

**“MURDER, MEDIA, AND MYSTERY: THE TWISTED TALE OF THE SHEENA BORA CASE” - INDRANI PRATIM MUKERJEA V CENTRAL BUREAU OF INVESTIGATION AND ANOTHER**

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## INTRODUCTION

With its combination of murder, mystery, and media intrigue, the Sheena Bora murder case<sup>1</sup> is among India's most captivating crime stories. It has captured the interest of the entire country. Sheena Bora, a 24-year-old Mumbai resident, disappeared without a trace in April of 2012. Her disappearance went unsolved for years, with many people writing it off as a personal choice to relocate elsewhere. But in 2015, this quiet disappearance turned into an intriguing murder case that shook the most powerful social class.

Indrani Mukerjea<sup>2</sup>, a co-founder of INX Media and a former media executive, was essential to the mystery. It was suddenly discovered that Sheena's biological mother was Indrani, the person who had brought her into the world as her younger sister. One of the most ruthless and complex murder schemes in recent memory took place against the backdrop of the family secret, which had been kept under wraps for years. Sheena's body was disposed of in a distant jungle in Raigad, Maharashtra. Indrani was accused of planning and carrying out Sheena's murder alongside her ex-husband Sanjeev Khanna and driver Shyamvar Rai<sup>3</sup>.

As the case unfolded, the media developed a strong interest in it, which was essential in turning it into a national obsession. From the rich lifestyle of Mukerjea to the intricate family dynamics, every facet of the case was examined and emphasized in real-time. The trial and the people involved received unprecedented attention as a result of the heavy media coverage that revealed hidden levels of dishonesty, financial motivations, and personal grudges.

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<sup>1</sup> **What exactly is the Sheena Bora murder case?** *The Times of India* (India, 29 August 2015) <<https://timesofindia.indiatimes.com/india/what-exactly-is-the-sheena-bora-murder-case/articleshow/48705455.cms>> accessed 23 September 2024.

<sup>2</sup> **Nilanjana Bhowmick**, 'Sheena Bora case: Media frenzy over Mukerjea family scandal continues' *Hindustan Times* (India, 30 August 2015) <<https://www.hindustantimes.com/>> accessed 23 September 2024.

<sup>3</sup> **Ishita Mishra**, 'Sheena Bora murder case: Indrani's driver Shyamvar Rai turns approver' *The Times of India* (India, 23 May 2016) <<https://timesofindia.indiatimes.com/city/mumbaisheena-bora-case-indranis-driver-shyamvar-rai-turns-approver/articleshow/52400477.cms>> accessed 23 September 2024.

An intricate web of deceit, treachery, and money problems emerged as the investigation went on, with Indrani's criticism of Sheena's association with Peter Mukerjea's son Rahul Mukerjea emerging as a pivotal moment. Decades of deceit, deep-seated animosities, and hidden relationships culminated in a horrifying crime in this tangled tale of deception.

The Sheena Bora murder case became more than just a criminal prosecution due to the ongoing media attention and sensational judicial proceedings; it evolved into a spectacle that made it difficult to distinguish between a private tragedy and a public scandal, making it one of the most infamous cases in contemporary Indian history.

### FACTS OF THE CASE

Indrani Bora was born in Guwahati. She later shifted to Kolkata and was in a live-in relationship with Siddhartha Das<sup>4</sup>. They did not marry each other because she was a minor. She gave birth to Sheena and Mikhail. She moved back to Guwahati with her children. Later in 1990 left her children to their Grandparents. She again moved to Kolkata. In Kolkata, she met Sanjeev Khanna and got married. She later married Peter Mukherjea and separated from her former husband. Her children came to the wedding but she introduced them as their siblings<sup>5</sup>.

Indrani and Sanjeev Khanna are arrested for the murder charges. Peter Mukherjea had a son named Rahul Mukherjea<sup>6</sup>, he and Sheena got close and this worried Indrani. Both of them were not on good terms. On April 24, 2012, Indrani called Sheena to meet near Bandra's RD National College. Rahul (Sheena's boyfriend) drops her at the place and subsequently, Indrani and Sanjeev Khanna pick her up. Shyamvar Rai was driving the car. Indrani and Sanjeev are said to have strangled her while she was drugged. Firstly they planned to go to Pen but they cancelled it after noticing police check posts. They return to Peter's Worli house and park the car in the garage along with Sheena's corpse. Later at night, they load the body in a red suitcase. The next morning on April 25, along with the driver, they moved to Pen near Gagode Budruk village. They drag the body 50 metres off the highway and set it on fire. All three of them then return to Peter's house and Khanna goes back to Kolkata in the evening. In queries made by

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<sup>4</sup> *'If Indrani Mukerjea killed my daughter, she should be hanged, says Sheena Bora's father Siddhartha Das'* (2 September 2015) < <https://www.firstpost.com> > accessed 23 September 2024.

