

A STUDY ON FREEDOM OF SPEECH AND EXPRESSION WITH REFERENCE TO MEDIA TRIAL

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Abstract

All democratic organizations are built on the principles of free speech and expression. In order to maintain the democratic way of life envisioned by the Indian Constitution, it is crucial that people have the freedom to express their thoughts and have the chance to have those thoughts heard by the general public. The welfare of the populace depends on the greatest possible transmission and circulation of knowledge from many sources. The ability to express fair, rational, and honest criticism on issues of public concern strengthens communities. The press, which is a crucial component of freedom of speech and expression, has a role to play in fostering a favorable environment for unrestricted political debates necessary for the smooth operation of a popular government. It should be allowed to contribute to the process of creating a strong, viable, and thriving society in India because it is a potent mass communication medium. Denying citizens their right to freedom of the press would undoubtedly weaken their ability to sway public opinion and go against the fundamental principles of democracy.

Keywords: Media, Media Trial, Freedom of Speech, Mass Media, Communication, Freedom of Expression

INTRODUCTION

The media serves as an “open court”, and it will begin to interfere in the judicial proceedings of the courts, which, ultimately, to overcome the major differences between the ‘suspect’ and ‘condemned’, which, true to the game, the basic rules of the “presumption of innocence until proven guilty” and “guilty, then that is a reasonable doubt”. This is harmful to the society, and sometimes to the right, and as result, the defendant, who has to be seen as harmless, it is a criminal life, respect for all the rights and freedoms of individuals.” It is to solve such a problem; it is always a question of the child’s best interests. These issues are not addressed, and it will not be fixed, which creates an urgent need to address this issue¹

In a Democratic Country like India, the media plays a very important role. It has grown to be a vital organ of the government, because it was his duty to the company to provide information in the areas of public affairs and the public interest. The role of the media has led us to consider IT to be the fourth pillar of democracy. The freedom of the press is considered to be the mother of all freedoms held in *Re Harijai Singh v. Vijay Kumar*² In a strong economy, the media plays a very active role and was able to get a “vox populi”, which allows them to effectively be able to create or change the whole perspective of the people at the various events. At the moment, and with the help of modern technology and innovative procedures for the collection of communication, electronic media such as radio, television, internet, etc., the mass media such as newspapers, magazines, etc., been made in order to attract the attention of the viewers or readers and to increase their volume.³

In addition, it has led to a competition for the creation and dissemination of the more sensational stories to attract viewers and readers of all other forms of access to a competitive level. Sometimes, it turns out that the creation of the sensational stories that are required for the fact that it is a true fact, distorted or color media. The issue becomes more pressing as the obsessive, and the practice of the collection of messages is used, which has a tendency to interfere with the privacy of the people for whom they are intended, and by the publication of the information and feedback we receive in each of the sub-court records. In particular, in anticipation of, a change in

¹ http://www.newworldencyclopedia.org/entry/Mass_media

² AIR 1997 SC 73.

³ Surette, R. (1998); Media, crime, and criminal justice: Images and realities 14(Wadsworth Publishing. (2nd ed. New York)

the judicial trend is to confirm the behavior of the sting operation, and the media to behave in the public interest, there are some concerns that the unconfined of attention in the media, or the excessive media campaigns can have a positive impact on the freedom of the individual, which cannot be recovered by any means.

These questions have led to a national debate on the conflict between the fundamental rights of every human being, namely, the freedom of speech and expression, on the one hand, and the rights to a fair trial, on the other hand, in the case of court proceedings by the media in a democratic state. This also raises the question of the power of the mass media in order to get an assessment in the course of the proceedings in the media. In this paper, an attempt has been made to examine the Constitutional guarantees of the freedom of the press is guaranteed to be a citizen of the Indian Constitution, as well as other aspects of the conduct of an impact on the Constitutional Guarantees of citizens, and one way or the other in this context.⁴

MEANING OF THE TERM MEDIA

The term ' medium ' is actually singular form of media which really implies, that any of the channel or approach to disseminate data yet the word media is plural interpretation of same which implies dispersal of data through the different channels. For instance like TV press and above all paper ,the utilization of the word was first time utilized in 1923 by H.L Mencken and he included further that media will not be considered as toys ,they ought not be in the hands of officials rather they ought to have their separate existence.The work done by media is to store all kind of informations and to arrange it to directly there where it is required generally .

