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PUBLIC INTEREST LITIGATION IN INDIA: A JUDICIAL PATHWAY TO SOCIAL JUSTICE

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ABSTRACT

It is rightly said that law is the means and justice is the end. The objective of PIL is to deliver justice which was almost impossible by conventional private litigation. It is a legal action taken up by any public-spirited person to pursue constitutional and legal rights on behalf of individuals who are disadvantaged socially or economically and are not able to approach the court for relief under Article 32 to Supreme Court and Article 226 to High Court.

The PIL has evolved over time in India. Initially, only affected parties could approach the court, but over the years, the judiciary adopted a more open approach, allowing anyone to file a PIL on behalf of others. This shift made it easier to address issues that affect the public at large, especially those who may not have the means to access the courts. Several factors, like increasing awareness of rights, judicial activism, and support from civil society, contributed to the rise of PILs in India.

It has become a tool for ensuring accountability in government and corporate actions, especially in matters affecting public health and the environment. Thus, in turn, helps in the encouragement of good governance.

Additionally, through PIL, judiciary plays a major role in driving social change. It also touches on the debates around whether the judiciary has gone beyond its powers in some cases and the challenges of enforcing of court orders to solve issues. In conclusion, PIL is important in ensuring justice and protecting constitutional rights while also making the system more effective.

Keywords: Public Interest Litigation, Social Justice, Accountability, Judicial Activism, Judiciary.

INTRODUCTION

Public Interest Litigation (PIL) is a legal mechanism in India that allows any individual or organization to approach the courts on behalf of the public, especially those who may not be able

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to represent themselves. Unlike traditional litigation, which requires the person filing the case to be directly affected, PIL gives standing to people or groups to raise concerns about issues that impact the general public or marginalized communities. This unique tool helps address social and environmental issues that may otherwise be ignored. PIL has been instrumental in securing justice for vulnerable groups and bringing government accountability into the spotlight.

The development of PIL in India started in the late 1970s and gained momentum in the 1980s when the courts began to adopt a more flexible approach towards the concept of “locus standi” (the right to bring a case). Previously, only those directly affected by an issue could file a case, but PIL made it possible for any public-spirited individual to seek judicial intervention in matters of public interest. This shift was a major step toward ensuring that justice was accessible to all, especially the poor and marginalized. The courts started accepting petitions for a wide range of issues, including human rights violations, environmental protection, and government inaction.

From a constitutional perspective, PIL is rooted in Article 32 and Article 226 of the Indian Constitution, which allow individuals to approach the Supreme Court or High Courts for the enforcement of fundamental rights. Additionally, PIL cases often invoke Directive Principles of State Policy (Articles 39, 47, 48A) and Fundamental Duties (Article 51A) as guiding principles for the court to ensure social welfare and environmental protection. Through the landmark judgements, the judiciary expanded the scope of Article 21 that is Right to Life and Personal Liberty.

Despite its success, PIL faces challenges such as delays in the implementation of court orders and the misuse of PIL by some for personal or political gain. Enforcing court rulings, especially in environmental cases, often requires administrative cooperation, which can be lacking.

The judiciary has played a crucial role in using PIL as a tool for social change. Through PIL, the courts have addressed several issues related to poverty, inequality, and environmental degradation, bringing justice to many who would otherwise have been ignored by the system. This judicial activism has been instrumental in advancing social justice and ensuring that the government fulfil its constitutional obligations.

WHAT IS PUBLIC INTEREST LITIGATION?

Public Interest Litigation (PIL) is a powerful legal tool in India that allows individuals or groups to seek justice for the public good, particularly in cases where the rights of marginalized or disadvantaged sections of society are at stake.² The concept of PIL was borrowed from American jurisprudence, where it was originally used to provide legal representation for underrepresented groups, such as the poor, racial minorities, and citizens concerned with environmental issues. It generally addresses issues that affect the larger public interest, including matters related to environment protection, labor exploitation, women's rights, food safety, and more. It is considered a boon for the common people.³

