

**BEFORE THE HON'BLE
SUPREME COURT OF INDIGO**

CIVIL APPEAL NO _ OF 2017
UNDER ARTICLE 136 OF THE CONSTITUTION OF INDIGO

**IN THE MATTER OF
SOCIETY FOR CRICKET CONTROL IN INDIGO**

V.

MR. DEV & OTHERS

WRITTEN SUBMISSION FOR THE RESPONDENTS

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LIST OF ABBREVIATIONS

1. &: And
2. AIR: All India Reporter
3. Art: Article
4. BOD: Board of Directors
5. Cl.: Clause
6. Corp.: Corporation
7. Edn.: Edition
8. G.O: Government Order
9. Hon'ble: Honorable
10. HC: High Court
11. IPL: Indigo Premier League
12. No: Number
13. Ors: Others
14. pg: Page
15. Pvt.: Private
16. SC: Supreme Court
17. SCC: Supreme Court Cases
18. SCCI: Society for Cricket Control in Indigo (SCCI)
19. SCR: Supreme Court Reports
20. Sec.: Section
21. Supp.: Supplementary
22. u/s: Under Section
23. u/a: Under Article
24. UOI: Union of India
25. US: United States
26. USA: United States of America
27. V.: Versus
28. viz.: Namely
29. vol.: Volume

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STATEMENT OF JURISDICTION

The Respondents, Mr Dev & Ors, hereby submit to the jurisdiction of the Hon'ble Supreme Court of Indigo, The Memorandum for the Respondent in an appeal filed by the Appellant, Under Article 136 (Special Leave Petition) Of the Constitution of Indigo, 1950.

STATEMENT OF FACTS

1. Indigo is a federal country with 30 states. The sport of cricket has been exceptionally popular in the country, assuming the status of a religion and the players- a Demigod. Society for Cricket Control in Indigo (SCCI) is established in Indigo to control the sports of Cricket. It was registered in 1940 under Societies Registration Act, 1860. After the States reorganization in 1956 its head office located at Erupadi, fell into the Tamil Pradesh State territory.

2. SCCI is engaged in hosting international cricket one-day matches and test matches and has absolute power to select the Indigo Cricket Team. The SCCI started Indigo Premier League a domestic cricket tournament, it brought a lot of revenue to SCCI and team owners earned huge income from advertisements and sale of tickets. Corruption made inroads into the sport with the involvement of team owners, players and middlemen. Aghast by the enormity of corruption and its impact on the quality of the game of Cricket, a former Cricketer of Indigo, Mr. Dev filed a PIL in the High Court of Maha Pradesh. The SCCI appeared before Hon'ble High Court and filed its counter affidavit denying the contentions and claims of the petitioner Mr. Dev.

3. The Hon'ble High Court passed orders constituting a Commission headed by Former Judge, Mr. Yodha to look into the affairs of the SCCI and suggest reforms to bring out proper functioning of SCCI. Yodha committee submitted its report with a number of suggestions. SCCI objected to a major portion of the report and contended that it is not possible to accept all suggestions as it affects its autonomy and fundamental rights.

4. However, the Hon'ble High Court did not accept the contentions of SCCI. Aggrieved by the orders of the High Court, the SCCI filed an SLP in the Supreme Court of Indigo. The Hon'ble Supreme court has granted leave and the civil appeal filed by the society is ordered to be placed before a constitutional bench of five judges, the matter is stands posted for the final hearing.

STATEMENT OF ISSUES

- I. Whether the SCCI is a State under Article 12 of the Constitution of Indigo?**
- II. Whether the SCCI is amenable to the to the writ jurisdiction of the High Court?**
- III. Whether the Orders of the High Court amount to Judicial legislation?**

SUMMARY OF PLEADINGS

I. THE SCCI COMES UNDER THE DEFINITION OF STATE UNDER ARTICLE 12

By virtue of the SCCI enjoying an absolute control over the sport of cricket and performing public functions and carrying out activities that are akin to public duties or State functions, also it regulates the freedom guaranteed under Article 19(1)(g). Thus, the SCCI falls under the ambit of 'other authorities' as an instrumentality of the state. Therefore, it is humbly submitted before the Hon'ble court that the Society for Cricket Control in Indigo falls within the scope of 'State' under Article 12 of the Constitution of Indigo.

