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2026:DHC:9804

* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

*Reserved on:**27.10.2026***
*Date of Decision:**04.11.2026***
*Uploaded on:**04.11.2026***

\# **CNR No. DLHC010086612020**

\+ **CRL.REV.P. 29/2020 & CRL.M.A. 704/2020**

NILLUM BATRA .....Petitioner

Through: Mr. Vishal Gosain, Sr Adv with Ms. Anushka Baruah and Mr. Pranav Das, Advs.
Ms. Rebecca M. John, Sr. Adv. with Mr. Pravir Singh and Ms. Anushka Baruah, Advs.

versus

STATE & ORS .....Respondents

Through: Ms. Meenakshi Dahiya, APP
Mr. Siddharth Aggarwal, Sr. Adv. and Mr. Amit Chadha, Sr. Adv., along with Mr. Pankaj Baghla, Ms. Vismita Diwam, Mr. Gurpreet Singh, Mr. Siddhant Saraswat, Mr. Manjit Walia and Mr. Harjas Singh, Advs. for R2 to R4.
Insp. Sanjay Kaushik, NR-1, Crime Branch.

\# **CNR No. DLHC010153802021**

\+ **CRL.REV.P. 170/2021 & CRL.M.A. 5849/2021**

MAYANK SINGHVI .....Petitioner

Through: Mr. Siddharth Aggarwal, Sr. Adv. and Mr. Amit Chadha, Sr. Adv., Mr. Pankaj Baghla, Ms. Vismita Diwam, Mr. Gurpreet Singh, Mr. Siddhant Saraswat, Mr. Manjit Walia and Mr. Harjas Singh, Advs

versus

STATE (NCT) OF DELHI .....Respondent

Through: Ms. Meenakshi Dahiya, APP
Insp. Sanjay Kaushik, NR-1,

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Crime Branch.

\# **CNR No. DLHC010187932022**

\+ **CRL.REV.P. 297/2022**

STATE OF NCT OF DELHI .....Petitioner

Through: Ms. Meenakshi Dahiya, APP
Insp. Sanjay Kaushik, NR-1, Crime Branch

versus

MAYANK SINGHVI & ORS. .....Respondents

Through: Mr. Siddharth Aggarwal, Sr. Adv. and Mr. Amit Chadha, Sr. Adv., Mr. Pankaj Baghla, Ms. Vismita Diwam, Mr. Gurpreet Singh, Mr. Siddhant Saraswat, Mr. Manjit Walia and Mr. Harjas Singh, Advs..

CORAM:
HON'BLE MS. JUSTICE MADHU JAIN

JUDGMENT

MADHU JAIN, J.

1. The present revision petitions arise out of the order dated 18.12.2019 passed by the learned Additional Sessions Judge-02 (South), Saket Courts, New Delhi, in ***Sessions Case No. 676/2018***, titled *State v. Mayank Singhvi*. The said Sessions Case arose from ***FIR No. 185/2018*** registered at Police Station Hauz Khas, South District, Delhi. The impugned order, concerns the offences punishable under Sections 304B, 498A, 306 read with Section 34 of the Indian Penal Code, 1860 (hereinafter referred to as 'IPC').

2. The result of the impugned order and the scope of the three revision petitions may be noticed separately.

Outcome of the Impugned order dated 18.12.2019

ACCUSED	RESULT	UNDER
Mayank Singhvi	Discharged	**Section 304B read with Section 34 IPC**

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ACCUSED	RESULT	UNDER
Mayank Singhvi	Charges directed to be framed	**Sections 498A and 306 IPC**
Rajender Singh Singhvi & Sushma Singhvi	Discharged	**Sections 304B and 498A read with Section 34 IPC**

Scope of the present revision petitions

PETITION	PETITIONER	RELATION	SCOPE OF CHALLENGE
CRL.REV. P. 29/2020	Nillum Batra	Mother of the deceased	Discharge of Mayank Singhvi under Section 304B read with Section 34 IPC and of Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 IPC.
CRL.REV. P. 170/2021	Mayank Singhvi	Husband/ Accused	Direction to frame charges under Sections 498A and 306 IPC.
CRL.REV. P. 297/2022	State (NCT of Delhi)	Prosecution	Discharge of Mayank Singhvi under Section 304B read with Section 34 IPC and of Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 IPC.

3. All three petitions arise from the same FIR, the same Sessions Case and the same order on charge. Since their determination requires consideration of the common material collected during investigation, they were heard together and are being decided *vide* this common judgment.

FACTUAL BACKGROUND

4. The facts leading to the present batch of petitions are that Anissia Batra (hereinafter referred to as 'the deceased'), daughter of Nillum Batra and R.S. Batra, got engaged to Mayank Singhvi, son of Rajender Singh Singhvi and Sushma Singhvi, on 29.09.2015 and both were later married on 23.02.2016.

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5. Upon their marriage, the deceased and Mayank Singhvi initially resided in a rented accommodation at Safdarjung Development Area, New Delhi, whereafter, they later shifted to the first floor of property bearing No. N-116, Panchsheel Park, New Delhi which was owned by Mayank Singhvi's parents, who resided separately from the couple.

6. According to the prosecution and the complainant, the matrimonial relationship became strained soon after their marriage. The first incident relied upon is stated to have occurred during the couple's honeymoon at Dubai in March 2016, when Mayank Singhvi allegedly assaulted the deceased after which she contacted her mother. Her parents state, that when the aforesaid incident was taken up with Mayank Singhvi's parents, they attributed it to the conduct of the deceased itself.

7. Alongside the allegations of physical cruelty, the parents of the deceased alleged, that monetary demands were raised before and after the marriage. Their statements refer to a demand of ₹10 lakh, payment of approximately ₹2 lakh to Mayank Singhvi at the time of the marriage, ten gold guineas, jewellery and expensive clothes allegedly given to him and his relatives, and a further amount of approximately ₹3 lakh allegedly advanced to him by the deceased. According to the prosecution, some of these demands were described as financial assistance for Mayank Singhvi.

8. The allegations continued throughout 2016 and 2017. In July 2016, Mayank Singhvi is alleged to have again behaved violently towards the deceased whereafter her father met her in-laws i.e. Rajender Singh Singhvi and Sushma Singhvi, who allegedly expressed dissatisfaction with the manner in which the concerned marriage had been performed and reiterated the demand for financial assistance. A similar demand is stated to have been made during the first wedding anniversary celebrations on 23.02.2017. The

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prosecution also relies upon an incident dated 12.04.2017, when Mayank Singhvi allegedly abused and assaulted the deceased. The deceased is stated to have informed Sushma Singhvi of the aforesaid incident, but her account was allegedly not accepted.

9. The relationship is stated to have deteriorated further during May and June 2018. Nillum Batra, the mother, came to Delhi on 05.06.2018 to stay with the deceased. On the following day, Mayank Singhvi allegedly behaved violently towards the deceased and her mother while speaking to his mother over the telephone. The complainant alleges that he was being instigated by his mother. It is further alleged that, after Mayank Singhvi's parents returned from abroad, the deceased and her mother were asked to vacate the matrimonial home and that Rajender Singh Singhvi threatened that the deceased could be made to disappear.

10. The dispute during this period also concerned a flat at Vasant Kunj, jointly owned by the deceased and her mother. According to the parents of the deceased, the accused persons pressurised her to sell the flat and hand over the sale proceeds to them. The sale is stated to have been completed on or around 12.06.2018. The complainant maintains that the matrimonial discord escalated when the sale proceeds were not made available to the accused persons.

11. During the same period, the deceased placed her concerns on record. On 23.06.2018, she addressed an email to her counsel setting out allegations concerning her matrimonial relationship. Four days later, on 27.06.2018, her father submitted a complaint at Police Station Hauz Khas expressing apprehension for her safety and alleging physical violence and threats at the matrimonial home. The prosecution also relies upon WhatsApp messages exchanged between the deceased and her family, including messages dated

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06.07.2018 in which she objected to the involvement of Mayank Singhvi's parents in the matrimonial dispute.

12. The accused persons however, dispute these allegations. They maintain that the couple had been provided a separate residence so that they could live independently. Mayank Singhvi states that he and the deceased lived apart from about 07.06.2018 to 07.07.2018 and considered an amicable separation. According to him, following an intervention by relatives and well-wishers, they decided to make another effort to preserve the marriage, obtain counselling and reside in separate rooms in the same house. He claims to have returned to the matrimonial residence on or around 08/09.07.2018.

13. It is against this background that the incident dated 13.07.2018 occurred. On that day, the deceased sustained fatal injuries after falling from the terrace of the matrimonial residence. Mayank Singhvi states that she had gone to the terrace at about 2:00-2:30 p.m., whereupon he followed her and persuaded her to return downstairs. He further states that a dispute arose later that afternoon concerning access to his electronic account and certain personal relationships of the deceased.

14. The prosecution relies upon messages allegedly sent by the deceased shortly before the incident. At about 2:56 p.m., she is stated to have informed her friend Seema Malik that Mayank Singhvi had locked her in, and further requested that the police be called. At about 4:12 p.m., she allegedly sent a message to Seema Malik stating, *inter alia*, that *"I am going to kill myself today bcoz Mayank has driven me to it. He finally let me out but I can't repair what he has done."* A similar message was also sent by the deceased to her counsel.

15. Mayank Singhvi, on the other hand, states that the deceased sent him a message asking him to come to the terrace. According to him, he rushed

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upstairs but found the terrace door locked from the other side. He claims to have gained entry after breaking through a side grill. Upon being informed by persons present in a neighbouring building that the deceased had fallen, he went downstairs and took her to Max Hospital, Panchsheel Park.

16. The deceased was brought to the hospital in an unconscious condition and was subsequently declared dead. At about 6:27 p.m., information regarding her death was received at Police Station Hauz Khas *vide* ***DD No. 40A***. The post-mortem examination attributed the cause of death to shock consequent upon multiple fatal injuries caused by blunt-force impact. Mayank Singhvi relies upon the viscera report, which recorded ethyl alcohol measuring 298 mg per 100 ml of blood, and contends that the possibility of an accidental fall could not be excluded.