In this present scenario ,a transformation occurred and got extraordinary change in the field of media. It modified the media enormously and the most unique change brought by this unrest is giving long separation correspondence initially in two different ways, acknowledged in 1906 was by means of simple and computerized media. Simple media transmission was one of the path acknowledged to disperse informations and incorporated the source like telephonic framework & radio framework to communicate. ⁵

⁴ Media Trials in India, available at: <https://www.jurist.org/commentary2021/01/vishwajeet-deshmukh-media-trials-india/>

⁵ Arunav Talukdar, Media Trial and Right to Freedom of Speech and Expression: An Analysis.

There was another conspicuous method for regular communication was advanced broadcast communications which takes into consideration and interchanges telecommunication and PC systems.

The fundamental differences is that one can do without much of a difficulty find in advanced sources like media transmission and PC can interchanges anything but difficult to alter the same and it represent a great deal of decisions to make any adjustments or any changes. In any case, the case it was not same when you depend on, simple photography for this one was required to be happy with the photograph even, in the event that you don't care for it. So putting the general population at freedom., The development in media can be followed as the advanced correspondence accommodates with exceptional separation communications while, the conventional were not unreasonably noteworthy in giving long separation interchanges in spite of the fact that it can not be denied that many communication media and broad communications favored correspondence to many including the sources like TV , films , radio magazine and paper.

INDIAN PRESS UNDER BRITISH RULE

The Portuguese established the newspaper around 1550. But in 1780, the first newspaper was founded in James Augustus Hicky's honor, and it was called the "Bengali Gazette" and published every week in India. Both Warren Hastings and Chief Justice E. Impey were assigned to write this article. A courier was employed in 1785 to distribute newspapers once a week. The "Bombay Courier," "Bombay Gazette," and "Bombay Herald" are combined with the "Bombay Herald" in 1792.⁶

Digdarshan was introduced by Marshman and the Srirampore for the first time in Bengali in 1818. Raja Ram Mohan Roy was Samvad Kaumudi on December 4, 1812. He contributed to the Persian-language periodical Mirat-ul-Akbar in 1822. However, Syed-ul-Akbar, who is spoken in Urdu every week, was born in 1837. In 1838, Dilli Akbar was first printed. The "Hindu Patriot" was started by Harishchandra Mukherjee in the 1840s. It began in Switzerland in 1851 for the Gujarati weekly Rust Gofar. In 1862, The Indian Mirror first appeared. On September 28, 1861, Devdaranath Tagore took over as editor. He was thereafter joined by Keshavchandra Sen and

⁶ Press under British Rule, in India, available at: https://historytuition.com/modern_india/press-under-british-rule.html

Narendranath Sen. The Times of India, which was founded by Carey, Ward, and Marshman in 1818, is connected to the website Twice, in the Mumbai (Bombay), by default, in "the Bombay Courier" and "the Telegraph" to each other. Robert Knight serves as editor of this newspaper. Prior to that, it was once a month; later, it was altered to once a week. Robert Knight created the company in 1875. As a politician and a friend of India, he joined forces to become a politician in the 1890s. The Pioneer was first published in 1865, from the state of Allahabad, on September 20, 1878, in the Hindu religion. A week or so later, it was published three times per week in October 1883, when the Kusturiangar was the editor. On February 2, 1881, Lokmanya Tilak and Kelkar began their work in Kesari, and that day was in 1889.⁷

POSITION OF MASS MEDIA IN MODERN INDIA

Since Independence, the Indian media has been developed in large part, restored, and it will be visible, and a clear separation between the brand and its sincere expression of our media samples, and sometimes the odds. In the modern, mass-communication, it is something special and connected with the sense of justice: bragging rights and ego, which is to replace the entire meaning of the theory. The judiciary is the most powerful response to the violence in the modern, mass-communication. Now, the media seems to be the avoidance of any determination by the exposure of their message to the audience, they are in to destroy it. The objective of mass communication is the order of the content solely for the purpose of winding up, and for the world-wide-web is no exception to this, and it's sure to be the most logical media is an important tool.⁸

