



The constitutional right to speedy justice in India: Unravelling its significance and challenges

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Abstract: *The constitutional right to prompt justice is one of the main tenets of the country's legal framework, ensuring that individuals have access to timely resolution of their legal disputes. This article delves into the significance and challenges associated with this crucial right within the Indian judicial system. The significance of the constitutional right to speedy justice lies in its role as a safeguard against prolonged and unjust delays in legal proceedings, thereby upholding the principles of fairness, equality, and access to justice. It serves as a cornerstone of democracy, ensuring that individuals are not unduly deprived of their liberty or subjected to prolonged uncertainty due to delays in the legal process. However, despite its paramount importance, the realization of the right to speedy justice in India is fraught with numerous challenges. These challenges stem from various factors including systemic inefficiencies, backlog of cases, procedural complexities, inadequate infrastructure, and shortage of judicial resources. Additionally, social and economic disparities often exacerbate delays in accessing justice, disproportionately affecting marginalized communities and vulnerable individuals. The article examines the legal framework surrounding the right to speedy justice in India, encompassing constitutional provisions, statutory enactments, and judicial pronouncements. It analyzes landmark judgments by the Indian judiciary that have shaped the interpretation and application of this right, highlighting the evolving jurisprudence in this area. Furthermore, the article explores potential solutions and reforms aimed at addressing the challenges impeding the realization of speedy justice in India. These include measures such as judicial reforms, use of technology in court proceedings, alternative dispute resolution mechanisms, and strengthening of legal aid infrastructure. It underscores the need for concerted efforts by all stakeholders – including the judiciary, legislature, executive, legal professionals, and civil society – to work towards the effective implementation of the right to speedy justice.*

Key Words: *Constitutional Right, Speedy Justice, Judicial System, Access to Justice Fairness, Equality, Judicial Resources.*

1. Introduction :

The right to speedy justice is a fundamental tenet of any democratic society, ensuring that individuals have access to timely resolution of their legal disputes. In India, this right is enshrined within the constitutional framework, emphasizing its significance in safeguarding the principles of fairness, equality, and access to justice. “However, despite the fact that it is mandated by the constitution, the implementation of fast justice in India is sometimes hampered by a significant number of obstacles.” These obstacles range from inefficiencies within the system to socio-economic imbalances. This article seeks to unravel the significance of the constitutional right to speedy justice within the Indian context while critically examining the challenges that impede its effective implementation.¹

The idea behind Right to Speedy Trial is to resolve cases as quickly as possible in order to improve the effectiveness and reliability of the judiciary. “The fundamental goal of the Right to a Speedy Trial is to instill justice in the community.” Human rights are necessary because of human life. A fair trial is an unbiased judge's open trial where all parties are given equal treatment. One of the essential protections of human rights and the rule of law, the right to a fair

¹ Dr V.P. Ramiah, Customary Clogs In Justice Delivery System” AIR 2003 Journal, p - 336



trial serves to ensure the administration of justice. A “fair trial entails providing her with the legal means to establish her innocence.”²

2. Historical Context :

Concept of speedy justice has deep roots in India's legal history, dating back to ancient texts such as the “Manusmriti” and “Arthashastra,” which emphasized the prompt resolution of disputes. Over the centuries, various legal systems in India, including the Mughal and British colonial regimes, recognized the importance of expeditious justice delivery. The Indian Constitution, which formed the country's current legal system, specifically states in Articles 14 and 21 that access to prompt justice is a basic right.³

3. Legal Framework :

With the support of court rulings and legislation enactments, the Indian legal system firmly establishes the constitutional right to prompt justice. “The judiciary has interpreted Article 21 of the Constitution broadly, and as a result, the right to a speedy trial is considered a fundamental aspect of the right to life and personal liberty.” Furthermore, procedural protections have been established under the Criminal Procedure Code (CrPC) and a number of High Court rulings to guarantee the prompt resolution of cases.⁴

Article 21: No one may be deprived of their life or personal freedom under the terms of this article unless it is done so in compliance with the legally established procedure. There are two conditions that must be satisfied before someone may be deprived of their life and liberty, citing the Supreme Court's 1978 ruling in the Maneka Gandhi case:

- ❖ A regulation or legislation should be implemented, and
- ❖ In order for the law to be considered “reasonable,” “fair,” and “just”.

