

# Bollywood Law: Commercial Hindi Films with Legal Themes\*

Michael H. Hoffheimer\*\*

*Professor Hoffheimer discusses commercial Hindi (Bollywood) films with legal themes, recommends twenty titles for addition to law library film holdings, and considers cataloging and citation challenges presented in transliterating Hindi titles.*

¶1 Law and film scholars have not yet discovered the mother lode of South Asian films.<sup>1</sup> But India is the world's leading producer of new feature films.<sup>2</sup> Film dominates Indian popular culture.<sup>3</sup> And Bollywood films reach a huge international audience and are beginning to influence mainstream American culture.<sup>4</sup>

---

\* © Michael H. Hoffheimer, 2006.

\*\* Professor of Law and Mississippi Defense Lawyers Association Distinguished Lecturer, University of Mississippi School of Law, University, Mississippi. I thank Professors Luanne Buchanan and Shubha Ghosh for critical responses to drafts of this article and Professor Frank Houdek for encouragement and helpful suggestions.

1. For lists of films with legal themes, see PAUL BERGMAN & MICHAEL ASIMOW, REEL JUSTICE: THE COURTROOM GOES TO THE MOVIES 327–30 (1996) (listing more than sixty films); STEVE GREENFIELD ET AL., FILM AND THE LAW 221–33 (2002) (listing about three hundred films); THOMAS LEITCH, CRIME FILMS 341–55 (2002) (listing one hundred crime films); NICOLE RAFTER, SHOTS IN THE MIRROR: CRIME FILMS & SOCIETY (2000) (appending list of more than 350 films); Paul J. Mastrangelo, *Lawyers and the Law: A Filmography*, LEGAL REFERENCE SERVICES Q., 1983, no. 4, at 31; Patric M. Verrone, *The Twelve Best Trial Movies*, A.B.A. J., Nov. 1989, at 96; Roy M. Mersky, *Law and Popular Culture in the Film Collection at the Tarlton Law Library*, 22 LEGAL STUD. F. 109 (1998); Tarlton Law Library, Univ. of Texas at Austin, Law in Popular Culture Collection: Feature Films & Television, <http://tarlton.law.utexas.edu/lpop/alphaf.html> (last visited Sept. 27, 2005) (listing film holdings in library's collection with brief descriptions). None of these lists include Bollywood films.
2. For production totals, see ASHISH RAJADHYAKSHA & PAUL WILLEMEN, ENCYCLOPEDIA OF INDIAN CINEMA 30–32 (new rev. ed. 1999) (discussing history of film in India); ERIK BARNOUW & S. KRISHNASWAMY, INDIAN FILM 294–95 (2d ed. 1980). Average annual production of features for the years 1990–1995 was 842. Because Indian films are produced in more than thirty languages, the production figure of more than a thousand annual Mumbai productions, given by Mari Matsuda, *Planet Asian American*, 8 ASIAN L.J. 169, 186 n.57 (2001), is probably an exaggeration.
3. See Lothar Lutze, *From Bharat to Bombay: Change and Continuity in Hindi Film Aesthetics*, in THE HINDI FILM: AGENT & RE-AGENT OF CULTURAL CHANGE 3, 14 (Beatrix Pfeleiderer & Lothar Lutze eds., 1985) (“[T]he Hindi film appears to be perhaps the most powerful cultural product based on non-Western aesthetic principles presently alive, and it is very much alive at that.”); Manjunath Pendakur, *India*, in THE ASIAN FILM INDUSTRY 229, 229 (John A. Lent ed., 1990) (“For nearly 50 years, cinema in India has been the dominant form of popular entertainment.”).
4. For evidence of growing popular interest in the West, see Suketa Mehta, *Welcome to Bollywood*, NAT'L GEOGRAPHIC, Feb. 2005, at 52. The Bollywood film LAGAAN (Aamir Khan Productions, Ashutosh Gowariker director 2001) won the Academy Award for best foreign film. Bollywood is the subject of the Andrew Lloyd Webber musical *Bombay Dreams*, and numerous Western films are incorporating references to Bollywood. See generally JIGNA DESAI, BEYOND BOLLYWOOD: THE CULTURAL POLITICS OF SOUTH ASIAN DIASPORIC FILM 41 (2004) (discussing global impact of Bollywood).

¶2 Bollywood is a hot topic for scholarly research.<sup>5</sup> Because the musical law drama forms an important subgenre of Hindi melodrama,<sup>6</sup> Indian films should be especially relevant for students of law and film. Moreover, attention to Bollywood representations of law is essential for understanding the place of law in South Asian society, and exposure to Asian depictions of Asian lawyers may help counter Western stereotypes of Asian lawyers.<sup>7</sup>

¶3 This article proposes that a collection of Indian films with legal themes will enhance existing collections of law library media holdings. The first part of the article provides an introduction to Bollywood films. The second identifies sources. The third considers citation and cataloging challenges presented by Hindi film titles. The final section presents a list of twenty recommended Bollywood law films and provides plot descriptions and comments for each film.

### Bollywood

¶4 Fanzines coined the term “Bollywood” in the 1970s to describe the commercial Hindi film industry. The term, an amalgamation of Hollywood and Bombay (now Mumbai), has entered the vernacular and is included in the *Oxford English Dictionary*. Though Western scholars routinely employ the term, some members of the Indian film industry avoid it because they feel it implies that Bollywood is derivative of Hollywood.<sup>8</sup>

¶5 Commercial Indian films fused traditional South Asian and modern Western influences. From the first talkie, they emphasized song and dance, and before Independence (1947) filmmakers adopted the formula of “a star, six songs, three dances.”<sup>9</sup> Melody and dance have maintained a privileged position in Bollywood, reflecting both the early impact of Hollywood musicals and the continuity of performance traditions with roots in the Golden Age of Sanskrit theater.<sup>10</sup> Lutze remarks, “To any open-minded spectator, the Hindi film may well appear as the twentieth-century Asian descendant of what Richard Wagner, with reference to his own operas, called the *Gesamtkunstwerk* [total work of art].”<sup>11</sup>

---

5. In addition to works cited throughout this article, see Shampa Banerjee, Bibliography, <http://216.152.71.145/books/books.html> (last updated Jan. 11, 1998).

6. See sources cited *infra* note 58.

7. See Shubha Ghosh, *Gandhi and the Life of the Law*, 53 SYRACUSE L. REV. 1273, 1278 (2003) (protesting stereotypical film portrayal of Indian lawyers, especially of Gandhi as lawyer).

8. *Do You Use the Term Bollywood?* FILMFARE, Oct. 2004, at 112 (interviewing directors and stars).

