

Rationalizing Goofy Traits of Media: A Quick Refresher

Rahul Kumar¹ & Muskaan Bansal²

Abstract

People will speak rumor & lies till they are considered they are facts. We have just become more than they know of not being victims anything than the mindsets, perspectives & expectations they just begin to operate defending Media ethics impeding equal opportunity upholding someone's legitimate efforts of going up & down examining their voyage eliciting the messages & videos hindering their right to privacy. This research exhibits eccentric moral beliefs that the media industry has fitted into and how sorcery and journalism go hand in hand. The turbulence levitates somewhere usurping the rights of freedom of manifestation destroying the justice dispensation system.

Thus, the matter-of-fact of the present paper is to assess the exotic callings that are used by media and journalists, ethical adversities about, and the legal provisions which can thwart the same and also examining extensive reinforcement mechanism by the nation in digging the other sides of the outlets. It will also oversee the role of the legality & the status of media in context to tyrannical proceedings. The media on free speech and unethical instruments put up by the media industry in respect of paid news. Further, the paper shall elaborate on different levels of consent vested by the candidates to the media to broadcasting optimistic anecdotes. After that, the research paper seeks to analyze the reasons for the evolving policies behind politicians' erratic introspection and opinions with meaningful messaging and about outnumbered repercussions of showcasing falsifiable statements.

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¹ Student, B.A.LL.B.(Hons.), Law Department Law College Dehradun Faculty of Uttarakhand University, Rahulkumarr21998@gmail.com

² Student, B.A.LL.B.(Hons.), Law Department Law College Dehradun Faculty of Uttarakhand University, Muskaanbansal55@gmail.com

1. Introduction:

“In old days men had the rack. Now they have the press. That is an improvement certainly. But still it is very bad, and wrong, and demoralizing. Somebody-was it Burke? - called journalism the fourth estate. That was true at the time, no doubt. But at the present moment it really is the only estate. It has eaten up the other three. The Lords temporal say nothing, the lords spiritual have nothing to say and the House of Commons has nothing to say and says it. We are dominated by journalism. In America President resigns for four years, and journalism governs for ever and ever.”

This old saying has its relevance in the present time. The changed role of media has proved that it's not the fourth estate but it's the only estate that exists. The reason for this lies in the fact that media in 21st century has been just a money making business and the ideology carrier of political parties. It seems today that, media exists only because they are run and administered by some political powerhouse. Speech is considered to be the nature's blessings to the mankind; as it helps a human being in conveying thoughts, emotions, sentiments, opinions and so much more. These media houses being the global carriers of speech and expression have merely turned out to be the underdogs of democracy. Today, their focus is not to enlighten and educate the world but to feed the nation through their dead journalism, journalism which is more of a propaganda war and carriers of the voices of a political party. Their goofy traits now have a very wider reach.

We've enthroned sectarianism, homophobia & contentiousness in our country, so are we to chide the Government or ourselves considering the affliction is ephemeral or permanent with no healing minding the difficulty. The Party that put on a pedestal to play divide & rule on religious grounds is now suppressing a particular caste & gender.

The 21st Century is only for those who can learn, unlearn & relearn. Plebeians being avoidant when it comes to self-attachment lifestyles. I see many exoduses of sophisticated citizens being confident on social media. It's important to understand that media isn't the same we had a decade ago. This is the era of goofy media tricks like fake journalism, targeted journalism, media trail etc. The later part of this paper would go on to discuss the legal status of media and the concerns that have come up to the mainstream amidst the declining and incredible media.

2. Revelation & Confession

Disgruntled with the country being embroiled in yet another conflict & I don't want to see another war under the hard-won stability. I am not giving a single hoot for antiquated & asinine built on the backs of entire world's worth of human rights after leaving democracy. Most people receiving abuse & violations floating in an empty void feeling like an ashtray.

We are apprehensive about what people think about us. Living amidst the opposite and finding harmony brings chaos. Wisdom emits foolishness, Bliss emits sufferings. Light in darkness and immortality in a place where everything just goes away from you. If we are on one, we May not see the other one. We see things impartially. India is a country where people who have neither basic nor deep knowledge ethics, factual proselytism only the fact that persists is misogynistic mind set whipping up frenzy. The heftiest people with gigantic notions can be shut down over the fragile people with the smallest minds; speculate anyway. Everyone prefers the honest person until the honest person resonates truth, they weren't ready to procure. The only advice in such a situation is to rewire your zest.