The technique that is prescribed by law for the purpose of depriving a person of his liberty cannot be regarded ‘reasonably fair or just’ unless it assures that the trial will be finished in a timely manner within the allotted time frame. It has been ruled, on the basis of a number of cases, that the right to a trial that is both fair and quick is a basic right that every person has.

4. Significance of Speedy Justice :

Significance of the constitutional right to speedy justice cannot be overstated. Prompt resolution of legal disputes is essential to prevent undue hardship and deprivation of liberty, uphold the rule of law, and foster public confidence in the judicial system. “The administration of justice in a timely manner not only acts as a deterrent against the misuse of power by state officials, but it also guarantees that justice is not delayed, which is often equivalent to justice being denied.”⁵

5. Challenges to Speedy Justice :

The realisation of fast justice in India is plagued by a great number of obstacles, despite the fact that it is of great significance. Systemic inefficiencies, including procedural delays, backlog of cases, and inadequate judicial infrastructure, pose significant hurdles to timely justice delivery. Moreover, socio-economic disparities exacerbate access to justice issues, with marginalized communities often bearing the brunt of delayed legal proceedings.⁶

6. Judicial Reforms and Initiatives :

Recognizing the pressing need for judicial reforms, various initiatives have been undertaken to expedite the justice delivery process. “These include the establishment of fast-track courts, adoption of technology in court proceedings, and

² James Antony, “Short Studies on great Subject”, (1818 – 94) “Calvinism” 1871

³ Coffery, AR, “Administration of Criminal Justice a managements system approach” p – 5

⁴ Dr. Sangita Bhalla “Judicial Bars of Limitation in Criminal Trials; validity dilemma resolved”; CriLJ 2003 Journal, p – 89.

⁵ K.K. Mathews, “Laws Delays” 2 Kochin ULP(1978),

⁶ H.R. Khanna, “Judicial Reforms”, 3 SSC 1979 (J) p – 25



promotion of alternative dispute resolution mechanisms.” However, while these reforms have yielded some progress, systemic bottlenecks persist, necessitating sustained efforts towards systemic overhaul.

The yearning for freedom is shared by all members of a democratic system.” Without freedom, it is impossible for anybody to aspire to be a free citizen of a country. “Only those who are still alive have the right to freedom and liberty. Article 21 of the Constitution of India includes a provision that guarantees the right to life and personal liberty to every individual, regardless of whether or not they are citizens of India. It is possible for a person to be deprived of his life and personal freedom if two conditions are satisfied: first, there must be a law; and second, there must be a way established by that legislation. However, the process must be fair, equitable, and reasonable.” When it came to interpreting Article 21, the Indian court system’s inventiveness was at its peak, with the possible exception of the brief emergency rule interregnum. Article 21 is a bright spot for everyone who values freedom since it guarantees the creation of new rights as required and at least a bare minimum of justice in all court cases.⁷

The Indian judiciary has been essential in safeguarding the constitutional rights of the people, and it has attempted to give some rights—such as the right to a fair trial and a swift trial—legal standing by including them all under Article 21 of our Constitution. By giving all Indian people a fair and just trial, the judiciary has actively contributed to the administration of justice in the country.” The Supreme Court and the High Courts have issued several decisions on the subject of trials, in which they have questioned the length of the processes and ruled the accused not guilty of the charges. The most obvious illness that has plagued the court system is the excessively long processing times and delays in case resolution. A scary scenario has arisen as a result of the growing backlog of cases and the weight that many courts are trying to bear. In point of fact, the whole system is about to collapse under the pressure of the daily growth in the number of cases that are still pending. “All these ailments were known to Justices V.R. Krishna Iyer and P.N. Bhagwati. On the other hand, court delays are common in India. It is impossible for anybody to expect justice in a reasonable amount of time. Criminal court proceedings may last for years or even decades. Even lengthier delays occur in civil proceedings.

This is true even if the law greatly favours a prompt trial. “The court’s concern over the issue of trial delays is evident in the following rulings. In *State of West Bengal v. Anwar Ali Sarkar*,⁸ a Bench of seven judges of the Supreme Court held that the necessity of a speedy trial is too vague and uncertain to form the basis of valid and reasonable classification. It is too indefinite as there can hardly be any definite objective test to determine it. It does not constitute a categorization in any way, shape, or form in the traditional meaning of the word since it does not take into account any features that are specific to individuals or to situations that are to be submitted to the particular process that is provided by the Act”.

