JUDICIAL ACTIVISM IN INDIA: A CATALYST FOR SOCIAL CHANGE

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The Supreme Court of India is entrusted to be the Custodian of the Constitution of India. It is the judicial obligation of the Court to safeguard the rights of individuals guaranteed by the Constitution. This paper puts forth the changing role of Judiciary and the journey it embarked from mere interpreter of law and established system to a catalyst of social change. Judicial Activism can be seen as the active role that Judiciary plays to promote justice. Deliverance of justice is the basic function of the Judiciary and must be achieved. Martin Luther King Jr.[1] rightly said, "Injustice anywhere is a threat to justice everywhere." It highlights the expending role of judiciary in fulfilling the vacuum created by passive performance of other agencies and organs. Black's Law Dictionary defines 'Judicial Activism' as a "philosophy of judicial decision-making whereby judges allow their personal views about public policy, among other factors, to guide their decisions."[2] This paper examines the evolution of judicial activism in India, its multiple reasons, dimensions and tendencies in Indian perspective. It gives a brief account of International perspective on Judicial Activism. Lastly, it diverts the reader to the merits and criticism keeping the above context in mind.

Keywords: *Constitution, Judicial Activism, Judiciary, Power, Society, Supreme Court*

INTRODUCTION

According to a renowned Indian Jurist, Upendra Baxi 'Judicial Activism' is "The way of exercising power vested by judiciary, which seeks fundamental recodification of power relations among the dominant institutions of State, manned by the members of ruling class."[3] Supreme Court notwithstanding its constitutional impediment has concocted flying hues as a champion of equity in the true feeling of the word. 'Equity', this six letter word, is a standout amongst the most discussed ones in the whole English lexicon. With the

[1]Letter from a Birmingham Jail [King, Jr.]

[2] "Takings Clause Jurisprudence: Muddled, Perhaps; Judicial Activism, No" DF O'Scannlain, Geo. JL & Pub. Pol'y, 2002

[3] Hayden, Robert M., et al. "The Role of the Judiciary in Plural Societies." *The Journal of Asian Studies*, vol. 47, no. 3, 1988, p. 579.

whole populace being connected to it, with changing scenario, the definition also changes. The concept of judicial activism in India has touched the roots of nation with a positive approach. The only precaution that Judiciary needs to take is that while going over the edge to do justice to regular man, it must not cross the line of restraints drawn by The Constitution. Judicial activism portrays judicial decisions founded upon welfare of individual or society as opposed to on existing law. The concept of judicial activism is firmly identified with constitutional interpretation, statutory development, and detachment of forces. Activism in judicial arrangement makes advances for social change or explains ideas, for example, freedom, balance or justice. A politically motivated justice is not a justice in true sense and these kinds of vested interest moves initiate this newly conferred responsibility upon the Judiciary and make it assume an essential part of the financial process. Judicial Activism can be interpreted as the scrutinizing power of the court to keep a check on the functioning of the other organs and striking a balance between the actions performed by them, it is an arm of the social upheaval.

SOURCE AND ORIGIN OF JUDICIAL ACTIVISM

Our Judiciary enjoys various Constitutional provisions that enable it to freely assert itself and judicially review the matters that it deems fit. There are two primary sources of law namely legislative enactments and precedents. The Apex Court enjoys certain special provisions as the custodian of Indian Constitution. It has special power of appeals[4] and also enjoys advisory jurisdiction to the President of India[5]. The decision of the Apex Court is also binding on all the other courts[6]. Article 12[7] bestows Judiciary with the power to strike down any law or call it unconstitutional if it violates the fundamental rights. Article 226[8] and 32[9] allows the aggrieved common public to approach the High Court and Supreme Court respectively in case their fundamental rights are violated. The origin of Judicial Activism in India can be traced back to 1893, where a dissenting judgment[10] was given by Justice Mahmood of Allahabad High Court. In the case of the under trial, the major issue to deal with was whether the court is capable of passing judgment on the case for someone who cannot afford a lawyer, merely by glancing through his paperwork. Justice Mahmood held that unless someone speaks, the very necessity of "heard" cannot be fulfilled. Justice

[4] Article 136, Constitution of India, 1950
[5] Article 143, Constitution of India, 1950
[6] Article 141, Constitution of India, 1950
[7] Constitution of India, 1950
[8] Ibid
[9] Ibid
[10] Balkrishna, Ref. to the Article, When seed for Judicial Activism was sowed, —*The Hindustan Times*‖(New Delhi) dated 01-04-96, p.9.

