
TRIAL BY MEDIA VS. FAIR TRIAL: A CONSTITUTIONAL ANALYSIS OF MEDIA INFLUENCE ON JUDICIAL INDEPENDENCE

Vaishnavi Sagar, United University, Prayagraj

ABSTRACT

The phenomenon of “trial by media” has emerged as a significant challenge to the administration of justice in contemporary democratic societies. While the media serves as a vital instrument for ensuring transparency, accountability, and public awareness, its increasing tendency to sensationalize sub judice matters often leads to prejudgment of issues that are within the exclusive domain of the judiciary. This paper critically examines the constitutional conflict between the right to freedom of speech and expression under Article 19(1)(a) and the right to a fair trial as an integral component of Article 21 of the Constitution of India.

Through an analytical study of landmark judicial pronouncements such as *Manu Sharma v. State (NCT of Delhi)*, *Sahara India Real Estate Corp. Ltd. v. SEBI*, and *R.K. Anand v. Registrar, Delhi High Court*, the paper evaluates the extent to which media intervention influences judicial proceedings and impacts judicial independence. It further explores the role of regulatory mechanisms, including the Contempt of Courts Act, 1971, and judicially evolved doctrines like postponement orders, in addressing the issue of prejudicial publicity.

The study argues that while media activism can at times act as a catalyst for justice by exposing systemic failures, its unchecked exercise poses serious risks to the presumption of innocence, due process, and the integrity of the judicial system. In the digital era, the problem is further aggravated by the rapid spread of unverified information through social media platforms. The paper concludes that a delicate balance must be maintained between media freedom and fair trial rights through a combination of judicial vigilance, ethical journalism, and a more structured regulatory framework.

Keywords: Trial by Media; Fair Trial; Judicial Independence; Freedom of Speech and Expression; Article 21; Article 19(1)(a)

Introduction

The relationship between media coverage and criminal justice has raised serious issues for both legal scholars and practitioners in the era of round-the-clock news cycles and pervasive social media presence. The “trial by media” phenomenon has become a serious threat to the right to a fair trial, which is one of the cornerstones of legal systems around the world. When media outlets provide extensive coverage of criminal cases, frequently accompanied by speculative reporting and prejudiced commentary, they risk creating a parallel court of public opinion that could ultimately affect formal legal procedures. The media’s influence on law has become increasingly pronounced in this context.

Trial by media refers to the process wherein media institutions through television debates, news reports, social media discussions, and investigative journalism create a parallel adjudicatory environment that tends to prejudge the guilt or innocence of an accused even before the court of law delivers its verdict. This trend has gained significant momentum in India with the advent of 24-hour news channels, digital journalism, and social media platforms, where information circulates rapidly and often without adequate verification. The race for higher viewership, sensational headlines, and public engagement has further intensified this issue, leading to the prioritization of narratives over neutrality.

The rise of media trials raises serious constitutional concerns, particularly in the context of the delicate balance between the right to freedom of speech and expression and the right to a fair trial. Article 19(1)(a) of the Constitution of India guarantees freedom of speech and expression, which includes the freedom of the press. This freedom is essential for maintaining an informed citizenry and fostering democratic accountability. However, this right is not absolute and is subject to reasonable restrictions under Article 19(2), including those related to contempt of court, defamation, and public order.

On the other hand, the right to a fair trial is an integral component of Article 21, which guarantees the right to life and personal liberty. The Supreme Court of India has consistently interpreted Article 21 to include the right to a fair, impartial, and unbiased trial. A fair trial necessitates that the accused is presumed innocent until proven guilty, that judicial decisions are based solely on evidence presented before the court, and that external influences whether political, social, or media-driven do not interfere with the administration of justice.

The conflict arises when media reporting goes beyond factual narration and enters the domain of opinion-making, speculation, and public judgment. In high-profile criminal cases, the media often conducts its own “investigation,” presents selective evidence, interviews witnesses, and frames narratives that may influence public perception. This not only risks prejudicing the minds of judges, witnesses, and investigators but also undermines the foundational principle of “innocent until proven guilty.” In extreme cases, it creates a form of “mob justice,” where public opinion, shaped by media narratives, begins to demand immediate punishment irrespective of due process.