In *Machander v. State of Hyderabad*⁹, “Due to the five-year lag between the conduct of the offence and the Supreme Court’s final ruling, the court declined to send the matter back to the trial court for a new trial. The Supreme Court has unquestionably noted: We are not prepared to keep persons on trial for their lives and under indefinite suspense because trial judges omit to do their duty. We have to draw a nice balance between conflicting rights and duties. While it is incumbent on us to see that the guilty do not escape, it is even more necessary to see that the person accused of crimes are not indefinitely harassed. While every reasonable latitude must be given to those concerned ‘with the detection of crime and entrusted with administration of justice, but limits must be placed on the lengths to which they may go.’”

In the case of *Chajoo Ram v. Radhey Shayam*,¹⁰ one of the reasons the Supreme Court decided not to pursue further proceedings was the trial’s delay.

In *State of Uttar Pradesh v. Kapil Deo Shukla*,¹¹ Despite concluding that the accused’s acquittal was unsustainable, the Court declined to remand the case or set a trial date for 20 years later.

The Supreme Court in *Maneka Gandhi v. Union of India*¹² has always maintained that Article 21 of the Indian Constitution grants every individual the basic right to not have their life or personal freedom taken away from them, unless it is absolutely required to comply with legal processes.” These procedures must be “fair, just, and reasonable” rather than “arbitrary, fanciful, or oppressive.” The court went on to say that “a person would be entitled to enforce such

⁷ Biswanath Bajpayee, “Law’s Delay” The Journal of the Bar Council of India – Vol I, 1978, p - 70

⁸ AIR 1952 SC 75.

⁹ AIR 1955 SC 792

¹⁰ AIR 1971 SC 1367.

¹¹ (1972) 3 SCC 504.

¹² (1978) 1 SCC 248.



fundamental right and secure his release if he is deprived of his Liberty under a procedure which is not 'reasonable, fair, or just. "This means that the deprivation would violate the individual's fundamental right under Article 21. The Supreme Court has noted that the right to a prompt trial is contained in the wide provisions of Article 21.

The apex Court's decision in *Hussainara Khatoon (iv) v. Home Secretary, State of Bihar*,¹³ "is a milestone in the development of the legal doctrine of expedited trials. A writ of habeas corpus was filed in the present case on behalf of men and women who are being held in prisons in the State of Bihar while they await trial. Some of them had spent much more time behind bars than they would have if the maximum penalty for the offence they were charged with had been applied to them. The Supreme Court went on to provide a new orientation to constitutional jurisprudence, alarmed by the startling findings revealed in the writ petition and worried about the denial of fundamental human rights to those victims of callousness of the legal and judicial system.

The Court did this by largely drawing on its ruling in a previous case where it interpreted Article 21 of the Constitution in a progressive manner. In *Hussainara Khatoon's* case, P.N. Bhagwati J. carried out this view to its logical conclusion by saying: "*Procedure prescribed by law for depriving a person of his liberty cannot be reasonable, fair or just unless that procedure ensures a speedy trial for determination of the guilt of such person. No procedure which does not ensure a reasonably quick trial can be regarded as 'reasonable, fair or just' and it would fall foul of Article 21. There can, therefore, be no doubt that speedy trial, and by speedy trial we mean reasonably expeditious trial, is an integral and essential part of the fundamental right to life and liberty enshrined in Article 21.*"

Bhagwati, J. further declared that "the state cannot deny the constitutional right to a speedy trial on the grounds that it lacks the financial means to make the expenditures required to improve the judicial and administrative systems to ensure a speedy trial. The issue was raised about the repercussions of going against the right to a speedy trial, but the Court offered no resolution." It turned out that the decision made in this case served as the cornerstone for India's right to a prompt trial. The Court Categorically stated that "*it is also the constitutional obligation of this Court as the guardian of the fundamental rights of the people, as sentinel on the qui vive, to enforce the fundamental right of the accused to speedy trial by issuing necessary directions to the state which may include taking of positive action, such as augmenting and strengthening the investigative machinery, setting up new courts, building new court houses, providing more staff and equipment to the Courts, appointment of additional judges and other measures calculated to ensure speedy trial.*"

The Supreme Court upheld the statute in many subsequent rulings, including the one that followed the *Hussainara Khatoon* case. In *State of Bihar v. Uma Shankar Ketriwal*,¹⁴ "The High Court dismissed the case on the grounds that the prosecution, which started sixteen years ago and is still going strong, is abusing the legal system and shouldn't be allowed to continue."