Krishna Iyer once observed, "Every judge is an activist either on the forward gear or on the reverse"[11].

NEED FOR JUDICIAL ACTIVISM

The intention of the founding fathers of the Constitution was to create strong pillars namely Parliament, Executive and Judiciary that together can shield and defend the ideals of our nation as envisioned and enshrined in the Constitution. In the primary decade of Independent India, activism on part of the judiciary was practically nil with political stalwarts taking control. In the 1950s up till a portion of the 1970s, the Apex Court entirely held a judicial and auxiliary perspective of the Constitution.

However, with time, people started losing faith in the functioning of the Parliament and it turned out to be less explanatory of the will of the population. There has been a developing feeling of open dissatisfaction with the majority rule. The Executive slowly started renouncing its active duties and the entire burden of sustaining democracy in its spirit had fallen on the shoulders of Judiciary. Gradually a feeling of dismay and dissatisfaction started engulfing the common people. There was a fear of losing faith in the judicial system and a state of helplessness was felt by the most of population. The major reasons that prompted judicial activism are- failure of governing bodies to release their duties; when the people in power abuse the official courtrooms for ulterior thought processes; and finally, the court may attempt to grow its ambit and delegate on themselves more functions and forces.

There cannot be a restricted view or scope of judicial interpretation and power to review. Our country is developing and with the developments come new challenges, scenarios and the need to develop new ways to tackle those problems. Justice Krishna Iyer once said: "Every new decision, on every new situation, is a development of the law. Law does not stand still. It moves continually. Once this is recognised, then the task of the judge is put on a higher plane."[12]

DIMENSIONS OF JUDICIAL ACTIVISM

Judicial Activism can be practiced in primarily four ways- firstly by the literal interpretation of the Constitution, secondly by striking down any law as unconstitutional, thirdly by overruling any judicial precedents and lastly by providing guidelines in certain cases. No universal strait-jacket formula can be applied to the practicality and applicability of Judicial Activism. However, efforts have been made in the domain to interpret the

[11]Shukla, Sharad Kumar. "Judicial Activism *"Indian Journal of Applied Research*, vol. 4, no. 5, 2011, pp. 370–373.

[12] Rajendra Prasad v State of Uttar Pradesh 1979 AIR 916

multidimensional facet of this concept. Professor Bradley C. Canon[13], a political science genius came up with six important dimensions of this concept by observing judicial behaviour in leading democracies namely Majoritarianism, Interpretive Fidelity, Interpretive Stability, Specificity of Policy, Substance Democratic- Process Distinction, and Availability of Alternative Possible Maker. One can try to comprehend their applicability in Indian context by evaluating various case laws and role of judiciary.

1. **Majoritarianism:** When the court puts its own interpretation on an upper pedestal than the legislative policy in case of a conflict and strikes down the law as unconstitutional, this dimension comes into force.
2. **Interpretive Fidelity:** When the courts give more preference to the intention of the law makers and with the changing socio-economics conditions tries to give a broader postulation to the law, this dimension is utilized. The spirit of the law is preferred over the literal meaning and in case of any conflict, the doctrine of harmonious construction is applied. Basic Structure Doctrine[14] is one important illustration of this dimension that was brought to keep a check on the amending powers of the parliament.[15]
3. **Interpretive Stability:** The extent to which Apex Court overrules any precedents is a measure of this dimension. The fluid interpretation of 'personal liberty' under 21[16], evolving from A. K. Gopalan v State of Madras[17] to Maneka Gandhi v Union of India[18] is a great example of this dimension.
4. **Specificity of Policy:** This category includes specific guidelines and policy changes in governmental, educational, environment, and other similar institutions.
5. **Substance Democratic- Process Distinction:** This dimension covers the scene when the court steps in to fill gap in legislative work and in non-political matters the court

[13]Cooper, Bradley C. "A Framework for the Analysis of Judicial Activism." Edited by Stephen Halpern and Charles Lamb, *Supreme Court Activism and Restraint*, Lexington Books, 1982
[14] Basic Structure Doctrine was given in case of Keshavananda Bharti v. State of Kerala, AIR 1973 SC 1461
[15] The 24th Constitutional Amendment Act was intended to affect the meaning of 'Law' under Article 13 and Article 368.
[16] Article 21, Constitution of India, 1950
[17]AIR 1950 SC 27
[18] AIR 1978 SC 597

makes policies like reservation etc. within its ambit.

