

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS



Open Access, Refereed Journal Multi-Disciplinary
Peer Reviewed

www.ijlra.com

DISCLAIMER

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Managing Editor of IJLRA. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of IJLRA.

Though every effort has been made to ensure that the information in Volume II Issue 7 is accurate and appropriately cited/referenced, neither the Editorial Board nor IJLRA shall be held liable or responsible in any manner what sever for any consequences for any action taken by anyone on the basis of information in the Journal.

Copyright © International Journal for Legal Research & Analysis

EDITORIALTEAM

EDITORS

Dr. Samrat Datta

Dr. Samrat Datta Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Samrat Datta is currently associated with Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Datta has completed his graduation i.e., B.A.LL.B. from Law College Dehradun, Hemvati Nandan Bahuguna Garhwal University, Srinagar, Uttarakhand. He is an alumnus of KIIT University, Bhubaneswar where he pursued his post-graduation (LL.M.) in Criminal Law and subsequently completed his Ph.D. in Police Law and Information Technology from the Pacific Academy of Higher Education and Research University, Udaipur in 2020. His area of interest and research is Criminal and Police Law. Dr. Datta has a teaching experience of 7 years in various law schools across North India and has held administrative positions like Academic Coordinator, Centre Superintendent for Examinations, Deputy Controller of Examinations, Member of the Proctorial Board



Dr. Namita Jain



Head & Associate Professor

School of Law, JECRC University, Jaipur Ph.D. (Commercial Law) LL.M., UGC-NET Post Graduation Diploma in Taxation law and Practice, Bachelor of Commerce.

Teaching Experience: 12 years, AWARDS AND RECOGNITION of Dr. Namita Jain are - ICF Global Excellence Award 2020 in the category of educationalist by I Can Foundation, India. India Women Empowerment Award in the category of "Emerging Excellence in Academics by Prime Time & Utkrish Bharat Foundation, New Delhi. (2020). Conferred in FL Book of Top 21 Record Holders in the category of education by Fashion Lifestyle Magazine, New Delhi. (2020). Certificate of Appreciation for organizing and managing the Professional Development Training Program on IPR in Collaboration with Trade Innovations Services, Jaipur on March 14th, 2019

Mrs.S.Kalpana

Assistant professor of Law

Mrs.S.Kalpana, presently Assistant professor of Law, VelTech Rangarajan Dr.Sagunthala R & D Institute of Science and Technology, Avadi. Formerly Assistant professor of Law, Vels University in the year 2019 to 2020, Worked as Guest Faculty, Chennai Dr.Ambedkar Law College, Pudupakkam. Published one book. Published 8Articles in various reputed Law Journals. Conducted 1Moot court competition and participated in nearly 80 National and International seminars and webinars conducted on various subjects of Law. Did ML in Criminal Law and Criminal Justice Administration.10 paper presentations in various National and International seminars. Attended more than 10 FDP programs. Ph.D. in Law pursuing.



Avinash Kumar



Avinash Kumar has completed his Ph.D. in International Investment Law from the Dept. of Law & Governance, Central University of South Bihar. His research work is on "International Investment Agreement and State's right to regulate Foreign Investment." He qualified UGC-NET and has been selected for the prestigious ICSSR Doctoral Fellowship. He is an alumnus of the Faculty of Law, University of Delhi. Formerly he has been elected as Students Union President of Law Centre-1, University of Delhi. Moreover, he completed his LL.M. from the University of Delhi (2014-16), dissertation on "Cross-border Merger & Acquisition"; LL.B. from the University of Delhi (2011-14), and B.A. (Hons.) from Maharaja Agrasen College, University of Delhi. He has also obtained P.G. Diploma in IPR from the Indian Society of International Law, New Delhi. He has qualified UGC – NET examination and has been awarded ICSSR – Doctoral Fellowship. He has published six-plus articles and presented 9 plus papers in national and international seminars/conferences. He participated in several workshops on research methodology and teaching and learning.