9. BARNOUW & KRISHNASWAMY, *supra* note 2, at 155 (describing evolution of romantic formula in Hindi melodramas).

10. See A. BERRIEDALE KEITH, *THE SANSKRIT DRAMA IN ITS ORIGIN, DEVELOPMENT, THEORY AND PRACTICE* 338 (Clarendon Press 1970) (1924) (“[B]oth [song and dance] were most important elements in the production of sentiment.”).

11. Lutze, *supra* note 3, at 3; see generally BARNOUW & KRISHNASWAMY, *supra* note 2, at 72.

¶6 Since the 1950s, film music has been the dominant form of Indian popular music.<sup>12</sup> Film songs help sell new films<sup>13</sup> and contribute to the formation of Indian national identity.<sup>14</sup> Voice-over vocalists, known as “playback singers,” are venerated performers in their own right. Female vocalist Lata Mangeshkar is the most widely recorded artist in world history.<sup>15</sup> The identity of music directors (composers) and lyricists can be as important for marketing as the stars and director.

¶7 Bollywood films follow distinct conventions:

- Films are about twice as long as Western films.
- The narrative is frequently interrupted by musical and dance routines.
- Romantic melodrama is the preferred genre.<sup>16</sup>
- Dense plots mingle pathos and humor without regard to Western distinctions between comedy and tragedy.
- Imagery is saturated with fantasy and spectacle.

Bollywood films do not restrict action to time and place. Rather they lean toward multigenerational story lines that follow the movement of characters from place to place, shifting from urban settings to pastoral scenes.

¶8 Indian films often advance overt political programs, and scholars have argued that Bollywood films have influenced political and legal history in India.<sup>17</sup> Political advocacy was further encouraged at the time of Independence when Nehru, along with other leaders associated with directors and stars, and filmmakers embraced the progressive politics associated with Independence.<sup>18</sup> Long

12. Film music melded traditional South Asian and modern Western elements, and the genre’s rising popularity fueled a long-running controversy because traditionalists regarded the new music as a Westernized corruption of indigenous musical forms, BARNOUW & KRISHNASWAMY, *supra* note 2, at 157–58.
13. In the 1950s, motivated by the desire to promote classical Indian music, All India Radio eliminated film music from its broadcasts. *Id.* at 208–12. As a result, India lagged behind other countries in radio listenership, and most Indian radios were tuned to Radio Ceylon (which broadcast Hindi film music). *Id.* at 212, 279.
14. It would be hard to overstate the significance of film music for South Asian culture. For example, the film song “Meera Joota Hai Japaani” is so well-known to Indian and nonresident Indian audiences that director Mira Nair deploys it as an anthem of Indian patriotism and a source of pathos in *MISSISSIPPI MASALA* (Mirabai Films 1991).
15. Some sources credit Lata with recording more than 25,000 songs. More conservative estimates place the total at more than 5000 songs as of 1989. *See* RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 144. *See generally* BARNOUW & KRISHNASWAMY, *supra* note 2, at 277 (discussing unique role of playback singers and the historic contribution of Lata Mangeshkar in Bollywood films).
16. Scholars have discussed Bollywood’s distinct treatment of melodramatic formulas. Rajadhyaksha, *supra* note 9, at 408–09; VIJAY MISHRA, *BOLLYWOOD CINEMA: TEMPLES OF DESIRE* 35 (2002); GAYATRI CHATTERJEE, *AWARA* 75 (1992).
17. *See* HUTOKSHI JALL, *RAJ KAPOOR AND HINDI FILMS: CATALYSTS OF POLITICAL SOCIALIZATION IN INDIA* 221 (1995) (“It can be rightly argued in the final analysis, that [Awāra’s director] Raj Kapoor and the Hindi films in which he was involved as either an actor or producer or director can be considered as direct or latent catalysts of political socialization in India.”). According to India’s deputy prime minister, Bollywood films also influenced international affairs by fostering pro-Indian sentiment among the citizens of the Soviet Union. *See* Mira Kamdar, *India and the New American Hegemony*, 19 *CONN. J. INT’L L.* 335, 344 (2004) (paraphrasing interview with L.K. Advani).
18. T.J.S. GEORGE, *THE LIFE AND TIMES OF NARGIS* 64–65 (1994).

before Ronald Reagan and Arnold Schwarzenegger, Bollywood stars entered politics—often with disappointing results.<sup>19</sup>

### Sources

¶9 More than a thousand Bollywood films are available in DVD format.<sup>20</sup> Sources for DVDs include retail distributors that specialize in Indian DVDs,<sup>21</sup> proprietary producers of digital video copies,<sup>22</sup> and traditional video sources.<sup>23</sup>

¶10 Since the advent of DVD, hit Bollywood films are marketed in high-quality digital transfer within a year of their studio release. Unfortunately, none of the older films have been restored and DVDs are often made from imperfect prints. Nevertheless, the commercially available DVD copies are adequate for most research purposes and suitable for entertainment. Most that are marketed in the West have optional English subtitles.<sup>24</sup>

### Catalog and Citation Issues

¶11 Hindi films present special cataloging challenges. In contrast to films from most other regions, Hindi film titles are not traditionally translated, but they are transliterated.<sup>25</sup>

### Transliteration Challenges

¶12 Hindi employs the phonetic Devanagari script, but there is no universally accepted character-for-character transliteration system, and there are several

19. Stars who have entered politics include Nargis, Amitabh Bachchan, Lata, Shabana Azmi, and Govinda. VIJAY MISHRA, *BOLLYWOOD CINEMA: TEMPLES OF DESIRE* 144 (2002); RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 162. In the 1960s, film hero M.G. Ramachandran became chief minister of Tamilnadu. The actor who had played the villain in Ramachandran's films shot and wounded Ramachandran in 1967. BARNOUW & KRISHNASWAMY, *supra* note 2, at 281.
20. Nehaflix.com lists more than 1620 DVD titles.
21. *E.g.*, Nehaflix.com; Indiaplaza.com.
22. Yash Raj (yashrajfilms.com); Baba Digital (babadigital.com); Eros International (erosentertainment.com).
23. FACETS COMPLETE VIDEO CATALOG (No. 16, Catherine McBride & Milos Stehlik eds., 2003) provides a useful reference, though its plot descriptions are not reliable. For example, the catalog says the judge in *KANOON* (B.R. Films 1960) committed murder when the film is a study in false identification. FACETS COMPLETE VIDEO CATALOG, *supra*, at 148. *See infra* ¶¶ 58–59 for a discussion of *Kanoon*.
24. Acquisitions librarians should be wary of collecting video copies of edited versions of the film. For example, Al Monsoor distributed a video copy of *AWĀRA* (R.K. Films 1951) based on an older film print that made extensive cuts, probably designed to market the film to a Middle Eastern market. These cuts are not indicated on the copy and include the removal of an English-language sign helpful to understanding the location of a scene, the deletion of images of handguns, the elimination of a barroom song and dance number, and the removal of half of the innovative and influential dream sequence. Nevertheless, there can be benefits in holding variant editions of films. For example, the Al Monsoor edition's subtitles (provided by Anis Ebeid, Cairo) adhere more closely in places to the Hindi dialogue than do the English subtitles on the widely available Yash Raj DVD version.
25. Important cultural reasons for this practice stem from the role of films and film titles in the formation of a distinct national identity.

