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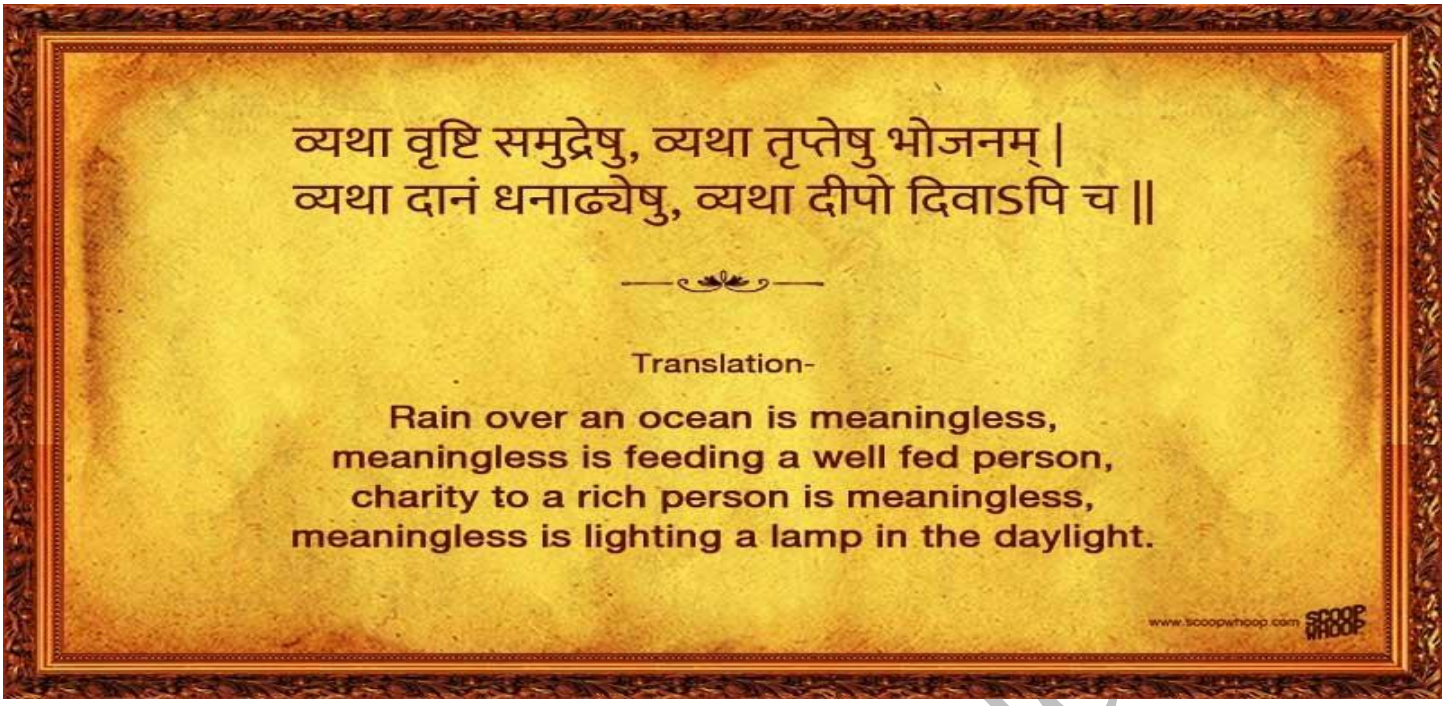
"Let Noble Thoughts Come To Me From All Directions"



EVALUATION OF EVIDENCE OF SOLITARY EYEWITNESS IN CRIMINAL CASES

➢ *INTRODUCTION*

It is a cardinal principle of criminal jurisprudence that prosecution has to prove its case by establishing the guilt of the accused. In criminal cases the standard of proof for establishing the guilt of the accused is proof beyond reasonable doubt. The Evidence Act envisages that a fact is to be proved and a fact can be proved either by oral evidence *i.e.*, statements made by the witnesses in the court or by documentary evidence. Section 59 of Evidence Act states that all facts, except the contents of documents or electronic records, may be proved by oral evidence. Chapter IX of Evidence Act deals with *"Of Witnesses".* Section 118 of the Evidence Act deals with Who may testify. Every person is competent to testify unless the court considers that they are prevented from understanding the questions put to them or from giving rational answers to those questions due to tender years, extreme old age, disease whether of body or mind or any other cause of same kind. However, as per the explanation to the section a lunatic is competent to testify unless he is prevented by his lunacy from understanding the questions put to him and giving rational answers to them. Section 134 of Evidence Act deals with the number of witnesses required to prove a fact or facts. The Section says that no particular number of witnesses shall in any case be required for proof of any fact. This section emphasizes the importance of quality rather than quantity. Section 134 acknowledges the well recognized maxim that evidence has to be weighed and not counted. It is a daunting task to judge whether a witness is speaking truth or not. The evidence or testimony of a witness depends upon several factors. The reliability of the evidence of the eye-witness generally depends upon the accuracy of the observation of the events which the witness describes, the correctness and the extent of what the witness remembers and the veracity of the witness. Witnesses are the eyes and ears of justice. The evidence of eyewitness requires careful assessment and evaluation for its credibility. The credibility of a witness is tested by way of cross-examination. The correct method of evaluation and assessing evidence of a witness is by scrutinizing it on its merits. Minor contradictions and omissions cannot be the basis for rejecting the evidence of eye witness or witnesses.

The Hon'ble Supreme Court of India in ***Himanshu Singh Sabharwal V. State of Madhya Pradesh and Ors.,(2008) 4 SCR 783*** enunciated the importance of witness in criminal trial and held as follows:

"14. "Witnesses" as Benthem said are the eyes and ears of justice. Hence, the importance and primacy of the quality of trial process. If the witness himself is incapacitated from acting as eyes and ears of justice, the trial gets putrefied and paralyzed, and it no longer can constitute a fair trial. The incapacitation may be due to several factors like the witness being not in a position for reasons beyond control to speak the truth in the Court or due to negligence or ignorance or some corrupt collusion. Time has become ripe to act on account of numerous experiences faced by Courts on account of frequent turning of witnesses as hostile, either due to threats, coercion, lures and monetary considerations at the instance of those in power, their henchmen and hirelings, political clouts and patronage and innumerable other corrupt practices ingenuously adopted to smoother and stifle truth and realities coming out to surface rendering truth and justice, to become ultimate casualties. Broader public and societal interests require that the victims of the crime who are not ordinarily parties to prosecution and the interests

of State represented by their prosecuting agencies do not suffer even in slow process but irreversibly and irretrievably, which if allowed would undermine and destroy public confidence in the administration of justice, which may ultimately pave way for anarchy, oppression and injustice resulting in complete breakdown and collapse of the edifice of rule of law, enshrined and jealously guarded and protected by the Constitution. There comes the need for protecting the witness. Time has come when serious and undiluted thoughts are to be bestowed for protecting witnesses so that ultimate truth is presented before the Court and justice triumphs and the trial is not reduced to mockery. The State has a definite role to play in protecting the witnesses, to start with at least in sensitive cases involving those in power, who has political patronage and could wield muscle and money power, to avert trial getting tainted and derailed and truth becoming a casualty. As a protector of its citizens it has to ensure that during a trial in Court the witness could safely depose truth without any fear of being haunted by those against whom he has deposed. Some legislative enactments like the Terrorist and Disruptive Activities (Prevention) Act, 1987 (in short the 'TADA Act') have taken note of the reluctance shown by witnesses to depose against dangerous criminals-terrorists. In a milder form also the reluctance and the hesitation of witnesses to depose against people with muscle power, money power or political power has become the order of the day. If ultimately truth is to be arrived at, the eyes and ears of justice have to be protected so that the interests of justice do not get incapacitated in the sense of making the proceedings before Courts mere mock trials as are usually seen in movies.