II. THE SCCI IS AMENABLE TO THE WRIT JURISDICTION OF THE HC UNDER ARTICLE 226

The PIL filed by Mr. Dev is maintainable as he has *locus standi* to file the same as the magnitude of public interest involved in the sport and the subject matter is so large and further there is a public interest at large as public money is involved and there was corruption. Further the SCCI by being a State attracts the jurisdiction under Article 226 and further *arguendo* the writ jurisdiction can lie against non-state and private entities as well and thus since the SCCI carries on public duty it is humbly submitted before this Hon'ble court that the SCCI is amenable to the writ jurisdiction of the HC under Article 226.

III. THE ORDERS OF THE HIGH COURT ARE JUSTIFIED

It is respectfully submitted that the orders of the High court freezing the accounts and appointing an administrator are justified and not contrary to the constitution. The orders are justified on the fact that the courts are empowered to do so by the Constitution itself to ensure complete justice.

ARGUMENTS ADVANCED

I. THE SCCI COMES UNDER THE DEFINITION OF STATE UNDER ARTICLE 12

1. In *Ajay Hasia V.. Khalid Mujib*¹ the honorable Supreme Court held that Societies formed were held to be coming under the definition of State under Article 12 of the Constitution of India. This case also laid down a few guidelines for which a non-statutory body can come under the definition of the state under Article 12. It was further held in *GM, Kisan Chunni Mills Ltd v. Satrugan Nishad*² even a private body can, which was formed and sponsored by Private Persons can come under the definition of the state.

1.1 The body enjoys a monopoly status

2. It was held in *Biman Kishore Bose v. United India Insurance Co. Ltd*³ a company enjoying the monopoly of carrying on a business has the trappings of state and is an authority under Article 12 of the Constitution of Indigo and thus requires to satisfy the requirement of reasonableness and fairness.

3. In *Pradeep Kumar Biswas v. Indian Institute of Chemical Biology*⁴ it was held that the principles of monopoly, government control and funding are the main tests to determine if it falls under the definition of State.

4. The SCCI indicates that it has extensive powers in selecting players for the Indigo National team representing Indigo in test matches domestically and internationally. Sports being a subject under the control of the States, in substance, the Society exercises governmental functions in the area of Cricket. It is submitted that the absolute authority of the SCCI is because of the recognition granted by the Government of Indigo, hence in effect even though it is as an

¹ *Ajay Hasia V..Khalid Mujib* 1981 AIR 487:1981 SCR (2) 79

² *GM, Kisan Chunni Mills Ltd v. Satrugan Nishad* (2003) 8 SCC 639

³ *Biman Kishore Bose v. United India Insurance Co. Ltd* (2001) 6 SCC 477

⁴ *Pradeep Kumar Biswas v. Indian Institute of Chemical Biology* (2002) 5 SCC 111

autonomous body the same comes under "other authorities" for the purpose of Article 12. It is also contended that the Board has the authority to determine whether a player would represent the country or not. Further, since playing cricket is a profession the Society controls the fundamental rights of a citizen under Article 19(1)(g) of the Constitution. The Functions performed are of public importance and closely related to a government function.

1.2 Test of Instrumentality

5. In *Sukhdev Singh v. Bhagat Ram*⁵, the question was whether the Oil and Natural Gas Commission(ONGC), the Industrial Finance Corporation and the Life Insurance Corporation(LIC) established under statutes of Parliament are authorities under Article 12 of the Constitution. The majority of the judges in this case held that statutory corporations are agencies/instrumentalities of the State for carrying on trade and business which would have been otherwise carried out by State itself. Therefore, the test must be to see whether a body is acting as an agency or instrumentality of the State. In this case, the Court found that bodies like LIC, ONGC etc. were created by statutes, had the statutory power to make binding rules and regulations and were under the pervasive control of the Government. In light of these facts plus the combination of State aid and furnishing of an important public service by these corporations, made the SC declare these corporations to be State under Art 12.

6. Justice Ruma Pal has held that whether in the light of the cumulative facts as established, the body is financially, functionally and administratively dominated by or under the control of the Government. Such control must be particular to the body in question and must be pervasive. If this is found, then the body is a State within Article 12.

