

1. **ZAINUL V. STATE OF BIHAR (2025, SC)**

Supreme court explains test to determine if bystander was member of unlawful assembly with common object.

The court observed that mere presence at the crime scene would not ipso facto render a person a member of unlawful assembly to book him under section 149 of (Indian Penal code, 1860) (Target for 10)

2. **RATENDRA SINGH AND ORS V. STATE OF UTTARANCHAL (2025, SC)**

The court held that only that part of disclosure statement under section 27 of Indian Evidence Act, 1872 would not be admissible which supports the maker's statement about the use of object in crime, as it would amount to a confession being inadmissible under the Act - only that part which supports the recovery statement would be admissible.

3. **STATE OF RAJASTHAN V. PARMESHWAR RAMLAL JOSHI & OTHERS**

The court held that high court exercising criminal jurisdiction cannot recall or review its own judicial order under the guise of inherent powers, except to correct a purely clerical or accidental error by virtue of section 403 of BNSS (section 360 of CrPc).

4. **REJANISH K.V V. K. DEEPA. (2025, SC)**

- The court held that under section Article 233(2) of The Constitution 7 years practice must be "continuous" and there should be no break.
- 25% quota set for direct recruitment for post of district Judges is not exclusively for Advocates.
- Judicial officers with 7 years combined experience on date of application eligible for direct recruitment as district Judges.

(5) RAHUL AGARWAL V. STATE OF WEST BENGAL & ANR.

The Supreme court held that a Magistrate can direct the collection of voice samples from not only the accused persons but also from witnesses. Article 20(3) of Constitution - not violated.

(6) SHYKUMAR @ BALESHWAR V. STATE OF CHHATTISGARH

The Supreme court criticized the practice of declaring the hostile witnesses merely for minor inconsistencies in their statements. It should be done only in exceptional circumstances where witness completely departs, gives false evidence or shows clear hostility (Section 154 of Evidence Act - now Section 157 of BSA, 2023) (Target for 20)

(7) KARAM SINGH V. AMARJIT SINGH & ORS.

The court held while deciding rejection of plaint only the averments made in the plaint and nothing else is to be considered to find out whether suit is barred by law - Order 7 (VII) Rule 11 of Civil Procedure Code, 1908.

(8) ZOHARBEE & ANR. V. IMAM KHAN (THROUGH LRS & ORS)

The court held Muslim widows with no child entitled to 1/4th share in deceased husband's estate.

(9) ANNAMALAI V. VASANTHI & OTHERS

The Supreme court has clarified that 2018 amendment to the Specific Relief Act, 1963 which made grant of specific performance of contracts a mandatory relief, has no retrospective effect - does not apply to suits or transactions that arose before its enforcement on Oct 1, 2018.

(10) JEMABEN V. STATE OF GUJARAT.

The court held that minor discrepancies in subsequent statements do not weaken first dying declaration if it is found —

- reliable ; (under Section 32(b) of IEA now Section 26 of BSA).
- consistent; and
- supported by corroborative evidence.



(11.) S. SANTHANA LAKSHMI V. D. RAJAMMAL

The court held that when title to the suit is disputed, a mere suit for injunction restraining interference with peaceful enjoyment of the property is not maintainable - unless it is "accompanied by a suit seeking declaration of title and recovery of possession". Proper remedy is a declaratory suit under **Section 34 of Specific Relief Act, 1963**.

(12.) In Re: SUMMONING ADVOCATES WHO GIVE LEGAL OPINION OF REPRESENTATIVES DURING INVESTIGATION OF CASES

**Section 132 of BSA, 2023** - intended to protect advocates from bullying by investigating agencies to disclose communications with clients which is privileged communication (u/s. 132-134 of BSA).  
• No summons to advocates (exception) except u/s. 132 with approval of superior officer. (target for IO)

(13.) K. KIRUBAKARAN V. STATE OF TAMIL NADU

Supreme court invoked its extraordinary jurisdiction under **Article 142 of the Constitution** - quashed conviction and sentence of men guilty u/s. **366 of IPC r/w Section 6 of (POCSO, Act)** - noting marriage between accused and victim

(14.) HARIBAU @ BHANSAHEB DINKAR V. STATE OF MAHARASHTRA

It is not necessary for each member of unlawful assembly to have committed a specific overt act. Once participation and sharing of common object - proved every member vicariously liable for offences committed in prosecution of that object - under **Section 149 of IPC, 1860**.

(15.) STATE OF KERALA V. SUNI @ SUNIL

The court ruled that offence of threatening witness under **Section 195A of IPC** - is a cognizable offence empowering a police to register FIR directly and investigate without waiting for a formal complaint from court.