



**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CIVIL APPELLATE JURISDICTION**

PUBLIC INTEREST LITIGATION NO. 118 OF 2025

Satyam Atul Surana

.. Petitioner

Versus

The State of Maharashtra & Ors.

.. Respondents

...

Mr. Satyam Atul Surana, Petitioner in-person present.

Mrs. Neha Bhide, Government Pleader a/w Mr. B. V. Samant, Additional Government Pleader and Mrs. P. J. Gavhane, AGP for Respondents-State.

Ms. Krupali H. Rajani & Esha Pachare, Standing Counsel for MSHRC.

...

**CORAM : SHREE CHANDRASHEKHAR, CJ &
GAUTAM A. ANKHAD, J.**

DATE : 27th JANUARY 2026.

P.C. :

Stating that in many cases recommendations of the "Maharashtra State Human Rights Commission" (in short, MSHRC) have been complied by the State Authorities, Mr. B. V. Samant, the learned Additional Government Pleader seeks adjournment.

2. However, the learned Additional Government Pleader is unable to indicate the number of cases/recommendations in which the recommendations of the MSHRC are yet to be complied. The learned Additional Government Pleader tenders a copy of the letter dated 23rd January 2026 from the Home Department, Government of Maharashtra and submits that there are about 15 cases in which the recommendations of the MSHRC have been complied by the State

Authority. Mr. Satyam Atul Surana, the petitioner appearing in-person refers to various judicial pronouncements and submits that the recommendations of the MSHRC have binding force in law. The State Authority is under statutory duty to comply with the recommendation made by the MSHRC provided the same is not put under challenge in any review or appeal proceeding. The petitioner in-person refers to the provisions under section 18(e) of the Protection of Human Rights Act, 1993 to lay support to his submissions.

3. It was on 18th November 2025 when cognizance of this PIL was taken by this Court. On 12th December 2025, this Court making an observation regarding the manner in which the recommendations of the MSHRC are dealt with in the State of Maharashtra directed the respondents to file their affidavit within four weeks.

4. On the next date of hearing, that is, on 12th January 2026, an adjournment by one week was sought by the learned Additional Government Pleader. That is how this PIL has come up on board today under the caption "High on Board". Notwithstanding sufficient time granted to the State-respondents, no concrete details are provided by them.

5. In view thereof, we propose to issue a direction to the Principal Secretary, Home Department, Government of Maharashtra to deposit a sum of Rs.3.60 crores with the office of this Court within next two weeks, appropriate arrangements for that shall be made forthwith. However, before that the Chief Secretary in coordination with the Principal Secretary, Home and General Administration Departments, Government of Maharashtra shall appoint a Nodal Officer who shall ensure that notices to all the victims/legal heirs of the victims etc. are served within next 10 days through all available electronic modes in addition to personal service to them. A copy of this order shall also be

served upon all such persons in whose favour compensation has been made by the MSHRC.

5. Ordered accordingly.

6. Post the matter on 17th February 2025, High on Board.

[GAUTAM A. ANKHAD, J.]

[CHIEF JUSTICE]

PRAVIN
DASHARATH
PANDIT
Digitally signed
by PRAVIN
DASHARATH
PANDIT
Date:
2026.02.02
10:45:53
+0530