ABOUT US

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN- 2582-6433 is an Online Journal is Monthly, Peer Review, Academic Journal, Published online, that seeks to provide an interactive platform for the publication of Short Articles, Long Articles, Book Review, Case Comments, Research Papers, Essay in the field of Law & Multidisciplinary issue. Our aim is to upgrade the level of interaction and discourse about contemporary issues of law. We are eager to become a highly cited academic publication, through quality contributions from students, academics, professionals from the industry, the bar and the bench. INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN 2582-6433 welcomes contributions from all legal branches, as long as the work is original, unpublished and is in consonance with the submission guidelines.

**“MANIKLAL SAHU VS STATE OF CHHATTISGARH, 2025
INSC 1107, SUPREME COURT OF INDIA, CRIMINAL
APPEAL NO. 5578 OF 2024: AN INSIGHTFUL EVALUATION
OF CAUSATION AND INTENT IN DELAYED DEATH
UNDER IPC SECTIONS 302 AND 307”**

AUTHORED BY - ASST. PROF. ABHIJIT MAHADEO CHAVAN,
New Law College, Mumbai

1.1. Introduction:

The evolution and interpretation of criminal jurisprudence in India have a profound impact on judicial outcomes, particularly in cases involving a complex chain of causation and violent injuries that ultimately result in death. Maniklal Sahu vs State of Chhattisgarh (2025 INSC 1107) serves as a recent and significant example in this domain, offering intricate legal and factual questions regarding intent, medical causation, and the appropriate application of penal provisions, especially Sections 302 and 307 of the Indian Penal Code (IPC). This case comment thoroughly analyses the Supreme Court's disposition, with due attention to precedent, medical testimony, and questions of legal doctrine.

1.2. Historical Background:

The Indian Penal Code (IPC) has long provided a detailed framework for distinguishing between murder, culpable homicide, and attempt to murder, incorporating the doctrines of causation and intention. Several judgments over decades have refined the jurisprudence around these provisions, particularly with respect to determining the liability of an accused when the victim dies due to injuries after a prolonged interval and subsequent medical complications.

In this context, Maniklal Sahu vs State of Chhattisgarh brought to focus recurring issues such as the doctrine of direct versus remote causality, the admissibility and reliability of medical and eyewitness testimony, and the extent to which supervening medical conditions (e.g., septicaemia or pneumonia) alter criminal liability. Indian courts have consistently referred to classic common law positions, such as those in “R. v. Holland” and indigenous judgments, establishing that the original wound remains the principal cause of death unless the chain of causation is clearly broken by unrelated, independent factors. The present case thus provided

a fresh opportunity for the apex court to clarify and consolidate these principles.

1.3. Facts of the case:

On 22 February 2022, Maniklal Sahu, along with three other co-accused, allegedly trespassed into the residence of the deceased, Rekhchand Verma, dragged him to the terrace, flung him from the rooftop, and subsequently assaulted him further once he hit the ground. The victim suffered severe injuries, including a critical head wound and, more importantly, spinal trauma resulting in paraplegia.

After emergency care and extended hospitalization, the victim survived for approximately nine months but ultimately succumbed on 8 November 2022. The immediate medical causes cited in testimonies and post-mortem reports included septic shock, bilateral pneumonia, infected bedsores, hepatic dysfunction—all traceable to the spinal injury and resulting paraplegia.

The original charges involved Sections 458, 294, 506B, and 323 of the IPC, but with the victim's eventual demise, Section 302 (murder) was added. The Sessions Court found all four accused guilty under Section 302 and sentenced them to life imprisonment. The convicts appealed to the High Court, which altered the conviction from Section 302 IPC (murder) to Section 307 IPC (attempt to murder), imposing a sentence of seven years rigorous imprisonment and a fine. Dissatisfied, Maniklal Sahu appealed to the Supreme Court.