Regarding the delay, the Supreme Court ruled that "there should be a limit on the amount of time that criminal litigation may continue during the trial phase since it represents significant harassment to the accused. This was a reaction to the ruling of the High Court, with which the Supreme Court rejected to become involved in the appeal." The Court further observed that "*We cannot lose sight of the fact that the trial has not made much headway even though no less than 20 years have gone by, such protection itself means considerably harassment to the accused not only monetarily but also by way of constant attention to the case and repeated appearances in Court, apart from anxiety. It may be said that the respondents themselves were responsible in a large manner for the slow pace of the case in as much as quite a few orders made by the trial Magistrate were challenged in higher Courts, but then there has to be a limit to the period for which criminal litigation is allowed to go on at the trial stage.*"

"The Court once again assessed whether or not the right to a speedy trial was applicable in the case of *State of Maharashtra v. Champalal Punjaji Shah*¹⁵ and noted that the court has the authority to consider whether or not the accused contributed fairly to the length of the trial, whether the delay was due to unintentional delays, overcrowding on the court's docket or understaffing of the prosecutors, or both when determining whether or not there has been a violation of the right to a speedy trial." Professor Upendra Bakshi claims that there was a lot of opposition to this action. He said that even in the event that the accused supports interlocutory appeals, it is impossible to draw the conclusion that he caused the delay since, in doing so, he is only using the opportunity framework provided by the country's legal system.

¹³ (1980) 1 SCC 81.

¹⁴ (1981) 1 SCC 85.

¹⁵ (1981) 3 SCC 610



“Legal strategies are chosen by the accused person's attorney rather than the accused person themselves since it is unreasonable to expect the accused person to understand the complexities of the law and the procedures that go along with it. He continued by saying that an accident could not be the cause of the delay caused by the courts' failure to prioritise the planning of daily tasks.”

In *Kadra Pahadiya v. State of Bihar*,¹⁶ P.N. Bhagwati, J. observed “8 more years have passed, but they are still rotting in jail, not knowing what is happening to their case. They have perhaps reconciled to their fate, living in a small world of their own cribbed, cabined and confined within the four walls of the prison. The outside world just does not exist for them. The Constitution of India has no meaning and significance, and human rights no relevance for them. It is a crying shame upon our adjudicatory system which keeps man in jail for years on end without a trial.”

The Court further observed that: “any accused who is denied this right of speedy trial is entitled to approach this Court for the purpose of enforcing such right and this court in discharge of its constitutional obligation has the power to give necessary directions to the state governments and other appropriate authorities for securing this right to the accused.”

*Mantoo Majumdar v. State of Bihar*¹⁷ is a different case that's now being tried. Judge Krishna Iyer concluded that two petitioners in this case had been detained for seven years without being given a chance to defend themselves. In addition, he found that the Bihar government was reluctant to provide the court with the facts that were required of it and showed no compassion for the plight of individuals who were in jail awaiting trial and had been rotting away for a long period. Even Magistrates “have bidden farewell to their primary obligation, perhaps fatigued by overwork and uninterested in freedom of other people,” according to his research. He said that under Section 167 Criminal Procedure Code: “The Magistrate concerned have been mechanically authorizing repeated detentions, unconscious of the provisions which obligated them to monitor the proceedings which warrant such detention.” It was brought to everyone's notice that the police did not investigate in a timely manner, and that the personnel at the prison did not determine how long those who were awaiting trial should be held in jail. Since the branches of law and justice had failed to function properly, the judge, like any of us, was perplexed. The question is, “If the salt has lost its flavour, what method of salting will be used?” The two petitioners were ordered to be released on their own bonds and without any sureties since he issued the order.

7. Reasons for Delay in Process :

On the part of the legal system, such as the number of cases that are in the pendency stage, the vacation of the court, the ratio of judges to the population, and the independence of the judiciary.

The actions of the lawyer, such as requesting adjournments, engaging in protracted debates in order to impress clients, and failing to adequately prepare for the case.

When it comes to the accused, such as when they abscond, behave in a manner that is not cooperative, etc.

The delay in decisions regarding cases is the primary issue, and it is also the most significant one. It takes years for the cases to be finally resolved, which would typically take just a few months of time. This is because of the enormous amount of pendency. Because of the arrears, there is a delay, and a delay implies that the accessibility of justice is diminished in terms that are meaningful to the average person.