PIL is unique as it allows individuals to approach the courts even if they are not directly affected by the issue to represent the interests of a group or the general public. For instance, cases concerning environmental pollution, labor rights, or atrocities against women have all been brought before the courts through PIL.⁴ This broad approach helps to ensure that social justice issues, which might otherwise go unnoticed or unaddressed, can be taken up for resolution in the courts.⁵

What makes PIL particularly effective is that it is not defined by any specific law or statute. Instead, it has been shaped and interpreted by judges over time, focusing on the intent to protect public interest. The courts, in turn, have the power to either initiate cases on their own (*suo motu*) or to take up matters brought forward by public-spirited citizens. However, the person filing the PIL must prove to the court that their petition is in the public interest and not a frivolous case filed to waste judicial time or serve personal interests.

PIL has expanded the scope of Fundamental Rights in India, particularly the Right to Equality (Article 14) and the Right to Life (Article 21). For instance, the courts have recognized the right to a clean environment as an essential part of the Right to Life under Article 21.⁶

In conclusion, PIL has become a vital tool for addressing social and environmental issues in India. It has given a voice to the voiceless, empowered citizens to hold government and private entities accountable, and has played a crucial role in ensuring justice for all. Through PIL, the courts have

² *Janata Dal v. H.S. Chaudhary*, AIR 1993 SC 892.

³ Dr. G.B. Patil, *Public Interest Lawyering and Social Transformation in India*, AIR 2011 Journal 217.

⁴ S. K. Agarwal, *Public Interest Litigation in India: A critique*, 2 N.M. Tripathi (1985).

⁵ M. P. JAIN, *THE CONSTITUTION OF INDIA*, 1370 8th ed (2018).

⁶ INDIA CONST. art. 21.; *M.C. Mehta v. Union of India & Ors.* AIR 1987 SC 1086.

been able to bring about social change and safeguard fundamental rights, making it a cornerstone of India's judicial system.

EVOLUTION OF PIL

ORIGIN OF PUBLIC INTEREST LITIGATION IN THE UNITED STATES

PIL has its roots in the United States during the 1960s. It was used as a method to provide legal representation to underprivileged groups such as racial minorities, the poor, and the unorganized workers. The idea behind PIL in the U.S. was to address social issues like environmental pollution, civil rights, and consumer protection by relaxing the rules of “locus standi” - the legal right of an individual to bring a case to court. This allowed people to file cases in the interest of the public, even if they were not personally affected.⁷

The term **locus standi** refers to the legal right or capacity of an individual to bring a case before the court. Traditionally, the rule of locus standi limited the ability to file a case in court to only those individuals who were directly affected by a legal issue or violation. This principle acted as a gatekeeper in the legal system, as it ensures that only those with a genuine personal stake in the matter could seek relief from the courts. Under this rule, third parties who are not directly affected by the issue could not file a case, even if they were concerned about the injustice.⁸

While locus standi protected the legal system from frivolous lawsuits, it also became a barrier to justice for marginalized groups by overlooking public issues and silencing the victim due to lack of access of legal help. These challenges led to the rise of Public Interest Litigation (PIL), allowing others to seek justice on behalf of the marginalized.

THE EMERGENCE OF PIL: A RESPONSE TO THE SHORTCOMINGS OF LOCUS STANDI

In the late 1970s and early 1980s, the Indian judiciary, under the leadership of progressive judges such as Justice P.N. Bhagwati and Justice V.R. Krishna Iyer, recognized the need to broaden the scope of legal access to include public interest and social justice issues. This relaxation gave rise to PIL, which allowed public-spirited individuals or organizations, social activists or NGOs to file

⁷ Sujit Kumar Biswas, *Public Interest Litigation: Meaning And Dimensions*, 8 INDIAN J.L. & JUST. 98 (September 2017).

⁸ P K SINGH, A TO Z OF PUBLIC INTEREST LITIGATION (Whitesmann 1st ed. 2022).

cases on behalf of those who could not represent themselves. The objective was to make justice more accessible and ensure that fundamental rights were protected, even for those who were unable to approach the court on their own.

