determination.

Therefore, while concluding that a case for a complete stay was not made out, the Court issued the following specific interim directions to balance the interests of all parties pending the final hearing:

- The provision requiring a person to prove five years of practicing Islam to create a waqf is stayed until relevant rules are framed.
- The provisions under Section 3C allowing an executive officer's report to automatically change a property's status as waqf are stayed. No dispossession or change in records can occur until the matter is finally decided by the Waqf Tribunal. However, no third-party rights can be created on such properties during the inquiry.
- The number of non-Muslim members in the Central Waqf Council and State Waqf Boards is capped at 4 (out of 22) and 3 (out of 11), respectively.
- An effort should be made to appoint a Chief Executive Officer of the Board from amongst the Muslim community "as far as possible".

Union of India and Ors. v. Sajib Roy (2025 INSC 1084)

"If an embargo is imposed under relevant recruitment rules, such reserved candidates shall not be permitted to migrate to general category seats"

CORAM: Justice Surya Kant and Justice Joymalya Bagchi

In a judgment delivered on **9 September 2025**, a two-judge bench of the Supreme Court held that reserved category candidates who have availed concessions like age relaxation are not entitled to migrate to the unreserved (general) category if the relevant recruitment rules or government orders explicitly bar such a move. The ruling clarifies the law on the migration of meritorious reserved candidates by emphasising the primacy of the specific rules governing a selection process.

The appeals were filed by the Union of India against a High Court judgment which had directed that OBC candidates who availed age relaxation for the post of Constable (General Duty) be considered for appointment under the unreserved category. The Union's case was based on an Office Memorandum dated 01.07.1998, which prohibits candidates who have "availed relaxations in age limit, experience qualification" etc from being considered for unreserved vacancies.

In its detailed reasoning, the Court made the following key observations:

- **Distinction from *Jitendra Kumar Singh*:** The Court held that the High Court erred in "mechanically applying the ratio in Jitendra Kumar (supra)" without appreciating the different factual matrix. It

clarified that the earlier decision was based on government instructions that expressly permitted migration, whereas the Office Memorandum in this case "clearly barred such migration".

- **A Precedent is Not Universal Law:** The Court reiterated the fundamental principle that a judgment cannot have universal application, quoting that "a case is only an authority for what it actually decides". It stressed that the specific rules of the recruitment process at hand were paramount.
- **Binding Nature of Recruitment Rules:** The Court noted that the candidates had "without demur participated in the selection process" and had not challenged the constitutional validity of the 1998 Office Memorandum. Therefore, the conditions laid down in it were binding upon them.
- **Summarised Legal Position:** The Court summarised the law by stating that whether a reserved candidate can migrate to an unreserved seat depends entirely on the governing rules. If there is "no embargo in the recruitment rules/employment notification", such migration is permissible for a meritorious candidate. However, if an embargo is imposed, then reserved candidates "shall not be permitted to migrate to general category seats".

Consequently, the Supreme Court allowed the appeals and set aside the judgment of the High Court. It held that since the respondents had "availed concession of age for participating in the recruitment process, in the teeth of office memorandum dated 01.07.1998," they could not be considered for appointment in the unreserved category.

Reena Banerjee and Another v. Government of NCT of Delhi and Others (2025 INSC 1101)

"The experiences of persons with disabilities demonstrate whether democratic institutions genuinely serve all citizens or whether they are designed around narrow assumptions about human capacity and participation"

CORAM: Justice Vikram Nath and Justice Sandeep Mehta

In a judgment delivered on **12 September 2025**, a two-judge bench of the Supreme Court issued a comprehensive set of directions to address systemic failures in protecting the rights of persons with disabilities, particularly those with cognitive impairments residing in state-run and private care institutions across India. The judgment reframed disability not as a medical issue but as a matter of "constitutional democracy and social justice," emphasising that the failure to ensure accessibility and inclusion turns constitutional rights into "hollow promises."

The judgment addresses two long-pending public interest litigations: one from 1998 seeking enforcement of disability laws, and another highlighting the "pitiable" conditions at the Asha Kiran state-run care home. Noting years of "lackadaisical" state non-compliance and citing an

expert report that called Asha Kiran a "microcosm" of systemic failure, the Court instituted a robust mechanism for nationwide reform.

The Court's key observations and directions are:

- **Shift to a Rights-Based Model:** The Court affirmed that the legal framework must move beyond a medical or charity-based approach to a social and human rights model. It held that disability should be seen as "a fundamental aspect of human diversity" and that legal systems must be designed to embrace it, rather than creating barriers.
- **'Project Ability Empowerment':** The Court launched a nationwide monitoring initiative named "Project Ability Empowerment" to be undertaken by eight National Law Universities (NLUs). Each NLU has been assigned specific states and union territories to conduct extensive monitoring of all state-run and private institutions housing persons with cognitive disabilities. The monitoring will focus on resident profiling, healthcare, rehabilitation, accessibility, education, grievance redressal, and compliance with the Rights of Persons with Disabilities (RPwD) Act, 2016.
- **Reservation and Upward Mobility:** The Court addressed a "glaring example of hostile discrimination" in the implementation of reservations for Persons with Disabilities (PwDs). It noted that meritorious PwD candidates who score above the cut-off for the unreserved category are not granted "upward movement" to general seats, unlike candidates under social reservation categories. This practice, the Court observed, "defeats the very purpose of reservation." The Union of India has been directed to submit its response on this issue.
- **Comprehensive Institutional Reforms:** The Court directed that the monitoring under "Project Ability Empowerment" must be comprehensive, mandating the creation of Individual Care Plans for each resident and detailed accessibility audits. The goal is to move away from large-scale institutionalisation towards "community-based systems of care."

Finally, while disposing of the application, the Court issued a series of detailed directions to ensure the effective implementation of its orders:

- The eight designated NLUs, in conjunction with an Advisory Group Expert Panel, are to undertake the monitoring exercise and submit a detailed consolidated report within six months.
- All District Magistrates and Secretaries of District Legal Services Authorities are directed to provide full cooperation to the monitoring teams.
- The Union of India is directed to provide an interim project fund of ₹ 25 lakhs to each of the eight designated NLUs to carry out the project.
- The Union of India must place its response on record regarding the upward movement of meritorious PwD candidates in reservations by 14th October 2025.

The matter is scheduled to be listed again on 13th March 2026 to review the consolidated report.

Shobhit Kumar Mittal v. State of Uttar Pradesh and Another (2025 INSC 1152)

"Courts have to be careful and cautious in dealing with complaints and must take pragmatic realities into consideration while dealing with matrimonial disputes where the allegations have to be scrutinized with great care and circumspection in order to prevent miscarriage of justice and abuse of process of law"

CORAM: Justice B V Nagarathna and Justice R Mahadevan

In a judgment delivered on **24 September 2025**, a two-judge bench of the Supreme Court quashed criminal proceedings against the brother-in-law of a complainant, making strong observations about the "growing tendency to misuse provisions like Section 498A of the IPC as a tool for unleashing personal vendetta." The Court emphasised that vague and generalised allegations against the husband's relatives in matrimonial disputes cannot be allowed to proceed, as it leads to an abuse of the legal process.

The appeal arose after the Allahabad High Court refused to quash an FIR lodged by the complainant-wife against her husband, mother-in-law, and the appellant (her brother-in-law). The FIR, filed under Sections 323 and 498A of the IPC and provisions of the Dowry Prohibition Act, 1961, was registered several years after the couple had separated.

