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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.

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ROLE OF COURTS IN RECTIFYING MORAL WRONGS IN TESTAMENTARY DISPOSITIONS AND ITS CONSTITUTIONAL FRAMEWORKS.

AUTHORED BY - ROHIT K & DR. P BRINDA

INTRODUCTION:

The Indian Succession Act, 1925¹ is the cornerstone statute governing testamentary succession in India. It applies primarily to Christians, Parsis, and Jews, while also offering general procedural guidance for others unless excluded by personal laws. The Act defines the legal capacity to make a will, the formalities required for execution, and the conditions for revocation, probate, and administration of estates. Under Section 59, any person of sound mind and not a minor may execute a valid will. The act further prescribes that the will must be in writing and signed by the testator in the presence of two or more witnesses (Section 63). The Act also outlines the process for proving a will in court, especially when its validity is challenged. In cases involving allegations of fraud, coercion, or undue influence, the burden is on the propounder to show that the will was executed freely and voluntarily. Sections such as Section 70 (Revocation of Will) and Section 71 (Incorporation by reference) helps to determine the continued applicability and authenticity of testamentary documents. If a testator executes a will under suspicious circumstances or significantly alters it close to death, courts may examine whether it was made in full consciousness and free of manipulation. Moreover, Part IX of the Act, which deals with Probate, Letters of Administration, and Administration of Assets, is relevant in cases where beneficiaries or heirs contest the will on moral or equitable grounds. Courts are empowered under this part to assess whether the will violates natural justice, especially in cases where dependents are excluded or beneficiaries unjustly enriched. The Indian Succession Act², procedural aspects, provides an avenue for equitable scrutiny through its requirement of free will, mental soundness, and the absence of undue influence, thereby making it possible to challenge wills that, while technically valid, are morally questionable. Whereas, the Act does not explicitly address moral wrongs, it empowers courts to declare wills void where improper influences or suspicious circumstances are proven. Thus, it acts as a legal gateway through which equity may enter to rectify injustice. When it comes to constitutional

¹ Law of intestate and Testamentary Succession, Paras Diwan

² www.lawbhoomi.com

framework, it further empowers courts to address moral injustices in testamentary dispositions. Article 14 of the Indian Constitution guarantees equality before the law, which courts may invoke when a will discriminates against certain heirs without just cause. Article 21 ensures the right to life and personal liberty, encompassing the right to livelihood; thus, courts may scrutinize wills that deprive dependents of their means of sustenance. Article 300A protects individuals from being deprived of their property without legal authority, allowing courts to invalidate wills that contravene statutory provisions or public policy.

LEGAL AND CONSTITUTION FRAMEWORKS:

The Hindu Succession Act, 1956 governs intestate and testamentary succession among Hindus, Buddhists, Jains, and Sikhs. While Hindus have testamentary freedom, that freedom is subject to customs, family obligations, and moral expectations. Though the Act itself does not regulate wills directly (testamentary succession is generally governed by the Indian Succession Act for Hindus), courts have interpreted Hindu moral and religious obligations (e.g., to provide for widows and unmarried daughters) when determining fairness through executing will. The courts have also invoked Section 6 (coparcenary property rights) and Section 8 (general rules of succession in the case of males) to examine whether testamentary dispositions unfairly deprive daughters or widows, especially post the 2005 Amendment that granted daughters equal coparcenary rights.

CODE OF CIVIL PROCEDURE, 1908:

The CPC provides the procedural framework for filing civil suits, including probate petitions, letters of administration, and suits for declaration or injunctions challenging wills. Under Order VI Rule 4, any party claiming undue influence, fraud, or coercion must specifically plead those facts. Further, Order XX Rule 5 mandates that judgments must be based on reasons, which becomes vital when challenging morally dubious wills.

Section 9 of the CPC³ gives civil courts jurisdiction over all civil matters, including those involving wills, unless expressly barred. Importantly, probate proceedings, while technically administrative in nature, are still subject to judicial scrutiny under the CPC. Courts may reject probate if the execution of the will appears unnatural, forced, or morally indefensible, even if it meets procedural formalities.

³ Code of Civil Procedure, 1908, Bare Act.