6. Availability of Alternative Possible Maker: This measure is taken when some other agency has failed to frame policies and the court has stepped into framing requisite work. For example, the Apex Court has framed policies for prevention of sexual harassment of women at workplace[19].

EVOLUTION OF JUDICIAL ACTIVISM

Amid the previous decade, numerous occurrences of judicial activism have picked up noticeable quantum and quality. The various sectors where the judiciary has managed to mark its presence are health, child protection, political debasement, environment, and so on. Activism in judicial approach facilitates the reason for social change or expresses ideas, for example, freedom, fairness or equity. In the well- known Keshavananda Bharati[20] case, two years before the revelation of crisis, the Supreme Court pronounced that the Executive had no privilege to disarray with the Constitution and modify its basic components. In any case, it couldn't turn away the crisis pronounced by Mrs. Gandhi[21] and it was just toward the end of it that the Apex court and the lower courts started to constantly intercede in official and in addition authoritative ranges. In 1979, Supreme Court advocate Kapila Hingorani[22] attracted the Court's consideration regarding a progression of articles in a daily paper uncovering the predicament of Bihar under-trial detainees, the majority of whom had served pre-trial confinement more than the period they could have been detained if indicted. Sunil Batra[23], a detainee, composed a letter to Justice Krishna Iyer of the Supreme Court attracting his thoughtfulness regarding torment by jail authorities and the hopeless states of detainees in prisons. This was taken up as an appeal to Court and the Court passed orders for conscious conditions in prisons.

In India, the opening up of access to courts to poor people, impoverished and burdened segments of the country through Public Interest Litigation, prevalently known by its acronym PIL, is unexceptionable judicial activism. From 1979, the judiciary drove by the Supreme Court in India became distinctly important to the country in a way that it was not mulled over by the makers of the Constitution and was turned into a dynamic member in the distributor of social equity.

[19] Vishaka and others v State of Rajasthan and others (1997) 6 SCC 241
[20]Keshavananda Bharti v. State of Kerala, AIR 1973 SC 1461
[21] ADM Jabalpur v S.S. Shukla 1976 AIR 1207
[22]1979 AIR 1369
[23]Sunil Batra v Delhi Administration 1980 SCR (2) 557

It is worrisome that throughout the years this unique, advantageous and unexceptionable character of the Court's activism in PIL has been to a great extent changed into a general supervisory purview to right activities and strategies of government, open bodies and powers. This is a kind of judicial activism unparalleled in whatever other judiciaries. PIL purview started haltingly with a little thought over its potential when the Supreme Court, in 1979, engaged grumblings by social activists drawing the consideration of the Court to the states of specific areas of society or organizations which were denied of their fundamental rights. In 1982, emphasizing on the purpose of PIL, Justice P.N Bhagwati[24] said, "A strategic arm of the legal aid movement which is intended to bring justice within the reach of poor masses, who constitute the low visibility area of humanity, is a totally different kind of litigation from the ordinary traditional litigation." In 1980s, two teachers of law composed a letter to the editorial manager of a daily paper portraying the brutal states of detainment in the Agra Protective Home for Women which came as a writ appeal[25] under article 21 by a few teachers of law uncovering the uncouth states of confinement in the Home, trailed by an argument against Delhi Women's Home recorded by a Delhi law staff understudy and a social labourer. The abuse of workers at development destinations infringing upon work laws was conveyed to the consideration of the Supreme Court by a letter. The slave-like state of fortified workers in quarries was conveyed to the consideration of the Court by a social extremist association. A writer moved the court against the removals of asphalt occupants of Bombay. A few instances of this sort took after. Taking cognizance of authority passing Supreme Court requested the police not to cuff a man captured simply on doubt and not to take a lady to the police headquarters after sunset. In the year 1993, the Apex Court declared judgement securing the privileges of the innocents held in Hazaratbal[26] mosque in Srinagar. In a 1994[27] judgment, it solicited the Chief from Army Staff to pay Rs. 6, 00,000 to the widow and two minor children of an armed force officer who died because of gross negligence and stringent powers concerned somewhere 16 years prior. The disputable 27% reservation[28] of occupations in Central Government and open division endeavours was alluded to the Supreme Court by the Rao Government. The court choice favoured 49% of employment for in backward positions and class, yet the creamy layer was exempted from this reservation. Similarly, the court put a check on the operation of capitation charge in universities of Karnataka.