The Supreme Court, after examining the FIR, made the following key observations:

- **Vague and Omnibus Allegations:** The Court found that the allegations made by the complainant against the appellant were "vague and omnibus." It noted that the FIR lacked any specific details regarding the time, date, place, or manner of the alleged harassment or the nature of the dowry demands. The Court held that "mere general allegations of harassment without pointing out the specific details would not be sufficient to continue criminal proceedings".
- **Absence of Prima Facie Offence:** The Court concluded that taking the allegations at face value, no prima facie case was made out against the appellant. It observed that the FIR failed to establish any proximate link between the alleged harassment and the injury (a burst brain vein) suffered by the complainant, thereby not satisfying the ingredients of Section 323 IPC. Similarly, the essential elements of 'cruelty' under Section 498A were not met due to the lack of specific instances.
- **Preventing Abuse of Process:** Reiterating the principles laid down in *State of Haryana v. Bhajan Lal*, the Court held that it was not in the interest of justice to permit the prosecution to continue. The judgment highlighted the need for courts to exercise caution and "scrutinize with great care and circumspection" complaints arising from matrimonial disputes to prevent "unnecessary harassment of innocent family members".
- **Misuse of Section 498A:** The Court expressed concern that while Section 498A was enacted to protect women from cruelty, it is increasingly being misused. It observed that vague allegations are sometimes made as a "counterblast" in matrimonial conflicts or to force compliance with unreasonable demands.

Consequently, the Supreme Court allowed the appeal and set aside the High Court's order. The FIR and all subsequent proceedings were quashed, in relation to the appellant.

M/s. U.P. Asbestos Limited v. State of Rajasthan and Others (2025 INSC 1154)

"For the purpose of encouraging or promoting the local industries, the weapon of taxation cannot be used to discriminate against the imported goods vis-à-vis the locally manufactured goods"

CORAM: Justice B V Nagarathna and Justice K V Viswanathan

In a judgment delivered on **24 September 2025**, a two-judge bench of the Supreme Court quashed a notification by the Government of Rajasthan that granted a full exemption from Value Added Tax (VAT) to certain asbestos cement products manufactured within the State. The Court held the notification was unconstitutionally discriminatory as it created a fiscal barrier against similar goods imported from other states, violating the freedom of trade guaranteed under Article 304(a) of the Constitution.

The appeals challenged a notification dated 09.03.2007, which exempted asbestos cement products manufactured in Rajasthan containing 25% or more fly ash. Appellants, who manufacture similar products outside Rajasthan for sale within the state, argued this preferential treatment created an unconstitutional "tariff wall". The Rajasthan High Court had dismissed their petitions, justifying the exemption under the narrow exception established in the Video Electronics case.

In its detailed analysis, the Court made the following key observations:

- **Impermissible Discrimination:** The Court found the notification created a clear case of prohibited discrimination. By establishing a zero-tax regime for local manufacturers while taxing imported goods, it created "fiscal barriers" that impede the free flow of trade, which Article 304(a) is designed to prevent.
- ***Video Electronics* Exception Not Applicable:** The Court held that the High Court erred in applying the "limited exception" from *Video Electronics*. That precedent was distinguished as applying to incentives for a specific class of new industries, for a truly limited period, to develop backward areas. The Court cautioned that this exception cannot be enlarged, "lest it would eat up the main provision".
- **Lack of Stated Rationale:** Reiterating the principle from *Mohinder Singh Gill*, the Court observed that public orders must be judged by the reasons they contain. The notification merely stated the exemption was "expedient in the public interest so to do" without any specific justification. The state's subsequent explanation in a counter-affidavit could not be used to supplement the order.
- **Discriminatory Structure:** The Court pointed out a structural flaw in the notification. The exemption was linked to the place of manufacture (Rajasthan) rather than the source of the raw material (fly ash). It noted that if the exemption had been available to any product using fly ash sourced from Rajasthan, regardless of its place of manufacture, there would "not have been any discrimination".

Consequently, the Supreme Court allowed the appeals and quashed the notification dated 09.03.2007 as being violative of Article 304(a) of the Constitution. The matter was directed to be listed again to determine the consequential relief of refund of the differential tax amount deposited by the appellants.

Arshad Neyaz Khan v. The State of Jharkhand and Another (2025 INSC 1151)

"Criminal law ought not to become a platform for initiation of vindictive proceedings to settle personal scores and vendettas"

CORAM: Justice B V Nagarathna and Justice R Mahadevan

In a judgment delivered on **24 September 2025**, a two-judge bench of the Supreme Court quashed criminal proceedings initiated over an alleged breach of an agreement for the sale of property, holding that the dispute was essentially civil in nature. The Court strongly deprecated the misuse of criminal proceedings to settle civil disputes and observed that the complaint failed to establish the basic ingredients for the offences of cheating (Section 420 IPC) and criminal breach of trust (Section 406 IPC).

The appeal was filed against a Jharkhand High Court order that refused to quash an FIR lodged nearly eight years after an agreement for sale was executed. The complainant alleged that the appellant had taken an advance payment of ₹20,00,000/- for a property deal but failed to either execute the sale deed or return the money.

In its detailed reasoning, the Court made the following key observations:

- **No Prima Facie Offence:** The Court found that the allegations in the FIR, even if taken at face value, did not make out a criminal offence. For cheating, it is essential to show a "fraudulent or dishonest intention at the time of making the promise." The Court noted a "clear absence of dishonest and fraudulent intention" and held that a mere failure to subsequently keep a promise does not establish a culpable intention from the beginning.
- **Cheating and Criminal Breach of Trust are Antithetical:** The Court explained the distinction between cheating and criminal breach of trust, noting that the two offences "cannot co-exist simultaneously in the same set of facts as they are antithetical to each other." In cheating, the dishonest intention exists from the inception, whereas in criminal breach of trust, a person is lawfully entrusted with property and later misappropriates it.
- **Abuse of Criminal Process:** The Court expressed concern over the misuse of the criminal justice system. It held that the complainant had an alternative remedy of a civil suit for damages but instead chose "a route through criminal proceedings, when no ingredient of offence is made out". Citing *State of Haryana v. Bhajan Lal*, the Court found the proceedings were maliciously instituted.
- **Unexplained Delay:** The Court highlighted the "delay of nearly eight years" in filing the complaint, which it stated "raises a suspicion about the bona fides of the complainant". The lack of a reasonable explanation for this delay further weakened the prosecution's case.

Consequently, the Supreme Court allowed the appeal and set aside the High Court's order. The FIR and all subsequent criminal proceedings against the appellant were quashed, with the Court concluding that allowing the prosecution to continue would amount to "undue harassment."

State of Uttarakhand v. Anil and Others
(2025 INSC 1170)

"We are also cognizant of the large pendency of cases bombarding our courts. However, the same cannot come in the way of the Court's solemn duty, particularly, when a person's liberty is at stake"

CORAM: Justice B V Nagarathna and Justice R Mahadevan

In a judgment delivered on **18 September 2025**, a two-judge bench of the Supreme Court set aside the acquittal of four accused by the Uttarakhand High Court, holding that the High Court had failed to discharge its appellate duty under Section 374(2) of the Code of Criminal Procedure, 1973. The Court emphasised that while brevity in judgments is not a defect, absence of reasoning that engages with the evidence on record renders a judgment legally unsustainable.