I am the judge, and I am the population ratio. At the moment, taking into account the total population of the nation as well as the number of cases that are now pending, the number of judges that are accessible is very low.

⁶There is a significant lack of satisfaction with the infrastructure of the lower courts. In spite of the fact that the Supreme Court and High Courts have a decent infrastructure, the situation is not the same with the lesser courts. Due to the fact that the courts do not own any buildings or physical facilities that are handy, the process of resolving a case takes much more time. In order to provide quality justice, it is necessary to have a good library, the necessary furniture, a enough number of staff members, and a decent amount of space. However, the majority of these amenities are not accessible in lesser courts.

Due to the fact that the Judiciary is considered independent, there are some judges who believe that they are not answerable to anybody. This belief often causes judges to be swayed by things like familiarity, ignorance, and other emotions, which ultimately causes the case to be postponed.

¹⁶ (1983)2 SCC 104.

¹⁷ AIR 1980 SC 847.



“Provision for adjournment: The primary cause for the delay in the proceedings is the postponement granted by the court on circumstances that are deemed to be unreasonable.”

There is a vacancy in the court. The rationale for giving courts with a vacation break also contributes to additional delay of the proceedings, particularly in countries like India where there are a significant number of cases that are still waiting. There is no provision of this kind in the majority of nations, including the United States and France.

8. Role of Stakeholders :

Efforts to realize the constitutional right to speedy justice require concerted action by all stakeholders, including the judiciary, legislature, executive, legal professionals, and civil society. While the judiciary plays a central role in adjudicating disputes, legislative reforms and executive measures are equally crucial in addressing systemic deficiencies and enhancing access to justice for all.

❖ On the part of the legal system, “such as the number of cases that are in the pendency stage, the vacation of the court, the ratio of judges to the population, and the independence of the judiciary. A basic right that is inherent in Article 21 of the Constitution, which provides for the right to life and personal rights, is the right to a trial that is conducted in a timely manner.” According to Article 32 of our Constitution, a person has the ability to petition the Supreme Court in the event that basic rights are violated, and Article 226 of our Constitution allows them to petition the High Court in the event that the violation occurs.

❖ “Within the context of the case of P.Ramachandra Rao v. State of Karnataka, the court established a number of rules and ruled that the criminal courts are obligated to employ the powers that are granted to them by Sections 309, 311, and 258 of the Code of Criminal Procedure in order to ensure that the Right to Speedy Trial is carried out.”

❖ The efficient administration of the judicial system: Appropriate scheduling of time should be carried out in order to ensure efficient management of time, which will ultimately lead to efficient administration of the judicial system.

❖ The steps that should be taken for judges include providing them with the appropriate training and education on a consistent basis. This will allow them to improve their abilities in drafting, listening, and writing, as well as their ability to make right and prompt decisions. It is also recommended that the number of judges relative to the population be raised, since this would facilitate the expeditious resolution of cases.

❖ Therefore, it is necessary to allocate cases in accordance with the specialised areas of judges.

❖ Therefore, “it is necessary to allocate cases in accordance with the specialised areas of judges. This indicates that a judge who has extensive expertise and knowledge of criminal law should preside over cases involving criminal law, and a judge who has a profound understanding of labour law should preside over cases involving labour law. The same may be said for most other circumstances.”

❖ Arbitration need to be carried out whenever it is feasible, and in particular, arbitration ought to be made obligatory for situations that are very little and insignificant. This will save the courts a significant amount of time.

❖ “One of the recommendations is to modify the method of adjournment in such a manner that it is restricted to a limit, and a fee should be levied on the individual who submits an application for an adjournment on reasons that are not very strong.”

❖ Technology-based courts and the notion of speedy justice: Scientific achievements made by humans have the potential to be very helpful in achieving this aim in terms of technology. Since the turn of the twenty-first century, information technology has significantly improved our quality of life. Furthermore, this IT instrument may prove to be just as beneficial in the administration of justice.

❖ The authority to dispose of minor and insignificant cases need to be delegated to the Nyaya Panchayats. On the other hand, Lok Adalats were formed in order to expedite the resolution of cases at lower quality levels.

❖ The actions of the lawyer, such as requesting adjournments, engaging in protracted debates in order to impress clients, and failing to adequately prepare for the case.