7. An important decision on the definition of State under Article 12 is *Pradeep Kumar Biswas v. Indian Institute of Chemical Biology*⁶. A seven-judge bench of the Supreme Court by a

⁵ *Sukhdev Singh v. Bhagat Ram* AIR 1975 SC 1331

⁶ *Pradeep Kumar Biswas v. Indian institute of Chemical Biology* (2002) 5 SCC 111

majority of 5:7 held that CSIR is an instrumentality of “the State” falling within the scope of Article 12. The test which is to be applied to ascertain the character of the body as falling within Article 12 or outside, is to ascertain the nature of financial, functional and administrative control of the State over it and whether it is dominated by the State Government and the control can be said to be deep and pervasive so as to satisfy the court “of brooding presence of the Government” on the activities of the body concerned.

8. The overall role of the SCCI in cricket is a public function. The SCCI formulates rules, regulations, norms and standards covering all aspect of the game of cricket. It enjoys the power of choosing the members of the national team. It exercises the power of disqualifying players, which may at times put an end to the sporting career of a person. It sells broadcast and telecast rights. All these activities are undertaken with the tacit concurrence of the State Government and the Government of India which is not only fully aware but supportive of the activities of the SCCI. Thus, we can say that there exists deep and pervasive control in the instant case.

II. THE SCCI IS AMENABLE TO THE WRIT JURISDICTION OF THE HC UNDER ARTICLE 226

9. The PIL filed by Mr. Dev before the high court of Maha Pradesh is maintainable as SCCI comes under the definition of state under Article 12 and additionally arguing without conceding that the scope of a PIL under Article 226 is not restricted to the State alone and is applicable to private entities as well.

2.1 Mr. Dev has Locus Standi to file the PIL

10. Writ Jurisdiction of this Hon’ble court flows from Article 226,⁷ which confers wide powers enabling the Court to issue writs, directions, orders for the enforcement of fundamental

⁷ Article 226, Constitution of Indigo, henceforth Para-Materia with Constitution of India

or legal rights.⁸ The exercise of writ jurisdiction by the High Court is discretionary in nature.⁹ In case a class of people have a collective grievance, even an unrecognized association may initiate writ proceedings.¹⁰ In England, Greenpeace was granted standing on the basis that they are acting in public interest, rather than for their own members.¹¹ In public law, the rule that only the aggrieved person is entitled to seek judicial redress has been liberalized to include any “public-spirited individual” or “association”.¹²

11. The High Courts have started following the practice of ‘PIL’s’ in their jurisdiction under Article 226.¹³ Locus standi means a place of standing, a right of appearance in a Court of Justice. The concept of Public Interest Litigation originated in USA in the case of *Gideon v. Wain*¹⁴. It signifies the right to bring an action and to be heard.¹⁵ In *Fertilizer Corporation Kamgar Union v. UOI*¹⁶, it was held by Justice Krishna Iyer that locus standi must be liberalized to meet the challenges of times. ‘*Ubi jus ibi remedium*’ must be enlarged to be embraced all interests of public minded citizens or organizations with serious concern for conservation of public resources.

12. For Public Interest Litigation, the key case talking about Locus Standi is *Chairman, Railway board v. Chandima Das*¹⁷ held that a person can file a writ on behalf of an unrelated other.

13. In the case in the HC, the petitioner Mr. Dev has a genuine interest in the matter and seeks to revive the credibility of the sport of cricket and there is definite public interest in the matter as [2.1.1] The magnitude of public interest in the matter is large and [2.1.2] There is Public Interest as public money is involved

⁸ H.M. SEERVAI, CONSTITUTIONAL LAW OF INDIA, 4th ed., vol. 2, 2007 at p. 1586.

⁹ D.D. BASU, COMMENTARY ON THE CONSTITUTION OF INDIA, C.K. Thakker & S.S. Subramani & T. S. Doabia & B. P. Banerjee eds., Vol. 6, 8th ed. 2012, p. 6614.