The appeals, filed by the State of Uttarakhand, arose from the High Court's common judgment dated 2 May 2013, which had allowed the criminal appeals of the accused, thereby acquitting them of all charges and setting aside the conviction and life sentences imposed by the Sessions Court.

The Supreme Court noted that the High Court's judgment did not consider the evidence on record in light of arguments advanced. Observing the impugned judgment to be "cryptic and dehors any reasoning", the court noted that the omission of discussion of evidence and proper reasons for overturning the trial court's findings is fatal.

The Court's key observations and directions are as follows:

- **Appellate Responsibility and Duty of Reasoning:** The Court reaffirmed that when a High Court hears an appeal against conviction, it acts as a court of first appeal and must independently evaluate all evidence, including medical, ocular, and documentary, before arriving at a conclusion. Even if the judgment is concise, it must demonstrate an application of mind to the crucial evidence and arguments advanced.
- **Brevity versus Reasoning:** While concision is not by itself a flaw, the Supreme Court clarified that the High Court's duty extends beyond summary affirmation or reversal. It must show reasoned engagement with the record to determine whether the prosecution has established guilt beyond reasonable doubt.
- **Remand to the High Court:** Given the lack of reasoning in the High Court's decision, the Supreme Court set aside the judgment dated 2 May 2013 and remanded the matter to the Uttarakhand High Court for fresh hearing. Both the State and the accused were directed to be given full opportunity to present their cases.
- **Expeditious Disposal:** Considering that the incident dates back to 2002 and the impugned judgment was passed in 2013, the Supreme Court requested the High Court to dispose of the appeals expeditiously.

In conclusion, the Court held that while it had not expressed any view on the merits, the High Court's failure to provide reasoned adjudication amounted to a miscarriage of judicial duty, warranting remand. The appeals were accordingly allowed on this limited ground.

Vaddi Ratnam v. State of Andhra Pradesh (2025 INSC 1180)

"Since the aforesaid judgment has not been assailed by the State, we think it is just and necessary to apply the principle of parity because the complaint as against both the accused is one and same and a joint trial was conducted in respect of both the accused, common evidence was let in and on the basis of appreciation of the said evidence, the High Court has set aside the judgment of conviction and acquitted accused no.1"

CORAM: Justice B V Nagarathna and Justice R Mahadevan

In a judgment delivered on **17 September 2025**, the Supreme Court set aside the conviction of appellant-accused no. 2 under the Narcotic Drugs and Psychotropic Substances Act, 1985 (NDPS Act), applying the principle of parity after finding that her co-accused (accused no. 1) in the same case had already been acquitted on identical facts. The bench observed that when the evidence, incident, and charges are common, it would be unjust to maintain conviction of one accused while another stands acquitted.

The case originated from an incident on 1 January 2002, when the State Task Force Prohibition and Excise Inspector and other officials apprehended two women—Vaddi Ratnam (Accused No. 2) and Nerella Vijaya Lakshmi (Accused No. 1)— while patrolling. They were allegedly in possession of 5.5 kilograms of opium. The Special Sessions Court, Rajahmundry, convicted both under Section 8(c) read with Section 18 of the NDPS Act, sentencing them to 10 years of rigorous imprisonment and a fine of ₹1,00,000 each.

While Ratnam's appeal was dismissed by the High Court in 2013, affirming the conviction, her co-accused was later acquitted by the High Court in 2014 in Criminal Appeal No. 1775/2005 on the ground that the prosecution failed to prove conscious possession of the contraband.

The Court accordingly allowed the appeal and set aside the conviction, observing that the appellant was entitled to relief on parity since both accused were similarly placed and tried on the same evidence.

All India Football Federation v. Rahul Mehra and Others (2025 INSC 1131)

"Unlike rights that can be enforced through law, fraternity is not amenable to judicial command; it must be nurtured through lived experiences of unity, trust, and shared endeavour"

CORAM: Justice Pamidighantam Sri Narasimha and Justice Joymalya Bagchi

In a judgment dated **19 September 2025**, a two-judge bench of the Supreme Court heard a Special Leave Petition, arising from a Delhi High Court judgment quashing the elections of the All India Football Federation (AIFF). The Supreme Court, while staying the Delhi High Court judgment, ordered to constitute a Committee of Administrators (COA) to frame the Constitution of AIFF, which is in line with the National Sports Development Code of India, 2011. The matter before the bench was primarily concerned with the finalisation and adoption of the AIFF Constitution.

The Court inter alia dealt with the issues of eligibility, disqualification and tenure of office bearers, structural composition of the Executive Committee and compliance of the draft Constitution with the 2011 Code.

The outcomes of the judgment can be summed up as:

- The Apex Court approved and finalised the AIFF Constitution along with a direction to convene a Special General Body Meeting within four weeks to formally adopt it;
- It was directed that the Constitution shall ensure the adequate representation of eminent players and women members in the General Body and Executive Committee;
- The Apex Court clarified that mere framing of criminal charges will not entail ineligibility and only a conviction resulting in an imprisonment of two years or more shall operate as disqualification;
- The Court further clarified that full-time public servants and ministers are to be disqualified from the membership, however part-time membership may be permissible under specific conditions;
- It was ordered that any further amendment to the AIFF Constitution shall not take effect without the permission of the Court, to ensure institutional integrity and adherence to the 2011 Code.

Anna Waman Bhalerao v. State of Maharashtra and Others (2025 INSC 1114)

"Liberty postulates the creation of a climate wherein there is no suppression of the human spirits, wherein, there is no denial of the opportunity for the full growth of human personality, wherein head is held high and there is no servility of the human mind or enslavement of the human body"

CORAM: Justice J B Pardiwala and Justice R Mahadevan

In a judgment dated **12 September 2025**, a two-judge bench of the Supreme Court dismissed the appeal and upheld the order of the Bombay High Court rejecting the anticipatory bail applications filed by the appellants. The appellants, then serving as public officials in the Revenue Department of the State of Maharashtra, were arrayed as accused in an FIR under sections 420, 467, 468, 471 and 474 read with section 34 of IPC. It was alleged that they, in their official capacity, certified the mutation entries on the basis of forged documents. The mutation entries were cancelled in 1998, yet the FIR was lodged in 2019, after a lapse of more than 20 years.

The appellants contended that their acts were performed bona-fide in discharge of official duties, without any criminal intent and that the inordinate delay in the registration of the FIR vitiated the prosecution. The Court dismissed the appeals, observing that the allegations disclosed serious irregularities requiring investigation.

Key observations of the judgment include:

- *"Applications affecting personal liberty, particularly bail and anticipatory bail, ought not to be kept pending indefinitely. The grant or refusal of bail, anticipatory or otherwise, is ordinarily a straightforward exercise, turning on the facts of each case. There is, therefore, no justification for deferring decision-making*

and allowing a sword of Damocles to hang over the applicant's head".

