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FROM THE BENCH TO LEGACY: A PROFILE OF JUSTICE SHARAD ARVIND BOBDE

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INTRODUCTION / BRIEFING OF THE JUDGE



FORMER CJI S.A. BOBDE

Date of Birth: April 24, 1956

Place of Birth: Nagpur, Maharashtra

Spouse: Information withheld at the request of the Justice for privacy in the public interest

Children: Information withheld at the request of the Justice for privacy in the public interest

Educational Background: Bachelor of Arts (B.A.) and Bachelor of Law (LL.B.) from Nagpur University

Predecessor: Justice Ranjan Gogoi (46th Chief Justice of India)

Successor: Justice N.V. Ramana (48th Chief Justice of India)

Sharad Arvind Bobde was a prominent personality in the Indian judiciary as the *47th Chief Justice of India* at the time of the appointment on November 18, 2019 through April 23, 2021, the chapter which was known to take a cautious approach to jurisprudence and rule of law. As a role, he contributed greatly to the establishment of the content of contemporary law in India. Being a son of a lawyer, Arvind Shrinivas Bobde and a homemaker, Smt. Pramila Bobde, Justice Bobde inherited a legal sense at the young age. The academic performance and the

accelerated studying of Justice Bobde implied that he had completed a Bachelor of Arts at Nagpur University and followed thereafter with LL.B. at Nagpur University, implying that he was perfectly equipped to understand and analyze the supporting legal doctrine.

The tenure of Justice Bobde proposed several high profile cases; the Ram Janmabhoomi-Babri Masjid land title adjudication was constitutionally sensitive case and raised the constitutional validity and proportionality of the Aadhaar Act and the issue of privacy (and new technology) in the digital age. The bench headed by Justice Bobde was in the centre of the adjudication process as Trying to reconcile conflicting rights and duties. Since 1978, Justice S.A. Bobde has been a lawyer.

In 1978, he had become an advocate on roll of the bar council of Maharashtra and goa in which he was practicing legal matters pertaining primarily to constitutional, administrative and company law. His school work was most extraordinary, and with a stern basic space made him at an extremely young age the one who could take a complicated question of law to pieces, and bring the law to bear on that question, with a clear and simple eloquence. He was next appointed as an Additional Judge of the Bombay HC in 2000. Like the lumbering of his opinions, his views were made extremely hard to follow, both as regards their merit of legal reasoning, by judges as well as by practitioners.

This was the year 2012 in which he was inducted into the Judgeship of the SC of India, amid a redoubtable mass of substantive constitutional, commercial and societal rising law, he was thrown into the stream of decisions annexing the liberal faculty of the Constitution as in encounter with alterations in society. When he ascended to the Chief Justice of India position in 2019 he added the laurel of presiding over the administrative process and the judicial process of the apex court to an already radiant career.

KEY JUDGEMENTS

“On 23 April 2021, Justice S.A. Bobde will step down as CJ of the Supreme Court of India, concluding an eight-year term on the bench that provided him the platform to adjudicate many of the nation’s most consequential legal questions. The following examination surveys selected pivotal judgments in which the Chief Justice either authored the opinion or delivered a decisive concurrence. It also briefly considers a range of significant cases that the JUSTICE admitted to the Court”.

The Court's affirmation of the right to privacy as a fundamental right emerged in "*Justice K.S. Puttaswamy v. Union of India*"¹, the bench of nine SC judges mutually ruled that the right to privacy is an unalterable right that enshrined in the Constitution of India. According to the concurring opinion of Justice S.A. Bobde, as privacy is an element of personal liberty enshrined in **Article 21**², as it safeguards bodily as well as freedom of choice. S.A. Bobde has referred to privacy as the inarticulate major premise underlying all other fundamental rights, a famous quote of his. This has broadened the meaning of **Article 21**³ itself and directly led to subsequent decisions, the most famous *Navtej Singh Johar v. Union of India*⁴. On the same case, the court use the principles set in Puttaswamy and overturned **Section 377 of the Indian penal code**⁵, decriminalizing consensual homosexual acts. It confirmed that privacy incorporated the right to make personal intimate decisions without state intrusion, indicating the Puttaswamy judgement as the precursor of extending Individual privileges in India.

Justice Bobde also presided over the three-judge bench in deliberate continuance of "*Karmanya Singh Sareen v. Union of India*"⁶. This matter, presently sub judice, inquires whether the privacy guarantees extended by WhatsApp to Indian users correspond with the more rigorous standards prescribed by the European Union framework.