The key transformation was that the court allowed cases to be filed not only by the direct victims but also by anyone acting for public good. The person filing the PIL didn't have to show that they had personally suffered any harm. Instead, they had to prove that the issue at hand affected a larger section of society and involved public interest.⁹

JUDICIAL PRECEDENTS THAT SHAPED THE EVOLUTION OF PIL

1. **Mumbai Kamgar Sabha v. Abdulbhai Faizullabhai (1976):** This case is considered one of the first PIL cases in India. A union of workers in Mumbai filed a petition against their employer for denying them their rightful bonuses. Justice Krishna Iyer relaxed the rule of “*locus standi*,” allowing the union to represent the workers. This case opened the door for organizations and individuals to file petitions on behalf of others, marking the beginning of PIL in India.¹⁰
2. **Hussainara Khatoon v. State of Bihar (1979):** This case dealt with the plight of undertrial prisoners in Bihar who had been in jail for extended periods, many for petty crimes, without proper legal representation. Advocate Kapila Hingorani filed a PIL on behalf of these prisoners, leading to the release of over 40,000 undertrial prisoners. The Supreme Court, led by Justice P.N. Bhagwati, declared that the right to a speedy trial is part of the right to life and personal liberty under Article 21 of the Indian Constitution. Thus, it expanded the access to justice.¹¹
3. **S.P. Gupta v. Union of India (1981):** This case expanded the scope of PIL significantly. The court ruled that any individual or organization working for the public good could file a petition to protect the fundamental rights of a group, even if the person filing the petition was not directly affected. This ruling established PIL as a means for public-minded citizens to hold the government accountable for violations of constitutional rights. Thus, by this judgment PIL became a potent weapon for the enforcement of “public duties” where executive action or misdeed resulted in public injury. And as a result, any citizen of India or any consumer groups or social action groups can now approach the apex court of the country seeking legal remedies in all cases where the interests of general public or a section

⁹ M. P. JAIN, THE CONSTITUTION OF INDIA, 1372 8th ed (2018).

¹⁰ Mumbai Kamgar Sabha v. Abdulbhai Faizullabhai, 1976 AIR 1455.

¹¹ Hussainara Khatoon v. State of Bihar, 1979 AIR 1369.

of the public are at stake. Justice Bhagwati did a lot to ensure that the concept of PILs was clearly enunciated. He did not insist on the observance of procedural technicalities and even treated ordinary letters from public-minded individuals as writ petitions.¹² *Mrs. Veena Sethi v. State of Bihar* (1983), where a letter written by a social activist to the Supreme Court was treated as a PIL. This shows how flexible the courts have become in accepting cases related to public welfare.¹³

Although PIL has played a transformative role in the Indian legal system, it has faced criticism for being misused. Many frivolous petitions are filed under the guise of public interest, wasting the court's time and resources. Some people use PIL for personal or political gain rather than genuine public interest¹⁴. The courts have had to become more cautious in accepting PIL cases to ensure that the petitions are not frivolous or filed for publicity.

Thus, PIL has been a vital tool in the Indian judicial system for upholding the rights of the public and addressing social injustices. By relaxing the rules of “locus standi,” the judiciary has made justice more accessible to those who cannot afford or understand the legal process. Despite its challenges, PIL continues to be an essential part of India's legal framework, helping to bridge the gap between law and social justice. However, to prevent misuse, courts must carefully scrutinize petitions to ensure they are filed in the true spirit of public interest.¹⁵

CONSTITUTIONAL ASPECTS OF PUBLIC INTEREST LITIGATION (PIL)

PIL can be filed by any citizen of India, but the intention must be for the public good, without any personal motive or gain. It is a powerful tool to seek justice for those who are unable to approach the court directly due to economic, social, or other constraints.

WHERE CAN A PIL BE FILED?

A PIL can be filed in two key courts under the Indian Constitution:

1. **Article 32 - Supreme Court:** A PIL can be filed in the Supreme Court when there is a violation of fundamental rights. Article 32 is often referred to as the “heart and soul” of

¹² *S.P. Gupta v. Union of India*, 1982 AIR 149.

¹³ *Mrs. Veena Sethi v. State of Bihar*, AIR 1983 SC 339.

¹⁴ *Kushum Lata v. Union of India*, 2006 6 SCC 180.