sources of uncertainty.<sup>26</sup> First, the sound of Hindi consonants may either vary or fall between the sound of two English consonants. For example, the same Devanagari consonant-syllable can sound like either “va” or “wa.” Second, Hindi vowels can be rendered by different Roman letters. For example, the Hindi long-a sound can be variously transliterated as “a,” “aa,” “ā,” or “ah.” The title of the seminal law drama *Awāra* illustrates the uncertainties. The title is the Hindi word for “tramp” or “vagabond” and might be transliterated as *aawaaraa*, *aavaaraa*, *āwārā*, *āvārā*—or some combination.

¶13 For the sake of consistency, this article proposes adopting the transliterated form given a title at the time of the original release of the film. This can be determined authoritatively from film credits, but it is usually reproduced on print material accompanying a DVD on which catalogers rely.<sup>27</sup> Accordingly, the title should be cataloged and cited as *Awāra* even though that transcription is debatable as a matter of theory.<sup>28</sup>

### *Translation Challenges*

¶14 There are sound reasons not to translate Hindi film titles. Some titles employ colloquial phrases that make literal translation inappropriate. For example, the title *Meera Naam Joker* literally means “my name is clown,”<sup>29</sup> but it derives from a formula employed in introductions that would be rendered more naturally as “I am a clown.” Titles often evoke multiple meanings that will be lost in translation. Thus while *aawaaraa* means “tramp,” it also means a homeless person and a stray animal.<sup>30</sup> Context often determines meaning. Titles like *Raja* (1995) and *Dev* (2004) employ nouns capable of translation, but those titles actually refer to names of characters and would not be appropriate to translate.

¶15 In short, Hindi film titles present all the issues that vex translators, and even a cataloger fluent in Hindi would fail to translate titles accurately without knowing the content of the films. It is probably wisest to respect the prevailing practice and to decline the challenge of translating titles rather than to embark on

26. Devanagari does not contain large and small case forms, so film titles would not be “capitalized” in the original. A few terms (e.g., Taj Mahal) have acquired standard, if problematic, renderings.

Conventional Devanagari orthography does not always correspond perfectly to the standard spoken form, and transliteration sometimes follows orthography rather than pronunciation. For example, the silent aspirant is retained in rendering the Hindi word for twelve as *baarah* rather than *baaraa*.

27. There are exceptions. See *infra* note 72.

28. This transliteration is questionable because it renders the same vowel two different ways, both of which vary from its rendering in the title of director’s previous film (*Barsaat*). The author transcribes the title as *Awara*. KHWAJA AHMAD ABBAS, NO MAN IS AN ISLAND: AN EXPERIMENT IN AUTOBIOGRAPHY 361 (1977). This example illustrates the need to faithfully indicate Hindi long vowels, because *awara* (with short a’s) transcribes a different Hindi word (*avar[a]*), an adjective meaning minor or lower (as in “lower court”). See THE OXFORD-HINDI DICTIONARY 62 (R.S. McGregor ed., 1993).

29. Note that the domesticated English term “joker” means clown, not joker.

30. The film deploys images of homelessness and stray dogs repeatedly.

a venture that would provide little useful information to patrons but would risk producing idiosyncratic, misleading, and potentially embarrassing translations.

¶16 Catalogers committed to transcribing rather than translating titles should be alert to the fact that many Hindi films bear domesticated English-language titles, e.g., *Mr. and Mrs. 55* (1955), *1947: A Love Story* (1994), and *Black* (2004). Such titles should pose no cataloging problems.

### Selection Criteria: Making the Cut

¶17 The recommended list of the top twenty Bollywood law films gives priority to historically significant films and to films that exhibit distinctive features of Bollywood approaches to legal themes. It excludes Bollywood remakes of Hollywood thrillers and dramas.<sup>31</sup> The list gives priority to films in which explicit legal themes dominate and in which legal characters play central roles in the narrative. It also seeks to include films representative of different genres, decades, and filmmakers.<sup>32</sup>

#### Omissions

¶18 Some omitted films will be of considerable interest to law and film research, so a brief discussion of omitted films and genres may be helpful in identifying additional sources.

#### *Films with Lawyer Characters*

¶19 The recommended list excludes many films in which the legal status of characters is peripheral to plot, though such films provide valuable information about popular attitudes toward lawyers.<sup>33</sup> For example, in *Diwana*,<sup>34</sup> directed by Mahesh Kaul, a lawyer supports the criminal conspiracies of the hero's evil father and provides the murder weapon. In *Kabuliwala*,<sup>35</sup> directed by Hemen Gupta, a lawyer lies to the jury about the circumstances of a fight in which the hero kills the victim, but the defendant interrupts the lawyer and insists on telling the truth.

31. See, e.g., *JURM* (KPS Films 2004), *DEEWANGEE* (Neha Arts 2002), and *KASOOR* (Vishesh Films 2001)—inspired by *PRIMAL FEAR* (Paramount 1996) and *JAGGED EDGE* (Columbia Tristar 1985); *MAIN AISA HI HOON* (Baweja 2005) (remaking *I AM SAM* (New Line Cinema 2001)); *KYO KII . . . MAIN JHUTH NAHIM BOLTA* (Sri Siddhivanyak Films 2001) (comedy inspired by *LIAR, LIAR* (Universal Studios 1997)).

32. For example, *SHREE 420* (R.K. Films 1955) is essential viewing as one of the great collaborations between Raj Kapoor and Khwaja Ahmad Abbas and one of the most popular and influential reformist dramas of the 1950s. But because those filmmakers are already represented on the list, *Shree 420* is omitted in favor of other titles that may be less original but contain more explicit legal themes.

33. More than twenty films with lawyer characters can be located employing the subject search function of the Web sites hosted by video retailers identified earlier. See sources cited *supra* note 21.

34. *DIWANA* (Anupam Chitra 1967). This film's close connection with *Awāra* is reinforced by casting Raj Kapoor as hero and employing composers and vocalists associated with that film.

