REPORTABLE

IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

MANMOHAN SINGH V. STATE OF DELHI (2022)

BENCH: Mr. Justice S. Abdul Nazeer & Mr. Justice J.K. Maheshwari **DECIDED:** November 28, 2022

RATIO DECIDENDI & PRECEDENTIAL CRUX:
Omnibus allegations against distant in-laws without specific overt acts of cruelty or dowry demand are liable to be quashed under Section 482 CrPC.

1. Factual Matrix & Background:

A wife lodged an FIR under Section 498A and 406 IPC naming her husband, parents-in-law, and married sisters-in-law living in other cities. The FIR contained general statements that 'all in-laws harassed me for dowry'. The High Court refused to quash the charges against the sisters-in-law.

2. Substantive Legal Questions Framed:

Whether criminal proceedings under Section 498A IPC against relatives of the husband are maintainable on the basis of vague and omnibus allegations.

3. Analysis & Ratio Decidendi:

The Supreme Court quashed the prosecution against the in-laws, reiterating that courts must be vigilant against the tendency to rope in all family members in matrimonial disputes. Where the allegations are general, omnibus, and lack specific dates or details of physical or mental cruelty, continuation of criminal proceedings constitutes an abuse of judicial process.

4. Principles Enunciated:

- 1. Vague and omnibus allegations under Section 498A IPC cannot sustain criminal charges.
- 2. Relatives living separately must not be subjected to vexatious criminal trials.
- 3. High Courts under Section 482 CrPC have a duty to weed out frivolous matrimonial FIRs.

5. Practical Litigation Implications:

- In defending married sisters-in-law or elderly in-laws, demonstrate separate residence through rental agreements or utility bills and move for Section 482 quashing.

.....J.
[SUPREME COURT BENCH]

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