- *"In matters concerning liberty, bail courts must be sensitive and ensure that constitutional ethos is upheld. While docket explosion remains a chronic challenge, cases involving personal liberty deserve precedence".*
- *"The consistent line of authority of this Court makes it abundantly clear that bail and anticipatory applications must be decided expeditiously on their own merits, without relegating the parties to a state of indefinite pendency. Prolonged delay in disposal not only frustrates the object of Code of Criminal Procedure, but also amounts to a denial of justice, contrary to the constitutional ethos reflected in Articles 14 and 21".*

Finally, while disposing the appeal, the court issued following directions:

- *"High Courts shall ensure that applications for bail and anticipatory bail pending before them or before the subordinate courts under their jurisdiction are disposed of expeditiously, preferably within a period of two months from the date of filing, except in cases where delay is attributable to the parties themselves".*
- *"High Courts shall issue necessary administrative directions to subordinate courts to prioritise matters involving personal liberty and to avoid indefinite adjournments".*
- *"Investigating agencies are expected to conclude investigations in long pending cases with promptitude so that neither the complainant nor the accused suffers prejudice on account of undue delay".*
- *"Being the highest constitutional fora in the States, High Courts must devise suitable mechanisms and procedures to avoid accumulation of pending bail / anticipatory bail applications and ensure that the liberty of citizens is not left in abeyance. In particular, bail and anticipatory bail applications shall not be kept pending for long durations without passing orders either way, as such pendency directly impinges upon the fundamental right to liberty".*

Mansi Brar Fernandes v. Shubha Sharma and Others (2025 INSC 1110)

"A home is not merely a roof over one's head; it is a reflection of one's hopes and dreams – a safe space for a family, a refuge from the worries of the world"

CORAM: Justice J B Pardiwala and Justice R Mahadevan

In a judgment dated **12 September 2025**, the court reaffirmed the right to shelter as a fundamental right under Article 21, and clarified the distinction between a genuine homebuyer and a speculative investor under the Insolvency and Bankruptcy Code (IBC), 2016. The Court also issued strong directions to the Union Government to fill vacancies in NCLT/NCLAT, strengthen RERA mechanisms, and establish safeguards to prevent misuse of insolvency proceedings in the real estate sector.

The batch of four appeals arose from NCLAT orders that had set aside insolvency proceedings initiated by certain homebuyers against defaulting

builders, holding them to be "speculative investors." The Court considered the appeals filed by two homebuyers, as well as cross-appeals by directors of real estate companies.

Key observations and directions included:

- **Vague Distinction Between Homebuyers and Speculative Investors Clarified:** The Court held that a genuine homebuyer under the IBC is one who intends to take physical possession of a residential unit, whereas a speculative investor is one who enters a transaction solely for financial gain. Factors such as the number of units purchased, the presence of assured returns or buyback clauses, and the conduct of the parties are relevant to this determination. The Court emphasised that schemes offering assured returns or compulsory buybacks are in essence "financial derivatives masquerading as housing contracts," detrimental to the real estate sector's health.
- **Finding on Speculative Investment Upheld:** Examining the facts, the Court noted that both appellants had entered into buyback agreements promising exorbitant returns, without any real intention to take possession of flats. Such arrangements, the Court held, were speculative and contrary to the objectives of the IBC. Accordingly, the Supreme Court affirmed NCLAT's finding that the appellants were speculative investors and could not invoke insolvency proceedings.
- **Right to Shelter Under Article 21:** Reiterating its constitutional jurisprudence, the Court held that the right to housing forms part of the right to life under Article 21. It stated that the State cannot remain a "silent spectator" and must ensure that housing is not reduced to a speculative commodity. The Court noted that housing is a facet of human dignity, and timely possession must be secured for homebuyers who invest their lifetime savings.
- **Directions to Strengthen Institutional Framework:** The bench issued extensive directions to the Union Government and regulatory bodies:
  - Vacancies in NCLT/NCLAT to be filled on a war footing,, and ad hoc appointments of retired judges permitted.
  - Creation of a revival fund may be considered by the Union government for financing stressed real estate projects under insolvency.
  - Every new residential project to be registered with local authorities after payment of at least 20% of property cost by buyer/allottee.
  - For projects at nascent stage, the proceeds from allottees shall be placed in an escrow account and disbursed in phases aligned with project progress.
  - Contracts significantly deviating from the Model RERA Agreement or containing buyback clauses for buyers above 50 years to be supported by an affidavit before the competent Revenue Authority.

M.S. Patter v. State of NCT of Delhi and Others (2025 INSC 1115)

"A beggars' home, maintained by the State, is a constitutional trust, not a discretionary charity. Its administration must reflect the values of constitutional morality – ensuring liberty, privacy, bodily autonomy, and dignified living conditions"

CORAM: Justice J B Pardiwala and Justice R Mahadevan

In a judgment dated **12 September 2025**, a two-judge bench of the Supreme Court dealt with a matter concerning the prevailing conditions in beggars' homes and rehabilitation centres established under the provisions of the *Bombay Prevention of Begging Act, 1959* as extended to the National Capital Territory of Delhi. The petitioner alleged gross violations of the fundamental rights of inmates residing in such institutions, *inter alia*, on the grounds of inhuman treatment, inadequate living facilities, absence of medical care, and lack of proper oversight.

Upon consideration of the reports placed on record and the submissions advanced by the parties, the Court observed that institutions meant for the care and rehabilitation of destitute and vulnerable persons cannot be administered in a manner that offends Articles 14 and 21 of the Constitution of India. It was further held that the mere existence of such facilities cannot be deemed sufficient compliance with constitutional mandates unless the same ensure dignity, humane conditions, and meaningful rehabilitation. The Court reiterated the State's positive obligation to protect the life and liberty of every individual, particularly those who are socially and economically disadvantaged.

The slew of directions issued by the court can be summarised as:

- Every inmate admitted to a Beggars' Home must undergo medical screening within 24 hours, followed by regular health check-ups and disease surveillance to prevent outbreaks.
- States and Union Territories must enforce strict hygiene and sanitation standards, ensuring access to clean water, proper toilets, and pest control.
- Independent infrastructure audits are to be conducted every two years, and overcrowding must be avoided to maintain humane living conditions.
- Qualified dieticians must monitor the quality and nutritional value of food, with standard dietary protocols ensuring adequate nutrition.
- Vocational training and rehabilitation programmes should be established in partnership with government bodies, NGOs, and private institutions to promote self-reliance among inmates.
- Regular legal aid visits, at least once every three months, must be organised, ensuring inmates are informed of their rights and have access to representation for bail, release, or appeals.
- Monitoring Committees must oversee conditions in Beggars' Homes, publish annual reports, and ensure accountability, including compensation and action in cases of negligence, lack of basic facilities or failure to provide timely medical care.

M. Rajendran and Ors. v. M/s KPK Oils and Proteins India Pvt. Ltd. and Ors. (2025 INSC 1144)

"The right of redemption of the borrower would be extinguished on the date on which the notice is published for auction, invitation of quotations, tender from public or private treaty"

CORAM: Justice J B Pardiwala and Justice R Mahadevan

In a judgment delivered on **22 September 2025**, a two-judge bench of the Supreme Court provided a clarification on the rights of borrowers under the *Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act,* 2002 (SARFAESI Act). The Court held that a borrower's right to redeem a mortgaged property is extinguished the moment a valid notice for public auction is published. The ruling aims to end the "interpretative deadlock" that has led to conflicting High Court judgments and extensive litigation.

The case involved borrowers who defaulted on a loan, leading the bank to auction their secured property. After the auction was completed and a Sale Certificate was issued to the successful bidders (the appellants), the borrowers approached the Madras High Court. The High Court, allowing the writ petition, quashed the Sale Certificate and permitted the borrowers to redeem the property by paying the outstanding dues. This order was challenged by the auction purchasers before the Supreme Court.