17. On the following day, i.e. 14.07.2018, the statements of the parents of the deceased were recorded before the Sub-Divisional Magistrate. On the basis of the statement made by Nillum Batra, ***FIR No. 185/2018*** was registered at Police Station Hauz Khas for the offence punishable under Section 304B IPC. Nillum Batra alleged, that Mayank Singhvi had repeatedly demanded money from the deceased and held him and his parents responsible for her daughter's death.

18. The parents of the deceased thereafter made supplementary statements. They gave further particulars concerning the alleged demands of money and jewellery, the acts of violence attributed to Mayank Singhvi, the alleged involvement of his parents, the pressure concerning the Vasant Kunj property and the threats allegedly extended to the deceased and her family. The investigating agency also recorded the statements of relatives, friends, neighbours and other persons acquainted with the parties.

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19. On 16.07.2018, notices under Section 41A of the Code of Criminal Procedure, 1973 [hereinafter referred to as 'CrPC'] were served upon Mayank Singhvi and his parents, whereafter, he was arrested on the very same day. The investigation was subsequently transferred to the Crime Branch, while Rajender Singh Singhvi and Sushma Singhvi later surrendered before the concerned Sessions Court.

20. During investigation, the mobile phones, laptop and other electronic devices connected with the parties were seized. The investigating agency also collected WhatsApp messages, emails, CCTV footage, bank records and other digital material. The electronic devices were sent for forensic examination, and the material retrieved therefrom was subsequently placed before the concerned learned Trial Court.

21. Upon completion of the initial investigation, a charge-sheet dated 12.10.2018 was filed against Mayank Singhvi, Rajender Singh Singhvi and Sushma Singhvi for the offences punishable under Sections 304B and 498A read with Section 34 IPC. A supplementary charge-sheet was also filed on 31.10.2018 after receipt of further medical material. The forensic reports concerning the electronic devices and other supplementary material were also placed on record.

22. The case was committed to the Court of Sessions on 15.11.2018 and was registered as ***Sessions Case No. 676/2018***. The prosecution, the complainant and the accused persons thereafter addressed arguments on the question of charge.

23. While considering the material on record, the learned Trial Court observed that no allegation of demand for dowry against Rajender Singh Singhvi and Sushma Singhvi was discernible from the FIR, the email dated 23.06.2018, the complaint dated 27.06.2018 or the contemporaneous

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WhatsApp messages. It also noted that they resided separately from the couple and found no sufficiently specific material disclosing cruelty or harassment by them in connection with a demand for dowry.

24. Insofar as Mayank Singhvi is concerned, the learned Trial Court found that the contemporaneous material contained allegations of assault and matrimonial cruelty but did not disclose the necessary connection between such cruelty and a demand for dowry. It nevertheless took note of the allegations of assault and the last communication of the deceased attributing her alleged decision to him. Having regard to that material and the presumption contemplated under Section 113A of the Indian Evidence Act, 1872 (hereinafter referred to as 'Evidence Act'), the learned Trial Court passed the directions reflected in the table at the outset.

25. Notice in ***CRL.REV. P. 29/2020*** was issued on 16.01.2020. Thereafter, notice in ***CRL.REV. P. 170/2021*** was issued on 09.04.2021, when Nillum Batra was impleaded as respondent No. 2, and both petitions were directed to be listed together. Notice in ***CRL.REV. P. 297/2022*** was issued on 17.05.2022 and the said petition was directed to be listed along with the other two petitions. *Vide* order dated 24.08.2022, the delay of 688 days in filing the State's petition was condoned.

SUBMISSIONS ADVANCED

On behalf of Nillum Batra, the complainant

26. Ms. Rebecca M. John, learned Senior Counsel appearing for Nillum Batra in ***CRL.REV.P. 29/2020***, and Mr. Vishal Gosain, learned Senior Counsel who subsequently appeared for the same in the connected petitions, assailed the discharge of Mayank Singhvi under Section 304B read with Section 34 IPC and the discharge of Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 IPC. It was

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submitted that the learned Trial Court had tested the prosecution material as though it were finally adjudicating the case, instead of determining whether the material, taken at its face value, raised a grave suspicion requiring the accused persons to stand trial.

27. Learned Senior Counsel submitted that, at the stage of charge, the Court may sift the material only for the limited purpose of ascertaining whether a *prima facie* case is disclosed and that it cannot undertake a roving enquiry, test the credibility of witnesses or decide whether the prosecution would ultimately secure a conviction. Reliance was placed upon ***Sajjan Kumar v. CBI, (2010) 9 SCC 368***, and ***Sukh Chand v. State (NCT of Delhi), 2026 SCC OnLine Del 6287***, to submit that contradictions, improvements and the weight to be attached to later statements are matters for trial where the record otherwise discloses the ingredients of the alleged offences.

28. It was submitted that the first statement of Nillum Batra recorded before the Sub-Divisional Magistrate itself alleged that Mayank Singhvi repeatedly demanded money from the deceased. That the complaint dated 27.06.2018, lodged while the deceased was alive, expressed an apprehension for her safety and referred to violence and threats at the matrimonial home. The supplementary statements of the parents were stated to furnish further particulars of the same course of conduct and could not be discarded merely because they were recorded later, particularly when the parents had made the initial statements immediately after their daughter's death and while they were stated to be in shock.

29. Learned Senior Counsel referred to the allegations that ₹10 lakh had been demanded before the marriage, that about ₹2 lakh, ten gold guineas, jewellery and expensive clothes had been given at the time of the marriage, that a demand for financial assistance was repeated by the parents of Mayank

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Singhvi in July 2016 and at the first wedding anniversary and that the accused persons later pressurised the deceased to sell the Vasant Kunj flat and part with its sale proceeds. It was contended that the description of a demand as financial assistance did not take it outside the scope of dowry if the surrounding facts showed its connection with the marriage and the alleged cruelty.

30. It was further submitted that the role attributed to Rajender Singh Singhvi and Sushma Singhvi was neither general nor peripheral. That the parents of the deceased had alleged that they blamed the deceased after incidents of physical violence, reiterated monetary demands, encouraged Mayank Singhvi, asked the deceased and her mother to vacate the matrimonial home and threatened dire consequences. The statement of Kanchan Sharma and the WhatsApp exchange dated 06.07.2018, in which the deceased objected to the involvement of Mayank Singhvi's parents, were also relied upon as corroborative material.

31. It was accordingly contended that the death had occurred within seven years of the marriage and that the statements of the parents, the complaint dated 27.06.2018, the email dated 23.06.2018, the WhatsApp communications, the bank material and the statements collected during investigation, when considered cumulatively, disclosed sufficient grounds to frame charges. The petitioner i.e. the complainant, therefore, prayed that the impugned order be set aside to the extent that it discharged Mayank Singhvi under Section 304B IPC and discharged Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A IPC.

On behalf of the State

32. Learned APP for the State supported the challenge to the impugned orders and relied upon the charge-sheets and the statements recorded during

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investigation. It was submitted that an FIR or a statement recorded immediately after the incident was not required to contain an exhaustive account of every prior demand or incident, and that the supplementary statements were required to be read as elaborating upon the allegation of repeated monetary demands already contained in the first statement.

33. The State relied, in particular, upon the alleged demands of ₹10 lakh, the payments and articles stated to have been given at the time of marriage, the alleged pressure concerning the Vasant Kunj property, the incidents of physical violence, the allegation that the parents of Mayank Singhvi had instigated or supported his conduct, and the proximity between the later events and the death. It was contended that this material, if accepted at its face value, disclosed the ingredients necessary to proceed to trial and that the learned Trial Court had impermissibly preferred the defence explanation while considering charge.

34. The State, therefore, prayed that the discharge of all three accused persons under Section 304B IPC and the discharge of Rajender Singh Singhvi and Sushma Singhvi under Section 498A IPC be set aside and that appropriate charges be directed to be framed in accordance with the material collected during investigation.

On behalf of Mayank Singhvi and the other accused persons

35. *Per contra*, Mr. Siddharth Aggarwal and Mr. Amit Chadha, learned Senior Counsel(s) appearing for Mayank Singhvi and the other accused persons, supported the discharge of Rajender Singh Singhvi and Sushma Singhvi and assailed the direction to frame charges against Mayank Singhvi under Sections 498A and 306 IPC. It was submitted that the contemporaneous record disclosed a troubled matrimonial relationship and mutual altercations,

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but did not disclose dowry-related cruelty or any act amounting to abetment of suicide.

36. Learned Senior Counsel(s) submitted that the prosecution case substantially rested upon the email dated 23.06.2018 sent by the deceased to her counsel and the WhatsApp messages allegedly sent to her friend Seema Malik and her counsel on 13.07.2018. The devices of the recipients were stated not to have been seized, while the mobile phone of the deceased was stated to have remained password protected and not to have been unlocked. The attribution, completeness, authenticity and context of the electronic communications were therefore questioned. It was further submitted that the email dated 23.06.2018 was written for obtaining legal advice in contemplation of matrimonial proceedings and was not, by itself, a declaration concerning the cause of death.

37. It was contended that neither the email dated 23.06.2018, the complaint dated 27.06.2018 nor the contemporaneous WhatsApp communications contained any demand for dowry by Rajender Singh Singhvi or Sushma Singhvi. According to the learned Senior Counsels, the later allegations regarding ₹10 lakh, the jewellery, the sale proceeds of the Vasant Kunj flat and the involvement of the parents-in-law, were all material improvements unsupported by contemporaneous documentary or financial evidence.