THE INDIAN EVIDENCE ACT, 1872 or THE BHARATIYA SAKSHYA ADHINIYAM, 2023

The Evidence Act governs how facts must be proven in court. For wills, Sections 68–71 are especially relevant. Section 68 mandates that a will must be proved by at least one attesting witness, unless the will is not disputed. Section 69 allows for alternative modes of proof when witnesses are unavailable, while Section 71 permits courts to examine the credibility of the witness if there are discrepancies.

Sections 101–114⁴ deal with burden of proof, which is essential when challenging a will on moral or equitable grounds. If undue influence is alleged, the burden of proof lies initially on the challenger. However, presumptions under Section 114 (like when a will is executed in suspicious circumstances or excludes close family without reason) can shift the burden back to the propounder.

Thus, the CPC and Evidence Act empower courts with procedural tools to dig deeper into the circumstances surrounding the creation of a will. They enable courts to go beyond the letter of the document to consider intent, fairness, and equity—making it possible to rectify moral wrongs when there is supporting evidence.

CONSTITUTIONAL FRAMEWORKS:

India's constitutional framework, especially Articles 14, 21, and 300A, offers a higher-order lens through which courts can assess the fairness and legality of testamentary dispositions. While wills are governed by personal and statutory laws, constitutional values often guide judicial discretion, especially in cases of manifest injustice or discrimination.

Article 14: Equality before law

Article 14 guarantees equality before the law and equal protection of the laws. While it typically applies to state action, Indian courts have extended its spirit into private legal arrangements, including wills, when they have a public or discriminatory effect. For example, a will that arbitrarily disinherits daughters, or is made under caste or gender bias, may be challenged for violating constitutional morality and equality norms.

⁴ Indian Evidence Bare Act, 1872

In *Githa Hariharan v. RBI* (1999)⁵, the Supreme Court invoked Article 14 to question discriminatory interpretations in personal laws. While not directly involving a will, the case illustrated how courts could bring constitutional values into personal legal domains, especially when vulnerable groups are affected.

Article 21; Right to Life and Dignity

Article 21 ensures the right to life and personal liberty, which includes the right to live with dignity. Courts have interpreted this provision expansively to include economic security and social justice, which are relevant in testamentary contexts where a will deprives dependents of support. If a person is denied livelihood, shelter, or dignity due to a will—particularly in the case of elderly widows, disabled heirs, or dependents—courts can scrutinize such documents through the lens of Article 21. This allows for a constitutional remedy even in matters seemingly private and non-state.

Article 300A: No Deprivation of property without Authority of Law

Article 300A protects the right to property, stating that no person shall be deprived of property except by authority of law. In cases where wills are manipulated, forged, or executed under duress, the resulting property deprivation can be contested under Article 300A. This provision becomes crucial when testamentary dispositions result in arbitrary disinheritance or fraudulent transfer of assets. Though Article 300A does not guarantee restitution by itself, it provides a constitutional grounding to seek judicial intervention and equitable relief.

LEGAL GROUNDS FOR COURT INTERVENTION

LACK OF TESTAMENTARY CAPACITY

A fundamental requirement for the validity of a will is that the testator must possess testamentary capacity at the time of its execution. Section 59 of the Indian Succession Act, 1925 provides that every person of sound mind, not being a minor, may dispose of their property by will. A person is said to have testamentary capacity if they understand the nature and effect of making a will, comprehend the extent of their property, and are aware of the claims of potential beneficiaries.⁶

The standard test for testamentary capacity was laid down in the landmark English case of

⁵ AIR 1999 SC 1149

⁶ Indian Succession Act, 1925, Sec 59.

Banks v. Goodfellow (1870)⁷, which remains influential in Indian jurisprudence. The court held that the testator must have a “sound disposing mind” and be free from delusions that might influence the disposition of assets. Indian courts have endorsed this approach and evaluate the mental condition of the testator based on medical evidence, witness testimony, and circumstances surrounding the execution.

Testamentary incapacity may arise due to mental illness, dementia, intoxication, delirium from physical illness, or other impairments affecting comprehension and judgment. However, the mere presence of a mental disorder does not automatically invalidate a will. The key question is whether the testator was of sound mind at the specific time the will was executed. Courts recognize that mental capacity can fluctuate, and a lucid interval may suffice for a valid execution.

In *Rani Purnima Debi v. Kumar Khagendra Narayan Deb*⁸, the Supreme Court held that a testator suffering from physical or mental ailments is not necessarily incompetent if the will was made during a lucid period and was executed with awareness of consequences. Similarly, old age or ill health alone does not imply lack of capacity unless it can be shown that the testator was incapable of understanding the nature of their act.