The Supreme Court, in a detailed analysis of the SARFAESI Act, made the following key observations:

- **Clarification of Section 13(8):** The Court interpreted the amended Section 13(8) of the SARFAESI Act, which came into effect in 2016. It held that the amendment "drastically curtailed" the borrower's right of redemption. While the unamended provision allowed redemption "at any time before the date fixed for sale or transfer," the amended section explicitly limits this right to "any time before the date of publication of notice for public auction".
- **Single Composite Notice:** The Court clarified that the various notices required under Rules 8 and 9 of the SARFAESI Rules (service on the borrower, publication in newspapers, affixation on the property) are not separate notices but are parts of "one single composite intended 'notice of sale'". The right of redemption is lost upon the valid publication of this composite notice.
- **Finality of Auction Process:** The judgment emphasised the need to protect the sanctity of the public auction process. It held that once the borrower's right of redemption is extinguished, the secured creditor is not bound to accept any tender of dues and can proceed with the transfer of the asset. This provides certainty to successful auction purchasers.
- **Retrospective Application:** The Court held that the amended Section 13(8) applies retrospectively to all loan claims that were "alive" when the amendment came into force on 1 September 2016. It reasoned that since the SARFAESI Act is a remedial statute for recovering pre-existing loans, its amendments should apply to pending causes of action to prevent creating "absurd situations."
- **Urging Legislative Clarity:** Expressing dismay over the "glaring inconsistency" and

"ill-wording" of the statutory provisions that have created an "endless pipeline of litigation," the Court urged the Ministry of Finance to review the provisions and make necessary amendments to provide clarity.

Consequently, the Supreme Court allowed the appeal and set aside the judgment of the High Court. The Sale Certificate issued to the auction purchasers was upheld, and the Court made it clear that any third-party rights created over the property by the borrower would be *nonest*.

Anjuman Ishaat-e-Taleem Trust v. The State of Maharashtra and Others (2025 INSC 1063)

"To deny Article 21A its rightful primacy is to reduce it to a skeletal promise—a right without fundamentals, stripped of the very essence that animates our constitutional vision"

CORAM: Justice Dipankar Datta and Justice Manmohan

In a judgment dated **1 September 2025**, a two-judge bench of the Supreme Court observed that its 2014 Constitution Bench ruling in *Pramati Educational and Cultural Trust v. Union of India*[1] might require reconsideration. The *Pramati* judgment had granted a blanket exemption to all minority educational institutions, whether aided or unaided, from the provisions of the Right of Children to Free and Compulsory Education Act, 2009 (RTE Act).

The present batch of appeals arose from conflicting High Court judgments concerning the mandatory implementation of the Teacher Eligibility Test (TET) for appointments and promotions in minority schools. Minority institutions argued that forcing them to adhere to the TET requirement infringed upon their fundamental right under Article 30(1) to establish and administer educational institutions of their choice.

The Court undertook a deep analysis of the constitutional journey of the Right to Education, tracing its evolution from a Directive Principle to a standalone fundamental right under Article 21A. The bench emphasised that the right to quality education is an inseparable part of Article 21A, and qualified teachers are its bedrock.

In its detailed reasoning, the Court made the following key observations:

- The Court found no inherent conflict between the right to education under Article 21A and the rights of minorities under Article 30(1), stating they must co-exist. The right to administer an institution does not include the right to mal-administer it, and the Court held that the "constitutional guarantee under Article 30(1)...was intended to preserve cultural and linguistic identity and not to provide institutions unqualified immunity from laws framed in the best interest of children".
- The bench critically examined the Pramati judgment, noting that its sweeping conclusion to exempt minority institutions from the entire RTE Act was based solely on an analysis of Section 12(1)(c) (the 25% reservation for weaker sections) without considering other crucial, child-centric provisions of the Act. The Court observed that the Pramati ruling "in effect would offend the Article 21A right of students admitted in such institutions".
- The Court noted that the blanket exemption has inadvertently created a "regulatory

1 Pramati Educational and Cultural Trust v. Union of India, (2014) 8 SCC 1

loophole, leading to a surge in institutions seeking minority status to bypass the regime ordained by the RTE Act".

- It was held that the TET is a mandatory minimum qualification for both initial appointments and promotions, as it is a "constitutional necessity flowing from the right to quality education under Article 21A".

Consequently, the two-judge bench, while observing that the Pramati judgment may require reconsideration, referred the matter to the Hon'ble Chief Justice of India for constituting a larger Bench.

However, invoking its extraordinary powers under Article 142 of the Constitution, the Court issued interim directions for in-service teachers in non-minority schools:

- Teachers with less than five years of service remaining are exempted from qualifying the TET for continuing in service, though they will not be eligible for promotion without it.
- Teachers with more than five years of service remaining must qualify the TET within two years to continue in service, failing which they may face compulsory retirement.

Mohammad Afzal Mohammad Sharif v. The State of Maharashtra and Others (2025 INSC 1100)

"Law requires, nay, ordains that its sentinels be vigilant, prompt and objective in enforcing and securing its mandate"

CORAM: Justice Sanjay Kumar and Justice Satish Chandra Sharma

In a judgment delivered on **11 September 2025**, a two-judge bench of the Supreme Court delivered a judgment concerning police accountability and the fundamental duty to register an FIR under Section 154 of the Criminal Procedure Code, 1973. The Court allowed the appeal, decisively holding the failure of the police to register an FIR based on complaint of assault. The Court's primary focus was on the extent to which police discharged their duty without bias and subjectivity.

The appellant approached the police to register a complaint that he had been assaulted by four individuals. The police officials failed in their duty by not registering an FIR regarding the attack and assault on him. Faced with this refusal, the appellant filed a writ petition before the High Court of Bombay, Nagpur Bench. However, the High Court also dismissed his writ petition, with the Division Bench even suspecting his bona fides. This dismissal by the High Court then led to the present appeal before the Supreme Court.

The Supreme Court found patent dereliction of duty, negligence, and bias on the part of the police officials. The Court noted that the failure to register the cross-complaint, while simultaneously registering a case against the victim, ran contrary to the requirement to register an FIR whenever an allegation of a cognizable offence is disclosed. The Court expressed disappointment that senior police officers failed to take prompt and appropriate action.

The Supreme Court allowed the appeal and directed the Home Ministry of the State of Maharashtra to constitute a Special Investigation Team comprising senior police officers of both Hindu and Muslim communities and to take concrete disciplinary action against the erring police officials and ensure a fair investigation.

Kailas S/o Bajirao Pawar v. The State of Maharashtra (2025 INSC 1117)

"Once the requirement of Section 65B is fulfilled, it becomes an admissible piece of evidence, like a document, and the video recorded therein is akin to the contents of a document which can be seen and heard to enable the Court to draw appropriate inference(s)"

CORAM: Justice Manoj Misra and Justice Ujjal Bhuyan

In a judgment delivered on **15 September 2025**, a two-judge bench of the Supreme Court recognised that technical compliance with Section 65B of the Indian Evidence Act, 1872 (hereinafter, IEA), satisfies the requirement of authenticity for electronic records, reducing unnecessary procedural hurdles. The ruling underscores the importance of striking a balance between procedural fairness and efficiency in criminal trials, particularly in NDPS cases where evidentiary proof is complex.

In the present case, the police conducted coordinated raids at two locations and seized a significant amount of Cannabis. The appellant and three others were thus tried for offences under the Narcotic Drugs and Psychotropic Substances Act, 1985 (hereinafter, the NDPS Act). The trial court convicted two accused, including the appellant and acquitted two others. On appeal, the Bombay High Court set aside the conviction and ordered a retrial, citing alleged procedural irregularities. Thus, challenging the High Court's order, this criminal appeal was preferred.