"*Deportation of Rohingya refugees*"⁷, confronting the court, compelled Justice Bobde to issue an interlocutory direction that confined the constitutional protection against deportation to the right to reside in the territory, as formulated in **Article 19(1)(e)**⁸. The bench found the petitioners' arguments, asserting safeguarding under **Article 21**⁹ and asserting equality under **Article 14**¹⁰, unavailing. Since **Article 19(1)(e)**¹¹ secures the privilege exclusively to Indian nationals, the conclusion compelled by the text and structure of the Constitution was that the Rohingya, characterised as refugees, were ineligible to challenge the order of expulsion on the proffered bases. The court appended an essential direction, reminding the Executive that the deportation of persons of concern must remain faithful to principles of due process.

¹ Justice K.S. Puttaswamy (Retd.) v. Union of India, (2017) 10 SCC 1.

² Art. 21, Constitution of India, 1950.

³ Art. 21, Constitution of India, 1950.

⁴ Navtej Singh Johar v. Union of India, (2018) 10 SCC 1.

⁵ Indian Penal Code, § 377 (1860) (India).

⁶ Karmanya Singh Sareen v. Union of India, S.L.P. (Civ.) No. 804 of 2017.

⁷ Mohammad Salimullah v. Union of India, W.P. (Civ.) No. 793 of 2017.

⁸ Art. 19(1)(e), Constitution of India, 1950.

⁹ Art. 21, Constitution of India, 1950.

¹⁰ Art. 14, Constitution of India, 1950.

¹¹ Art. 19(1)(e), Constitution of India, 1950.

Justice Bobde presided over arguably his most consequential matter, “*The Ayodhya Title Dispute*”¹², is one of the most important legal cases in India concerning property and constitutional values, a five-judge SC bench unanimously, reversed the decision of Allahabad HC in 2010 for allocating the disputed site into three parts in an unanimous ruling in 2019. The court had declared that the such division was not legally justified because the title issues cannot be solved with the help of dividing the property into parts on historical and archaeological findings. Whereas, the SC ruled that the Hindus had an uninterrupted position of the outer courtyard, whereas the inner is a tradition birthplace of Lord Ram. Meanwhile, the court was very keen on defending the constitution values and turn the 1992 demolition of the Babri Masjid as an unlawful activity that had reached the rule of law. To level the judgement was passed that the Five-acre piece of land in Ayodhya to be handed over to the Sunny waqf board to construct a new mosque. This was in a way that the claim of the Hindu parties met although the final decision was an attempt to state that India is a upholding the principle of fairness and pluralism. “*The apex Court conferred on the idol de jure the title of Sri Ram Virajman and directed the allotment of alternate space for the construction of the mosque*”.

Subsequently, Justice Bobde administered the Division bench that examined “*Poojaya Sri Jagadguru Maate Mahadevi v. Government of Karnataka*”¹³. The bench endorsed the executive order that prohibited the publication of the author’s work on the ground that immanent community antipathy had arisen among the adherents of Lord Basavanna. Justice Bobde articulated the position that judicial intervention in such executive space was impermissible, reiterating the principle of restraint in sensitive socio-religious contexts.

Justice Bobde has constituted a bench to consider a cluster of petitions that stand to transform the contours of the constitutional guarantee of religious liberty in the Republic. In the matter of “*Ashwini Kumar Upadhyay v. Union of India and Others*”¹⁴, the petitioner assails the validity of **Section 2(f) of the National Commission for Minorities Act, 1992**¹⁵, contending that the provision confers untrammelled discretion upon the Union in the allocation of minority-status and that this discretion has, to date, not been exercised upon a methodical or evidentiary foundation. In a companion petition bearing the same caption, the challenge is

¹² M. Siddiq (D) Thr. Lrs. v. Mahant Suresh Das, (2020) 1 SCC 1.

¹³ Poojaya Sri Jagadguru Maate Mahadevi v. Government of Karnataka, Crim. App. No. 491 of 2009.

¹⁴ Ashwini Kumar Upadhyay v. Union of India and Others., W.P. (Civ.) No. 699 of 2016.