38. The defence placed emphasis upon the fact that the marriage was a love marriage between two adults who had known each other before marriage. It was submitted that the parents of Mayank Singhvi had provided the couple with a separate residence at Panchsheel Park and did not reside with them. They were stated to have been abroad during a material part of the matrimonial discord and to have returned only after being called. Their absence from the matrimonial home and the lack of any specific

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contemporaneous allegation against them were relied upon to submit that they had been implicated solely on account of their relationship with Mayank Singhvi.

39. It was further submitted that the financial conduct of Mayank Singhvi was inconsistent with a demand for dowry. The defence referred to the BMW vehicle purchased for the deceased upon a loan stated to have been serviced by Mayank Singhvi even after her death, a diamond ring stated to have been purchased for about ₹16 lakh, regular transfers of approximately ₹35,000 per month and an offer to contribute towards a property to be acquired in the deceased's own name. These circumstances were relied upon to contend that the allegations of financial exploitation were inherently improbable.

40. As regards the Vasant Kunj flat, the learned Senior Counsel submitted that its sale proceeds remained with the deceased and her family and were not transferred to any of the accused persons. The communications concerning purchase of another property were stated to show that any contribution proposed by Mayank Singhvi was intended for a property in the deceased's name. It was contended that the prosecution had converted financial discussions between the spouses and the deceased's family into an allegation of dowry demand without any supporting transaction.

41. Learned Senior Counsel further relied upon the chronology immediately preceding the incident. Mayank Singhvi and the deceased were stated to have lived apart from about 07.06.2018 until 08/09.07.2018 while discussions for an amicable separation continued. Mayank Singhvi returned to the matrimonial home only a few days before the incident dated 13.07.2018. It was submitted that the record did not disclose any positive or proximate act during this interval by which the deceased had been instigated or intentionally aided to take her life.

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42. The reliability of the messages allegedly sent on 13.07.2018 was also questioned. It was submitted that the messages were exchanged between Seema Malik and the deceased between approximately 2:56 and 2:58 pm, whereas the incident occurred after 4:00 p.m., yet neither Seema Malik nor the counsel who later received a message contacted the police. The deceased herself had access to her mobile phone. The defence also referred to the configuration of the room and to the statement of the domestic help to dispute the assertion that the deceased had been confined. According to the defence, isolated messages could not be read without the preceding and subsequent communications, including the message asking Mayank Singhvi to come to the roof.

43. The statements of Raj Kumar and Naveen Kumar, who were stated to have witnessed the fall, were relied upon to submit, that the deceased was on the other side of the terrace railing with a mobile phone and may have slipped while attempting to take a photograph. Learned Senior Counsel also relied upon Mayank Singhvi's immediate conduct in taking the deceased to the hospital. The viscera report, which recorded ethyl alcohol measuring 298 mg per 100 ml of blood, and medical literature concerning the effect of such intoxication upon judgment and motor control were cited in support of the alternative possibility of an accidental fall.

44. The defence further referred to communications between the deceased and her mother concerning stress, depression, medication, alcohol consumption and episodes of emotional dysregulation, as well as material relating to an alleged earlier attempt at self-harm. It was submitted that these communications also recorded occasions when the deceased's mother appreciated the conduct of Mayank Singhvi and his family and sought to calm the deceased. According to the learned Senior Counsels, this material showed,

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that the unfortunate incident could not be attributed to a unilateral course of cruelty by the accused persons.

45. In relation to Section 498A IPC, it was submitted that neither limb of the said provision was attracted. That there was no contemporaneous material connecting the alleged conduct with a demand for property so as to attract Explanation (b), and that the allegations of marital quarrels and mutual altercations also did not constitute the wilful conduct of the nature contemplated under Explanation (a). The learned Trial Court was therefore stated to have erred in directing a charge under Section 498A IPC against Mayank Singhvi after itself finding no dowry nexus.

46. In relation to Section 306 IPC, the learned Senior Counsel submitted that the prosecution material did not disclose instigation, conspiracy or intentional aid within the meaning of Section 107 IPC. It was also argued that neither the original nor the supplementary charge-sheet proposed an offence under Section 306 IPC and that the impugned order did not identify any new material warranting its invocation. Matrimonial discord, harsh words or a message in which the deceased blamed Mayank Singhvi, without a positive and proximate act intended to bring about the suicide, were stated to be insufficient to constitute abetment. It was contended that the statutory presumption under Section 113A of the Evidence Act did not dispense with the need to establish the foundational facts and could not substitute proof of abetment.

47. It was accordingly prayed that ***CRL.REV. P. 29/2020*** and ***CRL.REV. P. 297/2022*** be dismissed and that the discharge of Rajender Singh Singhvi and Sushma Singhvi be affirmed. Mayank Singhvi prayed that ***CRL.REV. P. 170/2021*** be allowed and that the impugned order be set aside to the extent

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that it directed charges to be framed against him under Sections 498A and 306 IPC.

Submissions in rebuttal

48. In rebuttal, learned counsel for the complainant and the State submitted that the defence was inviting the Court to finally determine disputed questions of authenticity, credibility and causation at the stage of charge. The supplementary statements could not be excluded at the threshold merely because they contained further particulars, and the question whether they were improvements or reliable elaborations of the first statement could be tested only after evidence was led.

49. It was further submitted that alleged omissions in investigation, including the non-seizure of certain devices, could not by themselves confer a right to discharge where the remaining prosecution material disclosed a grave suspicion. The defence pleas concerning an accidental fall, alcohol consumption, mental health, prior conduct and the interpretation of electronic communications were stated to be matters requiring trial and could not be accepted conclusively at this stage. Insofar as the charge under Section 306 IPC was concerned, it was urged that the presumption under Section 113A of the Evidence Act was a relevant statutory circumstance, subject to proof of its foundational facts, and could not be neutralised by conducting a mini-trial at the stage of charge.

ANALYSIS AND FINDINGS

50. This Court has heard the respective learned counsel(s) appearing on behalf of the concerned parties and has also perused the material placed on record.

51. The principal issues which arise for consideration are, first, whether the discharge of the revisionist Mayank Singhvi under Section 304B of IPC and

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the discharge of Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 of IPC call for any interference by this Court in exercise of its revisional jurisdiction, and second, whether the material placed on record discloses any sufficient ground to proceed against Mayank Singhvi under Sections 498A and 306 of IPC.

52. Although these petitions arise from the same matrimonial relationship, death and investigation, each assails a distinct part of the order on charge, and the offences involved have separate statutory ingredients. They will therefore be considered, offence-wise. But before undertaking the aforesaid exercise, this Court deems it appropriate to delineate the scope of its revisional jurisdiction and the circumstances in which it may interfere with an order framing charge and discharge an accused to prevent a miscarriage of justice.

Scope of interference with an order on charge

53. The jurisdiction of the High Court under Sections 397 and 401 CrPC is supervisory and corrective in nature. It is concerned with the correctness, legality and propriety of the impugned order and the regularity of the proceedings. It does not permit an appellate reassessment of the material merely because another view might be possible. In ***Amit Kapoor v. Ramesh Chander, (2012) 9 SCC 460***, the Supreme Court explained that revisional interference is warranted where an order suffers from a patent defect or an error of jurisdiction or law, ignores material evidence, rests on no evidence, or reflects an arbitrary or perverse exercise of judicial discretion. These limitations govern the interference with an order on charge as well. But this restraint required of a revisional court, does not place such an order beyond scrutiny where the legal foundation for proceeding against the accused is itself in question. This scrutiny must be undertaken within the framework of Sections 227 and 228 of CrPC.

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54. The Court is not required to determine the guilt, or ascertain, whether the prosecution will ultimately secure a conviction or not. But it must satisfy itself, that the material before the Court provides sufficient ground(s) for proceeding against the concerned accused. As explained in ***Amit Kapoor v. Ramesh Chander (supra)***, satisfaction concerning the existence of the ingredients of the offence and the facts supporting them is a necessary condition for framing a charge. Such is because the tentative nature of the opinion of the Court concerned at this stage i.e. the stage of framing of charge, no doubt dispenses with the requirement of proof beyond reasonable doubt, but, it does not in any case dispense with the requirement of a factual foundation for the offence alleged against the concerned accused.

55. In ***Union of India v. Prafulla Kumar Samal, (1979) 3 SCC 4***, the Supreme Court recognised the power of the Court to sift through, and weigh the material for the limited purpose of determining, whether a *prima facie* case exists or not. It was observed that the Court in such cases must consider the broad probabilities, the cumulative effect of the material and any basic infirmities appearing from the record. That it cannot merely endorse the conclusion of the investigating agency. The same decision also recognises, that where two views are equally possible and the material gives rise only to some suspicion, as distinguished from grave suspicion, discharge is justified. This does not however, authorise a roving enquiry or the weighing of evidence as at the conclusion of a trial. What it requires is an independent judicial assessment of whether the threshold for putting the accused on trial has been crossed or not.

56. In ***Sajjan Kumar v. CBI (supra)***, the Supreme Court further explained the nature of this enquiry. The following observations are relevant:

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> "(vi) At the stage of Sections 227 and 228, the court is required to evaluate the material and documents on record with a view to find out if the facts emerging therefrom taken at their face value disclose the existence of all the ingredients constituting the alleged offence. **For this limited purpose, sift the evidence as it cannot be expected even at that initial stage to accept all that the prosecution states as gospel truth even if it is opposed to common sense or the broad probabilities of the case.** (vii) **If two views are possible and one of them gives rise to suspicion only, as distinguished from grave suspicion, the trial Judge will be empowered to discharge the accused and at this stage, he is not to see whether the trial will end in conviction or acquittal.**" (Emphasis supplied)

57. In ***State of M.P. v. Sheetla Sahai, (2009) 8 SCC 617***, the Supreme Court held that the material brought on record by the prosecution must be considered in its entirety, including material favourable to the accused. Such consideration is distinct from examining independent defence material, which does not ordinarily form part of the enquiry under Sections 227 and 228 CrPC. This distinction was reiterated in ***Vishnu Kumar Shukla v. State of U.P., (2023) 15 SCC 502***. Read together, these principles require the suspicion, which should be grave in nature, to arise from material supporting the ingredients of the alleged offence. The 'seriousness of an accusation' cannot substitute for the aforesaid requirement.

