

**CONSTITUTIONAL OVERHAUL TO ADDRESS
SHORTCOMINGS IN JUDICIAL FRAMEWORK**

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ABSTRACT

The Constitution is the supreme law of the country which is the fulcrum of various democratic institutions. It is a sacrosanct document for a democratic country and it is transformed with the advancement in society to maintain its relevance with the changing times. Owing to its adapting nature, the Constitution is a guiding light for the citizens even after seventy years since its inception.

Judiciary is often referred to as one of the most significant pillars of democracy. It is the guardian of the Constitution, hence it should observe the highest standards of ethics, transparency, equity, fairness and moral conscience while decision-making. However, various issues like rising vacancies of judges, pendency of cases, lack of transparency in appointment of judges, etc. are few of the many loopholes that make the judiciary less efficient.

This article makes an attempt to analyse the issues which act as a barrier for an effective judicial framework. Further, it discusses the impact of these impediments on various stakeholders. Lastly, the article will conclude with plausible constitutional and infrastructural reforms that can be adopted to promote a fair, transparent and expeditious judicial mechanism.

I. INTRODUCTION

Dr. B. R. Ambedkar, the father of the Constitution of India said that “*The Constitution is not a mere lawyer’s*

document, it is a vehicle of Life and its spirit is always the spirit of Age.” This statement implies that the Constitution of any nation is not a static document.⁴¹ It needs to evolve simultaneously with society to ensure that it does not become a dead letter. The Constituent Assembly had the foresight for such modifications in the future, thus the provision of amendment of the Constitution was provided under Article 368.⁴² The importance of transformation in the Constitution was observed by the Hon’ble Supreme Court in *Saurabh Chandni v. Union of India* where it was held that the “*Constitution is organic in nature. Being a living organ, it is ongoing. Hence, with time, the law must change.*”⁴³ Nevertheless, in the landmark judgement of *Kesavananda Bharti*, the court held, that the basic structure of the Constitution cannot be amended.⁴⁴

The Constitution is a sacrosanct document for a democratic country and it should be transformed with the advancement in society to maintain its relevance with the changing times. The legislature and judicial activism have played a pivotal role in increasing the ambit of its application. The milestone judgements affirming the right to education⁴⁵, right to privacy⁴⁶, etc. are in accordance with evolving social policies which enhanced the scope of the Constitution. It is a progressive shift that maintains equilibrium between constitutional values and modern changes in society.

The Constitution of India has established an independent and integrated system of judiciary.⁴⁷ It is the guardian of the Constitution and protects the rights of the citizens.⁴⁸ Regardless of extensive provisions, comprehensive functions and powers of the court, there exist lacunae in the judicial framework of India. Various issues like the rising vacancies of judges, pendency of cases, lack of transparency in appointment of judges, etc. are few of the many loopholes that make the judiciary less efficient.

⁴¹ Shreya Srivastav, *Constitution: Static or not?*, JUS DICERE (Jan. 1, 2022, 10:30 AM), <https://www.judicere.in/constitution-static-or-not/>.

⁴² INDIA CONST. art. 368.

⁴³ Saurabh Chandni v. Union of India, AIR 2004 SC 361.

⁴⁴ Kesavananda Bharati Sripadagalvaru & Ors. v. State of Kerala & Anr., AIR 1973 SC 1461.

⁴⁵ Mohini Jain v. State of Karnataka, (1992) 3 SCC 666.

⁴⁶ Justice K. S. Puttaswamy and Anr. V. Union Of India And Ors., AIR 2017 SC 4161.

⁴⁷ V.N. SHUKLA, CONSTITUTION OF INDIA 508 (Eastern Book Company 2017).

⁴⁸ M. LAXMIKANTH, INDIAN POLITY 260 (Mc Graw Hill 2020).

Wherefore, certain modifications may be introduced in the Constitution of India to promote the efficacy of the justice delivery system.