15. Legislative measures to emphasize prohibition against tampering with witness, victim or informant have become the imminent and inevitable need of the day. Conducts which illegitimately affect the presentation of evidence in proceedings before the Courts have to be seriously and sternly dealt with. There should not be any undue anxiety to only protect the interest of the accused. That would be unfair as noted above to the needs of the society. On the contrary, the efforts should be to ensure fair trial where the accused and the prosecution both get a fair deal. Public interest in the proper administration of justice must be given as much importance if not more, as the interests of the individual accused. In this courts have a vital role to play."

- ***WHAT ARE THE GUIDING PRINCIPLES FOR THE COURTS IN APPRECIATING THE EVIDENCE OF SINGLE EYE-WITNESS. IS IT NECESSARY THAT THE TESTIMONY OF SINGLE EYEWITNESS REQUIRES CORROBORATION***

The Hon'ble Supreme Court of India in ***Vadivelu Thevar V. The State of Madras, AIR 1957 SC 614*** held that the following propositions are firmly established (1) As a general rule, a court can and may act on the testimony of a single witness though uncorroborated. One credible witness outweighs the testimony of a number of other witnesses of indifferent character. (2) Unless corroboration is insisted upon by statute, courts should not insist on corroboration except in cases where the nature of the testimony of the single witness itself requires as a rule of prudence, that corroboration should be insisted upon, for example in the case of a child witness, or of a witness whose evidence is that of an accomplice or of an analogous character. (3) Whether corroboration of the testimony of a single witness is or is not necessary, must depend upon facts and circumstances of each case and no general rule can be laid down in a matter like this and much depends upon the judicial discretion of the Judge before whom the case comes. Section 134 of the Indian Evidence Act has categorically laid it down that *"no particular number of witnesses shall in any case be required for the proof of any fact."* The legislature determined, as long ago as in 1872, presumably after due consideration of the pros and cons, that it shall not be necessary for proof or disproof of a fact, to call any particular number of witnesses. The section enshrines the well recognized maxim that *"Evidence has to be weighed and not counted".* Our Legislature has given statutory recognition to the fact that administration of justice may be hampered if a particular number of witnesses were to be insisted upon. If the Legislature were to insist upon plurality of witnesses, cases where the testimony of a single witness only could be available in proof of the crime, would go unpunished. It is here that the discretion of the presiding judge comes into play. The matter thus must depend upon the circumstances of each case and the quality of the evidence of the single witness whose testimony has to be either accepted or rejected. If such a testimony is found by the court to be entirely reliable, there is no legal impediment to the conviction of the accused person on such proof. Even as the guilt of an accused person may be proved by the testimony of a single witness, the innocence of an accused person may be established on the testimony of a single witness, even though a considerable number of witnesses may be forthcoming to testify to the truth of the case for the prosecution. It is a sound and well- established rule of law that the court is concerned with the quality and not with the quantity of the evidence necessary for, proving or disproving a fact. Generally speaking, oral testimony in this context may be classified into three categories, namely:

(1) Wholly reliable.

(2) Wholly unreliable.

(3) Neither wholly reliable nor wholly unreliable.

In the first category of proof, the court should have no difficulty in coming to its conclusion either way-it may convict or may acquit on the testimony of a single witness, if it is found to be above reproach or suspicion of interestedness, incompetence or subornation. In the second category, the court, equally has no difficulty in coming to its conclusion. It is in the third category of cases, that the court has to be circumspect and has to look for corroboration in material particulars by reliable testimony, direct or circumstantial. There is another danger in insisting on plurality of witnesses. Irrespective of the quality of the oral evidence of a single witness, if courts were to insist on plurality of witnesses in proof of any fact, they will be indirectly encouraging subornation of witnesses. Situations may arise and do arise where only a single person is available to give evidence in support of a disputed fact. The court naturally has to weigh carefully such a testimony and if it is satisfied that the evidence is reliable and free from all taints which tend to render oral testimony open to suspicion, it becomes its duty to act upon such testimony.

In ***Shivaji Sahebrao Bobade & Anr V. State of Maharashtra., (1973) 2 SCC 793,*** the Court held that even where a case hangs on the evidence of a single eye witness it may be enough to sustain the conviction given sterling testimony of a competent, honest man although as a rule of prudence courts call for corroboration. "It is a platitude to say that witnesses have to be weighed and not counted since quality matters more than quantity in human affairs".

In ***Anil Phukan V. State of Assam., (1993) 3 SCC 282 ,*** the Court observed; "Indeed, conviction can be based on the testimony of a single eye witness and there is no rule of law or evidence which says to the contrary provided the sole witness passes the test of reliability. So long as the single eye-witness is a wholly reliable witness the courts have no difficulty in basing conviction on his testimony alone. However, where the single eye witness is not found to be a wholly reliable witness, in the sense that there are some circumstances which may show that he could have an interest in the prosecution, then the courts generally insist upon some independent corroboration of his testimony, in material particulars, before recording conviction. It is only when the courts find that the single eye witness is a wholly unreliable witness that his testimony is discarded in toto and no amount of corroboration can cure that defect."

In ***Jagdish Prasad and Others V. State of Madhya Pradesh, AIR 1994 SC 1251,*** the Court held that as a general rule the court can and may act on the testimony of a single witness provided he is wholly reliable. There is no legal impediment in convicting a person on the sole testimony of a single witness. That is the logic of Section 134 of the Indian Evidence Act, 1872. But, if there are doubts about the testimony the courts will insist on corroboration. It is for the court to act upon the testimony of witnesses. It is not the number, the quantity, but the quality that is material. The time-honoured principle is that evidence has to be weighed and not counted. On this principle stands the edifice of Section 134 of the Evidence Act. The test is whether the evidence has a ring of truth, is cogent, credible and trustworthy, or otherwise.