The onus is always on the Dalit community to prove how they have been victimized. Shame brands that sponsor dead & unproductive journalism, what their research process looks like, comical things they noticed about Tuning in to the virtual handles for Just Precise Excerpts & more 10/10 would recommend you to watch it! Dalit people face so many traumas in their life. On top of that, they have to prove their victimhood and justify why caste plays a major role in atrocities inflicted on them. The human loudspeaker making the TRP'S manipulated for their mean reasons they don't even mind being hate or misconstrued. Where is the Shoddy Investigation of about The Rape Capital slewed to work on Anti – Rape Laws so that we aren't supposed to justify our Aesthetic Sense in Crowd making uncomfortable in own skin only despicable practices of Female Genital Mutilation (FGM) Is that justifiable despite of being simply loaded with obligations. How is someone going to survive with the bruises for the entire life?

Caste institutional Murder: A young medical student Dr. Bhagwat Dewangan from Jabalpur medical college was pushed to take his life after regular Caste-based harassments and abuses by Upper Caste students. He belonged to an extremely Backward Caste.

Many more such instances are there to portray that reflects how media has diverted from their right path. They could have contributed so much to these evils of society but they are contributing the other way in creating more disharmonies and distrust among these people on the basis of caste, religion etc. media has undergone a huge change and there has been a complete transformation from being mission driven to full-fledged commerce-driven industry.

3. The legality & the status of media freedom in India

“The Press is merely another way of stating an individual or a citizen. The press has no special rights which are not be given or which are not be exercised by the citizen in his individual capacity. The editor of a press or a manager is all citizens and therefore when they choose to write in newspapers, they are merely exercising their right of expression and in my judgment therefore no special mention is necessary of the freedom of the press at all.”

As far as the freedom of media is concerned in India, there are two schools of thought on this point. The first school includes all such observers who believe and consider the Indian news media to be in an enviable position in the India and worldwide. The reason for this thought is the fact that the media freedom and security is something which is a result of long democratic history that led to their recognition; either by way of special enactment or through the constitutional protection. The legal status that media enjoys in every country is the reason behind its rapid growth and expansion. While on the other hand, the second school believes that advantages and the freedom that media enjoys in the contemporary world are offset to a considerable extent by an illiberal framework of laws, dating back to the British Raj, which cover criminal and civil defamation, contempt of court, legislative privilege, official secrecy, national security, and incitement to offences – and have a chilling effect on freedom of expression.

The media in India derives its rights from the right to freedom of speech and expression. The Preamble to the Indian Constitution, also considered as the introduction to the document is considered to be the source that prescribes for the freedom of media in a way to secure for its citizens, liberty of thought, expression and belief. The Courts have time and again given interpretation to include the rights of media within that of the Citizens under Article 19. Interestingly but not surprisingly, Article 19(1)(a) of our constitution find its roots in the 1st Amendment to the US Constitution. The amendment reads, “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging

the freedom of speech, or of the press; or the right of the people peaceably to assemble and to petition the government for a redress of grievances.” Unlike the 1st amendment to the US Constitution, India does not make any express provision prescribing such rights. The rights are intrinsic in Article 19(1) with the reasonable restrictions in 19(2). In case of pre-independent India, the Privy Council held:

“the freedom of the journalist is an ordinary part of freedom of the subject and to whatever lengths the subject in general may go, so also may the journalist, apart from the statute law, his privilege is no other and no higher.... No privilege appears to his position.”

To note, the freedom of media is not just restricted in Article 19(1)(a) of the Constitution. The Indian Supreme Court has rightly recognized and held that the freedom of press is a combination of two freedoms, one found in Article 19(1)(a) and the other inscribed in Article 19(1)(g) of the constitution. Which means that media has ‘the freedom to practice any profession, or to carry on any occupation, trade or business’ however, of the two freedoms that media enjoys, the first is considered to be the principal component and is subject to ‘reasonable restrictions’ provided under Article 19(2) of the Constitution.

4. Regulation of Media and the legal provisions:

Though there are several laws for media and regulation of information but media in India is mostly self-regulated. Some of the laws that existed before Independence included The Censorship of Press Act, 1799, The Licensing Regulations, 1823, The Vernacular Press Act, 1878 etc. Post-Independence era also saw some legislation to this point. A few of them includes The Press Enquiry Committee, 1947, The Parliamentary Proceedings (Protection of Publications) Act, 1960 etc. Most of the role regarding the regulation of media is looked after by the Press Council of India which is a statutory body and the News Broadcasting Standards Authority, a self-regulatory organization, that issue standards which are more in the nature of guidelines.