Furthermore, the impact of trial by media is not limited to the accused alone. It also affects the credibility and independence of the judiciary. Judges, though trained to remain impartial, do not function in isolation from society. Intense media scrutiny and public pressure can create an environment where judicial decision-making is indirectly influenced by external expectations. This poses a serious threat to judicial independence, which is a basic feature of the Constitution.

The problem is further aggravated in the digital age, where social media platforms have democratized content creation. Today, every individual with access to a smartphone can participate in shaping public discourse. While this has enhanced freedom of expression, it has also led to the spread of misinformation, unverified claims, and prejudicial content on an unprecedented scale. Unlike traditional media, digital platforms often operate without stringent regulatory oversight, making it difficult to control the dissemination of potentially harmful narratives.

In India, several high-profile cases have highlighted the dangers of media trials, prompting judicial intervention and scholarly debate. The Supreme Court has, on multiple occasions, cautioned against excessive media interference in ongoing investigations and trials, emphasizing the need to preserve the sanctity of the judicial process. At the same time, the Court has also recognized the importance of a free press in a democratic society, thereby underscoring the need for a careful balancing of competing rights.

1.1 Historical Development

In the late 20th and early 21st centuries, the term “trial by media” became popular to describe how media coverage on television and in newspapers can damage a person’s reputation by generating public opinions about guilt or innocence either before or after a court decision. The

concept was first popularized as “Trial by Television” following the February 1967 episode of “The Frost Programme,” in which host David Frost questioned insurance fraudster Emil Savundra in an adversarial manner, raising questions about whether the accused’s right to a fair trial would be compromised.¹

The notion that popular media can affect court cases extends back to the invention of the printing press and predates both contemporary television and digital media. However, in recent decades, this phenomenon has become much more intense due to the accelerated pace of media cycles and the proliferation of news outlets. High-profile cases nowadays frequently garner extensive coverage across a variety of platforms, resulting in what some legal scholars refer to as “a lynch mob-like atmosphere of public hysteria.”

1.2 Defining Trial by Media

Trial by media refers to the phenomenon where media outlets particularly news channels and newspapers intensely cover legal cases, often adopting the roles of investigator, prosecutor, and judge simultaneously.² This extensive coverage creates public perceptions about the guilt or innocence of the accused before the judiciary has delivered its verdict. In this process, the lines between reporting facts and sensationalizing stories frequently blur, leading to prejudiced views and potentially influencing the legal process itself.

The media is sometimes accused of inciting public hysteria during high-profile court trials, which not only makes it more difficult to secure a fair trial but also ensures that the accused will be under constant public scrutiny for the rest of their life, regardless of the trial’s verdict. This issue is especially troubling in situations involving well-known people, as irrelevant information may taint the jury’s or the public’s impartiality.

1.3 Constitutional Safeguards

The right to a fair trial stands as one of the cornerstones of modern legal systems worldwide. In India, this right derives from Article 21 of the Constitution, which guarantees the right to life and personal liberty.³ This fundamental right encompasses several key principles,

¹ Suzanne Christie, ‘Trial by Media: Politics, Policy and Public Opinion, the Case of the ACT Heroin Trial’ (1998) 10(1) *Current Issues in Criminal Justice* 37.

² Aishwarya Agrawal, ‘Media Trial and Judiciary’ (LawBhoomi, 31 July 2024) <<https://lawbhoomi.com/media-trial-and-judiciary/>>

³ Constitution of India 1950, art 21

including the presumption of innocence, the right to legal representation, and the right to be tried by an impartial tribunal.

Internationally, the right to a fair trial is enshrined in various human rights instruments. Article 10 of the Universal Declaration of Human Rights provides that “Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.” Similarly, Article 14 of the International Covenant on Civil and Political Rights (ICCPR) elaborates on the components of a fair trial.⁴

At the heart of fair trial guarantees lies the presumption of innocence the principle that individuals are innocent until proven guilty beyond reasonable doubt. This fundamental tenet of criminal jurisprudence serves as a safeguard against arbitrary prosecution and requires that the burden of proof rests with the prosecution. The criminal jurisprudence followed in India is explicitly based on the theory that an accused is entitled to a fair trial and is innocent until proven guilty beyond any reasonable doubt.

