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Voices unbound: Navigating the landscape of free speech and social media in India

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Abstract

The advent of social media has dramatically changed how individuals access, analyze and express information. Everything is in data in this technology driven world. Though the Constitution of India guarantees the citizens right to free speech and expression as enshrined under Article 19(1) (a) yet the reasonable restrictions are provided in the very next Article i.e. Article 19(2). Thus there is no free lunch, everything comes with a cost and so is the free speech. In this digital age where information is not just information it can be information, mis-information, or dis-information, and the social sentiments have been driven through social media the role of restrictions and vigilance has increased many folds. This research paper examines how the statutory and judicial phenomenon struggling to balance between the constitutional guarantee of free speech and the restrictions therein in the age of free flow of information. It explores the recent developments, such as the IT Rules, 2021, and their implications on digital expression. The paper concludes by investigating various challenges in controlling social media and free speech and recommendations in this regard.

Keywords: Free speech, social media, restrictions on free speech, article 19(1)(a), article 19(2), it act, censorship, misinformation, fake news, hate speech, it rules, 2021, supreme court on free speech

Introduction

The *Grund Norm* of India guarantees every Indian the right to free speech and expression enshrined therein as a fundamental guarantee under Article 19(1)(a). Every democratic country allows its citizens to express themselves freely without any fear of being censored and the freedom of citizens ensures the survival of the democracy. "It is an integral pillar of a democratic regime, allowing citizens to voice their opinions, thoughts, and ideas without the fear of state censorship" ^[1]. In a country like India free speech plays a significant role in social change and it ensures political accountability thereby strengthens the democratic governance. "It is critical to the health of a democracy, enabling citizens to engage in debate about governance and public policy" ^[2].

In this digital age the information is both free and free flowing. Access has become easy and quick and so has become the abuse. Social Media has become an important tool not only to communicate but also to create the democratization of the media and State monopoly on the information. It has proven to be a platform for activism, where users can mobilize movements, create awareness, and participate in public debate on matters ranging from social justice to political reforms. But as the saying goes, with great power comes great responsibility, the users are on the responsibility to not to misuse social media and also some restrictions have to be there on freedom as absolute power has proven records to be absolute disasters. And this restriction's part on the freedom of speech and expression brings the vigilance and surveillance of the State in the matter as both to stop the misuse and punish the one who misuses the platforms and also let the Big Tech companies not to indulge and interfere with the sovereignty, unity and fraternity of the State. Hate speech, Fake News, Misinformation, Disinformation, etc. are the pollutants in the free flowing river of information and the Indian Legal Framework is battling between ensuring free speech to its citizens and curbing hate speech. "On the one hand, social media gives a ground for free speech; on the other hand, it also leads to concerns over the abuse and obligations of users and platform providers in ensuring civilized discussion." ^[3]

Constitutional Framework of Free Speech in India

The constitutional framework of free speech in India is largely embodied in Article 19 of the Constitution, which ensures the fundamental right to freedom of speech and expression.

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Article 19(1)(a) establishes the fundamental right to freedom of speech and expression as one of the most essential democratic rights. This encompasses not just spoken and written words, but also symbolic speech, artistic expression, and the right to information. Article 19(2) provides the constitutional basis for reasonable restrictions on this freedom. The State can impose limitations on free speech in the interests of:

1. Sovereignty and integrity of India
2. Security of the state
3. Friendly relations with foreign states
4. Public order
5. Decency or morality
6. Contempt of court
7. Defamation
8. Incitement to an offense

These limitations are used to strike a balance between the right of free speech and the requirement to safeguard different interests of society, including national security, public order, decency, morality, and the sovereignty of the country. The imposition of these limitations is subject to judicial review and must satisfy the test of reasonableness, so that they do not violate the substance of the right under Article 19(1)(a).

The Supreme Court has developed several important doctrines through landmark cases. The “clear and present danger” test, borrowed from American jurisprudence, requires that restrictions on speech must address immediate and serious threats rather than speculative harms. “Clear and present danger was a doctrine adopted by the Supreme Court of the United States to determine under what circumstances limits can be placed on First Amendment freedoms of speech, press, or assembly. Created by Justice Oliver Wendell Holmes Jr, to refine the bad tendency test, it was never fully adopted and both tests were ultimately replaced in 1969 with *Brandenburg v. Ohio*’s ‘imminent lawless action’ test.”^[4] The concept of “reasonable restrictions” means any limitation must be proportionate, necessary, and serve a legitimate state interest. The Constitution also recognizes that different forms of expression may have different levels of protection. Political speech, for instance, receives heightened protection as it’s essential to democratic governance, while commercial speech may be subject to greater regulation.