¹⁵ M. P. Jain, *supra* note 9, at 1371.

the Constitution because it guarantees the right to approach the Supreme Court directly for the enforcement of fundamental rights.¹⁶

2. **Article 226 - High Court:** A PIL can also be filed in the High Court. Unlike Article 32, which focuses only on fundamental rights, Article 226 allows for the filing of a PIL for the violation of both fundamental rights and other constitutional and legal rights. This gives High Courts wider powers in PIL matters.¹⁷

WHO CAN FILE A PIL AND AGAINST WHOM?

Any Indian citizen with a concern for public interest can file a PIL, but it must meet certain conditions:

- i. The petition must be filed with the intent to protect the public interest, not for personal benefit.
- ii. The court must be satisfied that the petitioner is acting in good faith on behalf of those who cannot approach the court themselves.
- iii. The petitioner can be an aggrieved person, a public-spirited individual, or a social action group working for the enforcement of legal or constitutional rights.

PIL can be filed against state as defined under Article 12 of the constitution. which includes:

- i. The Government of India and State Governments.
- ii. Parliament and State Legislatures.
- iii. All local authorities and other authorities under the control of the government within the territory of India.¹⁸

However, a PIL cannot be filed against private parties. In essence, PIL is a means for citizens to hold the government and public authorities accountable for their actions and to seek justice for issues that affect society as a whole. It is a critical tool in promoting constitutional rights, ensuring that the judicial system works for everyone, especially those who are unable to access it directly.¹⁹

FACTORS RESPONSIBLE FOR THE GROWTH OF PIL IN INDIA

The growth of Public Interest Litigation (PIL) in India is due to several key factors:

¹⁶ INDIA CONST. art. 32. (India)

¹⁷ INDIA CONST. art. 226. (India)

¹⁸ INDIA CONST. art. 12. (India)

¹⁹ P K SINGH, *supra* note 9, at 231.

1. The Constitution of India, particularly Part III (Fundamental Rights) and Part IV (Directive Principles of State Policy), promotes justice and equality. Although Directive Principles are not legally enforceable, courts have used them alongside Fundamental Rights to protect socio-economic rights²⁰ like dignity²¹, education²², and livelihood²³.
2. India's progressive laws on issues like bonded labour²⁴, environmental protection²⁵, and minimum wages²⁶ support PILs, helping hold the government accountable for enforcing these laws.
3. Earlier, only affected individuals could approach the court. Now, anyone (NGOs, citizens) can file a PIL on behalf of those unable to due to economic or social constraints. Courts also take up cases based on media reports or public interest which broaden access to justice and thus addresses urgent social issues without a formal petition.²⁷
4. Courts have expanded the scope of Fundamental Rights. For example, Article 21 of the Constitution of India (Right to Life) now includes the right to education, health²⁸, livelihood, and a clean environment, making more social issues actionable through PILs. Courts have also introduced reforms like shifting the burden of proof to employer in cases involving bonded labor and allowing direct access to the Supreme Court in labor disputes thereby making it easier for victim to seek justice.²⁹ They also appoint independent commissions to gather evidence in complex cases.
5. Media coverage has raised awareness about social injustices that encourages more individuals and organizations to file PILs.

In summary, the growth of PIL in India stems from constitutional provisions, progressive laws, judicial innovations, and public engagement, making it a powerful tool for social justice.

²⁰ Monika Sangeeta Ahuja, *Public Interest Litigation in India; A Socio-Legal Study*. 51 ProQuest (2014).

²¹ Sanjit Roy v. State Of Rajasthan, 1983 (1) SCC 525.

²² Unnikrishnan JP v. State of Andhra Pradesh & Ors., 1993 AIR 2178.

²³ Olga Tellis & Ors v. Bombay Municipal Corporation & Ors., 1986 AIR 180.

²⁴ Bonded Labour System (Abolition) Act, 1976, Act No. 19 of 1976.

²⁵ The Environment (Protection) Act, 1986. Act No. 29 of 1986.

²⁶ The Minimum Wages Act, 1948, Act No. 11 of 1948.

²⁷ In RE, Felling of Trees in Aarey forest (MH), 2019 (9) SCC 363.