In ***Kartik Malhar V. State of Bihar., (1996) 1 SCC 614,*** referring to several cases, the Court observed that "On a conspectus of these decisions, it clearly comes out that there has been no departure from the principles laid down in Vadivelu Thevar case and, therefore, conviction can be recorded on the basis of the statement of a single eye witness provided his credibility is not shaken by any adverse circumstance appearing on the record against him and the court, at the same time, is convinced that he is a truthful witness. The court will not then insist on corroboration by any other eye witness particularly as the incident might have occurred at a time or place when there was no possibility of any other eye witness being present. Indeed, the courts insist on the quality, and, not on the quantity of evidence."

In ***Chittar Lal V. State of Rajasthan.,(2003) 6 SCC 397*** the Court had an occasion to consider the sole testimony of a young boy of 15 years whose evidence was relied upon for recording an order of conviction. The court held that the legislative recognition of the fact that no particular number of witnesses can be insisted upon is amply reflected in Section 134 of the Indian Evidence Act, 1872. Administration of justice can be affected and hampered if number of witnesses were to be insisted upon. It is not seldom that a crime has been committed in the presence of one witness, leaving aside those cases which are not of unknown occurrence where determination of guilt depends entirely on circumstantial evidence. If plurality of witnesses would have been the legislative intent cases where the testimony of a single witness only could be available, in number of crimes offender would have gone unpunished. It is the quality of evidence of the single witness whose testimony has to be tested on the touchstone of credibility and reliability. If the testimony is found to be reliable, there is no legal impediment to convict the accused on such proof. It is the quality and not the quantity of evidence which is necessary for proving or disproving a fact.

In ***Bhimapa Chandappa Hosamani and Others V. State Of Karnataka.,(2006) 11 SCC 323,*** the Court held that testimony of a solitary witness can be made the basis of conviction. The credibility of the witness requires to be tested with reference to the quality of his evidence which must be free from blemish or suspicion

and must impress the Court as natural, wholly truthful and so convincing that the Court has no hesitation in recording a conviction solely on his uncorroborated testimony.

In ***Namdeo V. State of Maharashtra,(2007) 14 SCC 150.,*** the Court observed that Indian legal system does not insist on plurality of witnesses. Neither the Legislature (Section 134 of Evidence Act, 1872) nor the judiciary mandates that there must be particular number of witnesses to record an order of conviction against the accused. Our legal system has always laid emphasis on value, weight and quality of evidence rather than on quantity, multiplicity or plurality of witnesses. It is, therefore, open to a competent court to fully and completely rely on a solitary witness and record conviction. Conversely, it may acquit the accused in spite of testimony of several witnesses if it is not satisfied about the quality of evidence. The bald contention that no conviction can be recorded in case of a solitary eye witness, therefore, has no force and must be negatived.

In ***Vithal Pundalik Zendge V. State of Maharashtra, AIR 2009 SC 1110,*** the Hon'ble Supreme Court while dealing with the question whether in a murder case the court should insist upon plurality of witnesses. The Hon'ble Supreme Court observed that as a general rule, a court can and may act on the testimony of a single witness though uncorroborated. One credible witness outweighs the testimony of a number of other witnesses of indifferent character. Unless corroboration is insisted upon by statute, courts should not insist on corroboration except in cases where the nature of the testimony of the single witness itself requires as a rule of prudence, that corroboration should be insisted upon, for example in the case of a child witness, or of a witness whose evidence is that of an accomplice or of an analogous character. Whether corroboration of the testimony of a single witness is or is not necessary, must depend upon facts and circumstances of each case and no general rule can be laid down in a matter like this and much depends upon the judicial discretion of the Judge before whom the case comes. Therefore, there is no hesitation in holding that the contention that in a murder case the court should insist upon plurality of witnesses, is much too broadly stated.

In ***Rai Sandeep @ Deepu V. State of NCT of Delhi.,(2012) 8 SCC 21*** it was observed by the Supreme Court that 'sterling witness' should be of a very high quality and caliber whose version should, therefore, be unassailable. The Court considering the version of such witness should be in a position to accept it for its face value without any hesitation. To test the quality of such a witness, the status of the witness would be immaterial and what would be relevant is the truthfulness of the statement made by such a witness. What would be more relevant would be the consistency of the statement right from the starting point till the end, namely, at the time when the witness makes the initial statement and ultimately before the Court. It should be natural and consistent with the case of the prosecution qua the accused. There should not be any prevarication in the version of such a witness. The witness should be in a position to withstand the cross- examination of any length and howsoever strenuous it may be and under no circumstance should give room for any doubt as to the factum of the occurrence, the persons involved, as well as, the sequence of it. Such a version should have co-relation with each and everyone of other supporting material such as the recoveries made, the weapons used, the manner of offence committed, the scientific evidence and the expert opinion. The said version should consistently match with the version of every other witness. It can even be stated that it should be akin to the test applied in the case of circumstantial evidence where there should not be any missing link in the chain of circumstances to hold the accused guilty of the offence alleged against him. Only if the version of such a witness qualifies the above test as well as all other similar such tests to be applied, it can be held that such a witness can be called as a 'sterling witness' whose version can be accepted by the Court without any corroboration and based on which the guilty can be punished. To be more precise, the version of the said witness on the core spectrum of the crime should remain intact while all other attendant materials, namely, oral, documentary and material objects should match the said version in material particulars in order to enable the Court trying the offence to rely on the core version to sieve the other supporting materials for holding the offender guilty of the charge alleged.

- ***IN ORDER TO PROVE THE GUILT OF THE ACCUSED IS IT NECESSARY TO EXAMINE ALL THOSE PERSONS WHO WERE PRESENT AT THE SPOT AND WITNESSED THE INCIDENT OR EVIDENCE OF SINGLE WITNESS IS SUFFICIENT***

In ***S.P.S. Rathore V. C.B.I & Anr, AIR 2016 SC 4486*** it was held that no particular number of witnesses is required for proving a certain fact. It is the quality and not the quantity of the witnesses that matters. Evidence is weighed and not counted. Evidence of even a single eye witness, truthful, consistent and inspiring confidence is sufficient for maintaining conviction. It is not necessary that all those persons who were present at the spot must be examined by the prosecution in order to prove the guilt of the accused. Having examined all the witnesses, even if other persons present nearby are not examined, the evidence of eye-witnesses cannot be discarded.

➢ ***CAN THE EVIDENCE OF SOLITARY EYE- WITNESS WHO HAPPENED TO BE A CHANCE WITNESS AND WHO GAVE DIFFERENT VERSIONS ABOUT THE INCIDENT BE RELIED***

A 3 judge bench of the Hon'ble Supreme Court of India in ***Shankarlal V. State Of Rajasthan, AIR 2004 SC 3559*** held that where the solitary eye-witness was a chance witness whose presence at the spot was highly doubtful and he did not tell any one about the incident though several persons were available and gave conflicting versions about the incident, his evidence cannot be relied.