In light of a legitimate concern for avoiding contamination, the Supreme Court requested control over car outflows, air contamination, gave orders for stopping charges, wearing of

[24]S.P. Gupta vs President of India and Ors. AIR 1982 SC 149
[25] Dr. Upendra Baxi (I) v State of Uttar Pradesh (1983) 2 SCC 308
[26] Sonaullah Dar & Ors v Union of India OWP No. 149 of 1996
[27] Charanjit Kaur v Union Of India 1994 AIR 1491
[28] "40 Landmark Judgments That Changed the Course of India." *DailyO - Opinion News & Analysis on Latest Breaking News India, Living Media India Limited*, 7 Dec. 2015.

caps in urban communities, cleanliness in lodging settlements, transfer of waste, control of movement in New Delhi, made necessary the wearing of safety belts, requested activity arrangements to control the monkey threat in urban areas and towns, requested measures to forestall mischance at unmanned railroad level intersections, anticipate ragging of school first year recruits, for accumulation and capacity in blood donation centres, and for control of amplifiers and banning of sparklers.

The Court is made the screen of the lead of exploring and arraignment organizations that are seen to have fizzled or fail to research and indict priests and authorities of government. Instances of this sort are the examination and indictment of clergymen and authorities accepted to be required in the Jain Hawala case[29], the feed trick including the previous Chief Minister of Bihar, Lalu Prasad Yadav[30], the Taj Corridor case[31] including the previous Chief Minister of Uttar Pradesh, Mayawati, and the late arraignment of the Telecom Minister and authorities in the 2G Telecom scam case[32] by the Supreme Court.

The Supreme Court offering headings to the CBI and summoning the leader of the CBI to provide details regarding the hawala[33] case uncovers the breakdown of different apparatuses of the administration. The court interference with the CBI working got to be distinctly unavoidable in the wake of the strategies of deferral and specialized avoidance that was embraced by the investigative offices.

Matters of the strategy of government are liable to the Court's investigation. Dissemination of sustenance grains to people beneath poverty line was observed, which even made the Prime Minister remind the Court that it was meddling with the unpredictable nourishment dispersion strategies of government. In the 2G Licenses case[34], the Court held that every single open asset and resources involve open trust and they must be discarded in a straightforward way by an open sale to the most astounding bidder. This has prompted to the President making a Reference to the Court for the Court's lawful exhortation under Article 143 of the Constitution. In a similar case, the Court put aside the master sentiment of the Telecom Regulatory Authority of India (TRAI) to offer 2G range without closeout to make a more noteworthy mark in India.

INTERNATIONAL SCENARIO

[29] "Court Discharges Four in 1991 Jain Hawala Diary Case." *The Economic Times*, 1 Sept. 2017.
[30] "Lalu Prasad Gets 3.5 Years in Jail, Fined Rs 10 Lakh in Fodder Scam Case." *The Economic Times,* 6 Jan. 2018.
[31] Mayawati v Union of India and Ors. 1 WRIT PETITION (CRIMINAL) NO. 135 OF 2008
[32] Venkatesan, J. "Supreme Court Scraps UPA's 'Illegal' 2G Sale." *The Hindu*, 2 Feb. 2012,
[33] Refer to footnote no. 25
[34] See footnote no. 28

Judicial activism in India has now gone up against an intriguing face. The courts in India seek a type of survey which can be depicted, best case scenario as "dialogic" — a term utilized broadly by Peter Hogg and Allison Bushell with regards to the Canadian Supreme Court's choices. The Indian Supreme Court's face has now gone past the assurance of the socially and financially discouraged, and into the domain of open administration.

1. The United Kingdom

The early 1960s of United Kingdom witnessed the rise of a new generation of English Judges, like Lord Denning, Lord Reid, and Lord Wiberforce with their new thoughts and doctrine of 'Purposive Interpretation'[35]. This doctrine introduced a new concept to the English Administrative Law and also helped in reviving the lost primordial principles of natural justice and equity. The doctrine was applicable to the public and private authorities that exercised unfettered discretion and provided a mechanism of checks and deliverance of justice.