The Press Council of India being a prominent body established in 1978 has some great responsibility in order to maintain and regulate ethical practices in the media industry thereby ensuring credibility of it being the fourth pillar of democracy. Some of the very vital functions includes but not limited to (i) helping the newspapers maintain their independence; (ii) to build a code of conduct for journalists and news agencies in India; (iii) help maintain “high standards

of public taste” and foster responsibility and credibility among citizens; and (iv) to take into account and review developments likely to restrict flow of news.

Very recently, we have all been a witness to the ongoing excessive reporting in the very high profile yet controversial case of late actor Sushant Singh Rajput. We have come across two instances, one through the Press Council, where it has pro-actively intervened in order to restrict the excessive media coverage and avoid media trail on the issue and maintain the code of ethics. The second instance by NBSA was punitive in nature where after receiving some complaints on the issue of the late actor’s reporting went on to impose a fine of rupees 1 lakh on certain news channel for violating the code of ethics. It was not only limited to fine but the news channels were also required to air an apology on the issue in question. The NBSA also said to this point that “Due diligence is a basic tenet and requirement of journalistic ethics and telecasting the tweets without verification had the tendency of spreading misinformation amongst the public.”

Even though, there has been much debate on regulation of media through some guidelines or a specific legislation but in my opinion that will again go fatal on the objective for which media was granted constitutional recognition.

5. Goofy Traits of Indian Media: A Quick refresher

When we recall those days, some three decades ago, we used to see the struggle of these media house. Struggle for existence and to gain public trust in proving them to be the fourth pillar of democracy. When we go back to the constituent assembly debates, it remembers me of the long debate that took place between the members on giving rights of free speech and expression similar to a man to the media houses. Finally, the assembly came out by placing media on same footing to that of human under the constitution of India. But what we have seen in recent times is the emergence of a media who uses its goofy tricks to survive in the business market. These goofy tricks involve media trials, paid news, political-centric approach etc. Courts, considered as the custodian of our rights have time and gain projected their concern on the media trails and other goofy tricks. The recent and ongoing media trail in the late actor’s death (“SSR Case”) reminds me of the Bombay High Court’s decision in *Maria Monica Susairaj v. State of Maharashtra*. The court placed its concern on the excessive media trail in the following words:

“If the reports in the media are responsible for creation of a perception in large number of people in the country that a particular person is guilty or he is innocent, and ultimately,

when the matter goes to trial, if the result is opposed to the perceptions of people, generally, they tend to believe that the court was not fair.”

Even in many cases the general presumption of criminal law that a person is innocent until proven guilty goes opposite due to the excessive media trail. To add on further, we may also project our reliance on the famous Neera Radia tapes which were published in November 2010 that exposed the intricate web connections between the powerful media persons, corporates and the politicians. Apart of these several other instances of Paid news, TRP scam etc. keep on projecting the goofy tricks that media houses are using to run their commercial business in the contemporary scenario. Some of the goofy ticks that are impacting our lives as well as the justice dispensing system of our country has been outlined below.

6. Role of Media and Concern of Judges

The current situation all across the globe is witnessing a changed role of media. Interestingly, concerning the role of media and its probable effect on the judges as humans, Justice Frankfurter, way back in 1946 raised his concern on the issue in the following words: *“No judge fit to be one is likely to be influenced consciously except by what he sees or hears in court and by what is judicially appropriate for his deliberations. However, judges are also human and we know better than did our forebears how powerful is the pull of the unconscious and how treacherous the rational process. While the ramparts of reason have been found to be more fragile than the age of enlightenment had supposed, the means for arousing passion and confusing judgment have been reinforced. And since, judges, however, stalwart, are human, the delicate task of administering justice out not be made unduly difficult by irresponsible print.”*

Historically, Indian jurisprudence on this issue seems to be very much concerned regarding the issue of media dominating the justice delivery system, including the administrative as well as the judicial officers. The apex court in *Rajendran Chingaravelu v. R.K. Mishra*, has raised a very important issue regarding the investigating officers, whereby they need to come in media for every small progress pertaining to investigation of a case. The court pointed the issue in the following words:

“There is a growing tendency among investigating officers (either police or other departments) to inform the media, even before the completion of investigation, that they

have caught a criminal or an offender. Such crude attempts to claim credit for imaginary investigational breakthroughs should be curbed. Even where a suspect surrenders or a person required for questioning voluntarily appears, it is not uncommon for the investigating officers to represent the media that the person was arrested with much effort after considerable investigation or a chase. Similarly, when someone voluntarily declares the money he is carrying, media is informed that huge cash which was not declared was discovered by their vigilant investigations and through checking. Premature disclosures or 'leakage' to media in a pending investigation will not only jeopardize and impede further investigation, but many a time, allow the real culprits to escape from law."