35. *KABULIWALA* (Bimal Roy Productions 1961). The film is based on a Tagore story.

¶20 In both *Hum Dil De Chuke Sanam*<sup>36</sup> and *Devdas*,<sup>37</sup> director Sanjay Leela Bhansali ascribes legal status to characters to signify important attributes. In both films, father and son fight over the proper role of law. In *Hum Dil De Chuke Sanam*, the hero jokes that he is a bad lawyer because he insists on telling the truth, and his father observes, “I may be a great lawyer, but you are a greater human [being].” In *Devdas*, the romantic hero (Shah Rukh Khan) opposes a brutal, abusive father who is associated with colonialism.

¶21 Excluded films contain scenes or plot elements that will be of interest to patrons studying law and film. Yash Chopra’s directorial debut, *Dhool Ka Phool*,<sup>38</sup> noteworthy for its defense of communal harmony and its critique of the stigmatization of illegitimacy, casts the father of the lost child as a respected judge. *Bekhudī*<sup>39</sup> will interest Bollywood fans as the vehicle that introduced superstar Kajol and cast her mother Tanuja as her character’s mother. The romantic hero is a law student and son of a lawyer. In a vacant courtroom he demonstrates to Kajol’s character what will happen if the lovers marry before she reaches the age of eighteen.

#### *Revenge-Genre and Terrorism Films*

¶22 The recommended list also omits films from the prolific revenge-action genre. Patrons interested in these films could be directed to *Darr*,<sup>40</sup> directed by Yash Chopra, in which the antihero (Shah Rukh Khan) stalks and terrorizes his victim (Juhi Chawla) for about three hours until her husband (Sunny Deol) survives a near-fatal attack and kills the stalker. *Darr*’s treatment of legal authority is typical of revenge films. Police are powerless to prevent the stalking, and the resolution of conflict occurs by extra-judicial violence, often inflicted by military figures.<sup>41</sup> Revenge-genre films retain the basic structure of justice relevant for understanding cultural attitudes toward law, but they are omitted from the recommended list because they replace the normative role of legal institutions with the extra-legal action of the vengeful hero.<sup>42</sup>

36. HUM DIL DE CHUKE SANAM (Jhamu Sughand 2000).

37. DEVDAS (Bharat Shah 2002).

38. DHOOL KA PHOOL (B.R. Films 1959).

39. BEKHUDI (Rita Rawail Prod. 1992).

40. DARR (Yash-Raj Films 1993). For a rare mystery, see GUPT (Trimurti Films 1997), notable for an exterior shot of the Mumbai Central Court and for a trial scene where the hero (Bobby Deol) is framed for the murder of his father.

41. In many revenge films, representatives of law and order are depicted as corrupt. For example, in the 2000 hit KAHO NAA . . . PYAR HAI (Filmkraft Prod. 2000), the hero (Hrithik Rohan) is murdered when he observes corrupt police engage in a drug transaction with the heroine’s father Sirji. A look-alike learns of the murder and exacts revenge by killing the corrupt police officers and revealing Sirji’s identity.

When the avenging hero is a military or police officer, he (not she) will usually be an outsider who refuses to play by the rules. The rogue officer (Om Puri) exemplifies this type in DEV (Entertainment One Ltd. 2004), discussed *infra* ¶ 50.

42. The vengeful hero may himself be identified ambivalently with criminal activity. Cf. YEH RAASTE HAIN PYAAR KE (Keepak Shivdasani producer, 2001). In that film, Ajay Devgan plays both a car thief pursued by killers and a look-alike whom they kill. Redeeming himself by sacrificing true love for the sake of the look-alike’s widow (Madhuri Dixit), the car thief kills the killers and is reunited with his true love (Preity Zinta).

¶23 For similar reasons, the list omits Mani Ratnam's probing studies of terrorism and redemption in films like *Roja*,<sup>43</sup> *Dil Se*,<sup>44</sup> and his Tamil-language *Kannathil Muthamittal*.<sup>45</sup> The plot of *Dil Se* illustrates themes common to Ratnam's work. The hero (Shah Rukh Khan) pursues a mysterious woman (Manisha Koirala). Flashbacks reveal how the woman becomes a terrorist after being raped as a child and witnessing the rape-murder of her family members. Police appear in a nuanced role, pursuing terrorists aggressively, while restraining the hero's efforts to prevent terrorism and save the woman. Though Ratnam's films portray the police as diligent and resourceful in counterterrorism, the police are not capable of preventing brutalities that motivate the terrorists; nor does any legal agency provide effective alternatives to terrorism.

### Rape Films

¶24 With the exception of *Dāminī*, the list omits films portraying the legal experience of rape victims. Such films attract interest and controversy both for their purported critique of the legal response to rape and for their commercial exploitation of depictions of rape.<sup>46</sup>

### Top Twenty Recommended Bollywood Law Films<sup>47</sup>

#### Ab Dilli Dur Nahin

¶25 In *Ab Dilli Dur Nahin*,<sup>48</sup> directed by Amar Kumar, prosecutors oppose truth, which prevails only through the perseverance of virtuous criminals. Hairiran is charged with murder, but when his young son finds an alibi witness, a pickpocket, police do not believe him. Pursued by the real killer, the boy and criminal travel to Delhi to seek an audience with Nehru. At Hairiran's trial, the jury believes the

43. ROJA (Hans Pictures 1992).

44. DIL SE (Mani Ratnam Film 1998). For another example, see BADAL (Salim 2000) (depicting evolution of Badal (Bobby Deol) from terrorist devoted to killing corrupt police officer responsible for murder of his family to revenge-hero who recognizes redeemability of state after falling in love with daughter of virtuous police officer (Rani Mukherjee)).

45. KANNATHIL MUTHAMITTAL (Madras Talkies 2002).

46. See INSAF KA TARAZU (B.R. Films 1980). While this film purports to criticize the injustice of rape, the "rape sequences shown in the film, staged with voyeuristic relish, no doubt contributed to its commercial success." RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 446. For a discussion of the rape and revenge genre, see LALITHA GOPALAN, CINEMA OF INTERRUPTIONS: ACTION GENRES IN CONTEMPORARY INDIAN CINEMA 40–59 (2002). In PREM GRANTH (R.K. Productions 1996), directed by Rajiv Kapoor, Rishi Kapoor plays a law student who opposes the religious and caste prejudices of his father. He helps the rape victim (Madhuri Dixit) achieve revenge in the end, but does so by means of private violence. The hero's status as law student plays little part in the plot other than to establish his class status and signal his general commitment to a secular career as opposed to his father's priestly profession.

47. For the convenience of acquisitions librarians and interested readers, the recommended list without annotations is included *infra*, Appendix: Top Twenty Recommended Bollywood Law Films.