❖ When it comes to the accused, such as when they abscond, behave in a manner that is not cooperative, etc.

❖ The delay in decisions regarding cases is the primary issue, and it is also the most significant one. It takes years for the cases to be finally resolved, which would typically take just a few months of time. This is because of the enormous amount of pendency. Because of the arrears, there is a delay, and a delay implies that the accessibility of justice is diminished in terms that are meaningful to the average person.

❖ I am the judge, and I am the population ratio. At the moment, taking into account the total population of the nation as well as the number of cases that are now pending, the number of judges that are accessible is very low.



❖ There is a significant lack of satisfaction with the infrastructure of the lower courts. In spite of the fact that the Supreme Court and High Courts have a decent infrastructure, the situation is not the same with the lesser courts. Due to the fact that the courts do not own any buildings or physical facilities that are handy, the process of resolving a case takes much more time. In order to provide quality justice, it is necessary to have a good library, the necessary furniture, a enough number of staff members, and a decent amount of space. However, the majority of these amenities are not accessible in lesser courts.

❖ Due to the fact that the Judiciary is considered independent, there are some judges who believe that they are not answerable to anybody. “This perception often leads to judges being influenced by factors such as comfort, ignorance, and other feelings that eventually lead to the postponement of the case.”

❖ A provision for adjournment is included. “The postponement that was granted by the court on reasons that were deemed to be unjustified serves as the primary basis for the delay in the proceedings.”

❖ One of the reasons for giving courts with a vacation break is that it also contributes to additional delay of the proceedings. This is particularly true in countries like India, where there are a significant number of cases that are still waiting. There is no provision of this kind in the majority of nations, including the United States and France.

9. Conclusion :

In conclusion, the constitutional right to speedy justice is a cornerstone of India's legal system, embodying the principles of fairness, equality, and access to justice. However, its effective realization faces formidable challenges, necessitating comprehensive reforms and multi-stakeholder collaboration. By unraveling the significance of this right and addressing the challenges that impede its implementation, India can move closer towards the ideal of a just and equitable society.

Although there have been several judgements handed down by the court in order to eliminate delays, as well as a number of steps that have been developed by the state, the concept of a rapid trial continues to be a fiction and has not yet been converted into reality.” To ensure that cases are tried as quickly as possible, it is necessary to establish a new thorough legislation. To accomplish the goal of a rapid trial of charges, the rules governing criminal prosecution should be revised appropriately. The fast trial of offences need to be the subject of a public awareness campaign. “According to the interpretation of Article 21 of the Constitution of India, the right to a timely trial has been elevated to the level of a basic right, even though the Constitution of India does not expressly mention the right to a fast trial. In addition to the Constitution of India, the Code of Criminal Procedure also has several laws that ensure the right to a prompt trial. This basic right was made possible by the court, which played a significant role in establishing this right.” It is impossible for anybody to have any chance of receiving justice within a reasonable amount of time. It might take years, and even decades, for the proceedings to conclude in a criminal prosecution. Even though the legal situation greatly favours a rapid trial, this is the case.

REFERENCES :

1. Anthony, G. (1975). *Amsterdam, Speedy Criminal Trial: Rights and Remedies*, 27 Stan. L. Rev. 525.
2. Bajpayee, Biswanath. (1978). *Law's Delay* the Journal of the Bar Council of India – Vol I.
3. Antony, James. (1871). *Short Studies On Great Subject*, (1818 – 94) “Calvinism”
4. Jayanth, K. Krishnan. (2010). *Globetrotting Law Firms* 23 Geo. J. Legal Ethics 57.
5. Jayanth, K. Krishnan. (2003). *Social Policy Advocacy and the Role of the Courts in India*. 21 Am. Asian Rev. 91.
6. Suraiya, Jug. (2009). *Free-For-All-Crime*. Times of India, Jan. 21, 2009,
7. Galanter, Marc. (2003). *Debased Informalism: Lok Adalats and Legal Rights In India, In Beyond Common Knowledge: Empirical Approaches to the Rule of Law*. 96.
8. Moog, Robert. (1997). *Whose Interests Are Supreme? The Organizational Politics of The Civil Courts in Two Districts of Uttar Pradesh*
9. Klein, Susan R. (1999). *Enduring Principles and Current Crises in Constitutional Criminal Procedure*, 24 L. & Soc. Inquiry 533.