The observation of the court is so relevant that when we look around, we find that similar instances and events are occurring on day to day basis. Though, we question media at every instance, but here if the agencies refrain from seeing the media on pre-mature investigations, it will definitely improve the system of media reporting as well as justice delivery system.

In the current scenario, the role of media has changed so much that it has become a concern for our judges too. Very recently, Justice AK Sikri, former Judge the Supreme Court of India raised his concern regarding the encroachment of media in the judicial proceedings. Lordship raised the concern regarding the media trials as to how it is impacting the mind-set of judges as well as decision making process. Lordship rightly pointed that in the contemporary scenario Even before a matter is decided by the court the same is taken by the media and it runs into the public domain even before the decision is rendered.

His lordship drawn everyone's attention towards the media trial and said, "Media trials were there earlier also. But today what is happening is that when an issue is raised, a petition is filed, (and) even before it is taken up by the court, people start discussing what should be the outcome. Not what 'is' the outcome, (but) what 'should be' the outcome." He further went on to add that, "Few years ago, it has always been an opinion that once a judgment was rendered by the court, be it the Supreme Court, high courts or any trial court, you have every right to criticize the judgment. Now there is slander or defamatory speeches even against judges who gave that judgment."

It is very much understandable from the above instance as to how the role of media has changed in this contemporary scenario and its growing concern casts much responsibility on Press Council of India, NBSA and related bodies to come forward and control the unregulated

actions of media. However, the various agencies are also required to understand their responsibility so as to avoid unnecessary encroachment of this 4th pillar of democracy.

7. Publicity of Proceedings: Not an Absolute Right

The fundamental aspect of justice mandates that justice must not only be done but seen to be done. The openness and publicity concerning justice are sine qua non and an offshoot of fair trial under Article 21. In 2005, the House of Lords reaffirmed the importance and value of open justice in the remarkable ruling of *S (A child), re. Lord Steyn* in this remarkable ruling said:

“A criminal trial is a public event. The principle of open justice puts, as has often been said, the judge and all who participates in the trial under intense scrutiny. The glare of contemporaneous publicity ensures that the trials are properly conducted. It is a valuable check on the criminal process. Moreover, the public interest may be as much involved in the circumstances of a remarkable acquittal as in a surprising conviction. Informed public debate is necessary about all such matters. Full contemporaneous reporting of criminal trials in progress promotes public confidence in the administration of justice. It promotes the value of rule of law.”

Interestingly there has been a diverse opinion as well as laws pertaining to this issue of public trials. The European Convention on Human Rights on the Right to fair trial mandates and provides that in certain situations, *“the press and public may be excluded from all or part of the trial.”*

The Indian scenario on this point seems to be more inclined towards the European Union convention, where it recognizes its importance in some cases and in certain situation it mandates to keep media away and avoid public proceedings. The Code of Criminal Procedure under section 327 mandates for open justice rule. However, Publicity of proceedings is not an absolute rule of justice dispensing system and in following situations, it mandates to restrict such activities and open court justice:

- a. The Indian Penal Code, 1860 under section 228-A prohibits the publication of the name of the victim of sexual offence and publication of proceedings in that regard.

- b. Special marriage Act, also mandates that trial under camera can only be initiated if both parties have their consensus over it. Even Hindu marriage Act, 1955 provides for a similar mechanism.
- c. Section 327 of CrPC vests power upon the presiding judge or magistrate, to restrict the access of public or any other person in the courtroom at any stage of the trial.

There are several under laws under Indian legislation that mandates and provides that the publicity proceeding is not an absolute right. Also, the changing contours of media in India has casted a huge concern over such public reporting due to unethical, non-credible news reporting.