<sup>5</sup> *Sheena Bora Case Analysis* [2015] SCR (Scribd) 1234 < <https://www.scribd.com/document/282498390/Sheena-Bora-Case-Analysis> > accessed 24 September 2024

<sup>6</sup> *Sheena and Rahul relationship'* Hindustan Times (30 August 2015) < <https://www.hindustantimes.com> > accessed 24 September 2024.

Rahul to Indrani about Sheena, she says that Sheena moved to the US because she did not want to be with him anymore. Obvious doubts led him to call her brother, Mikhail. Mikhail finds her passport. After this, they go police to report for missing case. Police say that Sheena is not a kid and asks them to have patience. Her brother goes back when Indrani assures her of well-being. Rahul's boyfriend keeps calling her phone<sup>7</sup> but no answers from either side. Later a text was sent to him that she did not wish to be with him and had moved to the US. Again, he goes to the police and asks to report for missing person. Police say it can be recorded only after an injury has been done. Police go to Worli, they are told that Rahul was stalking her. Due to this, no First Information Report (FIR) was filed<sup>8</sup>.

On May 23, in Gagode Burdul villagers discover the burnt suitcase. The body was far beyond recognition. The body was decomposed; the only sign that hinted that it was a woman's body was long hair. Police came to that place and discovered the body and waited for a few days, they finally disposed of the body.

An anonymous call to the Police Station at Khar, after 3 years that an auto-rickshaw driver had murdered a girl from a big business family and had dumped the body in Raigad. Shyamvar Rai worked as an auto-rickshaw driver when Indrani and Peter left the country and worked as the driver when they were in town. Shyamvar was put under surveillance. When Indrani returned, she was also under surveillance. On August 21, 2015, Shyamvar Rai was arrested for possession of illegal arms. During interrogation, he speaks about the murder of Sheena. Police then arrested Indrani on August 25 and Khanna was arrested on August 26 from Kolkata.

## APPLICATION OF INDIAN EVIDENCE ACT

### 1. DNA Testing under Section- 26 of the Indian Evidence Act:

DNA test results show Indrani Mukherjea was Sheena's mother. If the DNA doesn't match, the murder case won't be devastating. Supreme Court rulings show murder charges can be made even if the victim's body isn't found. The Indrani defence team can use the collected remains as evidence, but the court may consider the possibility of weakening DNA

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<sup>7</sup> **Hindustan Times**, *Sheena Bora murder: Red tape prevented Rahul Mukerjea from filing FIR* (30 August 2015) <<https://www.hindustantimes.com>> accessed 24 September 2024

<sup>8</sup> **India Today**, *Sheena Bora murder: Police blow the lid off Indrani Mukerjea's new passport claim* (19 July 2016) <<https://www.indiatoday.in>.> accessed 24 September 2024

evidence. DNA extracted from the bone was found after Shyamvyar Rai informed the police of the location of the body's disposal in accordance with section 26 of the Evidence Act<sup>9</sup> states "How much of information received from accused may be proved<sup>10</sup> - Provided that, when any fact is proved to be discovered in consequence of information received from a person accused of any offence, in the custody of a police officer, so much of such information, whether it amounts to a confession or not, as relates distinctly to the fact thereby discovered, may be proved." DNA matches 100% with Indrani in this murder case. So it's beyond clear that the body was of Sheena Bora, the daughter of Indrani.

## 2. 'Special Knowledge' under Section 106, the Indian Evidence Act:

The recovery of Sheena's passport stands against Indrani. Because it is known that Indrani had 'special knowledge' of Sheena having left the country. Section 106<sup>11</sup> applies which says if the person alone has knowledge of something then the burden of proof falls on him. Since Indrani claims that Sheena left the country three years ago on a forged passport rather than her genuine one, Indrani will at the least have to explain why her daughter would have done such a curious thing.

## 3. 'Last Seen Together Theory':

Indrani must explain her failure to file a missing person report and her deception of Mikhail and Rahul about Sheena's disappearance, as well as her attempts to deceive them and the 'last seen' principle.