The court held that once a valid certificate under Section 65B is produced, the authenticity of the video recording is established. The court further rejected the High Court's reasoning that non-production of the entire seized contraband is fatal if proper inventory, sealed samples and Forensic Science Laboratory reports are prepared in compliance with Section 52A of the NDPS Act. The court opined that the trial record showed the entire seizure process was properly documented, establishing a clear chain of custody and linkage between seizure and forensic reports. It found that the reasons for ordering a re-trial were misconceived and baseless. The Court, therefore, set aside the High Court's order directing a re-trial.

Thus, the Court held that:

- The video recordings with Section 65B of the IEA certification are admissible evidence without requiring transcripts or playing before each witness.
- The failure to produce the entire seized contraband in court is not fatal if proper procedures under Section 52A of the NDPS Act regarding sample drawing and inventory are followed.
- The procedural lapses that do not cause prejudice to the accused do not justify a retrial.

Sanjabij Tari v. Kishore S. Borcar and Anr.
(2025 INSC 1158)

"It is well settled that in exercise of revisional jurisdiction, the High Court does not, in the absence of perversity, upset concurrent factual findings"

CORAM: Justice Manmohan and Justice N V Anjaria

In a judgment delivered on **25 September 2025**, a two-judge bench of the Supreme Court addressed the scope of revisional jurisdiction and the operation of the Negotiable Instruments Act, 1881 (hereinafter, NI Act). The case arose from a Criminal Appeal challenging the ex parte acquittal of the Respondent-Accused by the High Court of Bombay at Goa under Section 138 of the NI Act, overturning the concurrent convictions of both the Trial Court and the Sessions Court.

The core facts involved the dishonour of a cheque for ₹6,00,000/- issued towards a friendly loan, where the Complainant testified to arranging the money partly from his father and his own borrowings. The central issue was whether the High Court was correct in its revisional jurisdiction to upset the concurrent factual findings of a legally enforceable debt.

The Supreme Court stressed that once execution of the cheque is admitted, the strong presumptions under Sections 118 and 139 of the NI Act arise. Crucially, the Court dismissed the High Court's acceptance of the defence that the accused issued a signed blank cheque to enable the complainant to obtain a bank loan as "unbelievable and absurd". Furthermore, the judgment made a significant legal clarification, holding that a breach of Section 269SS of the Income Tax Act, 1961 (for cash transactions above ₹20,000/-) is subject only to a penalty and does not render the underlying debt illegal or unenforceable for the purpose of prosecution under Section 138 NI Act. Based on these findings, the Court allowed the appeal, set aside the High Court's acquittal order, and restored the Trial and Sessions Courts' judgments. The Court also directed the Respondent-Accused to pay ₹7,50,000/- in 15 equated monthly instalments.

Furthermore, to address the massive backlog of Section 138 of the NI Act cases, the Court implemented guidelines that included the following measures: mandating dasti and electronic service of summons, creating dedicated online payment facilities for early settlement, introducing a new synopsis format for all complaints, and modifying the compounding guidelines by reducing the penalty structure. The High Courts and District Courts were directed to implement these guidelines by November 1, 2025.

Training Hub

Food Safety Training and Certification (FoSTaC) Programme



20 September 2025: The Training Cell organised a Food Safety Training and Certification Programme on Basic Catering for Canteen Staff including Stewards and Cooks in collaboration with the Food Safety and Standards Authority of India (FSSAI), Ministry of Health and Family Welfare, Government of India, New Delhi. The objective of the training is to educate food handlers on food safety, hygiene, and sanitation practices, promoting self-compliance with the FSS Act, rules, and regulations, while fostering a culture of food safety and responsible food handling

Branch Specific Training Programme for Scanning Cell







26 September 2025: The Training Cell, in collaboration with the National Archives of India, conducted a specialised training program for the Officers and officials working in the Scanning Cell of the Supreme Court of India at National Archives of India (NAI) premises. The aim of the training was to enhance practical knowledge and to adopt best practices in the modern techniques of digitisation and preservation of archival records, which will directly benefit the digitisation initiatives of the Supreme Court of India

A Conversation with Justice Sudhanshu Dhulia

The Supreme Court Chronicle is honoured to present an exclusive and elaborate interview with **Justice Sudhanshu Dhulia**, who demitted office upon retirement on **9 August, 2025.** Distinguished for his legal acumen, steadfast commitment to the rule of law and deep engagement with issues of constitutional and public interest jurisprudence, Justice Dhulia has throughout his tenure upheld the ideals of judicial independence and the highest standards of integrity.

With a career spanning decades, from his practice before the High Court of Judicature at Allahabad, to his elevation as a permanent judge of the Uttarakhand High Court on 1 November 2008, then to his appointment as Chief Justice of the Gauhati High Court on 10 January 2021, Justice Dhulia brings with him a profound understanding of the judiciary's role as guardian of rights and liberties.

In this conversation, Justice Dhulia reflects on his modest background, his judicial journey, his approach to leadership in a dynamic legal environment, and his vision for justice delivery in an evolving and plural democracy.

Q. We wanted to begin by asking about your background and your personal life, and how living and working in different Indian settings shaped you both personally and professionally, and how that has shaped your opinion of the role of diversity in one's life?

A. I was born in a small cantonment town in Lansdowne, which was in Pauri Garhwal District. Then in UP, now in Uttarakhand. My grandfather was a freedom fighter, and he was running a press where a weekly newspaper was published. My father was a lawyer and my mother was a teacher there. But then we shifted to Allahabad. Allahabad itself is a very cosmopolitan town. So, I saw various cultures. A lot of Bengali families in Allahabad, families from the southern part of India, were residing in Allahabad because of the Central Government Offices in Allahabad. Then Parsis, Christians and Anglo-Indians. So, I got the first share of this multicultural, diverse society when I went to Allahabad.

Then, in 1971, I won an essay competition when I was in Class VI, which was conducted by the Children's Films Society. This Society, under the Information and Broadcasting Department, Government of India which used to make films for children. Many good films were made by them. So, there was an all-India essay competition, and the topic was "India of My Dreams". I was selected for UP, and UP being the biggest state, there was not just me, there were four from UP. There were one or two from comparatively smaller states. Together, there were about 30-40 of us, and we were taken for an All-India Tour. We were all taken by an Indian Airlines plane from Delhi to Srinagar, which was my first flight on an aircraft. So, we travelled from Kashmir to Kanyakumari, from Bombay (as it was then)

to Calcutta. It was then that I had this idea of how big and diverse is my country. You see we were from different parts of the country, speaking different languages. Yet there was a common thread which kept us together. We were all Indians.

Then for my higher studies after graduation from Allahabad in 1981, I went to JNU where I did my Masters in Modern History. JNU is again a place where you see students and teachers from all parts of the country. There were students from North, East, West and South. There were many students from the North East. One of my best friends was from Mizoram. And there again, I could appreciate the immense diversity and culture of the nation. If I may put it very modestly I got a national outlook. These are the factors which have an important bearing in my growing up and learning.



Justice Sudhanshu Dhulia won an All India Public School Debate in the year 1977; with Lt.Gen. Raj Shukla in the frame

Q. You mentioned your family. You come from a family, which is rooted in law and academia. So how do you feel that those early influences shaped your journey towards the legal profession? How did that childhood environment guide you to pursue law, and also later, as a judge?