8. Gaudy Media's Oversight: Tyrannical Legal Proceedings

We are drained to such an extent that Dives more Light on the Dark Side of This Industry, Which is very critical for the well-functioning of a democratic Country like ours. Revenue for Media Houses is build-ups and backings which are deduced on the basis of TRP's generated. The main sources of interest for media houses are advertisements and sponsorships which are determined on the basis of TRP's generated. So the media houses have a tangible decision to make: To either show the masses the real news or show them something that makes them hooked onto their channel even if it goes against their journalistic integrity. And most of the media houses have to choose the later or coerced to choose the latter by certain individuals for instance: The current Government, People who are negatively impacted by the news media houses, goes against certain individuals who own this revenue for media houses are advertisements and sponsorships which are determined on the basis of TRP's generated.

9. Paid News: Buying Content viz-a-viz buying Media

Yours was not, in the beginning, a criminal nature, but circumstances changed it. At the age of nine, you stole sugar. At the age of fifteen, you stole money. At twenty, you stole horses. At twenty-five, you committed arson. At thirty, hardened in crime, you became an editor.

The practice of buying contents is not a new thing in picture. This event has been prevailing since long. A question arises here, Are we buying content or media? Well, what I feel is, we are buying media by buying content. This reminds me of the assembly debates where Dr. B.R. Ambedkar rightly said that, since these media houses are run by human like yes they will have no more rights than what is given to us under the Indian constitution under Article 19. In a similar way, if we are buying contents, we are buying media. There had been several

instances when this issue has come up in mainstream. By the 2009 General Elections, the paid news racket was deeply entrenched as a full-fledged industry worth countless crores of rupees. The Press Council of India in its report has rightly mentioned the key aspects that entail paid news during the elections. These being, one, the reader or the viewer does not get a correct picture of the personality or performance of the candidate in whose favour or against he decides to cast his vote. This destroys the very essence of the democracy. Two, contesting candidates perhaps do not show it in their election expense account thereby violating the Conduct of Election Rules, 1961 framed by the Election Commission of India under the Representation of the People Act, 1951. Third, those newspapers and television channels which received money in cash but did not disclose it in their official statements of accounts, have violated the Companies Act 1956 as well as the Income Tax Act 1961 besides other laws.

Even today, the concern surrounding the issue remains the same and uncured and the issue of paid news is flourishing with impunity. The future requires that this issue must be taken up seriously in order to protect the essence of media and media also needs to tie up their belts in order to ensure credible news.

10. Policies behind Politicians random thoughts and opinions with meaningful messaging: They are Playing You & Me

You do not truly believe in the candidate you may be voting for. But the leaders of your moral system have convinced you to vote for the party that mostly aligns with your moral system in order to prevent the other party from winning. Your party points out all the crap of the other party! And you get hit with confirmation bias and before you know it, you grow this resentment, hate and arrogance towards the other party that you haven't even researched extensively! The media is very slow to cover crimes against Dalit people. Someone's asks-why are we valued only after we die? And all such coverage reaches to you through the paid media who portrays their party. The game of religion, caste which has been initiated by these politicians reached to us through these media houses that do not shut them but make a mockery of the issue resulting in hatred amongst each other.

When Dalit people ask for justice, the response is 'haven't you gotten enough already? It was only when she (Hathras rape victim) died that the media gathered her story. Why is Indian media so slow in covering atrocities against Dalit women? Why are we valuable only after we die?

“Dissent, but only in designated spots are strikingly a horrendous accurate summary story in the last seven decades of the Hon'ble Court's understanding of and attitude towards civil rights over the last seven decades. The growing concern over these random thoughts of politicians being aired by the media houses needs to be checked. You can't be the fourth pillar of democracy by being a party to all communal disharmonies amongst the citizens. Media needs to change its role here and bring in mainstream reporting of all issues without being biased.

11. TRP Scam: Earning Viewership or Manipulating Viewership?

Television Rating Point (“TRP”) has been a primary issue with the news agencies. They have always given much importance to TRPs in order to win a commercial competition that is going on amongst them. They hardly care what they are showing. The new media has given rise to TRP war, a war amongst media houses and a war to emerge winners. And in this war of being the best, they have been able to manipulate everything around. This TRP has given rise to TRP Scams. The recent controversy where few channels were found manipulating the TRP meters holds much relevance to the goofy tricks these media houses are playing in the contemporary scenario.

The recent controversy and debate over the TRP reminds me of Justice Chandrachud's Judgment, way back in 2001 where he stressed upon formulating guidelines and laws for TRP. It is absolutely needed that TRP shall be mandated under some authority that would be responsible for proper checks and balances. This recent TRP scam in question very much justifies the objective of this paper and the commercialized media market in our country.