²⁸ Parmanand Katara v. Union of India, AIR 1989 SC 2039.

²⁹ Bandhua Mukti Morcha v. Union of India & Ors., 1984 AIR 802.

MISUSE OF PIL

Justice RS Sodhi stated that, “*There are always two sides to a coin. There will be people who will try and exploit [PILs], whether courts allow themselves to be misused... that is where the wisdom of the courts lie.*”³⁰ Public Interest Litigation (PIL) was designed to empower marginalized communities and address public interest issues. However, it is often misused, wasting valuable judicial time. Some of the common ways PILs are misused include:

1. FILING FRIVOLOUS PETITIONS

Frivolous petitions are those filed without any genuine public interest. They are often motivated by personal gain or to cause inconvenience to others. For instance, a business competitor might file a PIL to disrupt a rival’s operations, or someone may file a petition against a government official out of spite. These frivolous petitions clutter the courts, waste judicial time, and prevent real cases from being heard, while also eroding public confidence in the judiciary.

An example is the case of *Pratyush Prasanna and Anr. v. State of NCT of Delhi*, where the Delhi High Court dismissed a petition claiming misuse of public funds by the Delhi government during the Covid-19 pandemic. The petitioner had not done any proper research, relying solely on a tweet. The court criticized the petitioner for not using the Right to Information (RTI) Act to gather facts and imposed a fine of Rs. 50,000 for abusing the PIL process.³¹

In *Lalit Valecha v. Union of India*, a PIL was filed in the Delhi High Court to direct News and TV channels to follow the Code of ethics and regulations while reporting sensitive content of mass deaths and suffering. It prayed to curb the spread of negativity by restraining media channels from broadcasting such news. The petition also gave the ground that freedom of speech and expression under Article 19 is not absolute. The petition was dismissed by the bench and it was pronounced that reporting the number of deaths to the public is not negative news.³²

2. SETTLING PERSONAL VENDETTAS

PILs are also sometimes used to settle personal scores. For instance, a PIL might be filed against a political rival to damage their reputation, or against a business competitor to disrupt their operations. This misuse of PILs not only wastes judicial resources but also undermines public trust in the judiciary.

³⁰ Akanksha Kumar, *5 Public Interest Litigation Cases That Changed Our Lives Forever*, THEQUINT (Aug. 29, 2015), <https://www.thequint.com/news/india/5-public-interest-litigation-cases-that-changed-our-lives-forever>.

³¹ *Pratyush Prasanna and Anr. v. State of NCT of Delhi*, W.P.(C) No.5117/2021.

³² *Lalit Valecha v. Union of India*, W.P.(C), 5109 of 2021.

3. USING PIL FOR POLITICAL GAINS

Political parties or organizations may file PILs to gain political advantage. For example, a PIL might be filed against an unpopular government policy or a political opponent to create public embarrassment. This not only undermines the judiciary but also wastes its resources on cases that are not genuinely about public interest.

4. DELAYING OR DERAILING DEVELOPMENT PROJECTS

PILs can be used to delay or obstruct development projects. A petition may be filed against a project under the guise of environmental or public concerns, but the real intent might be to halt progress or create discomfort for political reasons. Such misuse can stall economic growth and burden the courts with cases that aren't truly in the public interest.

In the case of *Rajeev Suri v. Delhi Development Authority*, a petition was filed questioning the Central Vista project, including its environmental and land use approvals. While the case was transferred to the Supreme Court, the court criticized it as a misuse of PIL, stressing that PILs were not meant to make the judiciary a tool for interfering in daily administration but rather to protect the rights of those who suffer injustice.³³

5. SEEKING PUBLICITY

Sometimes, lawyers or even law students file PILs for the sake of gaining publicity. The courts have referred to such cases as “publicity interest litigation” and have noted that these cases harm the public good instead of serving the true purpose of PILs.

In summary, while PILs are an important tool for ensuring justice, they are often abused for personal, political, or obstructive purposes. This misuse clogs the judicial system and undermines the original purpose of PILs, which is to bring justice to those in need.