It was very interesting to see how, if, in the media age, they become more and more open to receiving and distribution of do-it-yourself details. This is due to the gravitational pull of a more democratic use of resources. There is an increasing pressure on the armed conflict in the press, because of the growth of the eyes, a camera, and a new digital device, observe the same events that have been reported by the media, there are a lot of possibilities open, and broadcast journalists will be forced to tell the truth (at the very least, a reasonable as well). Therefore, blogs are now the leading source of news and information about many of the things in the world! He also believes that the bloggers are often the only real journalists, when they are at their own risk,

⁷ Sumit Ghosh, *Modern History of Indian Press*, 45(Cosmo, Publication, New Delhi, 3rd Edn., 1998).

⁸ History of Mass Media in India, available at: www.nimc-india.com/history-mass-media-india.html

independent journalism in a country where the mainstream media to investigate, or in part, under the control.

HISTORY OF MEDIA TRIALS

The history of media, processes, dating back to the early 20th century. The term, although the thought of it had its meaning, derived from the case of Roscoe “Fatty” Arbuckle, 1921, which was found not guilty by the court, but he lost all his reputation, and his work in the media, stating that he was “guilty”. Another well-known case of the O. J. Simpson, trial in 1995, in which the media in the promotion of the event, and was influenced by the minds of the viewers due to its higher status in the court of law. It often happens that the media on which it may be said to reflect the views of the person in the street. The media, which act as a bridge for the different kinds of relationships between people, and for the viewers.⁹

The media, which is under the control of the Inspection of law, provided that the media needs to be published with the facts on each and every person, that is, from right to reliable sources. The use of the media, that is, both the evil and the good.

In the case of the *Stephen Downing*, in 2002, of Derbyshire, during the campaign by the editor-in-chief of the local newspaper, which has been extended in this matter, and that it was successful to be released from the condemned men, after 27 years of his sentence.

SCOPE OF ARTICLE 19

It is essential for a population-based country like, India to have Freedom of Speech as Fundamental Right. Various masterminds have given their view, on the availability of such right which gives the status of major right and it must be open to give the all-inclusive community of India to get the opportunity to talk one's mind which can be hampered by some other person.

It is basic to observe that the benefit of Article 19 (1) is available just to citizens of our country.

¹⁰It isn't available for non-citizens. Thus, the conditions which are indicated to be a constrained for part III of our constitution is to be fulfilled, while have the option to access such rights. Any person who isn't the citizen of our country, for instance, non-citizens didn't have such rights.

⁹ Constitutionality of Media Trials, available at: <https://blog.ipleaders.in/constitutionality-of-media-trials-and-landmark-cases/>

¹⁰ VN Shukla, *Constitution of India* 42(Eastern Book Company 13th Edition, , Lucknow)

The class of the 'citizens' in constitution have been in all regards clearly explained, this benefit is limited to simply citizens of country others like enlisted associations and social requests are in like manner not treated as citizens. It is interesting to observe that this was not commonly the circumstance since beginning. 'financial specialists' needed actualizing their rights as key rights in assurance.

In *Rustom Cavasses Cooper v. Union of India*¹¹ the candidates were a Shareholder, Director, and Holder of current records, who tried the nationalization of the bank, which was an association. It was held for this circumstance, that ward of the court can't remain foreseen, when rights from individuals are affected by state action similarly, as when the benefits of association are impacted. This infers an individual may form assembly or state his notions which he wishes insofar as he doesn't infringe any law or the benefit of others. The open expression not in the slightest degree like an infringed right is at risk to statutory reducing and may be restricted by lawful improvement of law. Properly flying national flag wholeheartedly with reverence and regard is an explanation and presence of his faithfulness.