II. CONSTITUTIONAL REFORMS TO RECTIFY THE IMPEDIMENTS TO PROMOTE EFFECTIVE JUDICIAL SYSTEM IN INDIA

Judiciary is often referred to as the custodian of the rights of the citizens. As a custodian, it is bestowed with significant powers and functions. However, there exist various impediments to the efficient functioning of the judiciary which may be rectified with appropriate constitutional and infrastructural reforms. The barriers to the effective judiciary and its plausible solutions are as under:

A. TRANSPARENCY IN APPOINTMENT SYSTEM:

The Supreme Court and High Court judges are appointed under Article 124 (2)⁴⁹ and Article 217⁵⁰ of the Constitution respectively. The Apex Court has interpreted the process of appointment under various landmark judgements.⁵¹ Currently, the judges are appointed under the Collegium system. The collegium consists of the Chief Justice and four other senior judges who recommend names of candidates to the Government. Further, the President shall appoint judges on the advice of the Government. The Supreme Court in one of the landmark judgements held that such recommendation or consultation by the collegium shall reflect concurrence i.e., it is not merely advisory in nature.⁵² Thus, in India, the collegium has primacy in the appointment process.⁵³

The Collegium system promotes the independence of judiciary but it lacks accountability and transparency.⁵⁴ There is an absence of any rules or guidelines for the selection of judges, whereby the collegium can exercise complete volition while recommending names of judges for appointment.⁵⁵ Thus, the process is devoid of fairness as there may be instances of nepotism.⁵⁶ Further, selection on the basis of favoritism without taking into account the merit of the candidate may lead to the appointment of an inefficient candidate which will compromise with the justice delivery system.⁵⁷ Moreover, the collegium system is considered to be unreasonable as it fails to select deserving judges in lower judiciary and advocates.

National Judicial Appointment Commission (NJAC) was introduced to rectify the aforementioned lacunae in the appointment procedure. The proposed NJAC was a unique blend of executive, judiciary and two eminent persons.⁵⁸ However, it was struck down by the Apex Court to prevent the independence of judiciary as it involved the participation of executive in appointment of judges. Albeit, it recognized loopholes in the collegium system.⁵⁹ Justice Kurian Joseph in the landmark judgement observed that “*there is lack of accountability and transparency in the current system of appointment.*”⁶⁰ Subsequently, the court decided to upload the names of shortlisted candidates along with the reasons for their selection via resolution on the Supreme Court’s official website. The step was to elicit the trust of people in the judiciary by promoting transparency in the appointment procedure. Nonetheless, it was merely a formality and the collegium failed to provide any reasons

⁴⁹ INDIA CONST. art. 124.

⁵⁰ INDIA CONST. art. 217, cl. 2.

⁵¹ SP Gupta v. Union of India, AIR 1982 SC 149; Supreme Court Advocates on Record Association v. Union of India, AIR 1994 SC 268.

⁵² *Id.*

⁵³ Dr. Anurag Deep and Shambhavi Mishra, *Judicial Appointments In India And The Njac Judgement: Formal Victory Or Real Defeat*, 3 JIJ 49 (2018), http://docs.manupatra.in/newslines/articles/Upload/88BE1E36-4D87-4B24-9C29-D565D0D368A0.%20Judicial%20Appointment%20in%20India%20_Civil.pdf.

⁵⁴ C raj Kumar, *Future of Collegium System: Transforming Judicial Appointments for Transparency*, 50 ECON. POLIT. WKLY. 31 (2015), <https://www.jstor.org/stable/44002895>.

⁵⁵ Dr. Prem Chandra and Ashutosh Garg, *Judicial Accountability and Transparency in India: Flaws and Road Ahead*, 3 GLS. LAW JOURNAL 79 (2021), <https://glslawjournal.in/index.php/glslawjournal>.

⁵⁶ LAW COMMISSION OF INDIA, 230TH REPORT ON REFORMS IN JUDICIARY (Aug., 2009).

⁵⁷ *Id.*

⁵⁸ Rehan Abeyratne, *Upholding Judicial Supremacy in India: The NJAC Judgment in Comparative Perspective*, 49 GEO. WASH. L. REV. 569 (2017), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2827793.

⁵⁹ Supreme Court Advocates-on-Record Association v. Union of India, (2016) 4 SCC 1.

⁶⁰ *Id.*

for appointment of a candidate after a period of time.⁶¹ Therefore, in the light of the aforementioned events, it can be concluded that the collegium system has glaring defects which need to be rectified for an efficient and transparent judicial framework.