RECOMMENDATIONS

To ensure that Public Interest Litigation (PIL) remains an effective tool for promoting justice and addressing societal issues, certain measures and reforms can be recommended.

³³ *Rajeev Suri v. Delhi Development Authority*, (2021) 15 SCR 283.

1. ESTABLISHING GUIDELINES FOR FILING PILS

The Supreme Court has laid down clear guidelines to ensure that PILs serve their true purpose- protecting public interest- and are not misused for personal or frivolous reasons. The court has directed:

- i. Courts should actively encourage legitimate public interest cases while deterring those filed for hidden motives.
- ii. Each High Court must establish formal procedures to promote valid PILs and prevent misuse.
- iii. Before accepting a PIL, the court should assess whether the petitioner is acting in good faith and without personal gain.
- iv. The court must be fully convinced that the case addresses a real public concern, not just an individual grievance.
- v. The petition should clearly demonstrate harm to the public, with no hidden motives behind it.
- vi. To discourage time-wasting or malicious cases, courts should impose penalties on those who file PILs for the wrong reasons.

These measures aim to uphold the true spirit of PIL- a tool for justice, not abuse.³⁴

2. STRENGTHEN SCRUTINY OF PILS

Courts should implement stricter scrutiny at the initial stage to ensure that only genuine PILs with significant public interest are admitted. This can help prevent the misuse of PIL for personal, political, or corporate gains and reduce the number of frivolous cases that overburden the judicial system. To discourage misuse, courts should impose penalties, such as fines, on individuals or entities filing frivolous or malicious PILs. This would serve as a deterrent to those who seek to abuse the system for private or non-public interests.

3. SPREADING AWARENESS

A key way to prevent the misuse of PIL is through public education. It is important for people to understand the true purpose of PILs and how they can be misused. Many people file frivolous petitions or use PILs for personal gain simply because they are unaware of how PILs should be used. Public awareness campaigns can be conducted through various platforms such as the media,

³⁴ Uttaranchal vs. Balwant Singh Chauhal and Ors. (2010) 3 SCC 402.

schools, and community organizations. By educating the public about the proper use of PILs, we can ensure they are used to protect public interest and promote justice.

4. ENCOURAGING THE USE OF ADR PRACTICES

Alternative Dispute Resolution (ADR) methods, such as mediation, arbitration, and negotiation, allow disputes to be resolved outside the court system. ADR can be quicker, more cost-effective, and help preserve relationships between the parties involved. In certain situations, ADR may be a better option than filing a PIL. By promoting the use of ADR mechanisms, we can reduce the number of PILs filed in court and encourage more effective resolution of disputes.

5. DUTY OF LAWYERS AND COURTS

Lawyers play a critical role in preventing the misuse of PIL. They should avoid representing dishonest petitioners and must uphold discipline and ethics in their profession. Lawyers should not take on cases that misuse the PIL process.

6. ESTABLISH PIL MONITORING BODIES

Independent bodies could be created to monitor the implementation of PIL judgments, ensuring that court orders are carried out effectively. This would help bridge the gap between judicial decisions and real-world outcomes, particularly in cases related to human rights and environmental protection.

CONCLUSION

The study of Public Interest Litigation (PIL) reveals the significant role PIL has played in advancing social and environmental justice in India. It was introduced as a legal tool to give a voice to the marginalized that enable ordinary citizens or groups to approach the courts on matters affecting public interest. It has become a powerful means to address large-scale issues like environmental degradation, child rights, and government accountability.

However, while PIL has been instrumental in addressing pressing social concerns, it has also faced challenges. There have been instances where individuals or groups have filed frivolous or self-serving PILs, overburdening the judiciary and delaying the resolution of genuine cases.

This has led the courts to establish guidelines to ensure that PILs are used responsibly and remain focused on issues of genuine public interest. *‘If carefully and prudently used, the PIL has great potential in correcting administrative wrong but if liberally and indiscriminately used in all kinds of cases, it may turn into*

an engine of destruction.”³⁵ The judiciary’s role in safeguarding the integrity of PIL while balancing judicial activism with the responsibilities of the legislature and executive is crucial for maintaining justice and protecting fundamental rights in India.

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