¹⁵ National Commission for Minorities Act, No. 19 of 1992, §2(f) (India).

directed against **Sections 2¹⁶, 3¹⁷ and 4¹⁸ of the Places of Worship (Special Provisions) Act, 1991**. The argument advanced is that the impugned Sections manifestly breach the commands of secularism and the equality clause. On 12 March 2021 the bench deemed it appropriate to issue notice to the concerned State governments, thereby keeping the matter alive for a full hearing.

In *“Indian Union Muslim League v. Union of India”¹⁹*, the petitioner contested the constitutionality of the **Citizenship (Amendment) Act, 2019 (CAA)²⁰** shortly after the Act’s enactment. The challenge argues that its selective provision of citizenship benefits to six non-Muslim communities from Afghanistan, Pakistan, and Bangladesh directly violates the constitutional mandate for equality under **Article 14²¹** and undermines the nation's secular fabric. At its core, the legal battle questions whether religion can be used as a valid basis for classifying individuals in matters of citizenship and whether excluding Muslims while including other persecuted groups is a constitutionally permissible distinction. Petitioners contend that the law is arbitrary and, when viewed alongside a proposed NRC, creates a system that unfairly burdens the Muslim community, infringing upon fundamental rights. In response, the Union government defends the CAA as a targeted humanitarian measure for religious minorities in neighbouring Islamic-majority nations, asserting Parliament's supreme authority over citizenship laws. While the SC has not stayed the Act, its final decision on its constitutional validity is awaited. The outcome of this case is immensely significant, as it will shape the future of secularism, equality, and the limits of legislative power in India, with lasting implications for the country's democratic principles and its treatment of migrants. The matter presently awaits deliberation before Justice Bobde.

Parallel proceedings arose in *“Citizens for Justice and Peace v. State of U.P. & Ors”²²*, wherein a challenge to the anti-conversion statutes of Uttar Pradesh and Uttarakhand received the attention of a bench of three judges, Justice Bobde presiding. The Court granted the petition admission, directing the state authorities to respond, while denying, at this interlocutory stage, an order of ad interim stay. In a third petition, Ashwini Kumar Upadhyay, a writ applica-tion

¹⁶ Places of Worship (Special Provisions) Act, No. 42 of 1991, §2 (India).

¹⁷ Places of Worship (Special Provisions) Act, No. 42 of 1991, §3 (India).

¹⁸ Places of Worship (Special Provisions) Act, No. 42 of 1991, §4 (India).

¹⁹ Indian Union Muslim League v. Union of India, W.P. (Civ.) No. 1470 of 2019.

²⁰ Citizenship (Amendment) Act, No. 47 of 2019 (India).

²¹ Art. 14, Constitution of India, 1950.

²² Citizens for Justice and Peace v. State of U.P. & Ors., W.P. (Crl.) No. 428 of 2020.

seeks judicial direction for the enactment of uniform and secular grounds for divorce, maintenance, and alimony. The Court interprets the demand for a Uniform Civil Code as, arguably, the prelude to measures that would place gender and religion-neutral regulation of the matter on a uniform statutory footing. Justice Bobde thereby directed the Union Government to respond to the proposition, while expressly issuing a notice with “great caution,” mindful that any elevation of a Uniform Civil Code standard in the marriage regulation sphere may presage constitutional contestation across a panoply of statutory and customary personal laws.

The Supreme Court has been subject to the ongoing examination concerning its 2018 ruling on *Sabarimala*²³, which removed the prohibition on the entry of women of “menstruating age” into the temple, resulting in more than fifty petitions for the review, in response, the court’s five judge bench subsequently referred the issue to a nine judge constitutional bench for a definitive ruling. The 2018 ruling concerning Sabarimala by the SC focused on a pivotal decision rendered by a 4-1 majority, the court annulled this practice, asserting the right of women of all ages to access the temple. The Justices argued that this exclusion constituted gender discrimination, violating the principles of equality, non-discrimination, and freedom of religion applicable to Hindu women. This historic ruling significantly influenced the legal landscape, prioritizing constitutional ethics over traditional religious practices and igniting a national discourse regarding the balance between religious liberty and gender equality, which encourage the social and political turmoil in Kerala. Justice Bobde, who presided over the bench, has articulated the essential constitutional inquiry regarding the extent of religious freedom as protected by the Constitution. Justice Bobde, presiding over the bench, has delineated the crucial constitutional question of the boundaries of religious freedom as guaranteed under the Constitution.