Many countries ensure active participation of a combination of executive and judiciary in the appointment process. In the United Kingdom (UK), the Judicial Appointment Commission (JAC) under Section 61 of the Constitutional Reform Act, 2005 is responsible for appointing suitable candidates.⁶² It consists of 15 members out of which the majority of the members are appointed by open competition and others are selected from a community of judges as per Schedule 12 of the act.⁶³ Moreover, the [Judicial Appointments and Conduct Ombudsman](#) under Section 62 is responsible for addressing any complaints or grievances with respect to the appointment procedure.⁶⁴ The selection is based on the merit of the candidate. Further, the selection committee advertises the vacancies and invites applications. This fosters transparency in the procedure. Subsequently, interviews are conducted for the finalization of candidates. On the concurrence of decision of the lord chancellor and the JAC the names are sent to the Queen via prime minister for final approval.⁶⁵

Similarly, in United States of America (USA), the judges are nominated by the President and confirmed by the Senate in accordance with Article II, Section 2.⁶⁶ of the Constitution. The judiciary has no role in the entire process of appointment, with the exception of the American Bar Association providing the details about the qualification of a nominee to the Senate. India adopted the principle of

independence of judiciary from the US.⁶⁷ However, in the USA the judges are appointed by the active participation of the executive while in India the judiciary has primacy in the appointment process.

India has preserved the independence of judiciary by providing constitutional protection to judges by ensuring security of tenure, fixed salary etc. However, the collegium system has decreased the credibility of the appointments whereby citizens may lose faith in the institution of democracy. Thus, the existing system of appointment which is promoting opacity and favoritism should be replaced by a more accountable and fair system for the protection of democracy.⁶⁸

In 2000, the National Commission to review the working of the Constitution, proposed a commission comprising of both executive and judiciary for appointments.⁶⁹ The judiciary being the guardian of the Constitution should observe the highest standards of ethics, transparency, equity, fairness and moral conscience while appointing judges. The selection should be based on various factors like integrity, qualification and seniority.⁷⁰ Further, there should be a secretariate as proposed by the government for determining the eligibility of the candidate and to act as an ombudsman for addressing any complaints with regard to the appointment.⁷¹ Therefore, India needs to amend Article 124 of the Constitution to introduce a more transparent, fair, reasonable and accountable system of appointment based on the merit of the candidate. India should adopt the best practices of the aforementioned jurisdictions to streamline its judicial appointment process.

B. VACANCIES TO BE FILLED IN A TIMELY MANNER:

⁶¹ Dr. Anurag Deep and Shambhavi Mishra, *Judicial Appointments In India And The Njac Judgement: Formal Victory Or Real Defeat*, 3 JLJ 49 (2018), http://docs.manupatra.in/newslines/articles/Upload/88BE1E36-4D87-4B24-9C29-D565D0D368A0.%20Judicial%20Appointment%20in%20India%20_Civil.pdf.

⁶² Constitutional Reform Act 2005, c. 4, § 61, (Eng.).

⁶³ Constitutional Reform Act 2005, c. 4, § 61, sch. 12 (Eng.).

⁶⁴ Constitutional Reform Act 2005, c. 4, § 62, (Eng.).

⁶⁵ Erin Delaney, *Searching for constitutional meaning in institutional design: The debate over judicial appointments in the United Kingdom*, 14 INT. J. CONST. LAW 752 (2016), <https://doi.org/10.1093/icon/mow044>.

⁶⁶ U.S. Const. art. 2, § 2.

⁶⁷ M.P. JAIN, INDIAN CONSTITUTIONAL LAW 396 (Lexis Nexis 2018).

⁶⁸ THE HANS INDIA, <https://www.thehansindia.com/posts/index/National/2016-07-31/Judges-selection-India-and-world/245784> (last visited Jan. 6, 2022).

⁶⁹ NATIONAL COMMISSION TO REVIEW THE WORKING OF THE CONSTITUTION, REPORT ON CONSTITUTIONAL REFORMS, 2000-01, at 289 (India).

⁷⁰ [Stephan Grimmelikhuijsen, The effects of judicial transparency on public trust: Evidence from a field experiment](https://www.researchgate.net/publication/271075291_The_effects_of_judicial_transparency_on_public_trust_Evidence_from_a_field_experiment/citation/download), 93 INT. J. PUBLIC ADM. 369 (2015), https://www.researchgate.net/publication/271075291_The_effects_of_judicial_transparency_on_public_trust_Evidence_from_a_field_experiment/citation/download.