➢ ***ONLY EYE WITNESS IS THE RELATIVE OF THE DECEASED/VICTIM. WHETHER SUCH EVIDENCE IS TO BE DISCARDED AS IT HAS NOT BEEN CORROBORATED IN MATERIAL PARTICULARS BY OTHER WITNESSES***

In ***Namdeo V. State of Maharashtra, (2007) 14 SCC 150.,*** the Court observed that a witness who is a relative of the deceased or victim of a crime cannot be characterized as 'interested'. The term 'interested' postulates that the witness has some direct or indirect 'interest' in having the accused somehow or other convicted due to animus or for some other oblique motive.

In ***Sambhu Das @ Bijoy Das & Anr V. State of Assam., (2010) 10 SCC 374,*** the Court dealt with the evaluation of evidence of the wife of the deceased on whom the prosecution case solely rested. The Court observed that the wife of the deceased had withstood the test of cross examination and there were no significant contradictions from her previous statement though her statement was recorded under Section 161 Cr.P.C., she had not implicated four other accused persons but certainly implicated the appellants and two other accused persons. Merely because she has made some improvement in the FIR lodged by her, totally her testimony cannot be discarded and further her testimony was corroborated by autopsy report.

In ***Mano Dutt & Anr V. State of Uttar Pradesh., (2012) 4 SCC 79,*** the Supreme Court held that more often than not, in cases involving family members of both sides, it is a member of the family or a friend who comes to rescue the injured. Those alone are the people who take the risk of sustaining injuries by jumping into such a quarrel and trying to defuse the crisis. The Court can convict an accused on the statement of a sole witness, even if he was a relative of the deceased and thus, an interested party. The condition precedent to such an order is that the statement of such witness should satisfy the legal parameters namely credible, reliable, trustworthy, admissible in accordance with the law. Once those parameters are satisfied and the statement of the witness is trustworthy, cogent then the Court would not fall in error of law in relying upon the statement of such witness. It is only when the Courts find that the single eye-witness is wholly unreliable witness that his testimony is discarded in toto and no amount of corroboration can cure its defect. There would hardly be any reason for the Court to reject such evidence merely on the ground that the witness was family member or interested witness or person known to the affected party. There can be cases where it would be but inevitable to examine such witness because, as the events occurred, he would be the natural or the only eye witness available to give the complete version of the incident.

In ***Satbir Singh and Ors V. State of Uttar Pradesh., (2009) 13 SCC 790,*** the Court held it is now a well-settled principle of law that only because the witness/witnesses is/are not independent one/ones may not by itself be a ground to discard the prosecution case. If the prosecution case has been supported by the witness/witnesses and no cogent reason has been shown to discredit his/their statement/statements, a judgment of conviction can certainly be based thereupon.

In ***Dalip Singh and Ors V. State of Punjab., AIR 1953 SC 364.,*** it has been laid down that a witness is normally to be considered independent unless he or she springs from sources which are likely to be tainted and that usually means unless the witness has cause, such as enmity against the accused, to wish to implicate him falsely. Ordinarily, a close relative would be the last person to screen the real culprit and falsely implicate an innocent person. It is true, when feelings run high and there is personal cause for enmity, that there is a tendency to drag in an innocent person against whom a witness has a grudge along with the guilty, but foundation must be laid for such a criticism and the mere fact of relationship far from being a foundation is often a sure guarantee of truth. However, we are not attempting any sweeping generalization. Each case must be judged on its own facts.

➢ ***IN CASE OF UNLAWFUL ASSEMBLY WITH A LARGE NUMBER OF ACCUSED, WHETHER THE EVIDENCE OF SINGLE EYE-WITNESS IS SUFFICIENT TO CONVICT THE ACCUSED***

The Hon'ble Supreme Court of India ***Masalti V. State of Uttar Pradesh., AIR 1965 SC 202,*** wherein the Court observed that under the Indian Evidence Act, trustworthy evidence given by a single witness would be enough to convict an accused person, whereas evidence given by half a dozen witnesses which is not trustworthy would not be enough to sustain the conviction. That, no doubt is true, but where a criminal court has to deal with evidence pertaining to the commission of an offence involving a large number of offenders and a large number of victims, it is usual to adopt the test that the conviction could be sustained only if it is supported by two or three or

more witnesses who give a consistent account of the incident. In a sense, the test may be described as mechanical, but it is difficult to see how it can be treated as irrational or unreasonable.

In ***Muthu Naicker and Others V. State of Tamil Nadu, AIR 1978 SC 1647,*** the court held in a situation where a witness has been attacked by the members of an unlawful assembly composed of a large number of persons, the court should carefully consider the question of the credibility of such a witness. Where the court is of the view that the testimony of such a witness is in the facts and circumstances of the case not reliable, it should insist that such testimony be corroborated by one or more other witness before it can be accepted by the court.

In ***Binay Kumar Singh V. State of Bihar, AIR 1997 SC 322,*** the Hon'ble Supreme Court held that there is no rule of evidence that no conviction can be based unless a certain minimum number of witnesses have identified a particular accused as a member of the unlawful assembly. It is axiomatic that evidence is not to be counted but only weighed and it is not the quantity of evidence but the quality that matters. Even the testimony of one single witness, if wholly reliable, is sufficient to establish the identification of an accused as a member of an unlawful assembly. All the same, where the size of the unlawful assembly is quite large and many persons would have witnessed the incident, it would be prudent exercise to insist on at least two reliable witnesses to vouchsafe the identification of an accused as a participant.

In ***Ranjit Singh V. State of Madhya Pradesh, AIR 2011 SC 255,*** the Hon'ble Supreme Court held that in a case involving an unlawful assembly with a large number of persons, there is no rule of law that states that there cannot be any conviction on the testimony of a sole eye-witness, unless that the court is of the view that the testimony of such sole eye-witness is not reliable. Though, generally it is a rule of prudence followed by the courts that a conviction may not be sustained if it is not supported by two or more witnesses who give a consistent account of the incident in a fit case the court may believe a reliable sole eye-witness if in his testimony he makes specific reference to the identity of the individual and his specific overacts in the incident. The rule of requirement of more than one witness applies only in a case where a witness deposes in a general and vague manner, or in the case of a riot.

- ***EVALUATION AND APPRECIATION OF THE EVIDENCE OF INJURED WHO IS THE SOLE WITNESS***

In ***Brahm Swaroop & Anr V. State of Uttar Pradesh, AIR 2011 SC 280,*** the Supreme Court observed and held that Injured witness in the case has been examined, his testimony cannot be discarded, as his presence on the spot cannot be doubted, particularly, in view of the fact that immediately after lodging of FIR, the injured witness had been medically examined without any loss of time on the same day. The injured witness had been put through a grueling cross-examination but nothing can be elicited to discredit his testimony. Where a witness to the occurrence has himself been injured in the incident, the testimony of such a witness is generally considered to be very reliable, as he is a witness that comes with a built-in guarantee of his presence at the scene of the crime and is unlikely to spare his actual assailant(s) in order to falsely implicate someone. "Convincing evidence is required to discredit an injured witness".