58. Revisional interference is therefore justified, where the learned Trial Court has applied an incorrect legal test, overlooked an essential ingredient or material circumstance, or treated conjecture as grave suspicion, and such error materially affects the decision to frame the charge. If, upon correcting that error and examining the record within the permissible limits, no sufficient ground for proceeding remains, the High Court may set aside the order on

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charge and discharge the accused in respect of the offence concerned. The accused is not required to establish innocence at this stage.

59. In ***Dilawar Balu Kurane v. State of Maharashtra, (2002) 2 SCC 135***, the Supreme Court applied these principles and set aside the impugned judgment, finding that the courts below had failed to apply their minds to the material and that no *prima facie* case existed. Further, in ***Vishnu Kumar Shukla v. State of U.P. (supra)***, the Supreme Court emphasised the duty of the High Courts, in deserving cases, to protect an accused from an unwarranted prosecution and the unnecessary rigours of a trial. Once the absence of sufficient ground to proceed is established through the scrutiny permitted by law, continuation of the prosecution cannot be justified merely because the proceedings have reached the stage of charge.

60. The question in the present revisions is accordingly, whether the concerned learned Trial Court applied the correct legal standard and whether the material on record furnishes sufficient ground to proceed against the concerned accused for the offences that he has been charged with, and whether the same material furnishes sufficient ground to discharge those accused persons who already stand discharged *vide* the impugned order.

61. Now the WhatsApp communications and emails which are going to be referred to below, were placed with the charge-sheet and were considered by the concerned learned Trial Court without objection from the parties. So they are also being considered here only as material forming part of the prosecution's record. This Court is neither certifying their proof nor finally resolving disputed questions of credibility. It is nevertheless necessary to read the communications as a whole, as an inculpatory extract cannot be isolated while the surrounding material collected in the same investigation is excluded.

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Section 304B IPC

62. Section 304B IPC, read with Section 113B of the Evidence Act, requires the prosecution material to disclose, that the death occurred otherwise than under normal circumstances within seven years of marriage and that, soon before her death, the woman was subjected by her husband or his relative to cruelty or harassment for, or in connection with, a demand for dowry. These are foundational facts which must be disclosed, as the statutory presumption under Section 113B of the Evidence Act arises only upon their disclosure and cannot be invoked to supply an ingredient otherwise absent from the record. Reference in this regard may be made to ***Baijnath v. State of M.P., (2017) 1 SCC 101***.

63. The expression 'dowry' is not confined to a demand which is made at the time of, or before the marriage. A post-marriage demand may also fall within its ambit, provided that it bears a reasonable connection with the marriage. Conversely, every financial dealing or demand arising during the subsistence of a marriage does not, for that reason alone, assume the character of dowry. The requisite nexus must emerge from the nature of the demand and the surrounding circumstances. Likewise, the expression 'soon before' does not prescribe a fixed interval. It requires a proximate and live link between the dowry-related cruelty or harassment and the death. A demand which is remote, stale or unconnected with the circumstances leading to the death would not satisfy this requirement. Reference in this regard may be made to ***Kans Raj v. State of Punjab, (2000) 5 SCC 207***, ***Rajinder Singh v. State of Punjab, (2015) 6 SCC 477***, ***Satbir Singh v. State of Haryana, (2021) 6 SCC 1*** and ***State of M.P. v. Jogendra, (2022) 5 SCC 401***.

64. These distinctions, assume significance in the present petitions. The occurrence of an unnatural death within seven years of marriage, even when

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accompanied by allegations of matrimonial cruelty, does not by itself attract Section 304B of IPC. The material must additionally disclose that the cruelty or harassment was connected with a demand for dowry and bore the required proximity to the death. In ***Chabi Karmakar v. State of W.B., (2025) 1 SCC 398***, the Supreme Court, maintained the distinction between cruelty attributable to other causes and cruelty connected with a demand for dowry. At the stage of charge, the Court is not required to determine whether these ingredients stand proved beyond reasonable doubt, but it must however, be satisfied, that the material taken at its face value and considered cumulatively, raises grave suspicion as to the existence of each of them. Neither the seriousness of the allegations nor the statutory presumption can compensate for the absence of the dowry nexus or the proximate link required by Section 304B of IPC.

Mayank Singhvi (Husband)

65. Applying these principles to the present case, it is undisputed that the death occurred otherwise than under normal circumstances and within seven years of marriage. The applicability of Section 304B IPC must therefore, turn on, whether the police-report material, taken at its face value and considered cumulatively, discloses that Mayank Singhvi subjected the deceased, soon before her death, to cruelty or harassment for, or in connection with, a demand for dowry. The contemporaneous material forming part of the record assumes particular significance in this regard.

66. The email dated 23.06.2018, addressed by the deceased to her counsel, constitutes the most detailed contemporaneous first-person account forming part of the record. It contains serious allegations of assault and matrimonial misconduct against Mayank Singhvi, but despite its detail and the fact that it was written for obtaining legal advice, the email does not refer to any demand

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for dowry, any demand for the proceeds of the Vasant Kunj flat, or any harassment intended to compel the transfer of those proceeds. The learned Trial Court correctly regarded this omission as being material to the distinct statutory requirement of a dowry nexus.

67. The contemporaneous communications concerning the Vasant Kunj property are consistent with this assessment. On 27.02.2018, the deceased described the proposed sale as an attractive transaction, stated that she had time to decide how the sale proceeds were to be utilised, and explained that any property acquired through a joint investment with Mayank Singhvi would stand in her name. She wrote that, *"Even if it's in both our names the property would be worth in crores and he would be putting in the bulk share. So it's still a win. But he wants to buy in my name."* This was followed by her another statement, that, *"Don't worry. I have thought about it. I'm completely guarding my financial investments"*.

68. The Court must decide on the basis of what's before it without making any assumptions as to whether something else could've happened or not. The relevance of the aforesaid statements lies in the fact that the deceased's own contemporaneous account does not disclose any existing obligation to surrender the sale proceeds. On the contrary, it records the commercial considerations underlying the proposed sale, the alternatives available for reinvestment, and her intention to retain control over the proceeds and protect her title in any future investment.

69. The exchange between Mayank Singhvi and Nillum Batra in April 2018 again points in the same direction. Mayank Singhvi wrote that, *"I will give her the house"*, *"Will take in her name and give it to her"* and *"Will give 1 CR and she can buy it in her name."* Nillum Batra responded, that, *"That's very generous of u Mayank. We'll talk when we meet"*. Other

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communications forming part of the record also refer to an agreement to bear the rent for separate accommodation, an express option that the deceased need not sell her apartment, and proposals for financial support. On 26.06.2018, the deceased herself stated that a major part of the money had been utilised towards repayment of her father's loans. No transaction forming part of the police-report material has been identified as showing that the proceeds of the Vasant Kunj property were received by Mayank Singhvi or his parents.

70. The subsequent statements alleging demands of ₹10 lakh, payments made at the time of marriage, gold guineas, jewellery and pressure concerning the Vasant Kunj property have also been considered. They cannot be discarded merely because further particulars were furnished at a later stage, but even when taken at their highest, those allegations must disclose a proximate link between the cruelty or harassment alleged soon before the death and a demand for dowry, and such a link, does not emerge from the detailed email of the deceased to her counsel, the contemporaneous property communications, the exchanges immediately preceding the death, or the financial material collected during the investigation.

71. The learned Trial Court, therefore, correctly held that although the material discloses a seriously strained matrimonial relationship, it does not disclose cruelty or harassment for, or in connection with, a demand for dowry. Neither the occurrence of an unnatural death within seven years of marriage nor the presumption under Section 113B of the Evidence Act can supply this indispensable statutory ingredient. The discharge of Mayank Singhvi under Section 304B IPC, is therefore liable to be affirmed.

Rajender Singh Singhvi and Sushma Singhvi (In-Laws)

72. The material concerning Rajender Singh Singhvi and Sushma Singhvi must also be examined independently, with reference to the acts specifically

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attributed to each of them. Their separate residence from the matrimonial couple is not, by itself, determinative of whether they *prima facie* committed the offences alleged against them or not. But it nevertheless assumes relevance, where the allegations concerning their participation in the matrimonial discord are collective in nature and lack particulars identifying the conduct of either of them.

73. Viewed in this light, neither the email dated 23.06.2018 nor the complaint dated 27.06.2018 attributes to either parent-in-law any demand for dowry, act of assault, or coercion concerning the proceeds of the Vasant Kunj property. The messages dated 06.07.2018 indicate that the deceased objected to their involvement in the matrimonial dispute. They do not, however, identify any specific act committed by either parent-in-law that would disclose dowry-related cruelty or harassment soon before the death.

74. The supplementary statements refer to dissatisfaction with the manner in which the marriage was performed, requests for financial assistance, support allegedly extended to Mayank Singhvi, pressure concerning the Vasant Kunj property, and an alleged threat. These allegations when taken at their face value, remain substantially collective and do not in the opinion of this Court *prima facie* disclose the commission of the offence under Section 304B IPC by Rajender Singh Singhvi and Sushma Singhvi. The material accompanying the charge-sheet also does not identify any contemporaneous communication or transaction connecting either of them with a demand for the sale proceeds, or with harassment employed to enforce such a demand in proximity to the death.

75. The invocation of Section 34 IPC cannot compensate for the absence of foundational material against a particular accused. Common intention becomes relevant only when the record first discloses participation by the

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accused in an act constituting the alleged offence. Mere relationship with the husband, or general support allegedly extended to him in a matrimonial dispute, does not satisfy that requirement.