ROLE OF PRESS AND MEDIA

The role of media is just not confined one or two functions rather, it has become part and parcel for so many functions such as take the example of campaigns and elections moreover it cover so many activities as well. It is almost impossible to imagine to conduct campaign and elections or any of the government activities without the aid of media.¹²

ROLE OF TRIAL BY MEDIA UNDER THE INDIAN PROSPECTIVE

Having the verdict announced on January 18, 2021. Due to the existence of a judicial point of view, the Supreme Court of India has concluded with the determination of the sample in the Indian media. The Court recognised that one typical aspect of the contemporary idea of democracy is the effect and outcome of the trials in the media, in the administration of justice. In a ruling that was criticized by Chief Justice Dipankar Datta and Justice G. S. Kulkarni, the Bombay High Court drew a line between "freedom of the press," which is protected by Article

¹¹ AIR 1970 SC 1782

¹² Durga Das Basu, *Commentary on the Constitution of India*, 40 (Wadhwa Publications, Nagpur, 8th edn., 2007)

19(1)(a) of the Indian Constitution, and "media freedom," in order to lessen the possibility of legal action and avoid conflict with the Indian Constitution. In a larger system that makes use of a case, which is novel in the legal field, that is, a contemporary database of court decisions in the media, in India, and in a society that has embraced new technologies.

Following the self-immolation of Sushant Singh Rajput, the most well-known actor in India, a report on the tragic situation is owed to the local news station. It is crucial for the application of the law to notify aggressive press organizations that have impeded the investigation. Following the declaration, numerous public interest petitions were submitted to the Mumbai High Court in opposition to the media. The judge's decision, or judgment, may be referred to as the conditions under which the defendant was found guilty and given a sentence. This is a thorough examination of the accused's guilt and the use of particular tactics to convince him and the rest of us, regardless of the judge's ruling. In this instance, what could be called a "media trial" took place where the actor's reputation and that of his co-star, actress Rhea Chakraborty, were almost completely destroyed.

In situations like the Jessica Lal Case, the Priyadarshini Mattu Case, and the Bijal Joshi Rape Case, 2005, it has been demonstrated that the fourth pillar of Indian democracy can be used to advance the interests of the victim. The fourth pillar's power to interfere with the criminal justice system, with or without the court's cooperation, was "the media," which was produced in great quantities.¹³

The court's decision was made by Chief Justice Dipankar Datta and Justice G. S. Kulkarni, who oversaw many significant media-related litigation issues, including those involving the major television networks' boards of directors, which have up until now been limited to the model that may be challenging to research, the interpretation of the contempt of court act, and the regulation that establishes guidelines for the print and broadcast media, witho.

In keeping with the standards established by the media organizations, that is. The Court issued its first set of guidelines on how the media and channels must cover suicide deaths. The court ruled that the deceased person's privacy must always be respected as evidence of your private information, which must never be disclosed. It also ruled that any confessions made to the police

¹³ M P Jain, *Indian Constitutional Law* 78(8th ,2018).

will not be made public, and that no one will need to be interviewed during the course of the investigation.

While they are necessary to have the media—print, electronic—and the same should be taken into account, the Court took up the Council's suggestions with the Press of India. to decide what information should be in the public's best interests.

It is crucial for understanding the meaning of the phrase "administration of justice" and its significance in contemporary economies like India. The question of contempt of court is further complicated by the disclosure of information while any of the material is being disclosed, which could be construed as a contempt of court. According to the court, STATE TV and TIMES NOW both reported on the case of a violation of the outcome and obstruction of justice. However, nothing was done to stop them.¹⁴

Facets of Speech and Expression under Article 19 (1) (a) are: -

a) Freedom of Press: -

Democracy can develop it, not only in the eyes of the legislature, as well as under the supervision and guidance of public opinion, and the superiority of the press. Freedom of speech and expression includes the right to express an opinion through print media and other communication channels, such as radio or television reception, subject to reasonable restrictions under Article 19 (2).

In the case of *Romesh Thappar v. State of Madras*,¹⁵ was one of the first cases to be decided by the Supreme Court declaring the freedom of the press is a part of freedom of speech and freedom of expression. Patanjali Sastri, for example, has pointed out that freedom of speech and freedom of the press is at the core at all democratic organizations for without free political discussions no public education, so essential for the normal functioning of the governance process, it is not possible.