Importantly, if testamentary capacity is questioned, the burden of proof lies on the propounder of the will to establish that the testator was of sound mind at the relevant time. If serious doubt persists, especially when combined with unnatural bequests or suspicious circumstances, the courts may presume incapacity unless rebutted.

UNDUE INFLUENCE, FRAUD, OR COERCION IN TESTAMENTARY DISPOSITIONS

Testamentary freedom allows individuals to dispose of their property as they choose, but this autonomy is not absolute. If a will is procured through undue influence, fraud, or coercion, it is not considered a valid reflection of the testator’s violation and may be set aside by the court. These vitiating factors undermine the authenticity of a will and are recognized as legal grounds for judicial intervention under Section 61 of the Indian Succession Act, 1925.

⁷ (1870) LR 5 QB 549.

⁸ AIR 1962 SC 567.

Undue Influence

Undue influence arises when a person in a position of trust or dominance manipulates the testator to execute a will that favors them, often contrary to the testator's natural inclinations. The influence must be so overpowering that it suppresses the free agency of the testator. The Supreme Court in *Seth Beni Chand v. Kamla Kunwar*⁹ held that undue influence must be proven with cogent evidence, particularly when the beneficiary was in a position to dominate the testator's will. Mere persuasion or affection is not undue influence; it must amount to moral or psychological pressure.

For example, an elderly testator who is dependent on a caretaker may be vulnerable to influence. If the caretaker becomes the sole beneficiary in such a scenario, courts demand heightened scrutiny and require the propounder to dispel any presumption of undue influence.

Fraud

Fraud in testamentary matters involves deliberate deception to secure a benefit. This could include forging signatures, misrepresenting the contents of the will, or misleading the testator about the legal implications of the document. If the testator is misled into signing a document under the belief that it is something other than a will, the act is fraudulent.

Coercion

Coercion entails actual or threatened physical force or intimidation to compel the testator to make a will or include specific clauses. Though rare in practice, such cases are taken seriously by courts, as coercion negates the very principle of free will. As per Section 15 of the Indian Contract Act, coercion includes acts forbidden by law, unlawful detention, or threats thereof, which may also apply analogously in testamentary contexts.

Courts approach these allegations cautiously, balancing the presumption of due execution with the need to prevent abuse. When any of these elements are proved, the will is rendered invalid, and the estate is distributed according to intestate succession laws.

SUSPICIOUS CIRCUMSTANCES IN TESTAMENTARY DISPOSITIONS

In testamentary jurisprudence, suspicious circumstances refer to facts or events surrounding

⁹ (1976) 4 SCC 554

the execution of a will that cast doubt on its genuineness or voluntariness. The Indian judiciary has consistently held that if a will is surrounded by suspicious circumstances, the onus shifts to the propounder of the will to explain and dispel those doubts to the court's satisfaction. This is a departure from the general rule of evidence, illustrating the higher scrutiny involved in probate proceedings.

The Supreme Court in *H. Venkatachala Iyengar v. B.N. Thimmajamma*¹⁰ laid down the principle that the court must be satisfied that the will was "duly executed" and "genuine", and that the testator was in a sound and disposing state of mind, acting of his free will without coercion or influence. Suspicious circumstances, if unexplained, can render the will invalid even if its execution appears technically correct.

Common instances of suspicious circumstances include:

- Exclusion of natural heirs without explanation, particularly close family members who would normally be expected to inherit.
- Active involvement of the beneficiary in the execution or drafting of the will, such as arranging witnesses or the scribe.
- Execution in secrecy or absence of usual safeguards, such as attesting witnesses not being aware of the contents.
- Unnatural or unjust distribution of assets, such as the entire estate being given to a relatively distant acquaintance.
- Illness or incapacity of the testator at the time of execution, raising doubts about mental soundness.
- Lack of registration, while not mandatory under Indian law, becomes a factor when considered with other suspicious facts.

In *Jaswant Kaur v. Amrit Kaur*¹¹, the Supreme Court emphasized that the burden is on the propounder to remove all legitimate suspicions and prove that the will truly represents the testator's intent. The test of suspicious circumstances is thus both factual and contextual—what may seem suspicious in one case may not be so in another, depending on relationships, family structure, and property history.