1.4. Legal Issues:

1. Whether the High Court erred in altering the conviction from murder under Section 302 IPC to attempt to murder under Section 307 IPC, on the ground that the deceased survived for an extended duration and ultimately died due to medical complications?
2. Whether the prolonged interval between the assault and eventual death, coupled with supervening medical issues, breaks the causal chain necessary for holding the accused guilty of murder?
3. What is the correct interpretation and application of the doctrines of causation and intention with respect to Section 299 (Culpable Homicide), Section 300 (Murder), and Section 307 (Attempt to Murder) of the IPC in this context?
4. Whether medical evidence, particularly concerning the nature of injuries and cause of death, sufficiently established the connection between the accused's act and death,

thereby justifying a conviction under Section 302?

1.5. Arguments from Both Sides:

1.5.1. Appellant's Arguments

The primary plea from the appellant (accused) was that the death of the victim was too remote from the injuries inflicted, occurring nearly nine months after the initial assault.

The defence emphasized lack of proximity in the causal chain, contending that death resulted from septicaemia and pneumonia, which they argued could be attributed to inadequate or improper medical care rather than the initial injury.

It was further submitted that the key eyewitnesses (brothers and mother of the deceased) were interested parties and their testimonies lacked independence and impartiality, thus requiring greater caution in acceptance.

The defence also stressed that the High Court's modification of the conviction from Section 302 to Section 307 should have instead resulted in acquittal, considering the lack of direct nexus between act and death.

1.5.2. State's Arguments:

The prosecution and State strongly contested any reduction or acquittal, asserting that the trauma suffered by the deceased at the hands of the accused led, via a natural and probable sequence of events, to death.

The State highlighted settled legal principle enshrined in Explanation 2 to Section 299 IPC and various judgments—that the possibility of skilful medical intervention preventing death is irrelevant in ascertaining criminal liability.

The prosecution, relying both on medical evidence and dying declarations, maintained that the injuries (primarily the spinal trauma resulting in paraplegia and ultimately fatal systemic infection) were an unbroken chain leading to death. On these grounds, the conviction under Section 302 should be retained, and the High Court erred gravely in downgrading the offense to 'attempt to murder'.

1.6. Legal Aspect:

The Supreme Court's deliberations focused meticulously on distinguishing between direct and remote causes of death, channelling Indian and comparative jurisprudence. The doctrine of causation, as embodied in Explanation 2 to Section 299, establishes that an assailant is responsible for fatal consequences of their conduct, even when the victim survives for a substantial period, provided there is no break in causal connection.

1.7. Key facets of law addressed:

Direct Versus Remote Causation: Death delayed by complications (such as septicaemia) arising as a direct and probable consequence of an injury does not sever legal culpability. Only truly remote or independently supervening causes, unconnected to the original injury, can absolve or mitigate liability.

Section 307 IPC- Attempt to Murder: Mere failure to achieve fatal result, when injuries are of a nature likely to cause death, may still constitute 'attempt to murder'. However, where death occurs and can be attributed to original injuries, Section 302 is usually most appropriate.

Relevance of Medical Evidence: Testimonies of treating physicians and forensic pathologists established that death was the proximate, natural outcome of the initial spinal injury aligning with established legal tests for murder when fatality is not instantaneous but results inevitably from infliction.

1.8. Judgment Analysis from Each Judge's View:

The Supreme Court bench comprised Justices J.B. Pardiwala and R. Mahadevan. The judgment, authored primarily by Pardiwala J., was unequivocal and critical of the High Court's reasoning.

Majority View (Justice J.B. Pardiwala, concurred by Justice R. Mahadevan):

The Court held that the High Court erred significantly by focusing on the delayed nature of death and possible faults in medical care. It restated that the "possibility that skilful and efficient medical treatment might prevent the fatal result is wholly irrelevant."

The evidence, both oral (eyewitnesses, doctors) and documentary (medical records, post-mortem report), consistently linked the accused's actions directly to the fatal complications

and death. The causal chain was unbroken.

The Court critiqued the High Court for overlooking the legal principle that any death resulting from injuries intended, and likely, to cause death—no matter how delayed or medically complicated—satisfies the criteria for murder as defined under Section 300 Thirdly, IPC.