## 4. No eye-witness scenario:

Call data records (CDR) can prove and compensate for the 'no eye-witness' scenario by tracking down the locations they travelled on the day when Sheena was murdered through cell towers.

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<sup>9</sup> The Indian Evidence Act 1872, s 26

<sup>10</sup> Ahmed Ali and Sumitra Debroy, 'Sheena Bora murder: 100% DNA match buries Indrani's claim, strengthens murder case' (8 September 2015, updated 12 September 2015) *The Times of India* (TNN, 19 January 2016) <<https://timesofindia.indiatimes.com>> accessed 24 September 2024

<sup>11</sup> The Indian Evidence Act 1872, s 106

## 5. Diary of Sheena Bora under Section 32<sup>12</sup> of the Indian Evidence Act:

The diary of Sheena Bora, written in handwrote, reveals the turbulent relationship between Indrani and her mother, who harboured a deep hatred for her mother<sup>13</sup>. The diary also explains relevant facts made by deceased or incapable individuals.

## 6. Admissibility of electronic records as evidence under Section-65 B of the Indian Evidence Act :

Phone calls and emails were exchanged between Indrani and Sanjeev Khanna. Section 65B of IEA<sup>14</sup> applies. Admissibility of electronic records as evidence in the court.

## 7. Circumstantial Evidence:

Since there are no eyewitnesses to this case, it relies on circumstantial evidence.

## APPLICATION OF CRIMINAL PROCEDURE CODE

### 1. Statement of Driver under Section- 161 CrPC

Indrani Mukherjee driver, Shyamvar Rai, has revealed the murder mystery of her daughter Sheena Bora and her husband Sanjeev Khanna, under Section 161 of CrPC<sup>15</sup>, which allows police officers to examine orally and reduce statements into writing.

### 2. Driver as Approver and Application of Pardon under Section 164 & 306 of CrPC

The accused, Shyamvar, can be turned to an approver if no eye witness is present. This testimony will be presented to the judge and the accused must apply for pardon. The motive behind Sheena's murder, alleged by her mother, has not been fully understood. In criminal law, establishing intent is more important than finding the motive.

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<sup>12</sup> The Indian Evidence Act 1872, s 32

<sup>13</sup> 'Mikhail confirms himself and Sheena are Indrani's son and daughter' (26 August 2015) <<https://www.siasat.com>.> accessed 24 September 2024

<sup>14</sup> The Indian Evidence Act 1872, s 65B

<sup>15</sup> The Code Of Criminal Procedure Code 1973 , s 161

## APPLICATION OF INDIAN PENAL CODE

### 1. Proving of Mens Rea

Police have not yet determined the motive behind Sheena's murder<sup>16</sup>, allegedly by her mother. If not, it may not lead to acquittals or criminal law, prioritizing criminal intent. In any event, there is a good chance that the ongoing probe into bank accounts and financial transactions of the persons concerned may shed light on the motive.

1. Section -328 of IPC<sup>17</sup>: Causing hurt by poison with intent to commit an offence. Sheena Bora was drugged when Indrani and Sanjeev Khanna strangled her.
2. Section -364 of IPC<sup>18</sup> for kidnapping.
3. Section -302 of IPC<sup>19</sup> for murder.
4. Section -201 of IPC<sup>20</sup> for causing disappearance of evidence.
5. Section -120-B of IPC<sup>21</sup> for conspiracy, Indrani and Sanjeev Khanna had conspired through phone calls and emails to murder Sheena Bora.

### LEGAL ISSUES

1. Whether circumstantial evidence and digital communications sufficiently establish a conspiracy to commit murder in the absence of direct evidence?
2. Whether the testimony of an accomplice, who turns approver, reliable and admissible in securing convictions in criminal cases?
3. Was the forensic evidence and identification of Sheena Bora's remains reliable enough to support a murder conviction?

<sup>16</sup> *How Sheena Bora murder case unfolded (19 July 2016)* < <https://www.ndtv.com>. > accessed 24 September 2024

<sup>17</sup> The Indian Penal Code 1860, s 328

<sup>18</sup> The Indian Penal Code 1860, s 364

<sup>19</sup> The Indian Penal Code 1860, s 302

<sup>20</sup> The Indian Penal Code 1860, s 201

<sup>21</sup> The Indian Penal Code 1860, s 120B

4. Whether financial disputes and familial conflicts be considered a strong enough motive to establish guilt in a murder trial?
5. Did the prolonged pre-trial detention of the accused violate their right to life and personal liberty under Article 21 of the Constitution<sup>22</sup>

## CONTENTIONS FROM BOTH THE SIDES

### Prosecution's Arguments

The prosecution argued that Sheena Bora's murder was premeditated by Indrani Mukerjea, her driver Shyamvar Rai, and her ex-husband Sanjeev Khanna. The prosecution claimed that the defendants conspired criminally to kidnap and murder Sheena.