76. The learned Trial Court considered these circumstances and found no specific material disclosing that Rajender Singh Singhvi or Sushma Singhvi had subjected the deceased to cruelty or harassment for, or in connection with, a demand for dowry. This Court finds no error in that conclusion. Their discharge under Section 304B read with Section 34 IPC, therefore, calls for no interference and is liable to be affirmed.

Section 306 IPC

77. Section 306 of IPC does not punish suicide simpliciter. It punishes the abetment of suicide. The expression 'abetment' must be understood in the light of Section 107 IPC, which contemplates three distinct modes. Instigation to do the act, engagement in a conspiracy followed by an act or illegal omission in pursuance thereof, or intentional aid by an act or illegal omission. Therefore, even at the stage of charge, the material, taken at its face value, must disclose a factual foundation for at least one of these modes against the accused concerned.

78. In ***Ramesh Kumar v. State of Chhattisgarh, (2001) 9 SCC 618***, the Supreme Court explained, that 'instigation' means to goad, urge forward, provoke, incite or encourage the doing of an act. That express words directing a person to commit suicide are not indispensable, and instigation may, in an appropriate case, be inferred from a continued course of conduct. Such an inference must however, emerge with reasonable certainty from the conduct attributed to the accused and cannot rest merely upon the fact that the deceased felt distressed or aggrieved by that conduct.

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79. The material must therefore disclose conduct, amounting to abetment within Section 107 of IPC, accompanied by the requisite *mens rea* and a proximate connection with the suicide. In ***S.S. Chheena v. Vijay Kumar Mahajan, (2010) 12 SCC 190***, ***M. Mohan v. State, (2011) 3 SCC 626*** and ***Gurcharan Singh v. State of Punjab, (2020) 10 SCC 200***, the Apex Court emphasised upon the necessity of there being a positive act of instigation or intentional aid, the requisite *mens rea*, and a proximate relationship between the conduct of the accused and the suicide. More recently, in ***Prakash v. State of Maharashtra, (2026) 6 SCC 251***, while considering a challenge arising from the rejection of an application for discharge, the Supreme Court reiterated, that the record must disclose direct or indirect incitement in close proximity to the suicide, a discernible intention to abet, and an active act of such nature as leaves the deceased with no other option. Therefore, harassment, matrimonial discord or a strained relationship, without the positive and intentional contribution contemplated by Section 107 of the IPC, does not complete the offence under Section 306 of the IPC.

80. The distinction where the deceased has left a note or a message attributing responsibility for the suicide to another person assumes particular significance. In ***Madan Mohan Singh v. State of Gujarat, (2010) 8 SCC 628***, the Supreme Court examined the allegations underlying such an attribution and found, that they did not disclose the ingredients of abetment. Similarly, in ***Netai Dutta v. State of W.B., (2005) 2 SCC 659***, the reference to the accused in the suicide note was held to be insufficient in nature, where the material did not disclose instigation or intentional aid. The principle that therefore emerges from these aforementioned decisions, is that the deceased's attribution of responsibility to another person is a relevant piece of evidence,

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but it does not by itself determine, whether the person named has committed the offence under Section 306 of IPC.

81. This requirement of there being these statutory ingredients or elements of the offence under Section 306 IPC is not diluted by Section 113A of the Evidence Act either. This provision i.e. Section 113A of the Evidence Act permits, but does not compel, the Court to presume abetment, where a married woman commits suicide within seven years of marriage and the husband or his relative is shown to have subjected her to cruelty. Even upon disclosure of those foundational facts, the Court must have regard to all the other circumstances of the case before drawing such a presumption. As explained in ***Gurjit Singh v. State of Punjab, (2020) 14 SCC 264***, cruelty and abetment remain distinct legal enquiries. The existence of cruelty, even when coupled with suicide within seven years of marriage, does not automatically establish the offence under Section 306 of IPC.

82. The present enquiry is therefore, whether the material accompanying the police report when taken at its face value and considered as a whole, raises grave suspicion that Mayank Singhvi abetted the suicide, or not.

83. The first aspect that needs to be considered by this Court concerns the sale of the deceased's flat and the suggestion that the transaction formed part of the financial pressure exerted upon her which eventually led to her committing suicide. The conversation between the deceased and her mother on 27.02.2018 gives a contemporaneous account of her reasons for selling the property. When her mother cautioned her that, *"N be very very sure that u want to sell it"*, the deceased replied that she was *"Getting an excellent deal"*, that the property was old and that she was *"getting 5 times"*. Her mother's concern was that she should retain an alternative place to live to which the deceased answered that she would not, in any event, return to that property.

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84. The deceased then explained how she proposed to use the proceeds. *"Let the money come 1st. I have a year to decide what I wanna do with it"*, *"1.45 is not a small amount. I can easily get a new 3 bedroom in Gurgaon high rise or if I invest with Mayank it will be in my name."* She described this as *"a win win"*. She further stated that, even if the new property were held jointly, Mayank would contribute the larger share, and added, *"But he wants to buy in my name"*. Her assurance to her mother was also unequivocal which is clear from the following text that *"I'm completely guarding my financial investments"*.

85. So the replies of the deceased show that she regarded the proposed sale as being financially advantageous to her. That she was considering whether to purchase a separate residence or invest the proceeds with Mayank, while retaining an interest in the property to be acquired. She explained to her mother why she wished to sell the property, the return she expected and the safeguards she proposed. Viewed in this context, the conversation does not in any way supports the inference, that she was being compelled to surrender either the property or its sale proceeds.

86. The mother's own response in this regard is also significant. During this private discussion concerning the financial security of the deceased, she wrote, *"Financially M has been very good with u.."* and *"The moment he had money he's been spending so much on u."* The deceased replied, *"Yup I know and understand."* These contemporaneous exchanges do not in any way indicate, that the proposed sale or investment was being forced upon the deceased, much less that the transaction formed part of any conduct intended to drive her to suicide. The allegation concerning this transaction, therefore, does not furnish material sufficient to support a charge under Section 306 of IPC.

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87. The next aspect is the deceased's treatment for her condition and the mother's repeated concern that she should take her medication. On 15.05.2018, the mother informed Mayank that she would be meeting a doctor and asked him to keep her informed about the deceased's behaviour. She advised him to remain patient, avoid arguments and provide affection and support. Later that day, she informed him that medication had been advised and that she had sent the prescription to the deceased.

88. On 16.05.2018, the deceased sent Mayank an attachment and asked him to stop on his way from the gym and obtain the medicines. When he asked what it was and what it was for, she informed him that her mother had gone to the doctor for her and stated, *"I told her that I think I have depression.. it's for that"*. In the exchange between Mayank and the mother on the same date, he informed her that the deceased had sent him the prescription and asked him to obtain the medicine. The mother replied, *"Also see she takes it regularly. Start from Tonite."* Mayank stated that he had visited two stores where the medicine was unavailable and that one store would deliver it the following morning. The mother subsequently asked him to wait until she consulted another doctor and stated, *"She's been diagnosed with mild depression."*

89. This exchange is significant for two reasons. First, the concern about the condition of the deceased came from the deceased herself and was constantly being expressed by the mother while the treatment was being arranged for her. It was not an explanation that was first advanced by Mayank as a cause of the death of the deceased. The chats between the deceased and Nillum Batra and between Nillum and Mayank Singhvi show that the deceased was constantly on medication for depression. It is the deceased herself who once stated to Mayank Singhvi that her mother went to the doctor because she i.e. the deceased thought that she is suffering from depression.

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Second, the mother sought his assistance in obtaining the medicine and ensuring that it was taken regularly. His responses in this exchange, concerned obtaining the prescribed medicine. This particular course of conduct supports his participation in the arrangements for treatment and it supplies no inference of instigation or intentional aid to the deceased to commit the alleged suicide.

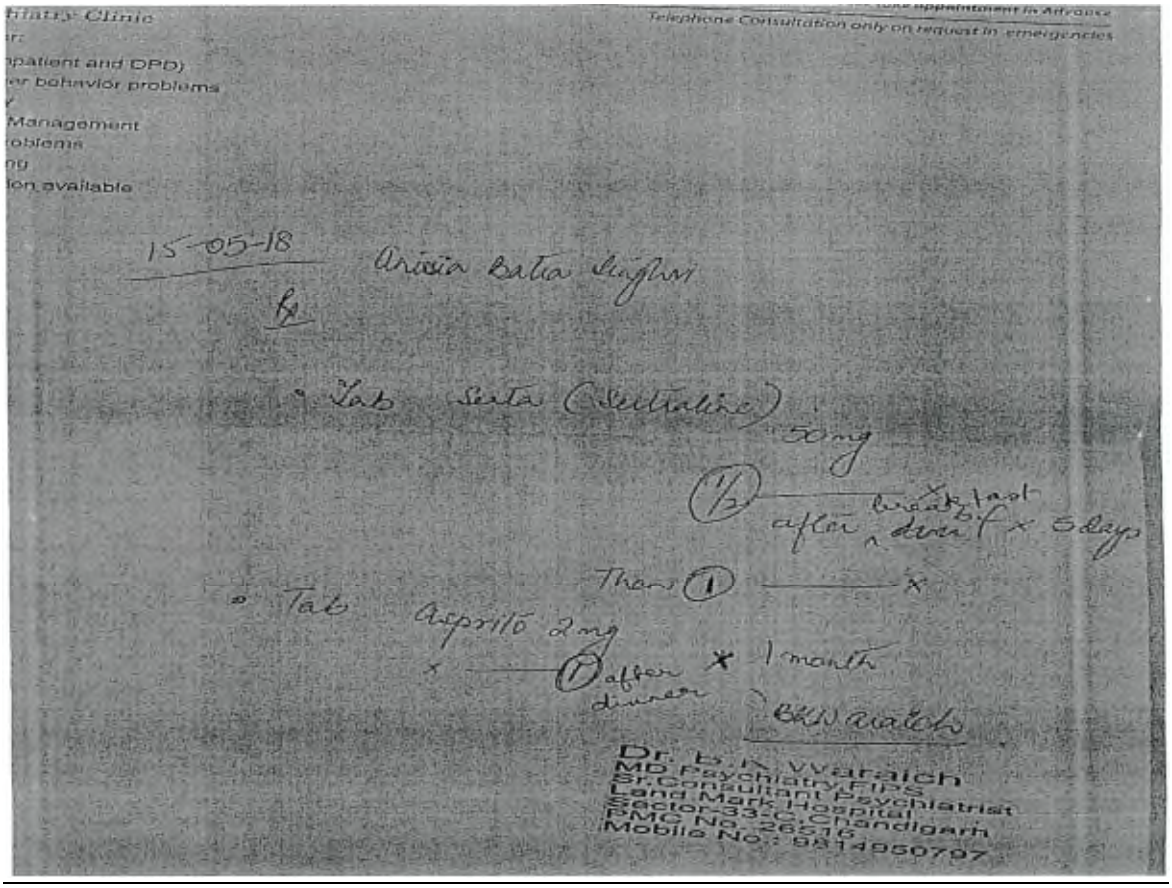
90. The communications between mother and daughter show not only repeated reminders, but also the deceased's own statements concerning her use of the medicines. On 20.06.2018, when her mother reminded her to take them before sleeping, the deceased replied that she would take them and sleep first. On 04.07.2018, in response to her mother's query whether she had been taking the medicines, she stated that she had not taken them the previous night because they made it difficult for her to wake without nine to ten hours' sleep. On 10.07.2018, when her mother reminded her of her promise to take the medicines regularly and asked whether she would take them that night, the deceased replied, *"Already took"*. She immediately added, *"Have taken them so takes me max an hr to sleep"*. Further reminders followed on 11.07.2018 and 12.07.2018. These communications go beyond the mother's reference to a diagnosis or her constant reminders to the deceased to begin a treatment as they contain the deceased's contemporaneous acknowledgments concerning her actual use of the medicines.