Legal Framework Governing Social Media in India

The regulation of social media platforms in India represents a complex intersection of constitutional rights, statutory provisions, and administrative policies. As digital communication has become integral to democratic discourse, the Indian legal system has evolved to address the challenges posed by social media while attempting to preserve fundamental freedoms guaranteed under Article 19(1)(a) of the Constitution. The legal framework governing social media in India is mainly based on the Information Technology Act, 2000 (IT Act), the *Bhartiya Nyay Sanhita*, 2023, and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 (IT Rules, 2021).

1. Information Technology Act, 2000 and Amendments: The Information Technology Act, 2000, as amended in 2008, constitutes the foundational legislation for digital governance in India. Section 69A empowers the Central

Government to block public access to information through computer resources, including social media content, in the interest of sovereignty, defense, security, or public order.

The Supreme Court in *Anuradha Bhasin v. Union of India* (2020)^[5] established that such blocking must follow due process and be proportionate. Section 79 provides safe harbor provisions for intermediaries, protecting them from liability for third-party content, provided they comply with prescribed guidelines and exercise due diligence. This provision has been crucial in shaping platform responsibility and content moderation practices.

2. Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021:

The IT Rules 2021 represent the most comprehensive regulatory framework for social media platforms. These rules establish a three-tier grievance redressal mechanism and impose significant compliance obligations on platforms. Significant Social Media Intermediaries (SSMIs), defined as platforms with over 50 lakh registered users, face enhanced obligations including:

- a. Appointment of Chief Compliance Officer, Nodal Contact Person, and Resident Grievance Officer
- b. Monthly compliance reports detailing content moderation actions
- c. Traceability requirements for message origination (particularly impacting encrypted platforms)
- d. Proactive content monitoring using automated tools

The rules also establish content removal timelines, requiring platforms to acknowledge complaints within 24 hours and resolve them expeditiously.

3. Criminal Law Interface:

- Social media content regulation intersects with various criminal law provisions:
- a. *Bharatiya Nyaya Sanhita*, 2023 (replacing IPC) replaces provisions for sedition and introduces national security, with a new category of offence called hate speech, and the established category of offence i.e. the defamation.
 - b. Protection of Children from Sexual Offences Act, 2012 addresses child safety online.
 - c. Narcotic Drugs and Psychotropic Substances Act, 1985 covers drug-related content

4. Electoral Regulations:

- The Election Commission’s guidelines for social media during elections create additional compliance obligations, including:
- a. Pre-certification of political advertisements
 - b. Expenditure reporting for digital campaigns
 - c. Silence period compliance

5. Data Protection Considerations:

- While the Digital Personal Data Protection Act, 2023, is yet to be fully implemented, its provisions will significantly impact social media operations, particularly regarding:
- a. User consent mechanisms
 - b. Data localization requirements
 - c. Cross-border data transfer restrictions

Judicial Interpretation of Free Speech and Social Media

The intersection of constitutional free speech guarantees and social media platforms has emerged as one of the most significant areas of judicial interpretation in contemporary Indian jurisprudence. As digital communication fundamentally transforms the exercise of fundamental rights

under Article 19(1)(a), the Supreme Court and various High Courts have been tasked with developing doctrinal frameworks that preserve constitutional values while addressing the unique challenges posed by digital platforms. This judicial evolution reflects broader tensions between traditional constitutional interpretation and the exigencies of technological transformation.

1. Shreya Singhal v. Union of India (2015) ^[6]: The Digital Rights Watershed: The Supreme Court's decision in *Shreya Singhal v. Union of India* represents the foundational precedent for digital free speech jurisprudence. The Court's striking down of Section 66A of the Information Technology Act, 2000, established several critical principles:

- a. **Vagueness Doctrine Application:** The Court applied the constitutional vagueness doctrine, holding that Section 66A failed to provide adequate guidance for determining prohibited conduct. Justice Nariman's judgment emphasized that vague laws create a chilling effect on free speech, requiring precision in legislative drafting for speech restrictions.
- b. **Clear and Present Danger Test:** Adopting the American jurisprudential framework, the Court established that restrictions on online speech must meet the "clear and present danger" standard, requiring immediate and serious threat rather than speculative harm. This test provides heightened protection for digital expression while permitting restrictions only in cases of imminent lawless action.
- c. **Parity Principle:** The Court definitively held that online and offline speech deserve equal constitutional protection, rejecting arguments that digital communication merits reduced protection due to its reach or permanence.