While the law preserves testamentary autonomy, it also guards against abuse, particularly when

¹⁰ AIR 1959 SC 443

¹¹ (1977) 1 SCC 369

the circumstances suggest manipulation or deviation from a testator's natural inclinations.

WHETHER THERE IS ANY EQUITABLE REMEDY ONCE MORAL WRONGS OCCUR IN TESTAMENTARY DISPOSITIONS

In testamentary law, a moral wrong refers to a situation where a testator acts in a manner that, while legally valid, offends prevailing social or ethical standards such as disinheriting close dependents, favoring one child over another without clear justification, or ignoring a long-time caregiver. Courts are often confronted with such situations where the will reflects clear injustice but does not violate the letter of the law.

I. The Nature of Moral Wrongs vs. Legal Wrongs

Moral wrongs differ from legal wrongs in that they do not necessarily breach statutory requirements. A will may be formally valid—it complies with the legal requisites of testamentary capacity, proper execution, and absence of coercion—yet still be morally flawed. For instance, a parent may disinherit a disabled child out of spite or manipulate the distribution of property in a way that favors friends over indigent family members.

Courts traditionally uphold testamentary freedom, treating it as a cornerstone of private property rights. However, this freedom is not absolute. Equity, a branch of law that operates to mitigate the harshness of strict legal rules, may step in to provide relief where there is clear unfairness or unconscionability in the will's execution or effect. Once affected person has filed in original section in the high court according to their respective jurisdiction, then the case will come to hearing. The person has to prove that such will is not last will neither it is not original will or need to have proof regarding to the forged will, by the way of court they can set aside such Will. If they have forged the will the high court has power to sentence he/she to prison by directing the concern magistrate where such property situated.

II. Equitable Remedies Available

1. Doctrine of Undue Influence

While technically a legal doctrine, undue influence often overlaps with equitable principles. Where it can be shown that a beneficiary exercised dominion or manipulation over the testator, the will or specific bequests may be set aside. This protects the testator's genuine intent and prevents opportunistic or unethical behavior.

2. Constructive Trusts

Courts may impose a constructive trust where one party, typically the beneficiary, has

unjustly enriched themselves through the will at the expense of someone morally or equitably entitled. For example, if a testator promised property to a caregiver but left it to someone else, a court may recognize a constructive trust in favor of the caregiver to prevent fraud or unconscionable denial of benefits.

3. Proprietary Estoppel

If a person has relied on a testator's assurance or promise to their detriment such as working on land or providing lifelong care in expectation of inheritance courts may enforce an equitable remedy, granting them a share in the estate. This principle is grounded in fairness and reliance.

4. Family Provision Claims

While not constitutionally guaranteed in India, some jurisdictions recognize a family provision law under which courts can restructure wills to ensure dependents receive fair maintenance. In India, Muslim law allows limited testamentary freedom (only up to 1/3rd without heir consent), indirectly acknowledging moral responsibility. In contrast, under Hindu Succession Law, disinheritance is permitted but can be challenged on grounds like fraud or coercion.

III. Judicial Interpretation and Equity's Role

Indian courts have at times used Article 14 (equality) and Article 21 (right to life and dignity) to critique testamentary dispositions that have severely impacted dependents' welfare, though such intervention is rare. Equitable remedies are more commonly available through the civil court's discretion, especially when injustice is glaring and documented.

For instance, in *Krishna Kumar Birla v. Rajendra Singh Lodha* (2008)¹², the Supreme Court recognized the importance of moral obligations, though it stopped short of enforcing them without a legal cause. The case illustrated how ethical breaches can invite judicial scrutiny, especially when accompanied by suspicion, procedural irregularities, or manipulation.

IV. Limitations of Equity in Rectifying Moral Wrongs

Despite the tools available, courts are constrained from rewriting wills solely on moral grounds. Freedom of disposition is still a strong principle in Indian jurisprudence. Courts must tread carefully to avoid overstepping their role into legislating morality. Equity intervenes only where there is a supporting legal or factual basis, not where decisions are merely seen as unkind, unfair, or controversial.

¹² C. A NO. 2277 OF 2008

JUDICIAL APPROACH AND CASE LAWS

In the Indian legal system, the judiciary plays a crucial role in maintaining a balance between respecting testamentary freedom and addressing instances where such freedom results in legal or moral injustice. Testamentary freedom, which allows individuals to distribute their property upon death according to their wishes, is generally upheld. However, courts have intervened in cases where the will is marred by illegality, fraud, coercion, or where its consequences result in significant ethical concerns, particularly concerning the exclusion of legal heirs or dependents.