91. These exchanges therefore place the deceased's treatment and her own reported use of medication among the circumstances preceding the incident. Generally, suicide by a person receiving treatment for depression does not exclude abetment of the same by another person, but if the material on record when taken at face value shows that in the particular case concerned, there is no *prima facie* material to show that the accused has abetted the suicide of the deceased, this Court is of the opinion that it would be a travesty to send such

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person to trial on the bases of the same material. Therefore, the relevance of the exchanges noted above is that her emotional condition had been recognised before the incident, treatment was being pursued, and Mayank had participated in the arrangements for obtaining the prescribed medicine. The exchanges themselves disclose a combined effort to treat the deceased's condition. It also shows no act of instigation or intentional aid. His liability, if any, must arise therefore, from conduct satisfying Section 107 IPC, and not from the occurrence of suicide alone. And as can be seen from the discussion made till now, no such conduct has been shown which would satisfy any element of Section 107 IPC.

92. The record also contains a prescription dated 15.05.2018 referred to in the aforesaid communications, as well as a handwritten clinical note, regarding the deceased. The said documents are reproduced hereunder:



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- Depression from morning
Sadness

Behaviour - worse since 5 months.
- aggression
- agitation
- compulsive self destructive behaviour
excitability
hostility
- self harm
- lack of restraint
Totally messed up all relationships
Prosecution Victim syndrome
seeks validation mostly & that she's

Temperamental since childhood & aggre
on brother.

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93. The purpose of reproducing the above clinical note and prescription is to notice the emotional and behavioural tendencies recorded in relation to the deceased before the incident. The clinical note records depression and sadness, worsening behaviour over the preceding five (5) months, aggression, agitation, compulsive self-destructive behaviour, excitability, hostility, self-harm and lack of restraint. It thus shows, that self-harm and compulsive self-destructive behaviour had been medically noticed as features of her condition. Read with the communications concerning her depression and treatment, this material raises a reasonable possibility that the suicide was also connected with her depressive condition and the self-destructive tendencies so recorded. The occurrence of suicide cannot, therefore, by itself support an inference that Mayank had instigated or intentionally aided its commission.

94. The allegations of violence and humiliation must next be considered on their own terms. The email dated 23.06.2018 addressed by the deceased to her Advocate Aman Hingorani contains the deceased's account of the marriage and several disputes between the spouses wherein she has alleged physical assaults, abusive language and humiliation. She also stated, *"He has led me to depression and now he and his parents are calling me mad"*. Now the case for discharge under Section 306 of IPC cannot proceed by treating these allegations as absent. Their substance is that Mayank's alleged conduct had caused her considerable suffering and had contributed to the breakdown of their marriage. But the account of the individual incidents also explains the setting in which these allegations arose. In describing an incident in July 2016, the deceased stated, *"He struck me again"*, and then wrote, *"I picked up the glass and broke it on my head coz I just couldn't take anymore of his abuses and insinuations."* In another episode, she described an exchange of abusive words, an assault upon her and her response with the phone in her hand, *"after*

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2 or 3 slaps I struck him with it on his head." Now these passages describe confrontations that escalated into violence. So the act involving the glass was described as her response to alleged abuse, and the act involving the phone as her response to being struck. Read in their stated context, they disclose the course of the quarrels and the deceased's reactions during them.

95. The mother's message dated 09.04.2018 provides further contemporaneous material concerning these disputes. In a message described as *"Ten Commandments"*, she advised the deceased: *"1-Anissia, no throwing or breaking things."*, *"2-Make a point, n leave it .. Don't keep stretching it."*, *"3-Don't bring in families At All in ur fights."* The message also referred to provoking a reaction and violence from Mayank and to the use of the word *"DIVORCE"* during arguments. The mother was addressing a recurring pattern of disputes in which arguments were prolonged, family members were brought into the quarrels and objects were thrown or broken. Her advice was therefore directed towards stopping that escalation.

96. Taken together, the email and this message depict a deeply troubled marriage, with repeated arguments, anger, and allegations of physical violence. The particular incidents were described as arising during disputes between the spouses. The inference that these acts amounted to instigation of suicide does not follow merely from their gravity or from the subsequent death. Even on the deceased's account, the episodes relied upon disclose abusive and violent conduct during those confrontations but they do not, in their stated circumstances, sufficiently disclose the further mental element which is necessary as has been made clear above, to treat them as acts of abetment.

97. The statement in the email that Mayank had led her into depression expresses the deceased's understanding of the effect of the marriage upon her.

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The statutory question under Section 306 IPC is whether the conduct, amounted to instigation or intentional aid in the commission of suicide. And when all the relevant material placed on record is considered for the purposes of the present enquiry, this Court finds that the material concerning those earlier disputes does not sufficiently disclose that element. The allegations arising from the email therefore do not sustain the charge under Section 306 IPC merely because they describe conduct which caused distress or may otherwise attract scrutiny under the law relating to matrimonial cruelty.

98. Now the material plainly discloses that, by July 2018, the marriage had become deeply strained and separation was under active consideration. The communications show that the deceased was consulting Advocate Aman Hingorani regarding separation and that her mother was discussing the necessary paperwork and the course to be adopted. On 10.07.2018, the mother asked when she would meet the lawyer *"to decide ur course of action"* and observed that living under the same roof was *"fraught with danger"*. She thereafter advised the deceased to meet the lawyer *"to chart out d course of action"* and to leave the relationship. These communications do not suggest that matrimonial harmony had been restored and hey show an acute breakdown in which legal advice and the possibility of the spouses living separately were being actively considered. But when all of the aforesaid is considered cumulatively, nothing on record shows that Mayank Singhvi aided or abetted the commission of the alleged suicide by the deceased. All that it shows is that the marriage had been constantly heading more and more towards the possibility of proper breakdown and an eventual separation between the parties.

99. The strongest material relied upon for this charge under Section 306 IPC is the sequence of communications on 13.07.2018. At approximately 2:56

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p.m., the deceased informed Seema Malik that Mayank had locked her up and sought assistance, including police assistance. She subsequently stated that he was sitting outside guarding her room. At approximately 4:12 p.m., she wrote: *"I am going to kill myself today bcoz Mayank has driven me to it. He finally let me out but I can't repair what he has done."* Her communication to Advocate Aman Hingorani similarly attributed her decision to Mayank and requested that he fight for her after her death. Now the allegation of confinement is specific and close in time to the suicide. Even if for the purposes of the present examination **only**, this allegation of confinement is accepted as stated, the deceased's subsequent message also records that she had been let out. Therefore, the sequence of this entire incident describes restraint during the dispute, its cessation and her ensuing declaration that she would end her life. So the confinement in question might have been a source of distress on her account and its proximity to the death also gives it evidentiary significance, but it does not automatically establish that the restraint was imposed to instigate or facilitate suicide of the deceased by Mayank Singhvi. Had there been an express exhortation to such effect, the case would have been at a position to be assessed differently, but presently as the material exists, nothing of the kind has been brought to the attention of this Court. The message establishes at best, that the deceased blamed Mayank for her decision to end her life, but it does not provide a sufficient basis to infer that, he intended to provoke her into committing suicide. Such an intention cannot be inferred from her attribution of responsibility alone.

100. The final messages of the deceased noted above, hold Mayank responsible for her suffering and her decision to die. This Court in no way, doubts the anguish conveyed by those words, but for the purposes of the present examination, the words *"Mayank has driven me to it"* remain an

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attribution which must be considered with the acts described in the record. The principles in ***Madan Mohan Singh v. State of Gujarat (supra)*** and ***Netai Dutta v. State of W.B. (supra)*** prevent that attribution from being treated as a substitute for the ingredients of abetment. Having examined the alleged conduct underlying the messages, this Court finds that the messages do not carry the prosecution's case beyond the deficiency already discussed.