⁷¹ *Id.*

The judge to population ratio in India is around 20 judges for a million people while the Law Commission Report recommended 50 judges per million population.⁷² There is a massive dearth of judges in Indian courts and it is further accentuated by the creation of multiple vacancies in courts every year due to promotion, resignation or transfer. There were about forty-two percent vacancies in the high courts in 2021.⁷³ The alarming number of vacancies augment the delays in the adjudication of cases. Further, the lower judiciary, tribunals and fast-track courts also experience paucity of judges. It paralyzes the justice delivery system and defeats the spirit of speedy justice as provided under Article 21 of the Constitution of India.⁷⁴

The 245th report of the Law Commission of India states that the number of vacancies in the lower judiciary is at an alarming high.⁷⁵ The procedural complexity and lackadaisical approach of the authorities are the primary reasons for increasing vacancies. The Apex Court in *Malik Mazhar Sultan v. U.P. Public Service Commission*, condemned vacancies in courts and held that it leads to an increase in the burden of court.⁷⁶ Further, a need for a well-oiled mechanism with timely examinations, advertisements, interviews was recognized to ensure filling up of vacancies in a timely manner. Subsequently, in *M/s PLR Projects Pvt. Ltd. v. Mahanadi Coalfields Ltd. &Ors.*, the Court set guidelines for the government for timely appointment of high court judges.⁷⁷ However, the guidelines were not adhered to and there have been instances of delay on part of the high court collegium as well as the government to fill the vacancies in time.

In the UK, it is the responsibility of the lord chancellor to recommend names for filling judicial vacancies under

Section 77 and Section 68 of the Act.⁷⁸ India should also entrust the duty of filling up vacancies to an authority. Therefore, India should transform its Constitution to include a similar provision to promote the filling of vacancies within a specific time frame. However, merely a constitutional reform alone might not eradicate the issue. To alleviate vacancies, it is necessary to foster coordination between the government and judiciary and conduct regular exams. Therefore, a holistic reform in the judicial process is the need of the hour.

C. ALLEVIATE PENDENCY OF CASES:

It is often said that delay in the administration of justice is the denial of justice. As per the 230th Law Commission Report, paucity of judges is one of the major factors that lead to an increasing number of pending litigations in the country.⁷⁹ Presently, there are more than four crore cases pending in Indian courts.⁸⁰ The disposal rate further decreased during the pandemic which dilated the delays and arrears in the courts. The Supreme Court highlighted the rising number of pending cases in *Imtiyaz Ahmad v. State of Uttar Pradesh and Ors.*, whereby the court aimed at eliminating delays in order to ensure smooth and expeditious justice.⁸¹

A constitutional reform regarding timely filling of vacancies in judiciary can reduce the burden of court and may alleviate the delay in litigation. Further, a provision may be added in the Constitution which shall mandate the High courts to undertake a periodic assessment of judicial facilities under its jurisdiction. This will provide accurate data to policymakers about vacancies, rate of disposal, judicial productivity, need for additional judicial staff etc.⁸² Regular availability of data can be helpful to take necessary steps to improve the quality of judicial infrastructure.

⁷² LAW COMMISSION OF INDIA, 120TH REPORT ON MANPOWER PLANNING IN JUDICIARY (Jul., 1987).

⁷³ PRS INDIA, <https://prsindia.org/theprsblog/understanding-vacancies-in-the-indian-judiciary> (last visited Jan. 2, 2022).

⁷⁴ *Hussainara Khatoon & Ors v. Home Secretary, State of Bihar and Ors.*, (1979) 3 SCR 532.

⁷⁵ LAW COMMISSION OF INDIA, 245TH REPORT ON ARREARS AND BACKLOG: CREATING ADDITIONAL JUDICIAL (WO)MANPOWER (Jul., 2014).

⁷⁶ *Malik Mazhar Sultan v. U.P. Public Service Commission*, (2008) 17 SCC 703.

⁷⁷ *M/s PLR Projects Pvt. Ltd. v. Mahanadi Coalfields Ltd. &Ors.*, (CIVIL) NO.2419 OF 2019.

⁷⁸ Constitutional Reform Act 2005, c. 4, § 77, (Eng.).

⁷⁹ LAW COMMISSION OF INDIA, 230TH REPORT ON REFORMS IN JUDICIARY (Aug., 2009).

⁸⁰ PRS INDIA, <https://prsindia.org/theprsblog/understanding-vacancies-in-the-indian-judiciary> (last visited Jan. 2, 2022).