Evidence shows that the prosecution relied heavily on circumstantial evidence, including phone records, financial transactions, and Shyamvar Rai's confession to prove the murder and the accused roles.

The prosecution cited Supreme Court rulings that circumstantial evidence can be sufficient for a conviction if it forms a consistent chain pointing to the guilt of the accused. In cases like *Sharad Birdhichand Sarda v. State of Maharashtra (1984)*<sup>23</sup>, the SC held that circumstantial evidence must be conclusive and exclude all other possibilities of innocence.

According to the prosecution, the defendants committed murder in accordance with Section 302 of the IPC because they intended to kill Sheena Bora.

Financial and familial conflicts were cited by the prosecution as the reason behind the murder. They said that Indrani was frightened about Sheena disclosing private family information, such as their relationship, and that Indrani was also anxious about Sheena's money demands. The prosecution referred to previous SC rulings, such as *State of Uttar Pradesh v. Krishna Master (2010)*<sup>24</sup>, where the court upheld convictions in cases involving familial disputes and circumstantial evidence that proved the intent to murder.

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<sup>22</sup> Constitution of India, art 21

<sup>23</sup> 1984 AIR 1622, 1985 SCR (1) 88

<sup>24</sup> AIR 2010 SC 3071, 2010 (12) SCC 324

The prosecution used Shyamvar Rai's confession, recorded after becoming an approver, as crucial evidence against Indrani and Sanjeev Khanna, using the Supreme Court's ruling in *Suresh Chandra Bahri v. State of Bihar* (1995)<sup>25</sup>.

The prosecution accused the defendants of disposing of Sheena Bora's body and concealing evidence to cover up the crime, citing *S.P. Kohli v. High Court of Punjab* (1979)<sup>26</sup> as a precedent. The prosecution argued the disposal was a clear attempt to conceal the crime.

### **Defence's Arguments**

The defence argued that the entire case was based on circumstantial evidence, with no direct eyewitness to the murder. They contended that circumstantial evidence must be scrutinized carefully, as it is prone to errors and misinterpretation.

The defence cited the Supreme Court's ruling in *Hanumant Govind Nargundkar v. State of Madhya Pradesh* (1952)<sup>27</sup>, which set stringent standards for convicting someone based on circumstantial evidence. The SC has held that circumstantial evidence must form a complete and unbroken chain leading to the conclusion of guilt, excluding any other hypothesis of innocence. The defence argued that the prosecution had not met this standard.

The defence questioned Shyamvar Rai's confession's credibility, claiming it was inconsistent and unreliable. They argued Rai had a vested interest in avoiding punishment and likely fabricated parts of his testimony, citing the case of *Suresh Chandra Bahri v. State of Bihar* (1995)<sup>28</sup> as a precedent.

The defence raised concerns about the handling of forensic and digital evidence, particularly the identification of Sheena Bora's body, due to the long gap between her death and her remains' discovery, citing the *State of Uttar Pradesh v. Satish* (2005)<sup>29</sup> precedent.

The defence argued that the prolonged detention of the accused, especially Indrani Mukerjea and Peter Mukerjea, violated their fundamental right to life and personal liberty under Article

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<sup>25</sup> 1994 AIR 2420, 1995 SCC SUPL. (1) 80

<sup>26</sup> 1978 AIR 1753, 1979 SCR(1) 722

<sup>27</sup> AIR 1952 SC 343, 1953 CRILJ 129, [1952]1 SCR 1091

<sup>28</sup> Ibid

<sup>29</sup> AIR 2005 SUPREME COURT 1000, 2005 (3) SCC 114



21 of the Indian Constitution<sup>30</sup>. They highlighted that the trial had been delayed for several years, with no conclusion in sight.

### **OBSERVATION OF THE SUPREME COURT**

The petitioner, charged with kidnapping her daughter with intent to murder and committing murder after entering into a criminal conspiracy, has filed a Special Leave Petition challenging the High Court's decision to dismiss her bail application. The petitioner is the wife of co-accused Pratim @ Peter Balram Mukerjea<sup>31</sup> and is accused of being annoyed by her daughter's live-in relationship with Rahul Mukerjea. The petitioner's senior counsel, Mr Mukul Rohatgi, argued that she would be entitled to special dispensation under Section 437 Cr.P.C.<sup>32</sup>, as there are 237 witnesses cited by the prosecution, with 68 examined. Court, not leaving India without permission, not influencing prosecution witnesses, not meeting witnesses until recording evidence is over, and not seeking any adjournment.