¹⁴ Durga Das Basu, *Commentary on the Constitution of India*, 370 (Wadhwa Publications, Nagpur, 8th edn., 2007)

¹⁵ (1950 SCR 594, 607; AIR 1950 SC 124).

Indeed, in the case of *Indian Express Newspaper (Bombay) (P) Ltd. v. Union of India*,¹⁶ claiming that the press plays a very important role in the democratic machinery. The courts are required to protect the freedom of the press, and to counter all the laws and administrative actions that restricts this freedom.

The freedom of the press includes freedom to publish, freedom of trade and freedom of prior censorship.

In fact, *Sakal Papers Ltd. v. Union of India*,¹⁷ in the Daily Newspapers (Price and Page) Order, 1960, which was determined on the basis of the number of pages, and the size of a newspaper could publish at a price, and, in fact, *Bennett Coleman & Co. v. Union of India*,¹⁸ the validity of the Newsprint Control Order, which was made on the basis of the maximum number of pages to the Supreme Court of India, which is in conflict with the provisions of Article 19 (1) (a) and to a reasonable limit on the basis provided for in Article 19 (2). The court rejected the government's suggestion that it would help small newspapers to grow.

In fact, *Brij Bhushan v. State of Delhi*,¹⁹ the Court ruled lawful order to submit the prior censorship of the English weekly of Delhi, which was sent to the newspaper, the editorial board and the publishers in all, making the general public, as well as news and reviews from all over Pakistan, including photographs and cartoons, on the grounds that it is a restriction on the freedom of the press.

b) Freedom of Commercial Speech: -

Indeed, in *Tata Press Ltd. v. Mahanagar Telephone Nigam Ltd.*,²⁰ the Supreme Court ruled that advertising, it is also a part of the freedom of speech and expression, which shall be limited to the amount of the limitation in Article 19 (2). The Supreme Court held that the complaint, which is nothing more than a commercial transaction, however, the dissemination of information about the advertised product. The general public of the benefits of the making available of the

¹⁶ (1985) 1 SCC 641.

¹⁷ AIR 1962 SC 305

¹⁸ AIR 1973 SC 106; (1972) 2 SCC 788.

¹⁹ AIR 1950 SC 129

²⁰ (1995) INSC 358

information through the means of advertising. In a democratic economy, and the free flow of commercial information is of vital importance.

c) Right to Broadcast: -

The concept of freedom of speech and expression, developed in conjunction with the development of technology and the available means of expression and communication. It includes all of the electronic and broadcast media.

In fact, the *Odyssey Communication (P) Ltd. v. Lokvidayan Sanghatana*,²¹ the Supreme Court held that a citizen has the right to get the movies to play on a state-owned channel, such as Door Darshan, a part of the fundamental right guaranteed under Article 19 (1) (a). In the present case, the applicants have challenged the exhibition on the Door Darshan. The series is entitled, “On the grounds that it can be enhanced by using a traditional and a blind faith in the viewers”. The proposal was rejected because the applicant failed to provide evidence of a bias against the general public.

d) Right to Information: -

Freedom of speech is not limited to, the right to express themselves, to publish and disseminate information, in its movement, as well as the right to receive information. This was done by the supreme court in a series of resolutions, which have discussed, the right to receive information in a variety of contexts—from advertising, which allows citizens to make important information on drugs, on the right-hand side of the sport, the fans, to watch the cricket, and to the right of the voters to get to know the pastors of the elections of a candidate.

The Supreme Court ruled in the case of *Union of India v. Assn. for Democratic Reforms*²² “one-sided information, disinformation, misinformation and non-information, all of which create a series of ill-informed people say that democracy is a fiction. Freedom of speech and expression includes the right to disseminate and receive information, in which have the freedom to hold opinions.”

e) Right to Report Court Proceedings: -

²¹ (1988) 3 SCC 410.

²² (2002) 5 SCC 294.

