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CASE COMMENTARY

Ravindra Pratap Shahi v. State of U.P. & Ors.

2025 INSC 1039 | Supreme Court of India | 25 August 2025

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CASE AT A GLANCE

Court: Supreme Court of India

Citation: 2025 INSC 1039; Criminal Appeal Nos. 3700–3701 of 2025 (arising out of SLP (Crl.) Nos. 4509–4510 of 2025)

Bench: Justice Sanjay Karol and Justice Prashant Kumar Mishra

Date of Judgment: 25 August 2025

Appellant: Ravindra Pratap Shahi (de-facto complainant)

Respondents: State of Uttar Pradesh & Ors.

Subject Matter: Delayed pronouncement of reserved judgments; Right to speedy justice under Article 21 of the Constitution of India

I. INTRODUCTION

The right to a speedy trial and the timely delivery of justice have long been recognised as integral components of the fundamental right to life and personal liberty guaranteed under Article 21 of the Constitution of India. Yet, the Indian judiciary continues to grapple with a persistent and systemic failure: the non-delivery of judgments even after arguments in a case

have been formally concluded and the matter reserved for orders. *Ravindra Pratap Shahi v. State of U.P. & Ors.* (2025 INSC 1039) is the Supreme Court of India's most recent and comprehensive attempt to address this malaise.

Decided on 25 August 2025 by a bench of Justice Sanjay Karol and Justice Prashant Kumar Mishra, the judgment arose from a criminal appeal pending before the Allahabad High Court since 2008. Despite arguments being concluded and the matter formally reserved for judgment on 24 December 2021, no pronouncement was made for over three years a delay the Supreme Court described as "extremely shocking and surprising." This commentary analyses the factual background, the legal issues raised, the judicial reasoning, the directions issued, and the broader implications of this landmark ruling for judicial accountability and constitutional rights in India.

II. FACTUAL BACKGROUND

The origins of this litigation trace back to a criminal matter in which Ravindra Pratap Shahi was the de-facto complainant. The accused in the underlying case was convicted by the trial court, following which the accused preferred Criminal Appeal No. 939 of 2008 before the High Court of Judicature at Allahabad. Shahi, as the aggrieved complainant seeking to uphold the conviction, became the appellant before the Supreme Court after the High Court's protracted inaction.

Over the years, Shahi made no fewer than nine representations and applications to the Allahabad High Court requesting early listing, hearing, and disposal of the appeal. Despite these persistent efforts, the Division Bench eventually heard arguments at length and formally reserved the matter for judgment on 24 December 2021. What followed was an unconscionable silence: the judgment was not delivered for more than three years.

The Allahabad High Court's own administrative framework acknowledged the problem. An administrative order issued by the Chief Justice of the High Court on 7 March 2019 had directed that any case where a reserved judgment was not delivered within six months would be relisted before a Regular Bench. Acting on this order, the matter was placed before the Chief Justice on 19 December 2022 and subsequently listed before a Regular Bench on 9 January 2023. However, since no one appeared for the appellant on that date, the appeal was adjourned, and thereafter, hearings consistently failed to materialise.

Frustrated by the inordinate delay and the erosion of his right to a timely verdict, Shahi approached the Supreme Court by way of Special Leave Petitions (SLP (Crl.) Nos. 4509 4510 of 2025). On 27 January 2025, the Supreme Court directed the Registrar General of the High Court to verify the averments made in the petition. The Registrar General's report dated 29 January 2025 confirmed that the criminal appeal had indeed been reserved for orders on 24 December 2021 but remained undecided a period now exceeding three years. Thereafter, on 15 April 2025, the Supreme Court directed the High Court to decide the appeal expeditiously, preferably within three months. Leave was ultimately granted, and the matter was decided by the present judgment dated 25 August 2025.

III. ISSUES FOR DETERMINATION

The Supreme Court was called upon to address the following principal questions:

- Whether the delay of over three years in pronouncing a reserved judgment by the Allahabad High Court was violative of the constitutional right to a speedy trial and access to justice guaranteed under Article 21 of the Constitution of India.
- Whether the Supreme Court should prescribe a strict time limit for the delivery of judgments post-hearing, along with enforceable remedies and accountability mechanisms for High Courts.
- Whether existing guidelines notably those laid down in *Anil Rai v. State of Bihar* (2001) 7 SCC 318 and subsequent cases had been effectively implemented, and what further directions were necessary to address systemic judicial delays in pronouncing reserved judgments.

IV. ARGUMENTS OF THE PARTIES

A. Contentions of the Appellant

The appellant contended that the delay of over three years from the date of reservation of judgment to the date of hearing before the Supreme Court was wholly arbitrary, unjust, and prejudicial to the ends of justice. It was submitted that despite nine separate requests for early listing, the High Court had failed to deliver the reserved judgment effectively denying the appellant his constitutionally guaranteed right to a fair and speedy resolution of the proceedings.