¹⁰ *Akhil Bhartiya Soshit Karamchari Sangh (Rly.) v. Union of India* AIR 1981 SC 298

¹¹ *R v HM Inspectorate of Pollution ex parte Greenpeace Ltd (No 2)* [1994] 4 All ER 329

¹² *S.P. Gupta v. President of India & Ors.* AIR 1982 SC 149

¹³ *State of West Bengal v. Sampat*, A.I.R. 1985 SC 195

¹⁴ *Gideon v. Wain* 372 US 335 (1963)

¹⁵ Aiyar Ramanatha, P., *Concise Law Dictionary*, LexisNexis Buttersworth Wadhwa Nagpur, 2009

¹⁶ *Fertilizer Corporation Kamgar Union v UOI* 1981 AIR 344

¹⁷ *Chairman, Railway board v. Chandima Das* AIR 2000 SC 988,

2.1.1 The magnitude of public interest is the matter is large

13. Cricket is by far the most popular sport in Indigo and the people of Indigo have strong emotional connect to the game and to the players and some of the players are also given Demigod status so the sport of cricket is considered to be of great importance to the public.¹⁸

2.1.2 There is Public Interest as public money is involved

14. The SCCI has also started Indigo Premier League (IPL) a domestic cricket tournament. It has made cricket more famous among the fans and more lucrative investment for many industrialists, politicians and film stars. IPL gained huge popularity in 2009 and brought a lot of revenue to SCCI and owners of different teams earned huge income from advertisements and sale of tickets.¹⁹

15. It is evident from the mention of “sale of tickets” that there has been the involvement of public money, further the advertisements that generate income are also only focused on the public as such and wouldn’t generate any income without the public interest existing in the sport here in particular the IPL, the primary factor that the public money is involved in the IPL and with the SCCI, any such corruption that arises involves such public money and thus there would be a genuine large public interest at hand.

16. All of the corruption is based only within the IPL as it is clearly stated “Corruption made inroads into the great entertaining sport in the form of Match Fixing. It turned out to be the biggest scam of the millennium with the involvement of team owners, players and middlemen”.²⁰ The mention of ‘team owners’ make it clear that the corruption is tied to the IPL only, as since it was introduced by the SCCI and it falls under their control, and public money is directly in the form of “ticket sales” there is a clear large public interest.

¹⁸ Factsheet para 1

¹⁹ Factsheet para 4

²⁰ Factsheet para 5

17. Therefore Mr. Dev has locus standi to file the PIL in the HC, keeping in mind the public interest at hand, the SCCI is amenable to the writ jurisdiction of the HC.

2.2 Writ jurisdiction can be invoked against non-state or private entities as well

18. Hon'ble Supreme Court in *UP State Co-Op. Land Development Bank v. Chandra Bhan Bubey and Ors.*²¹, held that Article 226 while empowering the High Court for the issue of orders or directions to any authority or person, does not make any such difference between public functions and private functions. Article 226 of the Constitution also speaks of directions and orders which can be issued to any person or authority.

19. In *Andi Mukta Sadguru Shree Muktajee Vandas Swami Suvarna Jayanti Mahotsav Smarak Trust v. V.R. Rudani*,²² the Supreme Court succinctly put this issue beyond the pale of controversy in the following words, "The term "authority" used in Article 226, in the context, must receive a liberal meaning unlike the term in Article 12. Article 12 is relevant only for the purpose of enforcement of fundamental rights under Article 32. Article 226 confers power on the High Courts to issue writs for enforcement of the fundamental rights as well as non-fundamental rights. The words "any person or authority" used in Article 226 are, therefore, not to be confined only to statutory authorities and instrumentalities of the State. Further "Person" under Section 2(42) of the General Clauses Act shall include any company or association or body of individuals, whether incorporated or not.

20. Therefore, as the SCCI, *in arguendo* not a state under Article 12, would still fall within the wider liberal meaning of authority under Article 226, if not will certainly fall within the scope of "any person" and thus be amenable to the writ jurisdiction under Article 226.

²¹ *UP State Co-Op. Land Development Bank v. Chandra Bhan Bubey and Ors.* AIR 1999 SC 753

²² *Andi Mukta Sadguru Shree Muktajee Vandas Swami Suvarna Jayanti Mahotsav Smarak Trust v. V.R. Rudani* 1989 (2) SCC 691

21. In *Rahul Mehra v. Union of India and Ors.*²³, It was held that the “function” test is the correct one to test maintainability. If a public duty or public function is involved, anybody, public or private would be subject to the judicial scrutiny under the extraordinary writ jurisdiction of Article 226.

22. In the case of *Marsh v. Alabama*²⁴ to hold that even where a corporation is privately performing a public function it is bound by the constitutional standard applicable to all State actions.