Lord Reid[36], in 1972 in one of his famous lectures pointed out, "There was a time when it was thought almost indecent to suggest that judges make law - they only declare it. Those with a taste for fairy tales seem to have thought that in some Aladdin's cave there is hidden the Common Law in all its splendour and that on a judge's appointment there descends on him knowledge of the magic words Open Sesame. Bad decisions are given when the judge muddles the password and the wrong door opens. But we do not believe in fairy tales anymore."

2. The United States

In the year 1803, a special power of judicial review was accorded to the Supreme Court of the United States through the landmark judgment of Malbury v Madison.[37]

Chief Justice Marshall made an observation in the case that is now considered a classic exposition of law. He held that it is the primary duty of judicial department to determine what law is. Judiciary on the facts and circumstances of each case must expound and interpret law and where it feels that the law is contrary to the Constitution, it must declare it void and this practice should be religiously followed.

Justice Warren Burger[38] of the US also shares the belief that the power of judicial review is essential and without this power and a Bill of Rights, The U.S. Constitution would have

[35]Jones v DPP [1962] AC 635
[36]Mason, Anthony. "The Judge as a Law Maker. "Mayo Lecture.1996, James Cook University, James Cook University.
[37] 5 U.S. (1 Cranch) 137(1803)
[38] Hall, Kermit L. "Yesterday, Today and Tomorrow." 2007

not sustained. In January 1947, Arthut Schlesinger Jr. introduced the phrase 'Judicial Activism' in an article titled "The Supreme Court: 1947" in Fortune Magazine.

MERITS

Judicial activism must be invited and its suggestions acclimatized in letter and soul. A dissident Court is clearly significantly more successful than a lawful positivist moderate Court to ensure the general public against authoritative adventurism and executive oppression. At the point when our chosen representatives have neglected to give us a welfare state, we let it spring from the Judiciary. The force of judicial survey is perceived as a component of the essential structure of the Indian Constitution. In India, the doctrine of separation of powers has not been agreed on a Constitutional status in its entirety. Apart from the standard set down in Article which orders detachment of judiciary from the executive, the sacred plan does not encapsulate any formalist or narrow-minded division of powers. The Supreme Court in Ram Jawaya Kapur v the State of Punjab[39] held:

"Indian Constitution has not indeed recognised the doctrine of separation of powers in 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."

The dissident part of the Judiciary is certain in the said control. Judicial activism is a sine qua non of vote based system on the grounds that without a ready and illuminated judiciary, the majority rules system will be lessened to a vacant shell. Judicial activism in its totality cannot be banned. Clearly under a constitution, a principal highlight of which is administered by law, there cannot be any restriction upon judicial activism in matters which legitimises executive requests and regulatory activities. The courts are the primary forum for those wronged by managerial overabundances and executive discretion. Judicial activism is not a variation. It is a basic part of the elements of an established court.

Lawyer activist, Prashant Bhushan[40] feels:

"Judiciary is an important institution... but the judicial system has collapsed. A big movement is needed to improve it. There is no institution free of government and judiciary (control) where a complaint against the judiciary can be lodged. Due to this, corruption is thriving. You can take the government to court but the system there has collapsed. You are

[39]AIR 1955 SC 549

[40]India, Press Trust of. "Judicial System Has Collapsed, Alleges Prashant Bhushan." *NDTV.com*, 10 Apr. 2016,

not heard and cases drag. So, along with legal awareness, social awareness is also needed to improve the system,"

CRITICISM OF JUDICIAL ACTIVISM AND SEPARATION OF POWERS

The two major jurisprudence schools share different views regarding Judicial Activism. The Realist School of jurisprudence believes that judges make laws while The Analytical School of jurisprudence finds the role of judiciary limited to interpretation of law. Some critics believe that Judicial Activism is an unnecessary encroachment of other tiers of democracy, namely legislative and executive. The doctrine of separation of powers is supreme for them. The early theorist on the doctrine of separation of powers, Montesquieu said:

"When the legislative and executive powers are united in the same person, or in the same body of Magistrates, there can be no liberty; because apprehensions may arise, lest the same monarch or senate should enact tyrannical laws, and executed them in a tyrannical manner."