48. AB DILLI DUR NAHIN (R.K. Films 1957). Dissanayake and Sahai argue that Raj Kapoor should be considered the auteur of this film, though they give no evidence for the claim. WIMAL DISSANAYAKE & MALTI SAHAI, RAJ KAPOOR'S FILMS: HARMONY OF DISCOURSES 41, 45, 58 (1988).

witness and returns an acquittal. The judge orders the trial of the real killer. Father and son return to the village while a patriotic song plays.<sup>49</sup>

#### Adalat

¶26 *Adalat* (“The Courtroom”),<sup>50</sup> directed by Kalidas, explores the consequences of a secret love marriage. Rajendra Singh (Pradip Kumar) marries Nirmala (Nargis) while she is serving as companion to his mother. Without announcing the marriage, Rajendra goes to London to be educated as a barrister. In his absence Nirmala learns she is pregnant. She is evicted by the family, kidnapped, and forced to sing in a brothel.

¶27 Nirmala’s husband becomes a respected judge. Her son, who has no knowledge of his real mother, grows up to be a righteous prosecutor. Years later when her husband visits the brothel, he is assaulted by the brothel owner, and Nirmala kills the brothel owner. To protect the reputations of her husband and son, Nirmala refuses to divulge her identity. Rajendra defends her in a courtroom climax that ends with Nirmala’s death in the dock.

#### Afsana

¶28 B.R. Chopra’s directorial debut, *Afsana*,<sup>51</sup> borrows plot devices from *Hamlet* and *The Count of Monte Cristo*. Identical twins (Ashok Kumar) are separated at birth. Ratan, suffering amnesia and raised in an orphanage, becomes a respected judge. His mean-spirited brother Chaman becomes a theater producer. When Chaman is suspected of murder, he meets Ratan, drugs him, and switches identities with him. Upon recovering consciousness, Ratan learns Chaman has died in a car crash, but everyone believes Ratan is Chaman.

¶29 Ratan discovers his wife has been having an adulterous affair with his friend. He pursues a course of revenge under the identity of Chaman that includes staging a dramatic reenactment of his wife’s infidelity. *Afsana* explores the identity of crime and law in the fate of the two brothers and explores the relationship of drama and justice by deploying theatrical performances that parallel the narrative action. In the end Ratan’s memory is restored with the help of his childhood sweetheart, while his wife commits suicide.

#### Amar

¶30 In *Amar*,<sup>52</sup> directed by Mehboob Khan, a lawyer (Dilip Kumar) has sexual intercourse with the village milkmaid (Nimmi) but refuses to acknowledge his

49. See generally DISSANAYAKE & SAHAI, *supra* note 48, at 58 (“Clearly, this is a film with a social message, one that at times borders on the propagandistic.”).

50. ADALAT (Kwatra Films 1958).

51. AFSANA (Shri Gopal Pics 1951).

52. AMAR (Mehboob Productions 1954). Despite powerful performances and a soundtrack by Naushad, this film was not commercially successful, “possibly because the audience refused to accept Dilip Kumar in a negative role.” RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 334.

responsibility when she becomes pregnant. His indecisiveness is aggravated by his desire to marry a virtuous upper-class woman (Madhubala).

¶31 When the village bully dies in a fight with the lawyer, the milkmaid is charged with murder. She falsely confesses to protect the lawyer's honor, but the lawyer redeems himself in open court and accepts responsibility for his relationship with the milkmaid. Lawyer and milkmaid are united at the temple while the upper-class woman returns the lawyer's ring and walks stoically away.

#### Anāri

¶32 In *Anāri*,<sup>53</sup> directed by Hrishikesh Mukherjee, Raj (Raj Kapoor) is a naive artist sheltered by his kindhearted Christian landlady, Mrs. Disa (Lalita Pawar).<sup>54</sup> Raj's love interest (Nutan) is the niece of a drug manufacturer. When the drug manufacturer refuses to recall a shipment of poisoned drugs, Mrs. Disa dies and Raj is charged with murder. Raj protests in a courtroom speech that real criminals are immune to legal justice. The manufacturer, abandoned by his daughter, eventually confesses and exonerates Raj.

#### Andaz

¶33 *Andaz*,<sup>55</sup> one of Mehboob Khan's great melodramas, exposes the anxiety unleashed by the prospect of gender equality after Independence. A westernized young woman (Nargis) encourages the love of an acquaintance (Dilip Kumar) even though she is already engaged to another man (Raj Kapoor). The film's casting, its thematic deployment of law as a source of restoring social order, and its final scene—where husband and wife are separated as the heroine begins to serve her prison sentence—all deeply influenced *Awāra*.

#### Awāra

¶34 The 1951 melodrama *Awāra*<sup>56</sup> became a smash hit, and its title song, "Aawaaraa huun" ("I Am a Tramp"), "swept through Asia."<sup>57</sup> The film earned producer-director Raj Kapoor (1924–88) a towering reputation as "the greatest showman this [commercial Hindi] cinema has ever produced."<sup>58</sup> Its success launched a new genre of

53. ANĀRI (L.B. Films 1959). The film starred Raj Kapoor and deployed composers, lyricists, and playback vocalists associated with R.K. Films. This, together with the film's social critique of wealth, lead Rajadhyaksha and Willemen to propose that Raj Kapoor exerted "direct influence" on the film. RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 358.

54. The close relationship between Hindu and Christian is a running theme in the film and a topic Raj addresses in his courtroom speech.

55. ANDAZ (Mehboob Productions 1949).

56. AWĀRA, *supra* note 24. See K. MOTI GOKULSING & WIMAL DISSANAYAKE, INDIAN POPULAR CINEMA: A NARRATIVE OF CULTURAL CHANGE 2 (1998) (referring to *Awāra*'s "classical status").

57. BARNOUW & KRISHNASWAMY, *supra* note 2, 160.

58. MISHRA, *supra* note 16, at 97.

commercial film, the Hindi musical law drama,<sup>59</sup> and inspired Kapoor to produce a sequel in 1955.<sup>60</sup>

¶35 Law graduate and political activist Khwaja Ahmad Abbas (1914–87) cowrote the story and screenplay with V.P. Sathe.<sup>61</sup> Abbas’s goal was to refute the idea that criminal character is inherited. Raj Kapoor cast himself as the good-hearted criminal Raj and cast Nargis as Rita, Bollywood’s first female lawyer. In a series of films, Kapoor and Nargis “came to symbolize the perfect romantic couple in the minds of Indian audiences at the time.”<sup>62</sup> Kapoor also cast his real-life father, veteran film star Prithviraj Kapoor, as Raj’s father, Judge Raghunath.