Pre-emptive limits on the media run against the “soul of justice,” even though we have witnessed the dangers of media overreach on many occasions.⁵ The Supreme Court declined to establish any general rules for media coverage in the Sahara case, thereby upholding the principle of open justice. Nevertheless, pretrial publicity can significantly jeopardize the foundational principle of innocence by forming widespread public perception of guilt, potentially influencing judicial outcomes.⁶

Media Trials and Their Impact on Justice

Media trials pose several threats to the integrity of judicial proceedings. When news outlets engage in extensive coverage of cases, they risk influencing both public opinion and judicial decision-making. The extensive coverage of witness interviews, victim testimonies, and

⁴ National District Attorneys Association, ‘Understanding Pretrial Publicity: An Overview for Journalists’ (NDAA, 2024) <<https://ndaa.org/wp-content/uploads/MEDIA-Handout-Understanding-Pretrial-Publicity.pdf>>

⁵ Nyaaya, ‘Rules of Court Reporting: What Can the Media Cover and What It Can’t’ (Nyaaya, 2 June 2023) <<https://nyaaya.org/nyaaya-weekly/rules-of-court-reporting-what-can-the-media-cover-and-what-it-cant/>>

⁶ Surekha Vitthal Bhosale, ‘A Critical Analysis of Media Trial and Its Effect on Indian Judiciary’ (2022) 9(4) Journal of Emerging Technologies and Innovative Research a619–a624 <<https://www.jetir.org/papers/JETIR2204078.pdf>>

comments from legal experts may prejudice trial proceedings and judicial thinking. The impact extends beyond public perception to potentially affect the administration of justice itself.

Media activism can impose indirect pressure on adjudicating authorities to deliver justice to victims, which may interfere with trial proceedings and prejudice the accused's chance of proving innocence. This creates a challenging scenario where judges might face indirect pressure from media coverage and public opinion, potentially compromising their impartiality. When media coverage appears to pre-judge case outcomes, it risks eroding public confidence in the judiciary. The legal system must maintain a delicate balance between the public's right to information and the necessity of ensuring fair proceedings.⁷

The Supreme Court of India has repeatedly emphasized that the administration of justice is affected by media trials. In recent pronouncements, the Court has highlighted the need to determine at which stage of investigation details should be disclosed, recognizing that this issue involves the interests of victims, accused persons, and the public at large.⁸

2.1 Landmark Cases and Judicial Responses

The Indian judiciary has consistently addressed the tension between media freedom and the right to a fair trial through a series of landmark judgments. These decisions reflect a gradual evolution of constitutional jurisprudence aimed at balancing Article 19(1)(a) and Article 21 while preserving judicial independence.

2.1.1 Manu Sharma v. State (NCT of Delhi)⁹

The Jessica Lal murder case represents a defining moment in the discourse on trial by media.

Facts:

This case arose from the murder of Jessica Lal in 1999, who was shot dead at a social gathering in New Delhi after she refused to serve alcohol to the accused, Manu Sharma. The trial court acquitted the accused in 2006 due to lack of credible evidence, primarily because key witnesses turned hostile. The acquittal led to widespread public outrage, amplified by extensive media

⁷ Ibid

⁸ Nyaaya, 'Rules of Court Reporting: What Can the Media Cover and What It Can't' (Nyaaya, 2 June 2023) <<https://nyaaya.org/nyaaya-weekly/rules-of-court-reporting-what-can-the-media-cover-and-what-it-cant/>>

⁹ (2010) 6 SCC 1.

coverage, which questioned the integrity of the investigation and trial process. The media played a significant role in mobilizing public opinion, leading to a re-examination of the evidence by the Delhi High Court, which subsequently convicted the accused.

Issues:

Whether media coverage prejudiced the fairness of the trial.

Whether public opinion influenced judicial decision-making.

Judgment:

The Supreme Court upheld the conviction and recognized that the trial court had erred in its appreciation of evidence. However, the Court issued a strong caution against media trials, observing that excessive publicity and prejudicial reporting could interfere with the administration of justice. It emphasized that media must maintain restraint, particularly in sub judice matters, and should avoid publishing material that may influence the outcome of a trial. The Court acknowledged the constructive role of media in exposing injustice but warned against its potential to undermine due process.¹

2.1.2 State of Maharashtra v. Rajendra Jawanmal Gandhi¹⁰

Facts

This case arose in the context of a criminal trial where extensive media coverage and public discourse had the potential to influence the outcome of judicial proceedings. The concern before the Court was not merely about reporting facts, but about the tendency of the media to present opinions, speculate on guilt, and create a narrative that could affect the fairness of the trial. The issue was particularly significant because such reporting risked influencing witnesses, investigators, and even the general atmosphere in which justice was to be administered.