A. As a family, we would sit for breakfast and talk about literature, politics and cinema. I used to hear about all that from my father and elder brother, and sometimes from my grandfather, when he was with us in Allahabad. I remember, my grandfather used to come very often from the hills, and though we got only one newspaper, the "Northern Indian Patrika", but, when he was around, I remember, we used to get 4 to 5 newspapers because he was a journalist. For him, newspapers were like food. So I liked that, and there were a lot of magazines too. There were books all around as my father was very fond of reading.

My mother used to initially take me on a bicycle to the school, and at times I used to go to her college. There were times we had to wait for her and then I would go to the library there. There I had a very good time. Her school had a very good library. I then went to a boarding school in Lucknow, the Sainik School. There again, my favourite place used to be the library. So, I learned a lot from libraries, as much from my classrooms.

Q. Sir, friendships are known to be very valuable. So, we wanted to understand how you see the role of friendship as a value, especially in public life?



Justice Sudhanshu Dhulia, former Judge, Supreme Court of India, along with Justice J B Pardiwala, Judge, Supreme Court of India and Justice Uday Umesh Lalit, former Chief Justice of India

A. Friends are very important, because I still have my old friends. As I told you, I was in a boarding school. My friends from the Sainik School are still in touch with me. And yes, your friends are very important because you share ideas with them. They are important in your political awakening. And particularly later on, after school, when you go to a university– it is the university which develops your critical thinking and at that stage your friends are even more important. I was very fortunate to have very good, progressive and large-hearted friends, and they were very helpful in shaping me and my philosophy. Your friends and your teachers, both play an important role in your life.

Q. In January 2021, you took oath as the Chief Justice of the Guwahati High Court. What insights did you gain from administering justice in the northeastern region of the country?

A. I was very fortunate to be there, because otherwise I would never have known what great culture and what rich diversity the Northeast itself has in its fold. We just say it is the Northeast, but there is great diversity in the Northeast. I used to say very often when I was a Chief Justice of the Gauhati High Court, that in the Northeast, and in Assam also, there is an India within India. Assam itself has within it diverse cultures. Each region has a different culture, different skills. And the music in Assam is so vibrant and different. So, Assam and the Northeast were wonderful. I met some of the most interesting, beautiful and heartwarming people there.

Q. You were elevated to the Supreme Court in May 2022. Can you please reflect on what this milestone meant for you, both professionally and personally, and how your career in the High Courts prepared you for the same?



Justice Sudhanshu Dhulia, former Judge, Supreme Court of India, at the Ahom Palace in Sivasagar district, Assam

A. Every High Court judge wants to become a judge of the Supreme Court, and becoming a judge of the Supreme Court of India is an important milestone in the life of a judge. A judge should be known for his judgments. When you are writing judgements, all you have learnt till then will have a very important bearing on how you write a judgment, and also how quickly you are able to write. I enjoyed writing judgments, both as a High Court Judge and a Supreme Court Judge, whatever came my way.

Q. Sir, we also wanted to ask you about your interest in acting and theatre. You have always had a strong inclination toward acting. Could you please share how you find that acting and cinema have shaped you as a person?

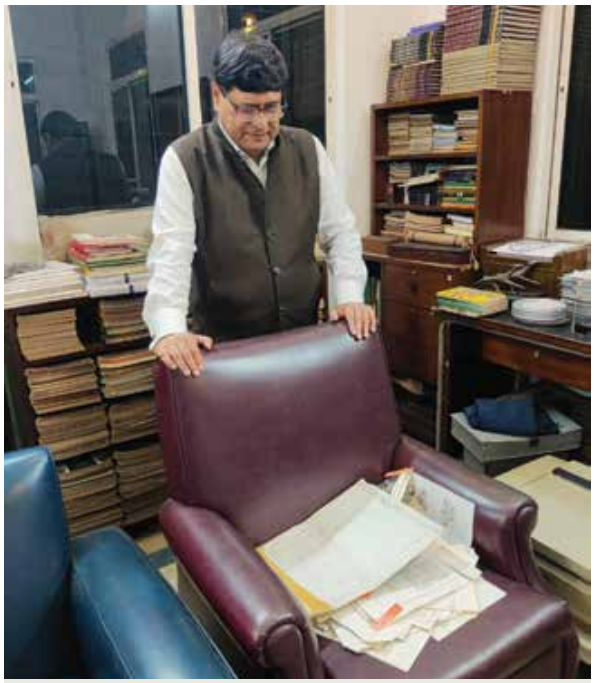
A. I would take part in plays, both in school and university. But what I was really interested in, apart from literature, was cinema. I found it to be a very strong medium of expression. At one point of time, I was seriously thinking of joining some film institute and becoming a director. In Allahabad University, we had a Film Club where I saw the best of world cinema. The cinema of Satyajit Ray, Kurosawa and Bergman. The best were the Italian neo-realism cinema of Rossellini and De Sica, films like Roma Open City and Bicycle Thieves. In those days, in the late 1970s and 1980s, there was no internet, there was no YouTube. It was a huge task getting access to this cinema. We had to go to the railway station to pick up those large circular spools of celluloids, put them on a rickshaw and carry them all the way to the university. We used to get these films from the National Films Archive, Pune.

Q. As someone who has interest in theatre, how do you think that theatre shapes one's personality?

A. Theatre would shape someone's personality like any other form of art, like music would shape or any other art. I gave a lecture recently on "fraternity and human dignity" which is mentioned in our Preamble to the Constitution. You will have a better idea of what fraternity means, what dignity means, not so much from scholarly articles, but from literature and cinema. This is because humanism is a part of your being, your upbringing and culture. It is not merely an academic exercise.

Q. Do you have any recommendations for our readers based on your interests in films?

A. Satyajit Ray, I consider one of the greatest Indian filmmakers. The filmmaker Kurosawa, who was his contemporary, said about Satyajit Ray, that if you have been in this world and not seen the cinema of Satyajit Ray, it is like staying in this world and not having seen the Sun and the Moon. Recently, when I became a Supreme Court Judge, I was in Calcutta. I requested my brother colleague Justice Aniruddh Bose, that I wanted to see the house of Satyajit Ray. And, it was a living house. Somehow, he arranged it, and I saw the house. The place where Satyajit Ray used to work.



Justice Shudhanshu Dhulia, former Judge, Supreme Court of India, at the residence of Satyajit Ray, an acclaimed Indian filmmaker

Q. You are known to be a voracious reader. You have read across multiple genres. Do you have any books on law, history or literature, which left a lasting impact on you, which you would also like to recommend to the readers?

A. Voracious, you call somebody who reads very quickly and consumes very fast. Like Justice Rohinton Nariman, he is a voracious reader. I am okay. Not at the level of being voracious. I take my time reading. I am not a very fast reader, but I enjoy reading. Yes I do.

Many years back, I read Madame Bovary by Gustave Flaubert and also Anna Karenina by Tolstoy which left a lasting impact on me. Then I read a substantial part of the entire short stories of Prem Chand. I read a lot in Hindi, poetry in particular. In non-fiction, I would recommend that every one should read Jawaharlal Nehru's autobiography and his Discovery of India. These are the two books, and Ramchandra Guha's India After Gandhi. These should be the necessary readings that give you an idea of what India is.

Q. Having been a lawyer and a judge, do you have any advice for young lawyers who are entering the profession or are already part of the profession?