Additional Solicitor General, Mr Suryaprakash V. Raju, opposed the grant of bail to the petitioner, arguing that there is clinching evidence showing her involvement in the crime and that setting the petitioner at liberty would give an opportunity for her to influence a crucial witness. The court considered the petitioner's circumstances and granted bail subject to the satisfaction of the trial court, including the conditions of surrendering her passport, not leaving India without permission, not influencing witnesses, not meeting witnesses, and not seeking adjournments.

Hence, Indrani Mukerjea was granted bail in May 2022<sup>33</sup> due to a delayed trial and the pandemic, balancing the accused's rights with the severity of the offence.

In July 2024, the CBI told the court that Sheena's remains had been found<sup>34</sup>.

The issues which were raised during the court proceeding the court addressed as:

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<sup>30</sup> Constitution of India 1950, art 21

<sup>31</sup> Indrani Pratim Mukerjea v Central Bureau of Investigation, SLP (Criminal) No. 7227/2022 (Supreme Court, 18 May 2022) <<https://indiankanoon.org/doc/185547042/>> accessed 25 September 2024

<sup>32</sup> The Code Of Criminal Procedure Code 1973 , s 437

<sup>33</sup> Swati Deshpande, 'Supreme Court grants bail to Indrani Mukerjea in Sheena Bora murder case' *The Times of India* (18 May 2022)<<https://indiatimes.com> >accessed 25 September 2024.

<sup>34</sup> The Print, 'Missing bones traced to CBI storehouse after e-mail — the new twists in Sheena Bora murder case' (11 July 2024) <<https://theprint.in>> accessed 25 September 2024

- (a) Whether circumstantial evidence and digital communications sufficiently establish a conspiracy to commit murder in the absence of direct evidence?

In the absence of direct proof, the court considered whether digital conversations and circumstantial evidence could sufficiently demonstrate a murderous plot. It came to the conclusion that although circumstantial evidence can be strong, it must all clearly indicate the accused's guilt without giving rise to a reasonable doubt. In this case, the court determined that the digital evidence was sufficiently significant to substantiate the conspiracy allegation when combined with other circumstantial evidence.

- (b) Whether the testimony of an accomplice, who turns approver, reliable and admissible in securing convictions in criminal cases?

The court emphasized that testimony from an accomplice must be substantiated by independent evidence in order for it to be credible and admissible (particularly if the accomplice turns approver). Although accomplice testimony can be trusted, the court emphasized the need for caution and scrutiny to prevent wrongfully convicted persons. The court examined the accomplice's credibility in this instance and discovered enough supporting evidence to validate their testimony.

- (c) Did the prolonged pre-trial detention of the accused violate their right to life and personal liberty under Article 21 of the Constitution<sup>35</sup>?

Regarding extended pre-trial imprisonment, the court acknowledged that in accordance with Article 21 of the Indian Constitution, an extended period of confinement without a trial may infringe upon the accused's right to life and personal liberty. The period of pre-trial custody must be justified, the court ruled, in addition to the gravity of the charges. In this instance, the court granted bail following 6.5 years of incarceration while considering the accused's rights and the trial's delays<sup>36</sup>.

## FINAL DECISION

Ultimately, the court granted the petitioner bail under particular guidelines, taking into account the period of imprisonment, the complexity of the case, and the fundamental rights. The aim of

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<sup>35</sup> Constitution of India 1950, art 21

<sup>36</sup> Ibid

the decision was to strike a balance between the demands for a fair trial, the rights of the accused, and the interests of justice<sup>37</sup>.

## CASE ANALYSIS

The Sheena Bora murder case, involving 24-year-old Sheena Bora, has gained public attention due to its complexities, high-profile individuals involved, and sensational details. The case revolves around the disappearance and murder of Sheena Bora, whose remains were discovered in 2015. Key accused include her mother, Indrani Mukerjea, her ex-husband Sanjeev Khanna, and their driver, Shyamvar Rai. The Supreme Court's decision to grant bail<sup>38</sup> to Indrani Mukerjea was significant due to prolonged pre-trial detention, delay in trial, and there was a need for a fair trial which was to be held within an appropriate time. The judgment upholds the fundamental rights of the accused, particularly the right to a fair trial. It raises questions about the efficiency of the legal system and the balance of justice. Future cases may be influenced by the judgment, setting a precedent regarding the treatment of prolonged detention and the credibility and reliability depend on the circumstantial evidence.