The right of legislative proposals, to obtain the necessary liquidity to be preserved. Justice must not only be done; but most of them are paid. It's a guarantee of a failure of justice, and misconduct. In the half-light of the secret, and doesn't allow the interest and the evil, in whatever form, is a full-range, in such a proportion as the promotion will be taking place from every one of the checks applicable to judicial dishonesty on the part of the operation. Where there is no publicity, where there is no justice. The mass media is to enjoy the privileges associated with the right to citizens to be informed and to be in the public interest. This is not because of a certain wisdom, interest or status enjoyed by its owners, editors and journalists. The fact that the mass media are the eyes and ears of the public. They are acting in the best interests of the society as a whole. The right to know and their right to not to publish it, as it is neither more nor less than the law of the society as a whole. Indeed, it has been an issue for the general public to whom they are accurate, as in the case with the *Lord Donaldson, in Attorney General v. Guardian Newspapers Ltd. (No. 2)*²³

f) Copyright versus the Freedom of Expression: -

Actually, the copyright Act's main objective was to stop unauthorized transmission of artistic works. This logically expands the right to free speech that is guaranteed by Article 19 (1) (a) of the Indian Constitution. A person needs the protection of intellectual property rights in order to enjoy their freedom of speech and expression. Without this safeguard, creative people may experience discouragement and their imagination may even be repressed. With copyright, you can do anything, but giving it to someone else will stop them from copying your original work. A decision made by one person places limitations on the other.²⁴

The goal of copyright laws is to protect everyone's rights while they fulfill their own duties. This raises the question of whether this infringes on anyone's right to economic freedom, their right to free expression, or copyright rules. contrasted with libel, slander, hate of ethics, morality, and the promotion of crime, etc. They are not subject to any restrictions under the Indian Constitution, including the copyright laws. the belief that the definition of trade should not be expanded to

²³ (1988) 3 All ER 595

²⁴ Constitution of India-Freedom of speech and Expression, available at:
<http://www.legalserviceindia.com/legal/article-572-constitution-of-india-freedom-of-speech-and-expression.html>

include the possibility that someone might have the right to utilize another person's property or to the results of another person's labor, as well as the right to freedom of speech and expression..

There is a large public interest in this in order to uphold copyright laws. In his book "Copyright and the Public Interest," author G. Davies claims that in order to maintain the right to free speech, author copyright must be in the public's best interests. Additionally, it allows the author the chance to receive compensation for their efforts as well as the freedom to express their creativity and publish whatever they like. Providing producers with incentives, such as funding, whether from the government or from private individuals who install risk-management controls or censorship, is an alternative option.

Conclusion

It is clear from the aforementioned that the media has a more negative than a positive impact, with a few outliers here and there. The competent courts will need to deal with the media in a persuasive manner. The media is not allowed to cover judicial proceedings because they are not covering any sporting events. Regarding the modifications to the Contempt of Court Act, 1971, the Law Commission created Report No. 200, which was released in 2006. In the cases of the mysterious murder of Jessica Lal, or Aarushi Talwars, the media plays a major role in the unification of the target in the minds of the common people, and the binding of that the person is a criminal, long before the CBI team, criminal law, courts, and even a final decision on the case. this is not just an act of protest against the decision of the commission, ministry of justice, but also undermines the reputation of the accused.

There are a variety of channels, which are arranged cutthroat competitions among each other in the channel is found to be the best prepared for the stories, was seized by the audience, from the observation of the increase of the control. As a result, they will bring in false information, as well as the price, make it look very, very convincing.

It provides a complete guide to the courts and their activities. Disputes in the field of media, which have a direct impact, and explore the history of the CBI, the teams and the court of appeal. Men have to trust and confidence in the media, and is confident that the various tests.

‘The Dairy Mirror’ and ‘The Sun’ newspapers, were to be responsible for the provision of information that could lead to the trial by the murder of Yeates, which is in the UK, condemned the false killer to justice. It may not be practical to follow in this case, in addition to the x-ray machine and therefore, the provisions of justice to Joana’s personality.

A person’s fame has to be very important. People may be arrested if they return to the electronic media, that is, their fame, however, is to be covered at all, even if they are able to be discharged later on.

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