The evidence of the stamped witness must be given due weightage as his presence on the place of occurrence cannot be doubted. His statement is generally considered to be very reliable and it is unlikely that he has spared the actual assailant in order to falsely implicate someone else. The testimony of an injured witness has its own relevancy and efficacy as he has sustained injuries at the time and place of occurrence and this lends support to his testimony that he was present at the time of occurrence. Thus, the testimony of an injured witness is accorded a special status in law. Such a witness comes with a built-in guarantee of his presence at the scene of the crime and is unlikely to spare his actual assailant(s) in order to falsely implicate someone. "Convincing evidence is required to discredit an injured witness". Thus, the evidence of an injured witness should be relied upon unless there are grounds for the rejection of his evidence on the basis of major contradictions and discrepancies therein. ***(See: Bhajan Singh @ Harbhajan Singh & Ors V. State of Haryana., AIR 2011 SC 2552., and Abdul Sayeed V. State Of Madhya Pradesh., (2010) 10 SCC 259)***

In ***State of U.P V. Naresh and Ors., (2011) 4 SCC 324.***, it was held by the Supreme Court that the evidence of an injured witness must be given due weight-age being a stamped witness, thus, his presence cannot be doubted. His statement is generally considered to be very reliable and it is unlikely that he has spared the actual assailant in order to falsely implicate someone else. The testimony of an injured witness has its own relevancy and efficacy as he has sustained injuries at the time and place of occurrence and this lends support to his testimony that he was present during the occurrence. Thus, the testimony of an injured witness is accorded a special status in law. The witness would not like or want to let his actual assailant go unpunished merely to implicate a third person falsely for the commission of the offence. Thus, the evidence of the injured witness should be relied upon unless

there are grounds for the rejection of his evidence on the basis of major contradictions and discrepancies therein. Mere contradictions on trivial matters could not render his deposition untrustworthy.

➢ ***WHETHER MINOR DISCREPANCIES IN THE EVIDENCE OF EYE WITNESS AFFECT THE CORE OF PROSECUTION'S CASE***

The Hon'ble Supreme Court of India in ***State of Uttar Pradesh V. M.K. Anthony., AIR 1985 SC 48,*** held that while appreciating the evidence of a witness, the approach must be whether the evidence of the witness read as a whole appears to have a ring of truth. Once that impression is formed, it is undoubtedly necessary for the court to scrutinize the evidence more particularly keeping in view the deficiencies, draw-backs and infirmities pointed out in the evidence as a whole and evaluate them to find out whether it is against the general tenor of the evidence given by the witness and whether the earlier evaluation of the evidence is shaken as to render it unworthy of belief. Minor discrepancies on trivial matters not touching the core of the case, hyper-technical approach by taking sentences torn out of context here or there from the evidence, attaching importance to some technical error committed by the investigating officer not going to the root of the matter would not ordinarily permit rejection of the evidence as a whole.

It is a settled legal proposition that while appreciating the evidence of a witness, minor discrepancies on trivial matters, which do not affect the core of the prosecution's case, may not prompt the Court to reject the evidence in its entirety. "Irrelevant details which do not in any way corrode the credibility of a witness cannot be labelled as omissions or contradictions." Difference in some minor detail, which does not otherwise affect the core of the prosecution case, even if present, would not itself prompt the court to reject the evidence on minor variations and discrepancies. After exercising care and caution and sifting through the evidence to separate truth from untruth, exaggeration and improvements, the court comes to a conclusion as to whether the residuary evidence is sufficient to convict the accused. Thus, an undue importance should not be attached to omissions, contradictions and discrepancies which do not go to the heart of the matter and shake the basic version of the prosecution witness. As the mental capabilities of a human being cannot be expected to be attuned to absorb all the details, minor discrepancies are bound to occur in the statements of witnesses. ***(See: State Represented by Inspector of Police V. Saravanan & Anr., AIR 2009 SC 152).***

In ***Bharwada Bhoginbhai Hirjibhai vs State Of Gujarat., AIR 1983 SC 753*** it was observed that undue importance should not be attached to omissions, contradictions and discrepancies which do not go to the root of the matter and shake the basic version of the prosecution witnesses. A witness cannot be accepted to possess a photographic memory and to recall the deals of an incident verbatim. Ordinarily, it so happens that a witness is overtaken by events. A witness could not have been anticipated the occurrence which very often has an element of surprise. The mental faculties cannot, therefore, be expected to be attuned to absorb all the details. Thus, minor discrepancies were bound to occur in the statement of witnesses.

In ***Sunil Kumar V. State Govt. of NCT of Delhi., AIR 2004 SC 552,*** it was held that merely because of the fact that there were some minor omissions, which are but natural, considering the fact that the examination in court took place years after the occurrence the evidence does not become suspect. Necessarily there cannot be exact and precise reproduction in any mathematical manner. What needs to be seen is whether the version presented in the court was substantially similar to what was stated during investigation. It is only when exaggerations fundamentally change the nature of the case, the court has to consider whether the witness was telling the truth or not.

➢ ***EVALUATION AND RELIABILITY OF DEFENCE WITNESS***

In the Hon'ble Supreme Court of India in ***Munshi Prasad and Others V. State of Bihar, AIR 2001 SC 3031,*** it was held that the evidence tendered by the defence witness cannot always be termed to be a tainted one by reason of the factum of the witness being examined by the defence. The defence witness is entitled to equal respect and treatment as that of the prosecution. The issue of credibility and the trustworthiness ought also to be attributed to the defence witness at par with that of the prosecution witness. A lapse on the part of the defence witness cannot be differentiated and be treated differently than that of the prosecutors' witness or witnesses.

➢ ***CONCLUSION***

In summing up it need not be over emphasized that the Court can record conviction of the accused on the basis of the evidence of solitary witness without insisting on corroboration provided the evidence of solitary eye witness is unblemished, reliable, cogent, credible, trustworthy and admissible in accordance with the law. The question of seeking corroboration arises only when the evidence deposed by the witness is not wholly reliable to inspire confidence in the mind of the Court about the involvement of the accused in the imputed crime. Truth is the

quintessence of justice. The role of an eyewitness is of paramount importance in the administration of justice and in justice delivery system. An eyewitness plays a stellar role in the system and the evidence of eye witness is significant for the trial process and to maintain the justness of the justice delivery system.

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JMFC, Spl.Mobile Court,
Mahabubnagar

*(Prosecution Replenish conveys its heartfelt thanks to **Sri D.V.R. TejoKarthik,** Judicial Magistrate of First Class, Special Mobile Court, Mahabubnagar, for contributing this article for our leaflet)*

CITATIONS

2021 0 Supreme(SC) 277; Sorathia Bindi Vs. The State of Gujarat & Anr; SLA (Crl.) No(s). 3162 of 2021; 01-06-2021;

In such serious matter, when the High Court exercised its power of granting ad interim protection from arrest to the respondent no.2 herein, the least that is expected by the High Court is to record some reasons as to why it chooses to exercise its extra-ordinary jurisdiction.