101. The confrontation acknowledged in the petitioner's own account shortly before the final messages must be considered against that background. According to that account, he questioned the deceased about her relationships with certain persons. Even if the immediate sequence is taken to include Mayank coming to her and a quarrel then happening between the spouses, they still establish only the proximity of a further acrimonious matrimonial confrontation. They do not, without material showing that his words or acts were intended to goad, provoke, encourage or facilitate suicide, establish instigation. The closeness of the confrontation to the suicide is relevant, but the fact that the deceased reacted to it by taking her life cannot, by itself, determine the intention with which the confrontation occurred.

102. The result remains the same when the material is considered as a continuing course of conduct also. The allegations disclose repeated marital conflict, abusive exchanges, violence and the deceased's increasing distress. Alongside them are her contemporaneous account of protecting her financial interests, the mother's efforts to address the conduct of both spouses during their disputes, and the arrangements for treatment in which Mayank was asked to participate. The inference of a course of conduct amounting to intentional instigation cannot be drawn merely by combining every unhappy incident in the marriage with the eventual alleged suicide. In the circumstances recorded

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here, the material does not raise grave suspicion of that distinct element of the offence.

103. The mother's earlier statement to Mayank that the deceased was speaking of dying shows that her vulnerability was known to him. That circumstance has been taken into account in assessing the later allegations also. It does not, standing alone, convert every subsequent dispute into an act of abetment. Nor does the deceased's treatment establish this fact. The conclusion rests on the absence of sufficient material concerning instigation or intentional aid, after considering both her vulnerability and the conduct attributed to Mayank.

104. Section 113A of the Evidence Act does not supply an automatic answer in favour of the prosecution either. Even assuming the allegations of cruelty **only** for the purpose of considering that provision, the inference of abetment must be drawn with regard to all the circumstances. Here, the financial allegations, the earlier disputes and the events of the last day have each been examined, and their cumulative effect has also been considered. They disclose the deceased's distress and her attribution of responsibility, but do not provide sufficient grounds to infer abetment. The permissive presumption cannot be used to dispense with that assessment, merely because the suicide occurred within seven years of marriage.

105. The concerned learned Trial Court treated the final message, "*read alone*", as sufficient to support the charge. This placed decisive weight upon the deceased's conclusion about responsibility without adequately examining whether the conduct described in the record disclosed the actual ingredients of Section 107 IPC or not. The error is thus, material in nature. A final message may explain why the deceased decided to take her life, but liability under Section 306 of IPC depends upon the acts and intention which are

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attributed to the accused person. For the reasons discussed above, the material in the present case falls short of raising grave suspicion of abetment.

106. Before concluding, this Court also finds it necessary to notice the scientific and medical material bearing upon the manner of the fall. The RFSL report records ethyl alcohol measuring 298 mg per 100 ml of blood. In ***IFFCO-Tokio General Insurance Co. Ltd. v. Pearl Beverages Ltd., (2021) 7 SCC 704***, the Supreme Court observed that even a concentration of 200 mg per 100 ml would indicate heavy intoxication and referred to its effect upon judgment, gait and motor coordination. The Medical Board in the present case further opined that the injuries could have resulted from a fall from a height or roof, while leaving the manner of death i.e. whether it was homicidal, suicidal or accidental, to be determined from the complete investigative and circumstantial material. These circumstances do not establish that the fall was accidental, nor do they permit the communications sent shortly before the incident to be disregarded. They do, however, show that the scientific and medical material admits of the possibility that the deceased's judgment and balance were impaired and that she may have lost her balance. When this material is considered with the site conditions, the eyewitness accounts and the entire sequence of communications, the possibility of an accidental fall cannot be ruled out altogether. This is an additional circumstance in the cumulative assessment carried out above of the charge under Section 306 IPC and is not, by itself, the basis of the conclusion reached by this Court.

107. The charge under Section 306 IPC against Mayank Singhvi therefore, cannot be sustained. The impugned order dated 18.12.2019, insofar as it directs framing of charge under Section 306 IPC, and the consequential charge framed under that provision on 05.02.2020, are therefore liable to be set aside.

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Section 498A IPC

108. For the purposes of adjudicating the challenge to the charge under Section 498A IPC, the allegations must be examined against the specific meaning assigned to 'cruelty' by that provision. Explanation (a) encompasses wilful conduct of such a nature as is likely to drive a woman to commit suicide or to cause grave injury or danger to her life, limb or health, whether mental or physical. Explanation (b) addresses harassment intended to coerce her, or any person related to her, to meet an unlawful demand for property or valuable security, as also harassment on account of the failure to meet such a demand. The two limbs operate independently and require separate consideration. Consequently, the conclusion reached in respect of the charge under Section 304B IPC does not, by itself, determine whether the material discloses cruelty under Section 498A IPC or not. Conduct may fall within Explanation (a) irrespective of any unlawful demand. Equally, the unlawful demand contemplated by Explanation (b) is not confined to a demand constituting dowry for the purposes of Section 304B IPC.

109. The enquiry in the present petitions must now, therefore, be directed to whether the prosecution material, taken at face value, discloses either of these statutory forms of cruelty. In ***Manju Ram Kalita v. State of Assam, (2009) 13 SCC 330***, the Supreme Court emphasised the gravity of the conduct and the need to examine whether such conduct was continuous or persistent, or sufficiently proximate, while distinguishing statutory cruelty from petty matrimonial quarrels. At the stage of framing of charge, this assessment does not entail a determination of the truth of the allegations or a meticulous weighing of the evidence. But it does require the Court to identify the conduct alleged and examine whether its nature, gravity and context disclose the ingredients of the particular limb of Section 498A IPC sought to be invoked.

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It is on this basis that the allegations against the respective accused must be considered.

Rajender Singh Singhvi and Sushma Singhvi (In-Laws)

110. Insofar as Rajender Singh Singhvi and Sushma Singhvi are concerned, the challenge to their discharge under Section 498A IPC rests upon the same body of allegations and material considered while examining their discharge under Section 304B IPC. The factual foundation is common, but the statutory enquiries are distinct. The conclusion under Section 304B IPC cannot, therefore, be treated as being sufficient, by itself, to sustain their discharge under Section 498A IPC. What requires consideration here is whether that same material, assessed with reference to the ingredients of either limb of Section 498A IPC, raises grave suspicion of the commission of that offence by either parent-in-law.

111. The deceased's detailed email dated 23.06.2018 contains no allegation of a specific act of cruelty by Rajender Singh Singhvi or Sushma Singhvi. The complaint dated 27.06.2018 likewise does not disclose any physical act, persistent course of harassment or individual conduct attributable to either of them of the nature contemplated by Explanation (a). The later statements refer to dissatisfaction with the marriage, financial demands, support allegedly extended to their son, pressure concerning the Vasant Kunj property and threats. These are the allegations already noticed in the preceding discussion. They have not been excluded merely because they were made subsequently, nor has the absence of an allegation in the earlier communications been treated as conclusive. Even when the later statements are taken at face value and read with the remaining material, they remain substantially collective and do not identify with sufficient particularity a proximate course of wilful conduct by either parent-in-law answering Explanation (a), or harassment attributable to

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either of them for the purpose of enforcing an unlawful demand, or on account of its non-fulfilment, within Explanation (b).

112. The allegation that the parents-in-law supported Mayank Singhvi following matrimonial altercations, or failed to intervene in favour of the deceased, cannot, without more, be equated with statutory cruelty. The communications dated 06.07.2018 disclose the deceased's objection to their involvement in the matrimonial dispute, but do not particularise conduct attributable to either parent which satisfies either explanation appended to Section 498A IPC. The difficulty is thus not merely the absence of a connection between the alleged conduct and a demand for dowry, which was relevant to the enquiry under Section 304B IPC. It is the absence of sufficiently particularised material disclosing that either parent-in-law subjected the deceased to cruelty of the nature independently punishable under Section 498A IPC.

113. It is in this context that the caution expressed by the Supreme Court in ***Preeti Gupta v. State of Jharkhand, (2010) 7 SCC 667***, ***Geeta Mehrotra v. State of U.P., (2012) 10 SCC 741***, ***K. Subba Rao v. State of Telangana, (2018) 14 SCC 452***, and ***Kahkashan Kausar v. State of Bihar, (2022) 6 SCC 599***, against proceeding against relatives on general and omnibus allegations assumes relevance. These decisions do not warrant the rejection of a genuine case at the threshold, but they do require the Court to ascertain whether the material discloses a specific *prima facie* role of each relative sought to be prosecuted. The same factual allegations may fall for consideration under more than one penal provision, but their invocation under distinct provisions does not dispense with the need to disclose the ingredients of each offence against the accused concerned.

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114. The learned Trial Court also found no document disclosing cruelty or harassment by the parents-in-law and attached significance to the absence of any allegation against them in the deceased's detailed email. Upon considering that circumstance together with the later statements and the contemporaneous communications, this Court finds no reason to differ from its assessment. Taken at its highest, the material indicates only that the parents-in-law supported their son in his matrimonial dispute with the deceased. It does not however, raise grave suspicion that either of them committed an act of statutory cruelty. Their discharge under Section 498A IPC is thus sustainable upon an independent examination of the ingredients of that offence, and not merely as a consequence of the conclusion already reached under Section 304B IPC.

115. Accordingly, the discharge of Rajender Singh Singhvi and Sushma Singhvi under Section 498A read with Section 34 IPC is liable to be affirmed.

Mayank Singhvi (Husband)

116. Turning now to the charge under Section 498A IPC against Mayank Singhvi, it is appropriate to consider Explanation (b) first, since the allegations concerning monetary demands and the proceeds of the Vasant Kunj property have already been examined in the context of Section 304B IPC as well as Section 306 IPC. That discussion provides the factual setting for the present enquiry, but does not conclude it. The absence of a dowry nexus sufficient to attract Section 304B IPC does not, by itself, exclude harassment falling within Explanation (b). The same material must therefore, be examined independently again, to ascertain whether it discloses harassment intended to coerce the deceased, or any person related to her, to meet an unlawful demand for property or valuable security, or harassment on account of the failure to meet such demand.