The appellant further argued that the absence of any effective internal mechanism within the High Court by which a litigant could bring a delay in the delivery of a reserved judgment to the notice of the concerned bench or the Chief Justice effectively rendered litigants remediless. This systemic gap, it was submitted, eroded public confidence in the judiciary and defeated the very purpose of adjudication. Reliance was placed on the constitutional mandate under Article 21 and the principle that justice delayed is justice denied.

B. Contentions of the Respondents

The State of Uttar Pradesh and the other respondents submitted that the matter had indeed been relisted and adjourned on multiple occasions, principally due to the non-appearance of counsel for the appellant. It was contended that procedural difficulties and the failure of the appellant's own counsel to appear had contributed substantially to the delay, and that the High Court could not be faulted for the entirety of the lapse.

However, the respondents did not offer any substantial justification for the prolonged delay of over three years that elapsed between the reservation of judgment on 24 December 2021 and the filing of the Special Leave Petitions before the Supreme Court. The Supreme Court implicitly rejected the suggestion that non-appearance of counsel could excuse the non-delivery of a judgment that had already been reserved.

V. JUDICIAL REASONING AND OBSERVATIONS

The judgment, authored by Justice Prashant Kumar Mishra, is notable for its candid acknowledgment of a recurring and systemic failure within the Indian higher judiciary. The Court's reasoning proceeded on several interconnected planes: constitutional, institutional, and remedial.

A. Constitutional Dimension: Article 21 and Speedy Justice

The Supreme Court reaffirmed that the right to a speedy trial, which necessarily includes the timely pronouncement of judgment after a case has been heard and reserved, is an inseparable component of the right to life and personal liberty under Article 21 of the Constitution. The court emphasised that the failure of a High Court to deliver a reserved judgment within a reasonable period is not a mere procedural lapse it constitutes a substantive violation of the litigant's fundamental right.

The Court observed that in most High Courts, there exists no mechanism by which a litigant can approach the concerned bench or the Chief Justice to bring to their notice the delay in delivering a reserved judgment. This structural lacuna, the Court held, leaves litigants in a state of helplessness that is fundamentally incompatible with constitutional guarantees.

B. Institutional Dimension: Precedent and Systemic Failure

The Court noted with concern that this was far from the first occasion on which the Supreme Court had been confronted with the issue of delayed pronouncement of reserved judgments. A series of earlier decisions had already issued detailed guidelines on the subject, including:

- Anil Rai v. State of Bihar (2001) 7 SCC 318 the foundational precedent
- Jagdev Singh Talwandi (1984) 1 SCC 596
- Zahira Habibulla H. Sheikh v. State of Gujarat (2004) 4 SCC 158
- Mangat Ram v. State of Haryana (2008) 7 SCC 96
- Ajay Singh v. State of Chhattisgarh (2017) 3 SCC 330
- Balaji Baliram Mupade v. State of Maharashtra (2021) 12 SCC 603
- Ratilal Jhaverbhai Parmar v. State of Gujarat (2024 INSC 801)
- K. Madan Mohan Rao v. Bheemrao Baswanthrao Patil (2022 INSC 1025)

The Court found that despite this long line of authority, the situation had not materially improved. It held that the root cause of recurrence was the lack of enforceable mechanisms guidelines existed in abundance, but adherence was inconsistent and accountability was absent. The judgment thus sought to move from exhortation to enforcement.

C. Remedial Dimension: From Guidelines to Enforcement

The Court noted the observations made in Anil Rai that, while no period for pronouncement of judgment is prescribed under either the Code of Civil Procedure or the Code of Criminal Procedure for High Courts, the pronouncement of judgment is an integral part of the justice dispensation system and must be made without undue delay. The Anil Rai guidelines, which had recommended that matters not decided within three months of reservation should be reported to the Chief Justice, had evidently not been consistently implemented across all High Courts.

The present Court accordingly converted these recommendations into binding and structured directions, establishing a clear escalation mechanism designed to prevent institutional inertia from defeating the rights of litigants.

VI. RATIO DECIDENDI AND DIRECTIONS ISSUED

The ratio decidendi of the judgment may be summarised as follows: the prolonged non-delivery of a reserved judgment by a High Court, without adequate justification, violates the fundamental right of litigants under Article 21 of the Constitution of India and undermines the institutional credibility of the judiciary. Courts have a positive constitutional obligation to deliver judgments within a reasonable period after hearing is concluded. Where internal mechanisms fail to ensure this, the Supreme Court, in the exercise of its powers under Article 142 and its supervisory jurisdiction, is entitled to issue binding directions to ensure compliance.

The Court issued the following specific directions, ordered to be circulated to the Registrar Generals of all High Courts in India for strict compliance:

- If a judgment is not pronounced within three months of being reserved, the Registrar General of the concerned High Court must immediately place the matter before the Chief Justice.
- The Chief Justice shall direct the concerned bench to deliver the judgment within two weeks of such intimation.
- If the judgment is still not delivered within those two weeks, the matter shall be reassigned to another bench for fresh disposal.
- Registrar Generals of all High Courts must furnish monthly lists of all cases where judgments have been reserved but remain unpronounced beyond the permissible period, ensuring ongoing institutional accountability.
- Litigants in whose cases judgments have remained reserved beyond three months are entitled to invoke these directions before the appropriate authority to ensure accountability.