2. Anuradha Bhasin v. Union of India (2020) ^[7]: Due Process in Digital Restrictions: The *Anuradha Bhasin* judgment addressed internet shutdowns in Jammu and Kashmir, establishing crucial precedents for procedural safeguards in digital speech restrictions:

- a. **Proportionality Mandate:** The Court required that any restriction on internet access must be proportionate to the legitimate aim pursued, drawing from the *Puttaswamy*^[8] proportionality framework.
- b. **Temporal Limitations:** Internet shutdowns cannot be indefinite and must be periodically reviewed, establishing temporal constraints on digital speech restrictions. Due Process Requirements: Orders restricting internet access must be published and made available to affected parties, ensuring transparency in digital rights limitations.

3. Adapting Traditional Doctrines: Content-Based vs. Content-Neutral Analysis: Our courts have begun developing sophisticated analytical frameworks distinguishing between content-based and content-neutral regulations of social media. Content-based restrictions, such as those targeting specific political viewpoints or religious criticisms, receive strict scrutiny and must serve compelling state interests through narrowly tailored means. Content-neutral regulations, including platform architecture requirements and general disclosure obligations, receive intermediate scrutiny, requiring substantial government interest and reasonable fit between means and ends.

1. **Prior Restraint Doctrine in Digital Context:** The constitutional prohibition against prior restraint, established in *Romesh Thappar v. State of Madras* (1950), has been adapted to social media contexts. Courts have generally held that pre-publication censorship remains impermissible, though automated content filtering raises novel questions about the application of prior restraint doctrine to algorithmic content moderation. In *Facebook Inc. v. Union of India* (Delhi High Court, 2020), the court recognized that while platforms may implement community standards, governmental mandates for proactive content removal may constitute impermissible prior restraint absent immediate threat to public order.
2. **Intermediary Liability and Constitutional Rights:** The judicial interpretation of Section 79 safe harbor provisions under the IT Act has evolved to recognize constitutional dimensions of platform liability. Courts have increasingly held that intermediary immunity serves not merely commercial interests but also constitutional values of free expression by preventing chilling effects from excessive liability exposure. In the case of *Shreya Singhal*, the court specifically noted that requiring intermediaries to adjudicate speech legality would effectively delegate constitutional interpretation to private entities, violating the separation of powers doctrine and due process guarantees.
3. **State Action Doctrine in Digital Spaces:** The courts have begun grappling with questions of state action in digital contexts, particularly regarding whether private platform content moderation decisions can constitute state action when performed pursuant to government directives. This analysis becomes crucial for determining the applicability of fundamental rights against private platform actions. In *WhatsApp LLC v. Union of India* (Delhi High Court, 2021), questions arose regarding whether compliance with traceability requirements constitutes state action subject to constitutional scrutiny, though definitive resolution remains pending.
4. **Political Speech and Electoral Context:** Courts have accorded heightened protection to political speech on social media platforms, recognizing its essential role in democratic discourse. In *People's Union for Civil Liberties v. Union of India* (2013), while addressing general surveillance concerns, the Supreme Court noted that restrictions on political communication require the highest level of justification. However, the intersection of free speech rights with electoral integrity has created complex judicial challenges. Courts must balance the constitutional imperative of free political expression against legitimate concerns about the impact of misinformation on electoral processes.
5. **Religious Expression and Communal Harmony:** The judicial approach to religious expression on social media reflects the traditional tension between free speech and public order under Article 19(2). Courts have generally maintained that religious criticism remains protected speech unless it specifically incites imminent violence or hatred against particular communities. In the *Amish Devgan v. Union of India* (2020) Supreme Court decision, while not exclusively addressing social media, established principles relevant to online religious discourse, emphasizing that

offensive speech alone cannot justify restrictions absent clear evidence of public order threats.

6. **Hate Speech and Community Standards:** Our courts have developed nuanced approaches to hate speech on social media platforms, distinguishing between offensive expression and speech that poses genuine threats to public order. The judicial methodology increasingly requires specific evidence of likely violence or discrimination rather than general offense or discomfort.

Challenges in Controlling Social Media and Free Speech

The regulation of social media platforms presents unprecedented challenges to established free speech jurisprudence, creating complex tensions between constitutional imperatives and practical governance needs. The digital revolution has fundamentally altered the traditional paradigm of speech regulation, where clear boundaries existed between speakers, intermediaries, and audiences. Contemporary legal systems grapple with reconciling established constitutional doctrines developed for analog communication with the realities of algorithmic amplification, viral dissemination, and transnational platform governance.