12. Conclusion: Outnumbered repercussions of showcasing truth vis- a- vis erroneous actions

“Fusing the entire pedagogy, as to every action, there's equal & opposite reaction. We should start heading towards people who defamed and tried to destroy Ironical lives, for a two-minute glory on electronic media carrying fake news.” What's your belief system? Do your beliefs have a purpose because what you believe is what you see? Be a responsible consumer of news. Apolitical is not an alternative. Self-deception can have you learn the same lesson twice. When you know what to do yet you keep doing it, that's just called being dumb or addicted. Which one are you? The media landscape has ballooned with digital proliferation and

the availability of platforms like YouTube which has substantially decreased the costs associated with running a media house. It's barely we lack consistency & proclivity. The media houses need to understand their role and we people need to come forward and reject the evil practices of media. Media can't exist without its viewers and we can really mend the ways and compel the media houses to adopt the ethical practices. We need to change our taste and not give unnecessary attention to the goofy tricks that media houses play to gather TRP. Banning media or regulating them under a scanner is something which is very difficult as doing so might go against the established principles of constitutionalism.

Lastly, to conclude my thoughts over the issue, I would quote K.T. Shah from the Constitutional Assembly debates where he demanded separate provision for regulation of media.

K.T. Shah said:

“The freedom of the press...is one of the items around which the greatest, the bitterest of constitutional struggles have been waged in all constitutions and in all countries where liberal constitutions prevail. They have been attained at considerable sacrifice and suffering. They have now been achieved and enshrined in those countries. Where there is no written constitution, they are in the well-established conventions or judicial decisions. In those which have written constitutions, they have been expressly included as the freedom of press... [E]ven the United Nations Charter gives good prominence and special mention of freedom of the press...The press may be liable to abuse; I feel there may have been instances where the press has gone, at least in the mid of the established authority, beyond its legitimate limits. But any curtailment of liberty of the press is...called a ‘black Act’... To omit it altogether, would be a great blemish which you may maintain by force of the majority, but which you will never succeed in telling the world is a progressive liberal constitution...”

References

Hathras Case: The Intersecting Factors behind Structural Violence against Dalit Women', *The Wire*, (2020, October 01), <https://m-thewire-in.cdn.ampproject.org>

'Payback Time: Female Genital Mutilation (Fgm)', United Nations (2020, February 06) <https://www.un.org/en/observances/female-genital-mutilation-day>

Fed up with ragging, Jabalpur doctor commits suicide, investigation underway', *News Track*, (2020, October 04) <https://english-newstracklive->

N Ram, 'The Changing Role of the News Media in Contemporary India', Indian History Congress, 72nd Session, Punjabi University Patiala, https://www.thehindu.com/multimedia/archive/00863/Contemporary_India__863821a.pdf

Code of Conduct, The Press Council of India, <http://presscouncil.nic.in/>

'Sushant Singh Rajput case: Press Council asks media not to carry out its own 'parallel trial', the *Times of India*, (2020, August 28), <https://timesofindia.indiatimes.com/entertainment/hindi/bollywood/news/sushant-singh-rajput-case-press-council-asks-media-not-to-carry-out-its-own-parallel-trial/articleshow/77807826.cms>

The Wire, <https://thewire.in/media/sushant-singh-rajput-death-nbsa-fine-aaj-tak-zee-news-india-tv-apology> (last visited Oct 15, 2020)

Radia Tapes: How One Woman's Influence Peddling Led to a Snake Pit', *The Quint* (2018, February 02) <https://www.thequint.com/explainers/what-are-niira-radia-tapes-explained>

'Judging under Stress', *The Times of India* (2019, February 10) <https://timesofindia.indiatimes.com/india/judging-is-under-stress-in-digital-era-says-justice-a-k-sikri/articleshow/67928639.cms>

Bar & Bench, <https://www.barandbench.com/news/litigation/payal-ghosh-tenders-unconditional-apology-richa-chadha-defamation-case> (last visited Oct 15, 2020)

P.Sainath, (2010, April 21), Paid News Undermining Democracy: The Press Council Report, *The Hindu*, <https://www.thehindu.com/opinion/columns/sainath/Paid-news-undermining-democracy-Press-Council-report/article16371596.ece>

Press Council of India, Report on Fake News, <http://presscouncil.nic.in/OldWebsite/CouncilReport.pdf> (last visited Oct 15, 2020)

Bar & Bench, <https://www.barandbench.com/news/trp-racket-mumbai-police-arrests-owners> (last visited Oct 15, 2020)