Brandeis J.[41] while laying emphasis on the doctrine of separation of powers said that the motivation behind the separation of powers doctrine is not to advance effectiveness in the organization but rather to block the practice of discretionary power. He additionally accentuates that it is not to maintain a strategic distance from grating among different organs of the state but keeping them isolated yet to shield individuals from dictatorship by a method for inescapable contact because of aggravation of forces. It is to gap administration against itself by making unmistakable focus of force so they could keep each-other from undermining oppression. Justice Jackson of the U.S said: "The doctrine of judicial activism which justifies easy and constant readiness to set aside decisions of other branches of Government is wholly incompatible with a faith in democracy and in so far it encourages a belief that judges should be left to correct the result of public indifference it is a vicious teaching."[42] In its most extremist and disputable translation of the Constitution, the Supreme Court took away the intrinsically presented force of the President of India to delegate judges after meeting with the Chief Justice and appropriated this power in the Chief Justice of India and a collegium of four judges. No Constitution in the world has the ability to choose and delegate judges given to the judges themselves. Former President Pranab Mukherjee[43] addressing Judicial Activism advised judges against the risks of 'Judicial Activism', saying the harmony in the practice of power must be kept up at all times and poise ought to be utilized when stood up to with such a circumstance. Mukherjee said "Judicial activism should not lead to the dilution of separation of powers, which is a

[41]Myers v. United States, 272 U.S. 52 (1926)
[42]Andhyarujina, T. R. "Disturbing Trends in Judicial Activism." *The Hindu*, 5 Aug. 2012.
[43]PTI. "President Mukherjee Cautions Judges against Perils of 'Judicial Activism'." *The Indian Express*, 16 Apr. 2016.

constitutional scheme. The balance of power between the three organs of the state is enshrined in our Constitution, "he said, stressing that "the Constitution is supreme".

The Judiciary can't assume control over the elements of the Executive. The Courts themselves must show reasonability and balance and be aware of the requirement for comity of instrumentalities as fundamental to great administration.

CONCLUSION

Whoever is conferred with the power to exercise discretion must exercise it with precautions. There is a sense of apprehension among other organs that the Judiciary will soon overstep its boundaries and Judicial Activism will convert into Judicial Adventurism or Judicial Overreach. The Judges should be careful about not venturing into aspects they do not have expertise knowledge about. For instance, the court can issue guidelines regarding a certain matter in need but it cannot take the role of legislating laws for the same in its own hands. Justice Goel[44] while participating in the inaugural function of Cuttack chapter of IIPA at Ravenshaw University described judicial activism as a part of the judicial review process and called it the 'need of the hour'. He opined that the other organs of the state seem to be falling apart and democracy is in danger, we need judicial activism to protect the democracy. At the same time, he expressed that the concept of judicial activism is no magic wand that will automatically cure all the problems afflicting the country at an instant. A more conscious crowd will help in an effective process of judicial activism. To conclude Judicial Activism in India, the words of Dr. A.S Anand[45], former CJI stands true, "…the Supreme Court is the custodian of the Indian Constitution and exercises judicial control over the acts of both legislature and the executive." The presence and rise of Judicial Activism in India has enhanced the hope of fair trial and justice deliverance for people. In the current socio-economic scenario where people are on the verge of losing faith in the system, Judiciary has opened gates for a mechanism where people can seek relief. In a democratic setup, justice deliverance finds an indispensable spot and cannot be ignored. This concept inspires faith in the judiciary. The legitimacy of the notion is based on the concept of vacuum filling. When the legislature fails to fulfil its responsibility, the Judiciary has to step in to cater the needs of the society. As an essential aspect in the dynamics of Indian Constitutionalism, Judicial Activism lies at the heart of justice. The court has to maintain a balance between its judicial reviews and see that it does not turn into judicial overreach, surpassing and breaking all boundaries. With time the court has learnt to expand its interpretation and adapt to the evolving social, cultural and economic changes.

[44] Correspondent. "'Judicial Activism Need of the Hour'." *The Hindu*, 10 Mar. 2014.
[45]Deep, Prerna. "Intersection of NJAC and Separation of Power." *The Law Blog*, 10 Jan. 2017.