# Legal Case Summary: Digambar & Another vs The State of Maharashtra & Another (2024)

Case Title: Digambar & Another vs The State of Maharashtra & Another

Citation: 2024 INSC 1019

Court: Supreme Court of India

Date of Judgment: 20 December 2024

Bench: B.R. Gavai, K.V. Viswanathan

## Facts of the Case:

- The appellants (Digambar and his wife) were the parents-in-law of the complainant.  
- FIR was filed in 2018 for cruelty, forced miscarriage, and abetment under Sections 498-A, 312, 313, and 34 IPC.  
- Allegations included mental and physical cruelty for not giving birth to a male child and coercion leading to miscarriage.  
- The marriage ended with a divorce by mutual consent in May 2019.  
- The appellants sought quashing of the FIR before the High Court under Section 482 CrPC, which was dismissed.  
- Chargesheet was filed in February 2021.

## Procedural History:

- High Court dismissed the quashing petition in January 2020.  
- Appellants approached the Supreme Court.  
- During pendency, the son (husband) passed away and his appeal abated.  
- The Supreme Court considered medical reports, FIR contents, and relevant case laws.

## Issues before the Court:

1. Whether vague, omnibus, and delayed allegations can sustain criminal prosecution under Sections 498-A, 312, 313 IPC.  
2. Whether the High Court erred in refusing to quash the FIR and chargesheet.  
3. Whether the allegations were made with an ulterior motive post-divorce proceedings.

## Judgment:

- The Supreme Court allowed the appeal.  
- It quashed the FIR, chargesheet, and all subsequent proceedings against the appellants.

## Key Legal Findings:

1. Vague Allegations: The FIR contained non-specific, omnibus allegations lacking dates, details, or evidence of cruelty or forced miscarriage.  
2. No Prima Facie Case: Even if taken at face value, no prima facie case was made out under Sections 498-A, 312, or 313 IPC.  
3. Doctor's Report: Medical evidence showed miscarriage due to abortion pills, with no link to the appellants.  
4. Delay in FIR: Incident occurred in 2016, FIR filed only after divorce notice in 2018, suggesting mala fide intent.  
5. Misuse of Legal Process: Filing of complaint appeared retaliatory to exert pressure in matrimonial proceedings.  
6. Application of Bhajan Lal Case: FIR quashed under grounds of abuse of process as laid down in Bhajan Lal and Dara Lakshmi Narayana cases.

## Final Decision:

✅ Appeal allowed  
✅ High Court order dated 23 January 2020 quashed  
✅ FIR No. 339 of 2018 and Chargesheet No. 10 of 2021 quashed  
✅ All subsequent criminal proceedings against the appellants quashed and set aside