A foundational case in this area is *H. Venkatachala Iyengar v. B.N. Thimmajamma*¹³, where the Supreme Court elaborated the principles to be applied when evaluating the validity of a will. The Court stated that a will must be executed voluntarily and in sound mental condition. When a will appears suspicious such as when it disinherits close family members without a rational explanation the burden lies on the propounder of the will to remove those doubts. This decision laid the groundwork for courts to consider not just the formal legality of a will, but also the broader context in which it was made.

In *Jaswant Kaur v. Amrit Kaur*¹⁴, the Supreme Court invalidated a will because of suspicious circumstances surrounding its execution. The testator had left out close family members without explanation and the circumstances suggested undue influence. The Court reiterated that the law does not permit a will to stand simply because it was executed with formal compliance; the content and context must also be examined to determine its genuineness.

In some cases, courts have taken a more progressive approach in recognizing the moral dimensions of inheritance. For instance, in *Savithri v. Karthyayani Amma*, the Court invalidated a will that excluded a daughter without reasonable justification, especially when evidence showed a close relationship had existed. Here, the Court highlighted that a will which offends natural justice and seems contrary to common expectations warrants close judicial scrutiny¹⁵.

While these cases highlight judicial willingness to address injustices, it must be noted that

¹³ AIR 1959 SC 443.

¹⁴ (1977) 1 SCC 369.

¹⁵ AIR 2007 SC 1062.

courts typically do not interfere with testamentary choices unless clear legal infirmities are proven. This is largely because Indian succession law does not impose an obligation to treat all heirs equally. As such, a will may legally disinherit certain individuals, even if doing so appears morally unjust.

Constitutional values have subtly influenced judicial reasoning in recent years. Though constitutional rights generally do not apply to private acts like wills, courts have invoked Articles 14 and 21 to support equitable interpretations in inheritance disputes. For example, the judiciary has occasionally examined whether a will indirectly discriminates against a person based on gender, disability, or dependence, in violation of the constitutional ethos of equality and dignity¹⁶.

LIMITATIONS AND CHALLENGES IN RECTIFYING MORAL WRONGS IN TESTAMENTARY DISPOSITIONS

While courts play an essential role in addressing legal and moral wrongs in testamentary dispositions, their ability to rectify such injustices is not without limitations. The primary challenges stem from the balance between testamentary autonomy and equitable justice, as well as procedural and evidentiary constraints that hinder the effective adjudication of moral claims. One of the most significant limitations lies in the doctrine of testamentary freedom, which grants individuals broad autonomy to dispose of their property as they wish. Indian law, particularly under the Indian Succession Act, 1925, respects the testator's intentions, and courts are generally hesitant to interfere unless clear legal grounds such as fraud, coercion, or lack of capacity are established. Mere moral dissatisfaction—such as the exclusion of a dependent child or spouse—does not necessarily give rise to a legal cause of action, unless accompanied by procedural impropriety or undue influence.¹⁷

Another core limitation is the absence of a statutory obligation to maintain dependents through wills, unlike jurisdictions such as the UK or Australia where family provision laws enable courts to modify wills to protect dependents. In India, unless specific personal law provisions apply—such as the one-third testamentary restriction under Muslim law—testators are not legally required to distribute their assets equitably or morally.¹⁸

¹⁶ (2008) 3 SCC 1

¹⁷ Indian Succession Act, 1925, Sec 63; *K. K. Modi v. K. N. Modi*, (1998) 3 SCC 573.

¹⁸ *Abdul Rahim v. Sk. Abdul Zabbar*, AIR 2009 SC 2623.

Evidentiary challenges also pose a significant hurdle. Establishing claims of undue influence or coercion often requires substantial and credible evidence. However, wills are typically executed privately, and key witnesses may be deceased or unavailable by the time of litigation. This makes it difficult for disinherited heirs to prove manipulative conduct or suspicious circumstances, especially in the absence of medical or circumstantial documentation.¹⁹

Procedurally, the probate process itself can be slow and costly, deterring individuals from challenging potentially unjust wills. Additionally, courts may be reluctant to engage in subjective moral assessments, preferring clear legal violations over ambiguous moral concerns. This judicial conservatism, while legally sound, can result in morally problematic wills going unchallenged or being upheld despite strong ethical objections.