¶36 *Awāra* was Bollywood’s first film to deploy the courtroom as a diegetic space.<sup>63</sup> The film announces its legal theme with opening scenes filmed at the Bombay High Court Building. Rita defends Raj who is charged with the attempted murder of Judge Raghunath. From a flashback, viewers learn that Raghunath once wrongfully prosecuted the thief Jagga (J.N. Singh) for the crime of rape. To get revenge, Jagga kidnaps Raghunath’s wife Leela, and this causes Raghunath to question the paternity of his own child and to evict his pregnant wife, forcing her to deliver Raj on the street.

¶37 Abbas’s story fuses two myths. First, as in the Oedipus myth, the son grows up, confronts his father, and attempts to kill him. Father and son compete for the same love object, Rita, and the son triumphs over the father in erotic competition. Second, as in the Rama myth,<sup>64</sup> the husband exiles his pregnant wife, forcing her to give birth to their son in hostile surroundings.

¶38 Raj becomes a petty criminal. He struggles to renounce crime, but his identity as thief is exposed when he steals a necklace from the judge to give to Rita. When Raj is forced to kill Jagga in self-defense, he is arraigned before Judge Raghunath.

59. See generally M. MADHAVA PRASAD, *IDEOLOGY OF THE HINDI FILM: A HISTORICAL CONSTRUCTION* 30 (1998) (exploring importance of legal denouements in Hindi films of 1950s); SUMITRA CHAKRAVARTY, *NATIONAL IDENTITY IN INDIAN POPULAR CINEMA 1947–1987*, at 131 (1993) (recognizing rise of “particular myth formation in the Bombay cinema of the fifties centered on the law”).

60. SHREE 420, *supra* note 32. The title means “Lord 420” or “Mr. 420” and is a reference to a section of the Indian Penal Code. INDIAN PENAL CODE § 420 (prohibiting cheating and dishonestly inducing delivery of property).

61. ABBAS, *supra* note 28, at 360. Like all great soap operas, the story is highly derivative. Abbas identified the inspiration for one song as Kishen Chander’s story “The Night of the Full Moon.” *Id.* at 378–79. The final script borrowed liberally from *KISMET* (Bombay Talkies 1943) and *ANDAZ*, *supra* note 55.

The film’s central conflict pays homage to the story in ALEXANDRE DUMAS, *THE COUNT OF MONTE CRISTO* 1170 (Robin Buss trans., Penguin Books 2003) (1844–45), where the criminal reveals during trial that he is the son of the self-righteous prosecutor and had been abandoned at birth.

62. KISHORE VALICHA, *THE MOVING IMAGE: A STUDY OF INDIAN CINEMA* 55 (1988).

63. CHAKRAVARTY, *supra* note 59, 131–42, discusses the use of this device as a distinct feature of Bollywood law films of the 1950s.

64. In the *Ramayana*, Rama’s consort Sita is kidnapped by the demon Ravana. When Rama recovers Sita, he suspects she committed adultery during her captivity. In order to prove her faithfulness, Sita burns herself alive. Only by miraculously surviving the fire does Sita convince Rama she has been faithful. Film dialogue refers repeatedly to the myth, and the identification of Leela with Sita is pictured in the song that plays as she gives birth to Raj: “You sent into exile the virtuous Sita.”

Raj's mother, a witness, is accidentally struck by the judge's car before she can testify. On her death bed she reveals to Raj that the judge is his father. Enraged, Raj tries to kill the judge, leading to the trial with which the film opens.

¶39 While the jury deliberates, the judge approaches Raj in his cell and acknowledges him as his son. Nevertheless, Raj is convicted of attempted murder. In the final scene Raj and Rita embrace through prison bars. Their dialogue indicates that Raj will become a lawyer and the couple will marry after his release from prison. Closing images reinforce the identity and separation of the family of judge, lawyer, and criminal.

#### Baazi

¶40 *Baazi*,<sup>65</sup> Guru Dutt's first film as director, appeared the same year as *Aw\_ra* and treated similar themes but achieved a less optimistic resolution of oedipal conflicts. Madan (Dev Anand) joins a gang in order to finance his sister's treatment for tuberculosis. He falls in love with his sister's doctor, Rajani (Kalpana Kartik).

¶41 The gang boss (J.N. Singh) turns out to be Rajani's father, and he frames Madan for murder when Madan refuses to stop seeing Rajani. A virtuous police officer, Rajani's former boyfriend, discovers the true killer and rescues Madan from execution. The closing scene depicts Madan's release from jail where he is greeted by Rajani and the police officer.

#### Bandini

¶42 Bimal Roy's prison drama *Bandini*<sup>66</sup> is set in pre-Independence days. Convicted of murder, Kalyani (Nutan) embraces the rigors of her punishment, declining early release and volunteering to care for an ill inmate.

¶43 Her crime is related in flashback. She is forced to leave her village in disgrace when her fiancé (Ashok Kumar), a revolutionary, marries another woman. Working in a hospital, Kalyani learns that an abusive wealthy woman is the wife of her former fiancé. She poisons the woman, confesses, and is convicted of murder.

¶44 A prison doctor falls in love with Kalyani and secures her release. While en route to the doctor's home, Kalyani meets her old fiancé, who is now dying, and decides to devote her life to the dying man. The ending equivocally celebrates the triumph of duty over love or the triumph of love over self-interest.

#### Bardaasht

¶45 *Bardaasht*,<sup>67</sup> directed by E. Niwas, deploys action-genre formulas when the law student brother of a quiet hero (Bobby Deol) is murdered by corrupt police and

---

65. BAAZI (Navketan 1951). The print material accompanying the DVD of BAAZ (H.G. Films 1953) (DVD Yash Raj ca. 2002), also directed by Guru Dutt, confuses *Baaz* with *Baazi* and erroneously identifies the 1953 film as Dutt's directorial debut.

66. BANDINI ("The Female Prisoner") (B.R. Films 1963).

67. BARDAASHT (Film Folks 2004).

falsely accused of drug trafficking. The hero's former lover Payal (Lara Dutta), a lawyer, brings the case to court, but legal efforts are frustrated when corrupt officers murder and intimidate key witnesses. The action builds toward a revenge-genre climax, but the hero avoids private retaliation while redeeming himself and restoring his family's honor.

### Boyfriend

¶46 *Boyfriend*,<sup>68</sup> directed by Naresh Saigal, stylishly reworked themes from *Awāra* and *Do Ustad*. Madan (played by Raj Kapoor's brother Shammi Kapoor) becomes separated from his family as a child and grows up to become a thief while his brother Sunil becomes a police officer. After falling in love with a woman (Madhubala), Madan seeks to become law abiding but is pressured into stealing again (or is suspected of doing so).