⁸¹ *Imtiyaz Ahmad v. State of Uttar Pradesh and Ors.*, AIR SC 2012 642.

⁸² LAW COMMISSION OF INDIA, 245TH REPORT ON ARREARS AND BACKLOG: CREATING ADDITIONAL JUDICIAL (WO)MANPOWER (Jul., 2014).

The aforementioned constitutional reform might expedite the process of appointment and provide for faster adjudication of cases, nevertheless, other judicial reforms in infrastructure are also essential to maximize judicial efficacy. The 245th law commission suggested a time frame to be adopted for specific cases in order to ensure timely disposal of cases. The timeline method is successfully practiced in many jurisdictions viz. Canada, UK and USA.⁸³ The Apex Court in *Ramrameshwari Devi v. Nirmala Devi* encouraged similar practice to be adopted in India.⁸⁴ Moreover, courts, tribunals and other fast-track courts need an influx of workmen and better infrastructure. In addition to this, digitalization of courts and alternate dispute resolution should be developed to increase the productivity of courts and realize the objectives under Article 21⁸⁵ and Article 39A of the Constitution.⁸⁶

D. INCLUSIVE JUDICIARY:

Participation in public service is recognized as a basic right of an individual under Article 2 of the Universal Declaration of Human Rights.⁸⁷ It implies that all the democratic institutions in a country should be the epitome of its diverse population. India is known to be a country of diversity, however, its justice delivery system does not reflect the adequate representation of its population viz. women, persons with disability (PWD), various socio-economic sections and other marginalized communities in India.

The United Nations Development Programme in its report stated that diversity of people is pertinent for judiciary as it gives a fresh perspective to the case and may lead to a better quality of judgement.⁸⁸ Moreover, it is beneficial for the victims as their plight can be understood better by a judge belonging to their community. Therefore, greater

inclusion is necessary as it will foster public confidence and faith in rule of law.⁸⁹

In a similar vein, several countries have taken initiative to encourage diversity in their respective law regulating bodies. In the UK Section 137A of the Act, states that the appointment commission shall take necessary steps to maintain judicial diversity.⁹⁰ Similarly, Article 174 (2) of the Constitution of South Africa, provides for adequate racial and gender representation in its courts.⁹¹ Further, many countries like Spain, Turkey and United Kingdom are making policies under the International Principles and Guidelines on Access to Justice for Persons with Disabilities to include PWD as judges and judicial officers.⁹² India should also transform its Constitution and laws for better representation of its diverse population.

Presently, there are less than thirty percent women in the judicial framework of India.⁹³ The statistics portend that the gender disparity in the judiciary is going to further increase in the coming years. There are multiple reasons viz. lack of opportunity, access to education and lack of infrastructure in courts which act as impediments for women. Their inclusion is vital for strengthening the quality of decision-making. For instance, a woman judge will be more sensitive towards the victim in cases related to gender issues or crime against women and thereby deliver a more appropriate judgement.⁹⁴ In many countries like Tanzania, Kenya, Argentina, Belgium and Australia there are quotas for adequate representation of women in courts.⁹⁵ A similar provision of quota can be added in the Constitution of India, at least at the lower judiciary. Subsequently, by

⁸⁹ *Id.*

⁹⁰ Constitutional Reform Act 2005, c. 4, § 137A, (Eng.).

⁹¹ S. AFR. CONST. art. 174, cl. 2.

⁹² UNITED NATIONS DEVELOPMENT PROGRAMME, <https://www.undp.org/sites/g/files/zskgke326/files/2021-07/UNDP-Advancing-Inclusive-Decision-Making-for-Sustainable-Development-Representation-in-the-Judiciary.pdf>, (last visited Jan. 4, 2022).

⁹³ Krishnadas Rajgopal, *CJI voices support for 50% representation for women in judiciary*, THE HINDU (Dec. 24, 2021, 9:50 PM).

⁹⁴ Uday Shankar and Sricheta Chaudhury, *Representative Judiciary in India: An Argument For Gender Diversity In The Appointment Of Judges In The Supreme Court*, 2 ILI LAW REV. 200 (2019), <https://www.ili.ac.in/pdf/uss.pdf>.