Furthermore, constitutional remedies under Articles 14, 21, and 300A, while conceptually powerful, are not easily invoked in testamentary matters, especially when there is no clear state action involved. The private nature of wills often restricts the direct applicability of fundamental rights unless personal laws or statutory frameworks demonstrate discrimination or arbitrariness.²⁰

SUGGESTIONS:

To further strengthen the judicial capacity to address moral wrongs in testamentary dispositions, several legal and policy-oriented suggestions may be considered. These proposals aim to reinforce fairness, protect vulnerable heirs, and align succession laws with constitutional and ethical values.

Firstly, judicial training and sensitization are essential for handling testamentary disputes that involve moral dimensions. Judges dealing with probate and succession matters should be encouraged to consider the broader socio-economic context of the testator and beneficiaries. This will ensure a more empathetic and equitable approach while adjudicating disputes that may be legally valid but ethically questionable.

Secondly, there is a pressing need to introduce statutory guidelines for family provision, similar

¹⁹ *Savithri v. Karthyayani Amma*, AIR 2007 SC 1062.

²⁰ *John Vallamattom v. Union of India*, AIR 2003 SC 2902; *Joseph Shine v. Union of India*, (2018) 2 SCC 189.

to those in jurisdictions like the UK, Australia, and New Zealand. These laws empower courts to revise a will to ensure that adequate provision is made for dependents, irrespective of the testator's intent. Enacting such legislation in India would provide a necessary check against arbitrary or vindictive disinheritance, especially in cases involving widows, children, or elderly parents.

Thirdly, the evidentiary framework under the Indian Evidence Act could be amended to allow for greater flexibility in proving undue influence or coercion, especially in testamentary cases involving elderly or ill individuals. At present, claimants bear a high burden to establish suspicious circumstances or manipulative behavior. Procedural innovations such as presumptions of undue influence in certain relationships (e.g., caregiver-beneficiary) could reduce this burden and enhance the ability to identify moral wrongs.

Fourthly, awareness and legal literacy must be promoted among citizens regarding the drafting and execution of wills. Many individuals draft wills without legal assistance, leading to ambiguities or potential misuse. Government and bar associations should collaborate to provide free or subsidized will-drafting services, especially for the elderly and those from marginalized communities.

From a constitutional perspective, there is scope to develop a principled jurisprudence that draws from Article 21's guarantee of dignity and livelihood to scrutinize testamentary instruments that deprive dependents of sustenance without just cause.

Finally, digitization of wills and probate processes can ensure transparency and minimize fraudulent manipulation. With e-wills gaining acceptance, incorporating biometric verification, timestamping, and secure storage can reduce instances of tampering and enhance judicial confidence in the authenticity of such documents.

CONCLUSION:

The constitutional role of courts in rectifying moral wrongs in testamentary dispositions reflects a careful and evolving balance between the principles of individual autonomy, legal fairness, and social justice. While the freedom to bequeath property is a well-established right under Indian succession laws, it is not absolute. The judiciary plays a vital part in ensuring that this freedom does not result in injustice—particularly in situations where vulnerable

individuals, such as dependents, children, elderly parents, or persons with disabilities, are unfairly excluded from inheritance without valid justification.

From a constitutional standpoint, the intersection of Articles 14, 21, and 300A opens a gateway for courts to examine the fairness and legality of testamentary dispositions. These provisions, although primarily directed at state action, have had an indirect impact on private testamentary practices when courts use constitutional values to interpret laws or weigh equitable claims. For instance, Article 14's guarantee of equality and Article 21's protection of dignity and livelihood provide a moral lens through which the courts can question wills that disproportionately harm certain individuals in contravention of these ideals.

The jurisprudence in this area demonstrates that courts are not just passive interpreters of legal text but active agents of justice. Through key decisions such as *H. Venkatachala Iyengar*, *Jaswant Kaur*, and *Savithri*, the judiciary has articulated the need to investigate suspicious circumstances, evaluate undue influence, and weigh the moral implications of a testator's decisions. This evolving judicial approach signifies a broader shift toward recognizing the interplay between legal rights and moral responsibilities, especially in the sensitive domain of inheritance.

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