2021 0 Supreme(SC) 278; IN RE : CONTAGION OF COVID 19 VIRUS IN PRISONS; IA No. 63600, 63602 & 63598 of 2021; 01-06-2021

The order dated 07.05.2021 passed by this Court pertains to parole and interim bail.

The non-consideration of the pre-mature release of prisoners by this Court in its order dated 07.05.2021 shall not deter the competent authorities to consider the pre-mature release of the prisoners in accordance with law.

2021 0 Supreme(SC) 283; IN RE CONTAGION OF COVID 19 VIRUS IN CHILDREN PROTECTION HOMES; SMW (C) NO.4 OF 2020 (IA No. 64373 of 2021); 07-06-2021.

(1) The State Governments/Union Territories are directed to continue identifying the children who have become orphans or lost a parent after March, 2020 either due to Covid-19 or otherwise and provide the data on the website of the NCPCR without any delay. The identification of the affected children can be done through Childline (1098), health officials, Panchayati Raj Institutions, police authorities, NGOs etc.

(2) The DCPU is directed to contact the affected child and his guardian immediately on receipt of information about the death of the parent/parents. Assessment shall be made about the suitability and willingness of the guardian to take care of the child. The DCPU should ensure that adequate provisions are made for ration, food, medicine, clothing etc. for the affected child. Financial assistance to which the disconsolate child is entitled to under the prevailing schemes by the Central Government and the State Governments/Union Territories should be provided without any delay.

(3) The DCPO should furnish his phone number and the name and phone number of the local official who can be contacted by the guardian and the child. There should be a regular follow up by the concerned authorities with the child at least once in a month.

(4) If the DCPO is of the prima facie opinion that the guardian is not suitable to take care of the child, he should produce the child before the CWC immediately.

(5) CWC should provide for the essential needs of the child during the pendency of the inquiry without fail. The inquiry should be completed expeditiously. CWC shall ensure that all financial benefits to which the child is entitled are provided without any delay.

(6) The State Governments/Union Territories are directed to make provisions for continuance of education of the children both in Government as well as in private schools.

(7) The State Governments/Union Territories are directed to take action against those NGOs/individuals who are indulging in illegal adoptions.

(8) Wide publicity should be given to the provisions of the JJ Act, 2015 and the prevailing schemes of the Union of India and the State Governments/Union Territories which would benefit the affected children.

(9) DPCO shall take the assistance of government servants at the Gram Panchayat level to monitor the welfare of the disconsolate children who are devastated by the catastrophe of losing their parent/parents.

2021 0 Supreme(SC) 277; Sorathia Bindi Vs.The State of Gujarat & Anr.; Petition(s) for Special Leave to Appeal (Crl.) No(s). 3162 of 2021 (Arising out of impugned final judgment and order dated 16-03-2021 in CRLMA No. 4045/2021 passed by the High Court Of Gujarat At Ahmedabad)
Decided On : 01-06-2021;
Petitioner allowed to apply for assisting prosecution and also to be granted an opportunity to be heard, in Sessions case.
High Court has to record reasons, for extending protection from arrest, in an application for anticipatory bail.

http://tshcstatus.nic.in/hcorders/2021/crlrc/crlrc_133_2021.pdf; CRLRC No.133 OF 2021: 01-06-2021; A. Revanth Reddy Vs. The State of Telangana through ACB, CIU, Hyderabad.
The principle laid down by the Apex Court in P.V. Narasimha Rao v. State (CBI/SPE) {(1998) 4 SCC 626} with regard to the finding that a Member of Parliament is a public servant and whether the immunity granted can or cannot extend to cases where bribery for making a speech or vote in a particular manner in the House, is referred to a larger bench in Sita Soren v. Union of India{Crl.A. No.451 of 2019}. The judgments relied on by the petitioner shows that act of casting of vote by the de facto complainant is merely exercise of franchise and not proceedings of legislative.

http://tshcstatus.nic.in/hcorders/2021/crlp/crlp_4327_2021.pdf; CRLP No.4327 OF 2021;10.6.2021; Rekulapally Ramesh Babu vs The State of Telangana and another
Police having already issued 41A CrPC notice are directed to follow 41A CrPC notice and the guidelines in Arnesh Kumar Vs State of Bihar and not to arrest the petitioners.

http://tshcstatus.nic.in/hcorders/2020/crlp/crlp_2041_2020.pdf; CRLP No. 2041 of 202: 9.6.2021 : Sriram Bhadraiah,vs Jogiparthy Venkatesh Gupta,
Having regard to the facts and circumstances of the case and since both the parties are claiming rights over the disputed property, I am of the considered view that continuation of criminal proceedings against the petitioner/accused will be a futile exercise and would amount to abuse of the process of Court.

http://tshcstatus.nic.in/hcorders/2021/crlp/crlp_3315_2021.pdf; CRLP No. 3315 of 2021; 8.6.2021 ;Yedukondala Venkatesham vs The State of Telangana
Police to follow the procedure laid down under Section 41-A of 2 Cr.P.C., and also the guidelines issued by the Apex Court in Arnesh Kumar v. State of Bihar and another1 . The Police are directed not to arrest the petitioner till the completion of investigation and filing of charge sheet.

http://tshcstatus.nic.in/hcorders/2016/crlp/crlp_6949_2016.pdf; CRL.P.No.6949 of 2016; 4.6.2021; M/S. GABA PHARMACEUTICAL PVT LTD. 3 OTHERSvs UNION OF INDIA REP., BY ASST., SOLICITOR GENERAL
D & C Act -As per Section 36AB of the Act, the Special Court is constituted only for trying the offences relating to adulterated drugs and spurious drugs and Section 27 (d) of the Act is conspicuously excluded from the amendment conferring jurisdiction to Special Courts. Therefore, the trial of offence under Section 16 (1) (a) punishable under Section 27 (d) of the Act still remains with the 6 Magistrate's Court. In the absence of vesting any jurisdiction to try the offence under Section 27 (d) of the Act, the learned Sessions Judge is incompetent to try the case.
http://tshcstatus.nic.in/hcorders/2021/crlp/crlp_1390_2021.pdf; CRLP 1390 of 2021; 3.6.2021; Yerra Ramesh vs The State of Telangana, And Another
Sec 304A IPC case has been quashed in view of the compromise entered between the petitioner and respondent

http://tshcstatus.nic.in/hcorders/2019/crlp/crlp_4130_2019.pdf; CRLP 4130/2019; 2.6.2021; **Mr. Madhu Koneru vs THE DIRECTOR OF ENFORCEMENT**

It is a well-settled principle of constitutional law that sovereign legislative bodies can make laws with retrospective operation; and can make laws whose operation is dependent upon facts or events anterior to the making of the law. However, criminal law is excepted from such general rule, under another equally well-settled principle of constitutional law i.e. no ex post facto legislation is permissible with respect to criminal law. Article 20 contains such exception to the general authority of the sovereign legislature functioning under the Constitution to make retrospective or retroactive laws."