VII. CRITICAL ANALYSIS

A. Significance of the Judgment

The judgment is significant for several reasons. First, it marks a decisive shift from advisory guidelines to enforceable directions. The Supreme Court has long issued guidelines on judicial administration, but these have often remained aspirational. By establishing a step-by-

step escalation mechanism with specific timeframes and directing its circulation to all Registrar Generals, the Court has attempted to institutionalise accountability in a manner that transcends individual cases.

Second, the judgment brings the right to the timely delivery of a reserved judgment within the express fold of Article 21. This is an important constitutional statement: it recognises that the denial of justice does not arise only from wrongful conviction or unlawful detention, but equally from the systemic failure to conclude proceedings that have already been heard. The litigant who has already argued their case before a High Court and awaits a verdict stands in a peculiarly vulnerable position the matter is sub judice and cannot be independently agitated elsewhere, yet no verdict is forthcoming. The Court's recognition of this vulnerability is constitutionally apposite.

Third, by directing monthly reporting by Registrar Generals, the judgment creates a systemic monitoring mechanism that could, if implemented effectively, transform the management of reserved judgments across all High Courts. This represents a meaningful step towards judicial transparency and institutional self-regulation.

B. Limitations and Challenges

Despite its significance, the judgment also invites certain critical observations. The escalation mechanism prescribed referral to the Chief Justice, two-week direction, and then reassignment presupposes a degree of administrative capacity and responsiveness that may not uniformly exist across all High Courts in India. The Allahabad High Court, for instance, already had an administrative order from 2019 that directed relisting of pending reserved matters, and yet this proved insufficient in the present case. The question therefore arises: what ensures that the new directions will be followed when the old ones were not?

Additionally, the judgment does not directly address the underlying causes of judicial delay, such as acute judicial vacancies, heavy docket pressure, and the absence of institutional support structures for research and drafting. While the three-month outer limit is a commendable norm, it may place undue pressure on judges who are simultaneously dealing with large volumes of pending work. A holistic approach addressing judicial appointments, infrastructure, and workload allocation would be necessary to fully realise the aims of the present directions.

Furthermore, while the directions are to be circulated to all Registrar Generals, the mechanism for enforcing compliance with the monthly reporting requirement is not articulated in detail. Without a corresponding supervisory framework at the Supreme Court level, the directions risk becoming another set of well-intentioned guidelines that are observed in the breach.

C. Relationship with Anil Rai and the Broader Jurisprudence

The judgment is best understood as a culmination and crystallisation of a long jurisprudential arc beginning with *Anil Rai v. State of Bihar* in 2001. The Court in *Anil Rai* had already made the compelling observation that delays in the delivery of judgments shake the confidence of the people in the judicial system and that a time had come for the judiciary to assert itself in preserving its stature and upholding the rule of law. Ravindra Pratap Shahi takes that observation and converts it from a normative aspiration into a structured institutional mandate.

The case also sits within a broader constitutional jurisprudence on the right to speedy trial, which traces its origins to *Hussainara Khatoon v. State of Bihar* (1980) 1 SCC 81, where the Supreme Court first recognised the right to a speedy trial as a fundamental right under Article 21. The present judgment extends that framework from the pre-trial and trial stages to the post-hearing, pre-judgment stage, thereby completing the constitutional protection across the entire arc of judicial proceedings.

VIII. CONCLUSION

Ravindra Pratap Shahi v. State of U.P. & Ors. (2025 INSC 1039) is a landmark judgment in the domain of judicial accountability and constitutional rights. By prescribing a three-month outer limit for the delivery of reserved judgments, establishing a structured escalation mechanism, and directing monthly monitoring across all High Courts, the Supreme Court has taken a definitive step towards transforming the principle that “justice delayed is justice denied” from a rhetorical maxim into an enforceable constitutional norm.

The judgment reflects the Supreme Court’s acute awareness of the gap between the aspirational standards set by earlier decisions and the reality experienced by litigants waiting years for judgments in cases already argued and decided. In doing so, it reaffirms the

judiciary's own commitment to self-reform and institutional accountability a commitment that is as vital to the credibility of the legal system as any substantive decision on the merits of a case.

Whether the directions issued will succeed where earlier guidelines did not will ultimately depend on the willingness of High Courts to internalise and implement these mandates in letter and spirit. The judiciary's legitimacy rests not only on the quality of its judgments but equally on the timeliness of their delivery. This case is a timely and important reminder of that fundamental truth.

SELECT REFERENCES

- Ravindra Pratap Shahi v. State of U.P. & Ors., 2025 INSC 1039
- Anil Rai v. State of Bihar, (2001) 7 SCC 318
- Hussainara Khatoon v. State of Bihar, (1980) 1 SCC 81
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- Constitution of India, Article 21.