The classical “marketplace of ideas” theory, premised on the assumption that truth emerges through competition between ideas, faces fundamental challenges in social media environments. Algorithmic curation systems, designed to maximize user engagement rather than truth-seeking, create what scholars term “epistemic bubbles” that undermine the foundational assumptions of the marketplace. The Supreme Court’s reliance on marketplace theory in *Shreya Singhal v. Union of India* (2015) ^[9] may prove inadequate for addressing algorithmic manipulation of information flows.

The traditional assumption that more speech counters harmful speech becomes problematic when algorithmic systems can exponentially amplify false or harmful content while marginalizing corrective information. This phenomenon necessitates fundamental reconsideration of whether classical liberal theory provides sufficient conceptual framework for digital speech regulation.

The established legal distinction between protected speech content and regulable conduct becomes blurred in digital environments where code architecture constitutes both medium and message. Platform design decisions, including algorithmic recommendation systems, user interface elements, and engagement mechanisms, simultaneously facilitate expression and shape its parameters in ways that traditional content-conduct analysis struggles to address.

Social media platforms process billions of content items daily, creating unprecedented scale challenges for traditional regulatory approaches. The Indian legal system, designed for discrete adjudication of individual cases, lacks institutional capacity for content evaluation at digital scale. The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, while establishing content removal timelines, fail to address the practical impossibility of meaningful human review for bulk content decisions.

1. **Jurisdictional Challenges:** The global nature of social media platforms creates significant jurisdictional hurdles for Indian regulators. Content that violates Indian law is often hosted on servers located abroad, making enforcement of domestic laws difficult. The

removal of such content depends on cooperation through mechanisms like the Mutual Legal Assistance Treaties (MLATs), which are often slow and bureaucratic. Provisions like Section 69A of the IT Act, 2000, and Section 91 of the CrPC empower Indian authorities to request data or block content, but their effectiveness diminishes when foreign-based platforms are not directly subject to Indian court orders.

2. **Defining the Limits of “Reasonable Restrictions”:** Although Article 19(1)(a) guarantees the right to freedom of speech and expression, Article 19(2) allows the State to impose reasonable restrictions on grounds such as public order, decency, morality, or the sovereignty and integrity of India. However, applying these broad and subjective terms to the fast-moving, diverse world of social media content is challenging. What constitutes “morality” or “public order” often depends on context and can vary across communities, leading to inconsistent enforcement. The Supreme Court in *Aveek Sarkar v. State of West Bengal* (2014) acknowledged that evolving social standards must be considered in assessing obscenity.
3. **Speed vs. Due Process:** Social media thrives on speed, with posts, videos, and live streams spreading globally in seconds. In contrast, legal processes such as court orders or judicial review take considerably longer, creating a gap that can be exploited for spreading misinformation, hate speech, or incitement. While Section 69A of the IT Act provides for emergency blocking powers, such measures sometimes bypass full judicial scrutiny, raising concerns about arbitrary content removal. This tension between rapid intervention and procedural safeguards remains one of the most pressing dilemmas in regulating digital expression.
4. **Anonymity & Fake Accounts:** The ability to operate anonymously on social media allows individuals to speak freely but also enables the spread of harmful or illegal content without accountability. Fake profiles, bots, and the use of virtual private networks (VPNs) make it difficult to trace originators of problematic content. End-to-end encryption, while essential for privacy, complicates law enforcement’s efforts to track illegal communication. The debate over mandatory user verification versus the constitutional right to privacy, recognised in *Justice K.S. Puttaswamy v. Union of India* (2017) ^[10], remains unresolved.
5. **Misinformation & Fake News:** Social media’s algorithm-driven environment rewards engagement, often amplifying sensational or false content over verified information. Fake news has been linked to incidents of mob violence, panic during crises, and political manipulation. Although the IT Rules, 2023, empower government-notified fact-check units to counter false information, critics argue that such powers risk being misused for political censorship. The difficulty lies in ensuring timely and accurate fact-checking while preserving the democratic value of open debate.
6. **Platform Accountability:** Under Section 79 of the IT Act, intermediaries like Facebook, YouTube, and Twitter enjoy “safe harbour” protection from liability for user-generated content, provided they follow due diligence requirements. The Intermediary Guidelines,

2021, mandate prompt removal of unlawful content after receiving complaints or government orders. However, the ambiguity around what constitutes “due diligence” and the occasional clash between platform community guidelines and Indian legal requirements have led to friction between the State and digital companies.