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117. As noticed above, the deceased's contemporaneous communications concerning the Vasant Kunj property records her freedom of choice regarding its sale and the reinvestment of the proceeds, her intention to protect her title and financial interests, and the proposal that the property to be acquired should stand in her name. The surrounding communications also contain offers to meet the rent for separate accommodation and provide financial support, an express option that she need not sell the property, and her statement that a substantial part of the proceeds had been utilised towards repayment of her father's loans. The relevance of this material to Explanation (b) lies in what it discloses concerning the alleged demand, and its connection with the mistreatment complained of. No contemporaneous communication has been identified, in which Mayank Singhvi demanded that the sale proceeds be transferred to him. or linked his treatment of the deceased to her refusal to do so.

118. The supplementary statements concerning the alleged demand of ₹10 lakh, payments of cash, articles and requests for financial assistance have also been considered together with the remaining prosecution material, and when read cumulatively, they do not disclose a sufficiently specific and proximate course of harassment directed towards enforcing an unlawful demand or occasioned by its non-fulfilment. The deficiency is thus not merely the absence of a marriage-related dowry demand, but the absence of the necessary nexus between the harassment alleged by Mayank Singhvi and the coercive purpose, or non-fulfilment, contemplated by Explanation (b). The material therefore, does not disclose the ingredients of that limb. This conclusion now leaves for separate consideration of this Court, as to whether the conduct attributed to Mayank Singhvi falls within Explanation (a) appended to Section 498A IPC or not.

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119. What remains for consideration now, is whether the material against Mayank Singhvi discloses cruelty within Explanation (a) to Section 498A IPC. This enquiry is independent, both of the conclusion concerning unlawful demands under Explanation (b) and of the conclusion already reached concerning abetment under Section 306 IPC. The email dated 23.06.2018 contains allegations of assault during the honeymoon and thereafter, of humiliation, controlling conduct and disputes during May and June 2018. Nillum Batra's subsequent statement also refers to an incident of violence allegedly witnessed by her. The allegation of confinement on the day of the incident and the deceased's final communications have also been considered, together with the remaining prosecution material, in examining, whether the ingredients of Explanation (a) to Section 498A IPC are disclosed or not.

120. In ***State of M.P. v. Sheetla Sahai (supra)***, the Supreme Court emphasised the need to consider the entirety of that material including the circumstances favourable to the accused. Such consideration is distinct from accepting an independent defence version or undertaking a trial of disputed facts, but the enquiry remains, whether the material read cumulatively, furnishes sufficient ground to proceed for the particular offence alleged.

121. Read in its entirety, the email describes an acrimonious matrimonial relationship involving disputes concerning intimacy, social interactions, suspected relationships, household affairs, expenditure and intervention by both families. Alongside the allegations of assault, it refers to retaliatory acts, periods of resumed companionship and attempts to preserve the marriage. The surrounding communications similarly record reciprocal conflict, apologies concerning particular incidents, efforts to obtain professional counselling and repeated discussions concerning reconciliation and separation. These circumstances do not efface the allegations of violence but they do form the

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context in which the nature and course of the conduct attributed to Mayank Singhvi must be examined.

122. The contemporaneous communications of Nillum Batra also form part of this record. In May 2018, she commended the restraint and understanding then shown by Mayank Singhvi and requested that she be kept informed. On 03.06.2018, she wrote to the deceased: *"Even now no wrong has been done to you. No one is against u. Mayank n we all love u, are with u nd will always support u"*. Nillum Batra subsequently explained that she had initially believed Mayank Singhvi over her daughter, that she had been misled and that she had thereafter witnessed violence. The earlier communications cannot be treated as a retraction of allegations made subsequently nor can the subsequent explanation be disregarded. Both must be considered without conclusively determining, at this stage, the credibility of either account.

123. The references to depression, medication and treatment are similarly relevant as part of the surrounding circumstances. They do furnish a basis to discredit the deceased or to attribute the matrimonial discord to a medical condition. Equally, expressions of affection, offers of financial support and attempts at counselling do not establish that the alleged violence could not have occurred. Now the limited relevance of all these aforementioned communications is, that the prosecution record, contains differing contemporaneous accounts that bear upon the nature, continuity and gravity of the conduct alleged against the revisionist Mayank Singhvi. They must be considered only for that purpose.

124. The final communications must also be examined in conjunction with the earlier allegations. They convey the deceased's perception that Mayank Singhvi had caused irreparable harm and driven her to take the extreme step. That attribution is relevant, but does not dispense with an examination of

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whether the conduct disclosed by the material on record, answers Explanation (a) or not. To the extent that the learned Trial Court treated the final attribution to Mayank Singhvi as being sufficient to establish statutory cruelty and thereafter invoked Section 113A of the Evidence Act to infer abetment, this reasoning did not maintain the distinction between the foundational fact and the presumption under law. Cruelty must be independently disclosed before the presumption under Section 113A of the Evidence Act can be considered. This presumption cannot by itself supply the very foundation of the offence.

125. The issue is thus not whether the allegations are serious, or whether their truth can finally be determined at this stage, but whether, the complete prosecution material raises grave suspicion of wilful conduct of such a nature as is likely to drive the woman to commit suicide or to cause grave injury or danger to her life, limb or mental or physical health. That enquiry cannot be replaced either by the existence of matrimonial discord or by the fact that the marriage ended in an unnatural death.

126. So considered cumulatively, the record discloses a deeply distressed matrimonial relationship, allegations and counter-allegations, harsh exchanges, prior allegations of assault and an unresolved dispute shortly before the fall. It also records reciprocal conflict, contemporaneous efforts at treatment and counselling, discussions concerning separate accommodation and property, and repeated attempts at reconciliation. Applying the distinction between suspicion simpliciter and grave suspicion explained by the Supreme Court in ***Union of India v. Prafulla Kumar Samal (supra)*** and ***Sajjan Kumar v. CBI (supra)***, and considering these circumstances together, without treating the latter as disproving the former or the final attribution as conclusive of statutory cruelty, this Court is of the opinion that the material does not raise grave suspicion of the particular offence contemplated by Explanation (a).

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127. The learned Trial Court did not give due effect to the entirety of the material accompanying the police report and treated the deceased's final attribution as supplying the statutory character of the conduct alleged. For the reasons discussed above, the material, considered as a whole, gives rise to suspicion but does not attain the degree of grave suspicion necessary to proceed under Sections 227 and 228 CrPC. The direction to frame a charge against Mayank Singhvi under Section 498A IPC is, therefore, liable to be set aside.

128. The conclusions in respect of the several offences rest upon their distinct statutory requirements. The material does not disclose the requisite dowry nexus under Section 304B IPC against any of the accused persons. As regards Mayank Singhvi, it does not disclose the intentional instigation or aid necessary, to sustain a charge under Sections 107 and 306 IPC. The material against Rajender Singh Singhvi and Sushma Singhvi does not raise grave suspicion of either form of statutory cruelty under Section 498A IPC either. Upon an independent consideration of both explanations to that provision, the material against Mayank Singhvi is also insufficient to sustain the charge under Section 498A of IPC.

129. Consequently, the discharge of Mayank Singhvi under Section 304B read with Section 34 IPC, and of Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 IPC, is liable to be affirmed. The direction to frame charges against Mayank Singhvi under Sections 498A and 306 IPC is also liable to be set aside, and consequently, he is liable to be discharged of those offences as well.

130. ***Before parting, this Court wishes to express its concern over the tendencies today, to implicate the husband's relatives in matrimonial disputes through sweeping allegations of cruelty. The anguish arising from***

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a troubled marriage is understandable, but it cannot justify drawing the entire family into criminal proceedings without a specific role being attributed to the persons concerned. A criminal prosecution has consequences that extend beyond the courtroom, affecting reputation, livelihood and family life. The law must therefore, afford effective protection to a woman subjected to cruelty, while ensuring that relatives are not made to face prosecution merely because of their relationship with the husband, and even the husbands should not be, without cause, penalized.

131. ***This Court also wishes to emphasise the importance of timely support from the parental family when a daughter speaks of violence or persistent mistreatment in her marriage. Her concerns should not be brushed aside with an advice to adjust, nor should a fear of social disapproval stand in the way of offering her a safe home. A daughter's return to her parents should never be regarded as a matter of shame for them. Preserving a marriage cannot take precedence over her safety and dignity, and support should not have to await an irretrievable tragedy.***

CONCLUSION

132. In view of the foregoing discussion, ***CRL.REV. P. 29/2020*** preferred by Nillum Batra and ***CRL.REV. P. 297/2022*** preferred by the State are dismissed. The impugned order dated 18.12.2019 passed by the learned Additional Sessions Judge-02 (South), Saket Courts, New Delhi, in ***Sessions Case No. 676/2018***, titled *State v. Mayank Singhvi* which arose out of ***FIR No. 185/2018*** registered at Police Station Hauz Khas, South District, Delhi is upheld, insofar as it discharges Mayank Singhvi under Section 304B read with Section 34 IPC and Rajender Singh Singhvi and Sushma Singhvi under Sections 304B and 498A read with Section 34 IPC.

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133. Further, ***CRL.REV. P. 170/2021***, preferred by revisionist Mayank Singhvi, in view of the aforesaid findings, is allowed. The concerned impugned order dated 18.12.2019, insofar as it directs the framing of charges against him under Sections 498A and 306 IPC, and the consequential charges framed on 05.02.2020, are set aside.

134. Accordingly, the revisionist Mayank Singhvi stands discharged of the offences punishable under Sections 498A and 306 of IPC.

135. The pending applications, if any, in all the 3 revision petitions, stand disposed of.

136. Interim order(s), if there, in any of the concerned petitions, also stand(s) vacated.

137. A copy of this judgment be sent to the concerned learned Trial Court as well as the concerned jail Superintendent for information and necessary compliance.

138. This judgment be uploaded on the website *forthwith*.

MADHU JAIN
(JUDGE)

NOVEMBER 4, 2026/PG