¶47 Madan's identity as criminal is revealed when he gives a necklace to his beloved that he unwittingly stole from his mother. Officer Sunil recognizes the stolen property and pursues Madan. The family acknowledges Madan as the lost son, but he is sentenced to prison where the lovers meet, separated by bars.

### Dāminī

¶48 *Dāminī*,<sup>69</sup> directed by Rajkumar Santoshi, has attracted scholarly comment<sup>70</sup> for its nightmarish inversion of Bollywood fantasy. A poor girl Damini (Meenakshi Sheshadri) marries the son (Rishi Kapoor) of a wealthy family. Damini witnesses her husband's brother rape a family servant. When she refuses to acquiesce in covering up the crime, the family engages a corrupt lawyer (Amrish Puri) who orchestrates her commitment for insanity.

¶49 Damini finds a champion in the disillusioned lawyer Govind Srivastav (played by action-hero actor Sunny Deol). The action unfolds within established revenge-genre conventions. The rape victim dies, and thugs pursue and try to kill Damini and Govind. But Govind's defensive force stops short of exacting retribution on the bodies of his assailants. Instead of achieving its climax in a burst of violence characteristic of revenge films, narrative conflicts culminate in a courtroom showdown where Damini and her husband confront the husband's family and the family's lawyer. Damini and her husband are reconciled while, with a nod to Hollywood westerns, Govind strides out of the courtroom alone.

68. BOYFRIEND (NS Films 1961).

69. DAMINI (Ciney 1993) (available on DVD from World Entertainment Group). This film is unusual in being given an English subtitle in the original credits: "Lightening." The only version of this DVD that I have seen does not have operable English-language subtitles.

70. See Madhava Prasad, *Signs of Ideological Re-form in Two Recent Films: Towards Real Subsumption?* J. ARTS & IDEAS, Jan. 1996, at 27, available at [http://dsal.uchicago.edu/books/artsandideas/pager.html?issue=29&objectid=HN681.S597\\_29\\_029.gif](http://dsal.uchicago.edu/books/artsandideas/pager.html?issue=29&objectid=HN681.S597_29_029.gif). The film is also discussed in RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 512–13.

## Dev

¶50 Set against the background of smoldering Hindu-Muslim conflict, director Govind Nihalani's *Dev*<sup>71</sup> follows the unraveling friendship between two veteran police officers, Dev Pratap Singh (Amitabh Bachchan), who remains dedicated to the rule of law, and Special Commissioner Tejinder Khosla (Om Puri), who facilitates anti-Muslim riots in his zeal to avenge acts of terrorism. The film explores conflicts among Muslims as recent law school graduate Farhan Ali (Fardeen Khan) repudiates his father's nonviolent idealism and turns to terrorism. Revolted by violence, Ali finds redemption when he returns to law. Though Singh is murdered to prevent him from testifying about police corruption, the film ends with Ali carrying Singh's report up the courthouse steps.

## Dharam Karam

¶51 Directed by Raj Kapoor's son, Randhir Kapoor, *Dharam Karam*<sup>72</sup> inverts the message of *Awāra* and promotes the theory that character is inherited and cannot be altered by social conditions. A criminal switches his newborn son with the son of a benevolent singer (Raj Kapoor). Despite the criminal's efforts to corrupt him, the singer's biological son (Randhir Kapoor) grows up with moral scruples while the criminal's son, raised by the singer, manifests a propensity to violence and crime. The plotting mirrors *Awāra*, notably when father and son are reunited in a jail scene where Raj Kapoor extends his arms toward his real-life son Randhir Kapoor, replicating *Awāra*'s jail scene where Prithviraj recognizes Raj.

## Do Aankhen Baarah Haath

¶52 The prison reform drama *Do Aankhen Baarah Haath*<sup>73</sup> won an award for its treatment of social problems at the Seventh International Film Festival at Berlin and was judged best foreign film for 1958 by the Hollywood Press Association.<sup>74</sup> It opens with screen text announcing that it is based on real experiences. Set in pre-Independence days, an idealist prison guard (played by the director, V. Shantaram) obtains the work release of six recalcitrant prisoners convicted of particularly brutal murders. The guard stakes his personal assets on the success of his project and transports the prisoners to a rural area where he supervises their collective farming.

71. DEV (Entertainment One India Ltd. 2004). Some of the film's themes were treated in KANOON APNA APNA (Prasad Productions Pvt. Ltd. 1989) where Jagat Pratap Singh (Dillip Kumar) stands for the rule of law in contrast to his son who turns to violence to achieve justice.
72. DHARAM KARAM (R.K. Films 1975).
73. DO AANKHEN BAARAH HAATH (Rajkamal Kalamandir 1957). The film's credits are unusual in that they do not transliterate the title but provide a translation ("Two Eyes Twelve Hands"). The transliteration provided on the print material accompanying the DVD (*Do Ankhien Barah Haath*) is transcribed from the certificate of the censor.
74. SHAMPA BANERJEE, PROFILES: FIVE FILM-MAKERS FROM INDIA: V. SHANTARAM, RAJ KAPOOR, MRINAL SEN, GURU DUTT, RITWIK GHATAK 6 (1985).

¶53 Awed by the image of the guard's watchful eyes and won over by his love, the prisoners overcome their criminal urges. But jealous villagers oppose their farming venture, destroy their crops, and kill the guard. Law triumphs when police arrest the mob's ringleader, and the prisoners, though reprieved, voluntarily return to their farm.

#### Do Ustad

¶54 From its opening image of a courthouse, director Tara Harish's *Do Ustad*<sup>75</sup> signals that it is modeled on *Awāra*. Like its model, the narrative emerges as flashback from a criminal trial. Jagannath (Sheik Mukhtar), defended by his younger brother (Raj Kapoor), confesses to killing but insists social conditions forced him to the deed: "I wasn't born a murderer."

¶55 The flashback shows how the brothers are separated at an early age and grow up to become criminals. The multiple story lines include a self-referential comic subplot where Raj is mistaken for the real-life Raj Kapoor. While ultimately winning the love of Madhu (Madhubala), Raj saves Jagannath's wife from suicide and supports her and her son, while helping police capture Jagannath.

¶56 The brothers are eventually reunited and Raj wins Jagannath's acquittal for murder, but Jagannath returns to prison for other offenses. In the final scene, family members part from him as he is transported to prison.

#### Kala Pani

¶57 The title of the film *Kala Pani*,<sup>76</sup> directed by Raj Khosla, refers to an island prison that became notorious during British colonial rule. Karan Mehra (Dev Anand) works to free his father who was framed for murder by a corrupt prosecutor and is serving a life sentence. With the help of a reporter (Madhubala) and a prostitute, Karan gets his father's case reopened and exposes the real killer and the corrupt lawyer.