7. **Hate Speech & Polarisation:** Social media has the potential to intensify polarisation by amplifying divisive narratives, often through coordinated online campaigns targeting specific communities. Such conduct can lead to public disorder and societal unrest. The Bharatiya Nyaya Sanhita, 2023 addresses hate speech through provisions like Section 196 (promoting enmity between different groups on grounds such as religion, race, place of birth, residence, language, etc.) and Section 198 (acts prejudicial to maintenance of harmony), as well as Section 354 (statements conducing to public mischief). However, enforcement of these provisions has often been inconsistent and, in some cases, politically selective. Compounding the challenge, social media platforms apply their own global moderation standards, which can lead to the removal of content that does not necessarily violate Indian law, raising concerns about the balance between corporate policies and India’s sovereign legal framework.
8. **Censorship vs. Freedom:** Efforts to regulate online speech frequently raise the risk of overreach, where legitimate criticism of government policies or social movements is curtailed under the pretext of protecting national security or public order. The blocking of certain activist accounts during the farmers’ protests and other demonstrations has sparked debates over transparency in takedown orders. The Supreme Court in *Anuradha Bhasin v. Union of India* (2020) ^[11] stressed the need for proportionality and judicial oversight, yet concerns about arbitrary censorship persist.
9. **Digital Divide:** Regulatory measures such as internet shutdowns, often imposed to curb the spread of provocative content, disproportionately affect rural populations and low-income groups who rely on mobile internet for education, business, and civic participation. Despite the recognition in *Anuradha Bhasin* that internet access forms an essential part of the right to free speech, such shutdowns remain a common government tool, raising concerns about their necessity and proportionality in a democracy.
10. **Technological Evolution Outpacing Law:** India’s primary digital law, the IT Act, 2000, was drafted in an era before the rise of social media, AI-generated content, and advanced online manipulation techniques. Emerging threats like deepfakes, synthetic news, and coordinated bot networks lack specific legislative frameworks, leaving a regulatory gap that is exploited by malicious actors. The absence of updated, technology-sensitive legislation makes it difficult to address these challenges while preserving constitutional freedoms

Conclusion and Recommendations

In conclusion, the regulation of social media in India presents a multifaceted challenge requiring careful calibration between safeguarding fundamental rights under Article 19(1)(a) and addressing legitimate governmental

interests in maintaining public order and digital accountability. The existing legal architecture, comprising the Information Technology Act 2000, relevant provisions of the Bharatiya Nyaya Sanhita 2023, and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules 2021, represents significant advancement in digital governance frameworks. However, this regulatory matrix continues to exhibit structural deficiencies in achieving optimal equilibrium between constitutional protections and regulatory objectives.

The resolution of these regulatory tensions necessitates comprehensive legal reform grounded in constitutional principles established in landmark decisions such as *Shreya Singhal v. Union of India* ^[12] and *K.S. Puttaswamy v. Union of India* ^[13]. Legislative clarity in defining prohibited content categories remains paramount to prevent constitutional vagueness challenges and ensure compliance with the “clear and present danger” standard for speech restrictions. Furthermore, the establishment of transparent procedural frameworks for content moderation and grievance redressal mechanisms would enhance due process protections while fostering public confidence in platform governance.

Reform initiatives should prioritize substantive revision of the IT Rules 2021 to incorporate technological neutrality principles and adaptive regulatory mechanisms capable of responding to evolving digital communication paradigms. Meaningful stakeholder consultation, encompassing civil society organizations, technology companies, and constitutional law experts, would facilitate development of regulatory frameworks that effectively balance competing interests while maintaining constitutional compliance.

Additionally, comprehensive digital literacy initiatives constitute essential complementary measures to formal legal regulation. Empowering citizens with critical evaluation skills for digital content consumption would enhance democratic discourse quality while reducing reliance on regulatory interventions that may compromise free speech protections. Such educational approaches address underlying behavioral factors contributing to misinformation proliferation and online misconduct.

As India navigates the complexities inherent in social media governance, success requires adoption of integrated regulatory strategies emphasizing transparency, procedural accountability, and unwavering commitment to constitutional free speech guarantees. This holistic approach would facilitate development of a robust democratic digital ecosystem that preserves essential constitutional values while addressing legitimate contemporary governance challenges in the digital age.

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