In “*Yasmeen Zuber Ahmad Peerzade & Anr. v. Union of India*”²⁴, the same constitution bench is hearing whether the barring of women from Mosques infringes the rights to equality, non-discrimination, freedom of religion, and life and liberty. An incidental issue is whether public forums of worship, not state-administered, can be subject to enforceable fundamental rights. The Chief Justice’s bench, which first issued notice to State Governments on 16 April 2019, has thereby re-opened the dialogue on the possible role of a Uniform Civil Code as a

²³ Indian Young Lawyers Ass’n v. State of Kerala, (2019) 11 SCC 1.

²⁴ Yasmeen Zuber Ahmad Peerzade & Anr. v. Union of India, W.P. (Civ.) No. 472 of 2019.

corrective mechanism for disparate treatment resulting from personal law regimes.

*“Abhiram Singh v C.D. Commachen”*²⁵ held that **Section 123(3) of the Representation of the People Act, 1951**²⁶, reaches beyond candidates and equally binds voters. The provision, which proscribes promoting enmity on the basis of religion, race, caste, community, or language, was interpreted by the majority, including Justice Bobde, as applying to any appeal to group identity, whether addressed to the candidate or to the electorate. Thus, any elector-driven appeal that invokes one of the protected categories constitutes a corrupt practise and therefore a ground for voidance. The import of the judgment is that voters alike are restrained from using communal, linguistic, or caste identity to justify support for, or opposition to, any candidate.

In the still-pending proceedings, *“Association for Democratic Reforms v. Union of India”*²⁷, the same Justice Bobde-led bench is interrogating whether the electoral bonds scheme, permitting anonymous donations to political parties, transgresses the limits of lawful political finance. The jurisdiction combines principles of informed choice and electoral integrity, and the petitioner contends that the opacity promoted by the scheme undermines the democratic mandate. An interim direction, issued on 26 March 2021, declined to stay the prospect of a subsequent tranche of bonds coinciding with the summer state assembly elections, leaving the scheme in force pending the bench's final disposition.

JUDGE’S PHILOSOPHY

Justice S.A. Bobde’s term can best be characterised as a form of judicial voluntarism punctuated by a conscious refusal to make authoritative doctrinal statements. Indicating a tactical unwillingness to enter into constitutional battle, Bobde's court gave interim orders instead of final ones and therefore did not ever entirely speak constitutionally. This was most apparent where there was an invitation to extra-judicial inquiry, the pandemic and the migrant crises, where the court intentionally took a spatial retreat from these systemic broader questions. Allegations against public officials for inertia were compounded by the trail behind that spectators observed of an institution, its guard rails explicit but so soft they did not obstruct executive overreach - allowing the executive's assumptions to be solidified while doctrine was

²⁵ *Abhiram Singh v C.D. Commachen*, (2017) 2 SCC 629.

²⁶ Representation of the People Act, No. 43 of 1951, § 123(3) (India).

²⁷ *Association for Democratic Reforms v. Union of India*, (2002) 5 SCC 294 (India).

in flux. Nevertheless, Bobde in the K.S. Puttaswamy reference provided a multi-layered notion of privacy that underpinned dignity and liberty in **Article 21²⁸**, affirming the role of informed consent for the features of informed consent institutionalised in the constitution. Through the Ayodhya Court, opposing rebuttals of communal telephone were dealt with, whose orders were later popularly regarded as mechanisms of reconciliation, ultimately revealed an adjudicative compromise that prioritized demographic calm over genuine minority commitments. Observers often called the court ‘judgment by avoidance’; the labels enclosed on never-ending procedural thought and the demonstrative avoidance of monumental jurisdiction created the suggestion that authoritative speech replaced the dignity of law.

In sum, his way of judging was about change step by step, respect for executive choices, and care, and these were all traits that many observers said gradually changed the SC from a **“lion lying underneath the throne”** to a **“mouse underneath the throne”** and then effected a quiet but important displacement of the Court’s constitutional function and institutional character.