Issues:

Whether media reporting during ongoing proceedings can prejudice the administration of

¹⁰ (1997) 8 SCC 386.

justice.

Whether “trial by media” is compatible with the principles of fair trial and rule of law.

Judgment:

The Supreme Court strongly disapproved of the practice of media trials and made a categorical observation that:

“Trial by press, electronic media or public agitation is the very antithesis of rule of law.”

The Court emphasized that:

Judicial proceedings must be conducted strictly within the framework of law and evidence presented before the court.

Any external influence, including media-generated public opinion, has the potential to interfere with the due course of justice.

The role of the media is limited to reporting facts and should not extend to adjudicating guilt or innocence.

The Court further reiterated that allowing media trials would undermine the fundamental principle that justice must not only be done but must also be seen to be done in a fair and impartial manner.

2.1.3 Sahara India Real Estate Corp. Ltd. v. SEBI (2012)¹¹

Facts:

The case arose from disputes between Sahara India Real Estate Corporation and SEBI regarding financial transactions. Extensive media reporting on the case raised concerns that such publicity could prejudice judicial proceedings and affect the rights of the parties involved.

¹¹ (2012) 10 SCC 603.

Issues:

Whether courts can restrict media reporting of sub judice matters.

Whether such restrictions violate freedom of speech under Article 19(1)(a).

Judgment:

The Supreme Court introduced the concept of **postponement orders**, allowing courts to temporarily restrict publication of certain aspects of a case to prevent prejudice. The Court held that such orders are constitutionally valid provided they are:

Necessary to prevent real and substantial risk of prejudice

Proportionate and limited in duration

The Court further held that freedom of speech must be balanced with the right to a fair trial. This judgment marks a significant development by providing a preventive mechanism to address media trials rather than relying solely on contempt proceedings after damage has been done.

2.1.4 R.K. Anand v. Registrar, Delhi High Court (2009)¹²

Facts:

This case arose out of the infamous BMW hit-and-run case (1999), where a luxury car driven by Sanjeev Nanda ran over several pedestrians in Delhi. During the pendency of the trial, a television news channel conducted a sting operation which revealed that senior advocate R.K. Anand and Special Public Prosecutor I.U. Khan were allegedly attempting to influence a key prosecution witness. The sting operation was broadcast publicly, exposing serious misconduct within the legal process and raising concerns about the integrity of the trial.

The Delhi High Court took suo motu cognizance of the matter and initiated contempt proceedings against the advocates involved. The case eventually reached the Supreme Court, where broader questions regarding the role of media in ongoing trials and the permissibility of

¹² 8 SCC 106.

sting operations were examined.

Issues:

Whether sting operations conducted by media amount to interference with judicial proceedings.

Whether the broadcast of such material during an ongoing trial prejudices the administration of justice.

Whether media exposure of corruption justifies deviation from procedural safeguards.

Judgment:

The Supreme Court upheld the findings of contempt against R.K. Anand and confirmed that his conduct amounted to interference with the due course of justice. The Court recognized the sting operation as credible evidence exposing unethical practices and acknowledged the important role played by the media in bringing such misconduct to light.

However, the Court laid down important cautions:

Media must exercise restraint and responsibility while reporting sub judice matters.

Sting operations should not obstruct or prejudice ongoing judicial proceedings.

The administration of justice must not be compromised in the pursuit of sensationalism.

The Court also emphasized that while freedom of speech under Article 19(1)(a) is vital, it is subject to reasonable restrictions, including contempt of court, to protect the sanctity of judicial proceedings. The case highlights the dual role of media as both a watchdog and a potential disruptor of judicial proceedings.

2.1.5 Reliance Petrochemicals Ltd. v. Proprietors of Indian Express Newspapers (1988)¹³

Facts:

This case arose during a period when Reliance Petrochemicals Limited had issued partly

¹³ 4 SCC 592.

convertible debentures to the public, which became the subject of legal scrutiny and litigation. While the matter was sub judice, certain newspapers, including Indian Express, published articles and reports discussing the merits of the case and raising questions about the legality and propriety of the financial scheme.