http://tshcstatus.nic.in/hcorders/2021/crlrc/crlrc_82_2021.pdf; CRLRC 82/2021: 2.6.2021; B.Shankar Naik vs The State of Telangana

A combined reading of all the above judgments shows that in order to discharge a person under 239 Cr.P.C., the Court has to necessarily see whether there is any prima facie material available on record to charge the accused. The Courts can discharge the accused if the material available on record is insufficient to connect the accused with the commission of the offence or that the trial Court is barred by law to proceed with the case i.e., cases where prior permission is needed to prosecute the accused or if the trial is allowed to proceed, the same will be an abuse of process of law, but not otherwise.

http://tshcstatus.nic.in/hcorders/2020/crlp/crlp_5561_2020.pdf; CRIMINAL PETITION Nos.5474, 5561, 5611, 5612, 5613, 5628 & 5629 OF 2020 AND WRIT PETITION Nos.3481, 3483, 3489 AND 3505 OF 2021; 1.6.2021; P Siva Kumar vs State of Telangana

Depositors Act : As stated above, the entire transaction between the Company and respondent No.2 and other alleged victims are oral. Respondent No.2 and others have not filed any document to show that they have deposited the said amount with the Company and the accused have promised them to pay half-yearly returns @ 4%. As discussed above, except the said payment through cheque, there is no other piece of evidence produced by respondent No.2 and other alleged victims to show that it is a deposit and the petitioners / other accused have agreed to pay half-yearly returns @ 4% and in the event of their failure, to register land in their favour by the petitioners. Even the details of number of victims, the amount alleged to have collected by the accused are also differs from the complaint and the statement of respondent No.2 and other victims recorded under Section - 161 of Cr.P.C. CASE QUASHED.

http://tshcstatus.nic.in/hcorders/2021/crlp/crlp_4396_2021.pdf; Dt. 22.06.2021 CRLP NOs.4396 AND 4400 OF 2021; Bailly Gui Landry Vs. State of Telangana

A perusal of both the judgments would reveal that learned Magistrate did not give any reasons for ordering deportation of the petitioner. There is no reason mentioned by the learned Magistrate in the judgments both dated 06.05.2021 that the petitioner herein a foreign citizen staying in India in contravention of the Act. As discussed above, learned Magistrate is not having power to order deportation of any foreign citizen even in case of violation of the provisions of the Act or otherwise. 5 Learned Magistrate has to confine his findings with regard to either acquittal or conviction of accused therein under Section 248 of the Cr.P.C., Learned Magistrate is not having power to order deportation of any foreign citizen for any violation.

there is no dispute that the visa granted to the petitioner was expired on 07.02.2020 itself. A perusal of a copy of visa filed by the Sub Inspector of Police, Cyber Crimes Police Station would reveal the said fact. It is also not in dispute that the petitioner is having Ivory Coast passport bearing No.17AP18083 valid till 30.10.2022. Thus, deportation of a foreign national for any violation is specifically mentioned in the Act and Regulations mentioned therein. The Police have already invoked said procedure and an order dated 18.05.2021 was passed by the FRRO. The efforts are being made to send the petitioner to his native place.

http://tshcstatus.nic.in/hcorders/2021/crlp/crlp_3446_2021.pdf; CRLP No.3446 OF 2021, dt. 14-06-2021; Jakka Vinod Kumar Reddy & another vs. State of Telangana & another.

S.	Decision	The dispute arose out of	Whether the Second (2nd)

No.			FIR or Multiple FIR filed are Valid or Invalid
1.	Ram Lal Narang v. State (Delhi Administration) and Om Prakash Narang & Ors v. State (Delhi Administration) MANU/SC/0216/1979: (1979) 2 SCC 322	Arose out of theft of two sandstone pillars of great antiquity	Valid
2.	M. Krishna v. State of Karnataka, MANU/SC/0127/1999: (1999) 3 SCC 247	Arose out of amassing wealth disproportionate to one's source of income	Valid
3.	V.K. Sharma v. Union of India, MANU/SC/0215/2000: (2000) 9 SCC 449	Arose out of swindling a large number of depositors on the false pretext that their deposits would be returned with interest on a subsequent date. (White Collar Crime)	Valid (Multiple FIRs)
4.	Mohan Bhaitha v. State of Bihar, MANU/SC/0217/2001: (2001) 4 SCC 350	Arose out of a dowry death. Note: The question involved here is not concerned about whether there can be more FIRs than one but whether there can be more trials than one.	Held: Offences more than one committed by the same persons could be tried at one trial, if they can be held to be in one series of facts so as to form the same transaction.
5.	T.T. Antony v. State of Kerala, (2001) 6 SCC 350	Arose out of police firing resulting into deaths of few people and injuries to a large number of people.	Third (3rd) FIR invalid.
6.	Narinderjit Singh Shani and another v. Union of India, MANU/SC/0644/2001: (2002) 2 SCC 210	Arose out of swindling of a large number of depositors on the false pretext that their deposits would be returned with interest on a subsequent date.	Valid (Multiple FIRs)
7.	Kari Chaudhary v. Most, Sita Devi and Ors, MANU/SC/0781/2001: (2002) 1 SCC 714	Arose out of murder case	Valid
8.	State of Punjab v. Rajesh Syal, MANU/SC/0867/2002: (2002) 8 SCC 158	Arose out of swindling of a large number of depositors on the false pretext that their deposits would be returned with interest on a subsequent date. (White Collar Crime)	Valid (Multiple FIRs)
9.	Upkar Singh v. Ved prakash, MANU/SC/0733/2004: (2004) 13 SCC 292	Arose out of an attempt to murder and house trespass cases	Valid
10.	Rameshchandra Nandlal Parikh v. State of Gujarat MANU/SC/2289/2006: (2006) 1 SCC 732	Arose out of swindling of a large number of depositors on the false pretext that their deposits would be returned with interest on a subsequent date.	Valid (Multiple FIRs)
11.	Vikram v.State of Maharashtra, MANU/SC/7628/2007:	Arose out of murder case	Valid