SCHOLARLY VIEWS ON THE JUDGE

Academic reviews of Justice S.A. Bobde are polarized in identifying particular technical instigations toward personal liberties while simultaneously identifying serious gaps. Academics appreciate his discriminating voice facilitating personal liberties particularly in his Concurring opinion in **“K.S. Puttaswamy v. Union of India”²⁹**. Comments bracket this commentary as acceptable in revising informational jurisdiction as an intrinsic extension of the liberty and dignity guaranteed by the Constitution. Decisions of his court, including Ayodhya titles and electoral directives on impacts, were commended for their deliberative attitude rather than flagrant constitutional gyrations. However, in academic opposition, it was connected to Bobde's particular legacy that In his subsequent role as Chief Justice, it marked an interregnum of 'judicial abstention' trending toward paralysis. Their position contends that constitutional orders in pathways, and in lines of precedent and the minutia of undue delay were being explicited by dubious ex-parte filings and multiple interims, and random rehearsing on data collection with a glut of assumptions, but a poverty of right to competence. Their case is strengthened by their view that the use of the Court's ownership model relieved the executive of final reference to the constitutional dais in calibrating periods of emergency during the

²⁸ Art. 21, Constitution of India, 1950.

²⁹ Justice K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1.

pandemic, or in any defined sense of redress for limitation of bodily or collective integrity.

Critics have identified what is viewed as inconsistency in the Supreme Court's application of constitutional provision under Justice Bobde's tenure in relation to free expression, religious freedom, and the treatment of the Rohingya minority. A noticeable tendency of adjudicated opinions with incomplete reasoning, biased application, and controversial results has been noted by observers, and is not in line with the conventional constitutional doctrine. This reinterpretation by the judiciary is often explained in detail, and some academics use the metaphor of a sovereign animal sitting literally underneath its constitutional threshold to describe the Court, or the inverse, of an animal that cower behind the same threshold. The more advanced literature recognizes the procedural scrupulousness and consistent protection that Justice Bobde has given the institution over a critical time in history, such as clearing backlogs during the pandemic and upheaval in the world; but such metaphors also mean that the Court is more likely to be lenient in its attentiveness as a watchdog of the abuse of authority by the state. The Justice Bobde heritage is gradually becoming apparent in the changing outlines of the legal environment relating to data privacy, and the demonstrated observance of the conventional allegiance of officers in the administering Justice even in a limited setting. Put collectively, both views - limited substantive restraint and principled procedural heritage - give some observers the idea that judgments of his tenure could be seen as complementary, but not contradictory.

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CONCLUSION

The tenure of **Justice Sharad Arvind Bobde** as the **47th Chief Justice of India** was characterized by a consistent policy of moderate jurisprudence, institutional forbearance, a policy of digit-by-increment and a hostility to institutional Resentment. His power was grounded in an unceasing balance of the necessity to protect constitutional freedoms against the reasonableness of establishing power in the hands of the executives, even in the disastrous atmosphere of the **COVID-19**, which predetermined the uppermost public agenda and executive ambitions such as never previously in the history of existence in modern society.

The legacy would be enshrined in the instantiation of the right to privacy; in case decency would be revered in the Constitution, this right, which could be attributed to its noble constitutional context, was guarded in the groundbreaking the Puttaswamy case ruling. Without diligent rule-making, which what jurists might call a broad band pronouncement, a little more elaboration on narrow, moderate interim orders must be resorted to unless such diligence has been indulged in within the nomenclature list. The criticisms on the basis of this step have been lasting; the services attempts to explain the presidency of S.A. Bobde sometimes as more inconsistency than a calculated surrender to an agency with the limited constitutional aim, to consider active governance supervision. The systematic discourse, Onward casing by a responsible inward profession of jurisprudence, does well characterize sections of the period to which the Court never merely issued replys, but shared by acting to cope with governance crises or citizen established federal rights and value conflicts.

However, the legacy of Justice Bobde has in the past contributed to interpretive poverty whereby the heritage given is simply a foil to assertions of non-action, his then office self-authorized to repetitive thrusts on deliberate suits to institutional inoperability and timing of occasion, which the then actively degrading political order inevitably caused and which is direly needed. Verdicts of Justice Bobde that were judiciously reserved were, in any rate, animated by the fear to preserve the station quiesces of the people; they were an example of a shrewd and well-timed temper of hot-blooded cases, **best of all the litigations of Ayodhya, and the issues of electoral integrity**. His efforts, in a very real sense, reconstituted the very scaffolding of constitutional India, and these are now central to its conception.

Justice S.A. Bobde meet a real difference in Indian law with his thoughtful judgements. He

was known for balancing the rules of the Constitution with the everyday needs of people. He focused on protecting people’s basic rights while also considering real-life problems. This showed how important the courts are in helping the country through difficult issues, earning him a significant place in the history of Indian legal System.