Reliance Petrochemicals approached the Supreme Court seeking restrictions on such publications, arguing that media reporting on pending matters could prejudice judicial proceedings and influence public opinion against the company. The central concern was whether the press, in exercising its freedom, could comment on issues that were actively under judicial consideration.

Issues:

Whether the press has the right to publish and comment on matters pending before courts.

Whether such reporting could prejudice the administration of justice.

How to balance the right to know with the right to a fair trial.

Judgment:

The Supreme Court refused to impose a blanket prior restraint on publication and held that the **right to know is a fundamental aspect of freedom of speech and expression under Article 19(1)(a)**. The Court emphasized that an informed public is essential for the functioning of a democratic society.

However, the Court also clarified that:

Freedom of the press is not absolute and is subject to reasonable restrictions under Article 19(2).

Publications that create a real and substantial risk of prejudice to a fair trial may be restricted.

Courts must strike a balance between openness of justice and protection of judicial proceedings.

The Court thus adopted a balanced approach, allowing media reporting while cautioning

against prejudicial publications.

2.1.6 Romesh Thappar v. State of Madras (1950)¹⁴

Facts:

This case is one of the earliest constitutional cases dealing with the scope of freedom of speech and expression in India. The petitioner, Romesh Thappar, was the editor of a political journal named Cross Roads, which was published from Bombay. The Government of Madras imposed a ban on the entry and circulation of the journal within the state under the Madras Maintenance of Public Order Act, 1949, on the ground that its content was likely to disturb public safety and public order.

The petitioner challenged the validity of the ban before the Supreme Court, arguing that it violated his fundamental right to freedom of speech and expression guaranteed under Article 19(1)(a) of the Constitution.

Issues:

Whether the ban on circulation of a journal amounts to a violation of freedom of speech and expression.

Whether “public safety” and “public order” fall within the permissible restrictions under Article 19(2) (as it stood at that time).

What is the scope and importance of freedom of press in a democratic society.

Judgment:

The Supreme Court struck down the ban as unconstitutional and held that **freedom of speech and expression includes freedom of propagation and circulation**, which is essential for the functioning of democracy.

The Court made several important observations:

Freedom of speech and expression lies at the foundation of all democratic organizations.

¹⁴ AIR 1950 SC 124.

Any restriction on circulation directly affects this freedom.

At the time, “public order” was not a valid ground for restriction under Article 19(2) (prior to the First Constitutional Amendment).

The Court thus held that the impugned law was unconstitutional as it imposed restrictions beyond the permissible limits.

The Indian judiciary has addressed media trials through several important cases. In *Saibal Kumar Gupta and Ors. v. B.K. Sen and Anr.* (1961), the Supreme Court held that newspaper investigations during ongoing trials could interfere with the course of justice, whether prejudicing the accused or the prosecution.¹⁵

In the *Sushant Singh Rajput Case* (2020), the Bombay High Court noted that media trials interfered with the investigation and administration of justice when the actor’s girlfriend faced relentless media scrutiny and character assassination following his death.¹⁶

2.2 Balancing Media Freedom with Fair Trial Rights

The tension between freedom of the press and the right to a fair trial presents a significant constitutional challenge. While media freedom is essential for democratic functioning and transparency, it must be exercised responsibly to avoid compromising judicial integrity. The media serves as an essential pillar of democracy by ensuring transparency and accountability. However, when media coverage extends beyond reporting facts to sensationalizing stories or making prejudicial statements about ongoing cases, it risks undermining the presumption of innocence and the right to a fair trial.

2.3 Responsible Journalism

Ethical journalism plays a crucial role in addressing the challenges posed by media trials. Adherence to legal guidelines and respect for the judicial process are essential to prevent media coverage from compromising justice. Journalists must recognize their responsibility to report accurately and fairly, avoiding speculation and sensationalism that could prejudice legal proceedings. The Supreme Court has emphasized that while people have the right to access

¹⁵ *Saibal Kumar Gupta & Ors v. B.K. Sen & Anr.* [1961] INSC 12.

¹⁶ *Nilesh Navalakha v. Union of India* AIR 2021 Bom 14.

information, the premature revelation of important evidence during investigations may compromise the investigation itself.