⁹⁵ UNITED NATIONS DEVELOPMENT PROGRAMME, <https://www.undp.org/sites/g/files/zskgke326/files/2021-07/UNDP-Advancing-Inclusive-Decision-Making-for-Sustainable-Development-Representation-in-the-Judiciary.pdf>, (last visited Jan. 4, 2022).

⁸³ *Id.*

⁸⁴ *Ramrameshwari Devi v. Nirmala Devi*, (2011) 8 SCC 249.

⁸⁵ INDIA CONST. art. 21.

⁸⁶ INDIA CONST. art. 39A.

⁸⁷ UNIVERSAL DECLARATION OF HUMAN RIGHTS, art. 2.

⁸⁸ UNITED NATIONS DEVELOPMENT PROGRAMME, <https://www.undp.org/sites/g/files/zskgke326/files/2021-07/UNDP-Advancing-Inclusive-Decision-Making-for-Sustainable-Development-Representation-in-the-Judiciary.pdf>, (last visited Jan. 4, 2022).

simultaneously improving other social and judicial infrastructural aspects, the reservation may be extended to the higher judiciary as well.

Similarly, a quota can be introduced for people belonging to scheduled tribes, scheduled caste, other backward classes and economically weaker sections for appointment at all levels of judiciary. Moreover, for people belonging to PWD and LGBTQIA+ community their needs to be widespread awareness and infrastructure development to cater to their needs. They should be encouraged by modifying the judicial system by being sensitive to their needs. It should be ensured that they have access to quality education and equal opportunity. Further, the courts should be made PWD friendly by providing instructions in braille, providing an assistant for his or her guidance etc. Therefore, greater inclusivity in the judiciary is the cornerstone for promoting fairness and efficiency in the judicial ecosystem.

III. CONCLUSION

The Constitution is the supreme law of the country which is the fulcrum of various democratic institutions. The core of the Constitution of India is based on the ideals of socialism, equality, justice, liberty and fraternity.⁹⁶ It is a unique blend of various provisions which promote the vision of the founding fathers of the Constitution. They recognized that both constitution and constitutionalism are subject to simultaneous change in society, thus, provision for amendment was provided in the Constitution. Subsequently, it has been modified from time to time to serve the best interest of the stakeholders. Hence, even today, after more than seventy years it is a guiding light for its citizens.

Judiciary is often referred to as one of the significant pillars of democracy. It is the custodian and supreme interpreter of the Constitution.⁹⁷ Therefore, it must abide by the highest standards of impartiality and should avoid any affection or ill will in the decision making. Nevertheless, there have been various instances that have questioned the efficient

functioning of the judiciary. Lack of transparency in appointments, the time lag in filling vacancies, pending litigations and a non-representative judiciary are a few glaring defects in the judicial ecosystem. Therefore, the transformation of the Constitution is essential to make judicial framework more efficient and accountable. The Constitution should mandate the appointment process to be transparent and provide for the vacancies to be filled on a timely basis. Moreover, the judiciary should reflect the diverse population of India. These constitutional reforms may establish a healthy, inclusive and expeditious judicial model.

However, mere constitutional reforms are not a panacea. There needs to be an overhaul in the judicial machinery of the country. Apart from the aforementioned constitutional reforms, the formation of All India Judicial Services under Article 312 (1) of the Constitution can address the issue of the vacancy of judges and pendency of cases.⁹⁸ It may also promote inclusivity in the judiciary. Similarly, the proposed National Judicial Infrastructure Corporation will be a significant contributor to the improvement of judicial infrastructure across the nation.⁹⁹ Therefore, in order to achieve the Sustainable Development Goal 16, Target 16.7 i.e., to promote inclusive, participatory and responsive judiciary, we need to embrace constitutional reforms along with effective policies and holistic improvement in infrastructure.¹⁰⁰

⁹⁶ M.P. JAIN, INDIAN CONSTITUTIONAL LAW 396 (Lexis Nexis 2018).

⁹⁷ V.N. SHUKLA, CONSTITUTION OF INDIA 508 (Eastern Book Company 2017).

⁹⁸ INDIA CONST. art. 312, cl. 1.

⁹⁹ OBSERVER RESEARCH FOUNDATION, <https://www.orfonline.org/expert-speak/judicial-infrastructure/>, (last visited Jan. 1, 2022).

¹⁰⁰ SUSTAINABLE DEVELOPMENT SOLUTIONS NETWORK, <https://indicators.report/targets/16-7/>, (last visited Dec. 24, 2021).