23. Additionally in *Federal Bank Ltd v. Sagar Thomas*²⁵, “it was clearly laid down that a writ petition under Article 226 of the Constitution of India may be maintainable against (i) the State (Government); (ii) an authority; (iii) a statutory body; (iv) an instrumentality or agency of the State; (v) a company which is financed and owned by the State; (vi) a private body run substantially on State funding; (vii) a private body discharging public duty or positive obligation of public nature; and (viii) a person or a body under liability to discharge any function under any statute, to compel it to perform such a statutory function.

24. In *Board of Control for cricket in India v. Cricket Association of Bihar*²⁶, it was held “Be that as it may, it cannot be denied that the Board does discharge some duties like the selection of an Indian cricket team, controlling the activities of the players and others involved in the game of cricket. These activities can be said to be akin to public duties or State functions and if there is any violation of any constitutional or statutory obligation or rights of other citizens, the aggrieved party may not have a relief by way of a petition under Article 32. But that does not mean that the violator of such right would go scot-free merely because it or he is not a State. Under the Indian jurisprudence, there is always a just remedy for the violation of a right of a citizen. Though the remedy under Article 32 is not available, an aggrieved party can always seek a remedy under the

²³ *Rahul Mehra v. Union of India and Ors* 114(2004) DLT 323

²⁴ *Marsh v. Alabama* (3) 326 U.S. 501: 19 L.ed. 265

²⁵ *Federal Bank Ltd v. Sagar Thomas* AIR 2003 SC 4325

²⁶ *Board of Control for cricket in India v. Cricket Association of Bihar* (2015) 3 SCC 251

ordinary course of law or by way of a writ petition under Article 226 of the Constitution, which is much wider than Article 32.”

25. Here since the SCCI (i) Is the sole repository of the cricket organization in India. (ii) Hosts even international cricket matches involving the “Indigo National Cricket Team”. (iii) Selects the Indigo cricket team that represents Indigo. (iv) Has a dominant position and control almost all the State Level Cricket Associations. (v) Functions like a Cricket Federation. (vi) It has absolute power to select the players for the Indigo Cricket team. (vii) It fixes the remuneration of the players as well.

26. Thus, the SCCI bearing in mind the above-mentioned functions clearly perform public functions, it regulates the game of Cricket in Indigo which is tantamount to a public function. A body which carries on the monopolistic function of selecting team²⁷ to represent the nation and whose core function is to promote a sport that has become a symbol of national identity and a medium of expression of national pride, must be held to be carrying out public(governmental) functions.

27. Further as stated public money is involved and thus there is a clear public duty on the part of the SCCI. For all of the above functions and reasons, it can be said that the SCCI is discharging public duty.

28. Therefore, it is humbly submitted that the SCCI is amenable to the writ jurisdiction of the High Court under Article 226 even when it is not ‘State’ within the meaning of Article 12 by virtue of the public duty owed and public function it performs.

2.3 Alternative remedy is no bar to the maintainability of writ petition

29. PIL by public spirited persons against abuse, mismanagement, misadministration of religious/charitable trust entertained and directions given based on a report of Commission appointed by the High Court. Compliance of directions was also monitored by the High Court.

²⁷ Factsheet para 4

Availability of alternative remedy was held to be no bar to the maintainability of the writ petition²⁸. Constitution benches of the Supreme Court in *K.S. Rashid and sons v. Income tax Commission and Ors.*²⁹ Held that Article 226 of the constitution confers on all the high courts a very wide power in the matters of issuing writs. The court in extraordinary circumstances may exercise the power if it comes to the conclusion that there has been a breach of principles of natural justice or procedure required for the decision has not been adopted.

30. Therefore, it is humbly submitted that the contention of SCCI that the writ petition not being maintainable due to an alternative remedy under the criminal law of the land shall not be taken into account.

III. ORDERS OF THE HIGH COURT ARE JUSTIFIED

31. It is humbly submitted that the orders of the High Court though amounting to judicial legislation is not contrary to the Constitution of Indigo.

32. In Indigo, the doctrine of separation of powers has not been accorded a constitutional status. Apart from the directive principle laid down in Article 50 which enjoins separation of judiciary from the executive, the constitutional scheme does not embody any formalistic and dogmatic division of powers.³⁰ But, since it is a Directive Principle of State Policy, it is unenforceable.