The Supreme Court's final analysis emphasized that the original injury was sufficient in the ordinary course of nature to cause death, making Section 302 (murder) the only appropriate conviction.

The appeal was dismissed, restoring the trial court's original judgment convicting under Section 302.

1.8.1. Ratio Decidendi:

Primary Legal Reasoning: The ratio decidendi lies in reaffirming that where injuries inflicted are sufficient in the ordinary course to cause death, the offense is murder, even if the victim dies much later owing to medical complications directly flowing from those injuries.

The High Court erred in treating lack of proper treatment or the lapse of several months as a break in the necessary causal nexus. Legal doctrine does not require death to be immediate; it requires the act to be sufficient, in all reasonable probability, to bring about death, and for the link to remain unbroken unless intervened by independent, unrelated factors.

The case further clarifies that prosecution's burden is to prove causal connection on the balance of probabilities, not beyond the reach of all academic or hypothetical possibilities as postulated by defence.

1.8.2. Obiter Dicta:

The judgment also included instructive obiter on judicial approaches to causation and intention, cautioning courts against mechanically downgrading charges due to extended survival periods or extensive hospital treatment.

The bench underlined the importance of not permitting medical advances or heroic interventions to dilute criminal liability when original harm was sufficient (or intended) to kill. The judgment serves as a guide for future courts on distinguishing between a proximate, natural

chain of events and cases where external supervening causes genuinely sever criminal responsibility.

1.9. Conclusion:

In *Maniklal Sahu vs State of Chhattisgarh*, the Supreme Court delivered a rigorous and reasoned exposition of criminal law principles governing causation and intention. The decision critically addressed persistent ambiguities in lower courts' reasoning and set out clear directives for future jurisprudence. The bench's insistence on following settled law, especially regarding the irrelevance of intervening medical care and delayed death, serves as a benchmark for the assessment of murder and culpable homicide.

The outcome affirms the principle that an offender remains responsible for fatal consequences so long as the injuries inflicted are causally unbroken and sufficient to, in the ordinary course, bring about death. The case will likely be cited as authoritative precedent in interpreting the chain of causation and related criminal liability.

1.9.1. Findings and Suggestions:

Findings:

The Supreme Court correctly restored the original conviction, setting aside the High Court's dilution, thereby upholding doctrinal uniformity on causative liability.

The testimony of medical experts and contemporaneous dying declarations wielded significant influence in establishing the integrity of the causal chain.

The judgment's didactic character provides much-needed clarity to prosecutors and trial courts on handling similar cases of delayed death and medical complications.

Suggestions:

Lower courts should exercise greater caution in analysing medical evidence, ensuring that distinctions between proximate and remote causation are grounded in fact and law.

Judicial education on the significance of explanations attached to IPC provisions (especially Sec. 299 and 300) can aid in avoiding similar errors.

The prosecution should, wherever possible, pre-empt defence strategies attacking medical continuity by eliciting detailed expert opinions linking injury to death.

There is scope for legislative or judicial guidelines on accounting for advances in medical science, to clearly demarcate the principles of liability where the recovery period is unusually protracted due to modern treatment protocols.

References:

Case law:

Maniklal Sahu vs State of Chhattisgarh, 2025 INSC 1107, Supreme Court of India, Criminal Appeal No. 5578 of 2024

References to landmark cases:

1. Sreedharan v. State of Kerala (1969 SCC Online Ker 46)
2. R v. Holland (English common law)
3. State of Haryana v. Pala Ors. (1996 8 SCC 51)
4. Sudershan Kumar v. State of Delhi (1975 3 SCC 831)
5. Patel Hiralal Joitaram v. State of Gujarat (2002 1 SCC 22)
6. Jagtar Singh Anr. v. State of Punjab (1999 2 SCC 174)
7. Prasad Pradhan Anr. v. State of Chhattisgarh (2023 11 SCC 320)

IJLRA