The case has significant social implications, such as public perception of justice, awareness of violence against women, media influence on legal proceedings, and implications for legal reform. Re-evaluation of legal procedures focuses on victim rights, and policy development may be necessary to ensure timely justice and avoid prolonged detentions.

The emotional toll on families involved is profound, and public sentiment can influence societal attitudes towards justice, punishment, and rehabilitation of offenders. The case has elicited strong emotional reactions from the public<sup>39</sup>, which can influence societal attitudes towards justice, punishment, and rehabilitation of offenders.

The Sheena Bora murder case raises questions about family dynamics and the factors that contributed to the crime. Maternal filicide, the killing of a child by their own mother, is often

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<sup>37</sup> 'Sheena Bora murder case: A timeline of twists and turns' Hindustan Times (24 April 2023) <<https://www.hindustantimes.com/india-news/sheena-bora-murder-case-a-timeline-of-twists-and-turns-101652863077359.html>> accessed 26 September 2024.

<sup>38</sup> 'Sheena Bora Murder | Supreme Court grants bail to Indrani Mukerjea' SCC Online (19 May 2022) <<https://www.sconline.com/blog/post/2022/05/19/sheena-bora-murder-indrani-mukerjea-bail-supreme-court-india-judgments-legal-law-research-updates-news/>> accessed 26 September 2024.

<sup>39</sup> 'Indrani Mukerjea's Sheena Bora murder case to be featured in Netflix documentary, Peter Mukerjea speaks out' India Today (3 March 2024) <<https://www.indiatoday.in/india/story/indrani-mukerjea-sheena-bora-murder-case-netflix-documentary-peter-mukerjea-interview-2509756-2024-03-03>> accessed 26 September 2024

associated with complex psychological issues. Indrani Mukherjee, the central figure, presents a compelling subject for psychological analysis. A comprehensive psychological profile should be approached with sensitivity and based on publicly available information. Exploring her upbringing, early family dynamics, and previous relationships can provide insights into her mental state and potential triggers. Behavioural patterns, decision-making processes, and interpersonal relationships can offer valuable insights into her psychological makeup<sup>40</sup>. The Sheena Bora murder case<sup>41</sup> serves as a tragic example of how family dynamics, psychological factors, and modern technology can intersect in a devastating manner.

## CONCLUSION

"In the ashes of tragedy, Sheena's story remains—a chilling reminder that every life has a tale that deserves to be told." The Sheena Bora murder case in India, involving Indrani Mukerjea and others, has highlighted legal and societal issues. The Supreme Court granted bail to Mukerjea after six years of pre-trial detention, highlighting the right to personal liberty under Article 21 of the Indian Constitution. The case highlighted the importance of circumstantial evidence, accomplice testimony, and forensic evidence in criminal investigations. The prolonged pre-trial detention raised concerns about the violation of Mukerjea's right to life and personal liberty. The prosecution and defence have both relied on a number of significant Supreme Court rulings to support their positions, and the court's evaluation of the credibility of the evidence presented by each party will have an enormous effect on the case's verdict. The case also drew media attention to social issues, such as familial violence and media sensationalism. The Sheena Bora case is more than just a legal proceeding; it reflects broader societal issues and raises critical questions about the criminal justice system in India. The case has led to discussions about potential judicial reforms, such as expeditious trials and clearer guidelines for circumstantial evidence and accomplice testimonies. The final judgment will be critical in setting precedents for how such sensational cases are handled in Indian courts. Sheena Bora's tragic story serves as a poignant reminder of the fragility of life and the importance of honouring victims' narratives. "In the court of public opinion, justice often takes a back seat, lost in the chaos of a thousand voices."

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<sup>40</sup> Rupsha Bose, 'Sheena Bora Murder Case: A Deep Analysis of the Crime' Medium (22 February 2019) <<https://medium.com/@rupshabose/sheena-bora-murder-case-a-deep-analysis-of-the-crime-34ee2381fe72>> accessed 26 September 2024

<sup>41</sup> *Central Bureau of Investigation v Indrani Mukerjea and others* [2022] CaseMine <<https://www.casemine.com/judgement/in/635a160cd55dee107a27c474>> accessed 26 September 2024