Conclusion

The phenomenon of trial by media presents significant challenges to the fair administration of justice. While media freedom is essential for democratic functioning and public accountability, its exercise must be balanced against the equally important right to a fair trial. As the Supreme Court of India has emphasized, “administration of justice is affected by media trials,” highlighting the need for guidelines to navigate this complex intersection.

Moving forward requires multi-faceted solutions involving judicial initiatives, media self-regulation, and public education. The Supreme Court’s directive to develop guidelines for police press briefings represents an important step toward addressing these challenges. Similarly, media organizations must embrace responsible reporting practices that respect both the public’s right to information and accused persons’ right to fair proceedings.

The legal community also bears responsibility for educating the public about the importance of preserving fair trial rights and the potential harms of trial by media. By fostering greater understanding of these issues, we can work toward a media environment that informs the public without compromising the integrity of judicial processes. As technology continues to evolve and media platforms multiply, the challenges surrounding trial by media will likely grow more complex. Addressing these challenges requires ongoing dialogue among legal professionals, media practitioners, and policymakers to develop frameworks that protect fair trial rights while preserving press freedom in our increasingly connected world.

Trial by media poses a serious challenge to the administration of justice by undermining the fundamental principle of a fair trial and threatening judicial independence. While freedom of speech and expression is essential in a democratic society, its misuse through sensational and prejudicial reporting can distort public perception and interfere with due process. Judicial pronouncements have attempted to strike a balance by recognizing both the importance of media freedom and the necessity of fair trial safeguards. However, the absence of a clear and comprehensive regulatory framework continues to create ambiguity. Therefore, a balanced approach combining judicial control, ethical media practices, and limited regulatory

intervention is essential to ensure that media acts as a facilitator of justice rather than an impediment to it.

Bibliography

Books

1. M.P. Jain, *Indian Constitutional Law* (8th edn., LexisNexis 2018).
2. V.N. Shukla, *Constitution of India* (13th edn., Eastern Book Company 2017).
3. H.M. Seervai, *Constitutional Law of India* (4th edn., Universal Law Publishing 2013).

Journal Articles

1. N. Ram, “Trial by Media: Freedom of Press vs. Fair Trial” (2010) 45 *Journal of the Indian Law Institute* 123.
2. R. Rajagopal, “Media and the Law: Balancing Free Speech and Fair Trial” (2012) 54 *Economic and Political Weekly* 45.
3. Surekha Vitthal Bhosale, “A Critical Analysis of Media Trial and Its Effect on Indian Judiciary” (2022) 9(4) *Journal of Emerging Technologies and Innovative Research* a619–a624 <https://www.jetir.org/papers/JETIR2204078.pdf>.

Cases

1. *Manu Sharma v. State (NCT of Delhi)*, (2010) 6 SCC 1.
2. *State of Maharashtra v. Rajendra Jawanmal Gandhi*, (1997) 8 SCC 386.
3. *Sahara India Real Estate Corp. Ltd. v. SEBI*, (2012) 10 SCC 603.
4. *R.K. Anand v. Registrar, Delhi High Court*, (2009) 8 SCC 106.
5. *Reliance Petrochemicals Ltd. v. Proprietors of Indian Express Newspapers*, (1988) 4 SCC 592.
6. *Romesh Thappar v. State of Madras*, AIR 1950 SC 124.

Reports & Online Sources

1. Law Commission of India, *200th Report on Trial by Media: Free Speech vs. Fair Trial under Criminal Procedure (Amendments to the Contempt of Court Act, 1971)* (2006).
2. Press Council of India, *Norms of Journalistic Conduct* (latest edition).
3. Nyaaya, “Rules of Court Reporting: What Can the Media Cover and What It Can’t” (2

June 2023) <https://nyaaya.org/nyaaya-weekly/rules-of-court-reporting-what-can-the-media-cover-and-what-it-cant/>.

4. National District Attorneys Association, “Understanding Pretrial Publicity: An Overview for Journalists” (2024) <https://ndaa.org/wp-content/uploads/MEDIA-Handout-Understanding-Pretrial-Publicity.pdf>.
5. “Trial by Media and Fair Trial in India,” SCC Online Blog.
6. “Media Trial vs Right to Fair Trial,” Legal Service India (www.legalserviceindia.com).