33. Also, we follow a separation of functions and not of powers. And hence, we don't abide by the principle in its rigidity. This was the observation made by the Hon'ble SC in *Ram Jawaya v. State of Punjab.*³¹ The court in the said case was of the opinion that the Doctrine of

²⁸ *C.K.Rajan v. State* AIR 1994 Ker 179

²⁹ *K.S.Rashid and sons v. Income tax Commission and Ors.* AIR (1954) SC 207

³⁰ Upendra Baxi, *Developments in Indian Administrative Law*, in PUBLIC LAW INDIA

³¹ *Ram Jawaya v. State of Punjab* AIR 1955 SC 549

Separation of Powers was not fully accepted in Indigo. Further, the view of Mukherjea J adds weight to the argument that the above-said doctrine is not fully accepted in Indigo. He states that:

“The Indian constitution has not indeed recognized the doctrine of separation of powering its absolute rigidity but the functions of the different parts or branches of the government have been sufficiently differentiated and consequently it can very well be said that our constitution does not contemplate assumption, by one organ or part of the state, of functions that essentially belong to another”.

34. Judges make laws, they have been making it & shall always be making it for the good of the society and to keep the constitutional balance. Just before entering the office, the Judges of the Supreme Court take oath which says,

I, ..., having been appointed Chief Justice (or a Judge) of the Supreme Court of India do swear in the name of God/solemnly affirm that I will bear true faith & allegiance to the Constitution of India as by law established, [that I will uphold the sovereignty and integrity of India,] that I will duly and faithfully and to the best of my ability, knowledge and judgement perform the duties of my office without fear or favour, affection or ill-will and that I will uphold the Constitution and the laws.³²

The judges of the High court also take a similar oath under Schedule III, Part VIII of the Constitution. Judges are called as the “watch-dogs of the Constitution.” The Constitution places implicit faith & trust in judicial law-making. Judicial law-making is concerned with &

³² Constitution of Indigo, Schedule III, Part IV

essentially restricted to interpretation of the Constitution though & the laws & conflict with the Legislature becomes inevitable when judicial law making transgress such limits.

35. Nevertheless, we must not forget that the Constitution itself gives the powers to the Courts to make laws. The Supreme Court is empowered to make laws under Articles 32, 136, 141, 142, 144 while the High Court is empowered to make laws under Articles 226 & 227. Law pronounced, proclaimed and declared by the Judiciary in Indigo & the Supreme Court in particular, namely “judicial law”-is as much a part of the law of the land, as legislation is & therefore the Legislation is not the only source of law in Indigo.

36. The orders issued by the High court are justified under the light of the fact that even after interim directions were issued to SCCI to conduct elections, they did not comply with the directions of the court. Hence, the court was forced to freeze the accounts of SCCI and also appointed an administrator to implement the recommendations of Yodha committee.

37. In *Vishaka v. State of Rajasthan*³³, the hon’ble Supreme Court framed guidelines for redressal mechanisms to tackle sexual harassment at workplace. Though the decision has come under considerable criticism for encroaching into the domain of the legislature, the fact remains that till date the legislature has not enacted any law on the point. Similarly, in *Abhay Singh v. State of U.P & Ors.*,³⁴ Supreme Court gave directions on the misuse of red beacons. The court ordered to restrict the use of beacons on the official cars in their effort to make the roads safer for the public.

38. The courts have not done anything wrong by legislating for the welfare of the society keeping in mind the ethos of the constitution. As stated above, the judges ultimately are bound to uphold their oath. The general impression that the business of the governance of the State is cast upon one particular organ or agency of the State under the Constitution is erroneous. The general

³³ *Vishaka v. State of Rajasthan* (2007) 1 SCC 728

³⁴ *Abhay Singh v. Union of India*

impression that the business of the governance of the State is cast upon one particular organ or agency of the State under the Constitution is erroneous.³⁵

39. Therefore, the Orders of the High Court are not contrary to the Constitution of Indigo because the expression 'Court of Law' can never be construed in a literal manner, 'Law' also includes 'Justice', which founding fathers were also aware of and that is the reason the courts are given the power to make laws.

³⁵ Halsbury Laws-Vol. 7, Art. 409.

PRAYER

Wherefore, in the light of the facts of the case, arguments advanced and authorities cited, it is submitted that the Hon'ble Supreme Court of Indigo may be pleased to uphold the orders of the High Court of Maha Pradesh.

And/or pass any other writ, order or direction which the court may deem fit in the ends of equity, justice, expediency and good conscience in favour of the Respondent. All of which is respectfully submitted.

Place:

S/d _____

Date:

(Counsel for Respondent)