A. The trend which I am seeing is that a lot of students, a lot of young lawyers, bright minds, are into commercial litigation. They join law firms or are getting into arbitration, that is their number one choice. No problems in that, but should also be attracted to social issues, they should also speak on behalf of the people, especially the marginalised. Like Bryan Stevenson. Bryan Stevenson is an Afro-American lawyer. He's a Harvard graduate. Recently, a movie has also come out, Just Mercy. That is about him. He fights for those convicts who are facing capital punishment. He got many of them released. Because, earlier, there was no proper legal aid for them. I am sure, if Mahatma Gandhi had been alive and if he would be practicing law, he would be doing the same thing that Bryan Stevenson is doing. I don't see any young Indian lawyer trying to become Bryan Stevenson. That is my worry.

Q. Do you think that there are any particular practices or initiatives, which the bench or the legal fraternity can undertake to mentor the next generation of legal minds?

A. I don't know what the prevailing system in the Supreme Court is, but at High Court level, one joins a senior advocate of the Bar, assists the senior in preparing his briefs, and observes him and other seniors. In the court, he would spend quality time in libraries, and this is how he would build his foundation for learning. This is where I think nothing much is being done. It is only after you have built a proper foundation layer by layer through your hard work that you can kick start your career. But young lawyers are in a hurry.

There is now a Judicial Academy, in every State, largely controlled by the High Court. There is a Judicial Academy, now in Bhopal, which is under the Supreme Court. There are a lot of training centres for judges. But there are hardly any training centres for lawyers. When I was in Uttarakhand and I was given the charge of education, I had at least two or three programs for lawyers, young lawyers. I requested the senior advocates to give lectures, share their skills and experiences with the young lawyers. We used to interact with them, used to show them movies, and books were distributed where they desire to learn more. We asked the Bar Council and the Bar Associations to contribute. This effort needs to come from the Bar Council of the State and Bar Association. And this should be done regularly. I am sure that would make some difference. These days, there are some judicial academies, which have got a module, which have training programs, which have been very scientifically designed to train lawyers. Lawyers don't need training which may tell them about the statutes. You have to tell them about the etiquette, the ethics, the art and the craft. Particularly, the ethics.

Q. Finally, looking back on your career, do you have any reflections that you want to share and also hopes that you have for India's legal future?

A. The attention time of youngsters is getting shorter. For many, it is difficult to concentrate for long. It is too much of a task for them. Then they hardly read books. That culture of learning is missing. That is why I find that most of the time, young lawyers are not prepared with their cases. Make no mistake, these are all bright minds, and the kind of information that they have with them is mindboggling. They can really do wonders. They are living in good times. The only thing

required is some introspection and some effort on their part. Also, they should think about society as well, apart from making money. The majority of our freedom fighter leaders were lawyers. Many of those who won us our freedom were lawyers. Mahatma Gandhi was a lawyer, Jawaharlal Nehru was a lawyer, Sardar Vallabhbhai Patel was a lawyer, B R Ambedkar was a lawyer. Ambedkar was a thinker who gave us our Constitution. Why can't the lawyers do what they are supposed to do? Make our society better.

Q. Sir, any final reflections on your career trajectory that you would like to share with us?

A. It has been a satisfying journey for me. I know that there are much better people than me who deserved to be in the Supreme Court. So, it is also a matter of luck and the times, so many things. The important thing is not that you are here, what is important is, what have you done, after you were here. So, I would say that overall, it was satisfying.



9 August, 2025: Justice Sudhanshu Dhulia, former Judge, Supreme Court of India, during the ceremonial Guards of Honour marking his retirement

10 January 2021:
Justice Sudhanshu Dhulia took oath as the Chief Justice, High Court of Gauhati





9 May 2022:
Justice Sudhanshu Dhulia took oath as a Judge, Supreme Court of India



9 August 2025: Justice Sudhanshu Dhulia, on his last working day, with Justice B R Gavai, Chief Justice of India, and other Judges of the Supreme Court of India

Bid Adieu



Shri Subhash Chander Chawla concludes a truly distinguished career, retiring from the Supreme Court of India as an Additional Registrar after a journey spanning nearly 36 years with the institution. A native of Delhi, his dedicated service began on November 21, 1989, when he joined the Registry as a Junior Stenographer. He has also served at the residential offices of the judges as well as in the Court. Reflecting on his expansive service, he underscores the value of his tenure, stating that this institution gives employees an opportunity to learn so as to gain legal knowledge and transform themselves into experienced individuals. He reflects on the deep connection that he developed with the people in the registry. He also emphasised that such long and satisfactory service was only possible due to the support of his family. As he retires, he expresses his deep gratitude. He thanks everyone who supported him. He looks forward to this new chapter, focusing on his personal goals and familial responsibilities.



Ms Sonali Banerjee joined the Supreme Court on 31 January 1990, commencing her dedicated career as a Junior Clerk (called Junior Court Assistant). A native of Delhi, Ms Banerjee's professional journey within the institution spanned over three decades, marked by consistent growth and commitment. She steadily rose through the ranks, demonstrating exceptional service and diligence throughout her tenure. Ms Banerjee retires from the Supreme Court as an Assistant Registrar, a testament to her long and successful career within the judiciary. As she bids adieu to the institution that was an integral part of her life for many years, she looks forward to the new chapter that awaits, cherishing the memories and experiences gained during her distinguished service.



Shri Dharmendra Kumar joined the Supreme Court on 1 April 1989 as a Junior Court Attendant. Shri Kumar describes his experience as a great addition to his character. Reflecting on his journey, Shri Dharmendra shared that he thoroughly enjoyed working at the Supreme Court and appreciates the institution. The Court for him has been, not just a workplace but a temple of justice where he has learned, grown and contributed to the noble pursuit of upholding the rule of law. He rose to different ranks in the service and finally retired as a Restorer Library-Grade I on 27 September 2025. He carries with himself countless memories, invaluable lessons and enduring friendships. After 36 years of dedicated service to the Supreme Court, he bids farewell to this august institution with deep gratitude and humility.



Shri Pinkari concludes an exemplary and dedicated career, retiring from the Supreme Court as a Restorer Grade-I. A native of Azamgarh, Uttar Pradesh, his journey began over 38 years ago, on 27 February 1987, when he joined the Registry as a Junior Court Attendant. Looking back on his journey, he describes his experience as deeply fulfilling and reflects with pride on the steady growth of his career and the many opportunities the Court offered. He is thankful for the valuable lessons he learned over the decades. As he now bids farewell to the institution, Shri Pinkari looks forward to dedicating more time to his personal goals and family.



Shri Shiv Kumar, hailing from Ayodhya, Uttar Pradesh, joined the Supreme Court on 27 March 1984 as a Peon in the Grade D, non-clerical cadre. He fondly recalls joining the institution during the tenure of Chief Justice Y V Chandrachud. Reflecting on his journey of nearly four decades of dedicated service, he described his time at the institution as a truly life-changing experience. He particularly cherishes his service in Court Room No. 1 under various Chief Justices. His career path reflects his steady growth within the institution, beginning as a Peon and culminating in his service in the Paperbook department before retirement. As he bids farewell, having retired as a Restorer Gr. On 30 September 2025, Shri Shiv Kumar carries forward the ethos of service he imbibed at the Court and looks forward to continuing his commitment to the public in some capacity.



Supreme Court of India
Tilak Marg, New Delhi-110001

© Supreme Court of India, 2025

Designed by
Design Team, Editorial, Supreme Court of India