	(2007) 12 SCC 332		
12.	Pramod Kumar Saxena v. Union of India and Ors, MANU/SC/8060/2008: (2008) 9 SCC 685	Arose out of swindling of a large number of depositors on the false pretext that their deposits would be returned with interest on a subsequent date.	Valid (Multiple FIRs)
13.	Nirmal Singh Kahlon v. State of Punjab and Others, MANU/SC/8189/2008: (2009) 1 SCC 441	Arose out of scandal involving selection of Panchayat Secretaries	Valid
14.	C. Muniappan and others v. State of Tamil Nadu, MANU/SC/0655/2010: (2010) 9 SCC 567	Arose out of setting fire to a university bus and several public buses.	Investigation of the Second FIR was clubbed with the investigation of the First FIR. In essence, two complaints/ FIRs are clubbed together and investigated jointly.
15.	Bahubhai v. State of Gujarat, MANU/SC/0643/2010: (2010) 12 SCC 254	Arose out of altercation that took place between members of the two communities.	Invalid
16.	Chirra Shivraj v. State of AP, MANU/SC/0992/2010: (2010) 14 SCC 444	Arose out of an attempt to murder case	Second F.I.R. held valid because SHO made a mistake by recording information as a fresh F.I.R. and that this mistake should not make the case of prosecution weak especially when no prejudice had been caused.
17.	Shiv Shankar Singh v.State of Bihar, MANU/SC/1373/2011: (2012) 1 SCC 130	Arose out of dacoity and murder	Valid
18.	Surender Kaushik and others v. State of UP, MANU/SC/0131/2013: (2013) 5 SCC 148	Arose out of fake and fraudulent documents prepared by the accused persons.	Invalid
19.	Amitbhai Anilchandra Shah v. CBI, MANU/SC/0329/2013: (2013) 6 SCC 348	Arose out of murder cases	Invalid
20.	Anju Chowdry v. State of UP, MANU/SC/1129/2012: (2013) 6 SCC 384	Arose out of hate speech	Valid
21.	Yanab Sheikh @ gagu v. State of West Bengal MANU/SC/1122/2012: (2013) 6 SCC 428	Arose out of a murder case.	Invalid

The sum and substance of the above said judgments is that there is no embargo for registration of two FIRs on the following circumstances/grounds:

(a) where the allegations made in both the FIRs are from different spectrum, where there are different versions from different persons;
(b) same set of facts may constitute different offences;
(c) where there are two distinct offences having different ingredients;
(d) where the allegations are different and distinct;
(e) when there are rival versions in respect of same episode, they would normally take shape of two different FIRs and investigation can be carried out under both of them by the same Investigating Agency.

http://tshcstatus.nic.in/hcorders/2007/crlp/crlp_655_2007.pdf; CRLP No.655 of 2007; Dt. 10-06-2021; M/s. Deccan Tobacco Processors Limited & another Vs. Union of India, rep. by Commissioner (Prosecution) Custom and Central Excise, Hyderabad & another
It is settled law that the standard of proof in criminal proceedings is higher than the standard of proof in civil/departmental proceedings. In a reverse case, where criminal proceedings ended in acquittal but simultaneous departmental proceedings continued, the result of the criminal proceedings will not have any bearing on the departmental proceedings, as judgment of the criminal Court is not binding in civil or departmental proceedings. However, in the instant case, when the departmental proceedings ended in favour of the accused and moreover, when the prosecution launched is on the same set of facts and allegations, the continuance of prosecution would be gross abuse of process of law.

CRLA NO. 533 OF 2021 (@ Special Leave Petition (Crl.) No.308 of 2021) SHAIK AHMED VS STATE OF TELANGANA; 28.6.2021
the essential ingredients to convict an accused under Section 364A which are required to be proved by prosecution are as follows:-
(i) Kidnapping or abduction of any person or keeping a person in detention after such kidnapping or abduction; and
(ii) threatens to cause death or hurt to such person, or by his conduct gives rise to a reasonable apprehension that such person may be put to death or hurt or;
(iii) causes hurt or death to such person in order to compel the Government or any foreign State or any Governmental organization or any other person to do or abstain from doing any act or to pay a ransom.

NOSTALGIA

No review of bail order
In Abdul Basit Vs. Mohd. Abdul Kadir Chaudhary {(2014) 10 SCC 754} , the Hon'ble Apex Court held that since there is no express provision for review of the order granting bail exists under the Cr.P.C., the High Court becomes functus officio and Section 362 of Cr.P.C. applies barring review of the judgment and order of the Courts granting bail to the accused.

Absence of Prosecutor {Prosecution Replenish thanks Sri Shamshud Hasan ji for contributing this precedent}
LALA DHANPAT RAI VS STATE, 16 Jan 1959; 1959 0 AIR(All) 425; 1959 0 CrLJ 806;
For example if the presiding officer of the Court fails to attend the court on a particular date and the complainant is also absent then in such a case the accused will not get the benefit of the provisions of Section 247, Cr. P. C.
It is not possible to interpret the law in a manner which would necessitate that for every magistrates Court a separate Public Prosecutor should be appointed. Under the existing circumstances the Public prosecutor appears before several Magistrates and therefore when he is functioning in a Court he should be deemed to be present in all those Courts which are in his charge. It is only when he is not functioning in any Court that it can be said that he was absent. There is nothing on the record of the case to indicate that the particular Public Prosecutor who was in charge o this prosecution was not functioning in the courts of law on that date. The magistrate cannot insist that the moment they take up a case the Public Prosecutor must immediately appear before them. The Magistrates have to come to an understanding between themselves and the Public Prosecutors as to when their attendance is desired before a particular court.

NEWS

- **GOVERNMENT OF ANDHRA PRADESH-** RULES - Special Rules – Amendment to the Andhra Pradesh State Prosecution Service Rules, 1992 - Notification – Orders – Issued vide G.O.MS.No. 56 HOME (COURT.A) DEPARTMENT Dated: 15-06-2021.

- **GOVERNMENT OF ANDHRA PRADESH- LAW OFFICERS – HIGH COURT OF ANDHRA PRADESH –** State Public Prosecutor and Additional Public Prosecutors in the High Court of Andhra Pradesh – Enhancement of rates of fee and conveyance allowance **–** Revised orders – Issued- G.O.RT.No. 159- LAW (G) DEPARTMENT Dated: 07-06-2021.

- **GOVERNMENT OF ANDHRA PRADESH-** Public Services – Prosecuting officers – Recruitment to the category of Assistant Public Prosecutor - Appointment – Notification – Orders – Issued- G.O.Ms.No.55 HOME (COURTS.A) DEPAERTMENT Dated:14-06-2021.

- **GOVERNMENT OF TELANGANA** The Telangana Public Employment (Organization of Local Cadres and Regulation of Direct Recruitment) Order 2018 - Scheme for Organization for Local Cadres in PROSECUTIONS DEPARTMENT - Approved - Orders Issued. GENERAL ADMINISTRATION (SPF) DEPARTMENT G.O.Ms.No. 129 Dated: 30-06-2021

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ON A LIGHTER VEIN

ATTORNEY: Do you recall the time that you examined the body?

WITNESS: The autopsy started around 8:30 PM

ATTORNEY: And Mr. Denton was dead at the time?

WITNESS: If not, he was by the time I finished.

While due care is taken while preparing this information. The patrons are requested to verify and bring it to the notice of the concerned regarding any misprint or errors immediately, so as to bring it to the notice of all patrons. Needless to add that no responsibility for any result arising out of the said error shall be attributable to the publisher as the same is inadvertent.

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NOTICE:

- ✓ For the notice of the Patrons preparing the articles for the commemorative edition of our leaflet,
- ✓ We have received the articles on the following subjects, so please avoid them in your preparation.
  - Should Perjury & Hostility Win?
  - Solitary witness vs sterling quality