#### Kanoon

¶58 *Kanoon* ("The Law"),<sup>77</sup> a noirish crime drama directed by B.R. Chopra, questions the capacity of legal institutions to recognize truth. In opening scenes, a man is tried a second time after escaping and killing the victim of whose murder he had previously been convicted. The killer makes an impassioned speech before dying in the courtroom. This is followed by dialogue in chambers where Judge Badriprasad (Ashok Kumar) expresses doubts about capital punishment while an elder judge reproves him (in English): "Exceptions do not prove the rule."

75. DO USTAD (Sheikh Mukhtar Prod. 1959).

76. KALA PANI (Navketan 1958).

77. KANOON, *supra* note 23. The lack of music reinforces *Kanoon*'s Hollywoodish noir feel and may explain its lukewarm reception. CHIDANANDA DAS GUPTA, TALKING ABOUT FILMS 34 (1981).

¶59 In the main story, prosecutor Kailish Khanna (Rajendra Kumar), who is in love with Judge Badriprasad's daughter (Nanda), witnesses a murder by a man he believes is Judge Badriprasad. The judge denies his guilt, and the case goes to trial. Before the jury's decision is announced, police produce the corpse of the look-alike killer. Judge Badriprasad then delivers a speech denouncing capital punishment and holding law (*kanoon*) "responsible for the murder of these innocents." He insists that the law should remember that man is human and fallible, that only God has the right to take life, and that revenge is not just.

#### Moksha

¶60 The failure of legal institutions to effect justice motivates self-destructive violence in *Moksha*,<sup>78</sup> directed by Asok Mehta. A law student (Arjun Rampal), guilt ridden when he fails to prevent the conviction of an innocent defendant, enlists the support of his girlfriend (Manisha Koirala) in a project to provide legal services to victims of extreme injustice. Unable to secure financing, the law student decides to rob a bank. When the robbery is foiled due to an anonymous tip from a woman, the law student suspects his girlfriend betrayed him.

¶61 When the girlfriend dies under ambiguous circumstances, the law student is tried for murder. He wins an acquittal by impeaching the prosecution witness, the girlfriend's roommate, for being a lesbian. The student later learns that the witness was the source of the anonymous tip and engages in a self-destructive act of violence.

#### Veer-Zaara

¶62 The 2004 hit *Veer-Zaara*,<sup>79</sup> directed by Yash Chopra, demonstrates the enduring appeal of the law drama. In her first case, female Pakistani lawyer Saamiya Siddiqui (Rani Mukherjee) must vanquish a hostile government lawyer and prove the true identity of Veer Pratap Singh (Shah Rukh Khan). Imprisoned for twenty-two years on his own false confession that he was a spy, Veer is in fact an Indian citizen who fell in love with Zaara Hyaat Khan (Preity Zinta), a Pakistani woman. When Veer followed Zaara to Pakistan, corrupt Pakistani officers in league with Zaara's jealous fiancé coerced Veer into signing the false confession.

¶63 Siddiqui's victory proves the competence of woman lawyers, restores Veer's true identity, reunites the lovers, and returns them to India. The film evokes traditions of progressive law dramas with its advocacy of women's rights, religious tolerance, and international cooperation. Its nostalgic appeal is enhanced by a soundtrack of previously unreleased songs by Madan Mohan (1924–75).

78. MOKSHA (Ashok Mehta 2000).

79. VEER-ZAARA (Yash Raj Films 2004). See Michael H. Hoffheimer, *Veer-Zaara: Love and Law in Bollywood*, PICTURING JUSTICE: ON-LINE J.L. & POPULAR CULTURE, Aug. 5, 2005, [http://www.usfca.edu/pj/veerzaara\\_hoffheimer.htm](http://www.usfca.edu/pj/veerzaara_hoffheimer.htm).

### *The Top Three*

¶64 Libraries that are limited to acquiring three Bollywood DVDs should get *Awāra*, *Bandini*, and *Veer-Zaara*. These films, products of three different decades, represent the work of three of India's most popular directors and feature strong performances by top Bollywood actors from their respective periods.

### *Four Other Essential Bollywood Films*

¶65 Four films that are not included in the suggested list because they lack explicit legal themes still would make valuable additions to a larger Bollywood law collection.<sup>80</sup>

#### Devdas

¶66 Saratchandra Chattopadhyay's 1917 Bengali novel *Devdas*<sup>81</sup> has been made into six films and deeply influenced many others.<sup>82</sup> The story became best known to post-Independence audiences in Bimal Roy's 1955 film.<sup>83</sup>

¶67 The drama follows the conflicted relationship of two children of neighboring families. Paro (Suchitra Sen<sup>84</sup>) yearns to marry Devdas (Dillip Kumar). When her mother's efforts to arrange the marriage founder, Paro visits Devdas's bedroom where he rebuffs her proposal of marriage.<sup>85</sup>

¶68 Devdas soon changes his mind but not before Paro has become engaged to a wealthy landlord. When she refuses Devdas's proposal, he strikes her, deliberately scarring her forehead.

¶69 Devdas moves to the city where he becomes an alcoholic. The prostitute Chandramukhi (Vyjayanthimala) falls in love with Devdas and resolves to lead a virtuous life. Preoccupied with Paro, Devdas is unable to return Chandramukhi's love. In the end, Devdas leaves Chandramukhi, drinks alcohol, knowing it will kill him, and dies outside the gate of Paro's house.

80. For one compilation of significant South Asian films, see British Film Inst., 50 Essential South Asian Films, <http://imagineasia.bfi.org.uk/poll/index.html> (last visited Sept. 27, 2005). The list is divided by Top 10s for Bangladesh, Diaspora, India, Pakistan, and Sri Lanka.
81. SARATCHANDRA CHATTOPADHYAY, *DEVIDAS: A NOVEL* (Sreejata Guha trans., Penguin Books 2002) (1917). According to one biographer, episodes in the novel drew on the author's childhood experiences. VISHNU PRABHAKAR, *AWARA MESSIAH: A BIOGRAPHY OF SARAT CHANDRA CHATTERJEE 19–20, 133, 177* (Jai Ratan trans., 1989).
82. P.C. Barua made both Bengali and Hindi film versions in 1935. RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 261. Barua himself played the lead in the Bengali version. BARNOUW & KRISHNASWAMY, *supra* note 2, at 79. The novel's author did not originally want Barua to film *Devdas*, but he relented and even attended Barua's shootings. PRABHAKAR, *supra* note 81, at 341.
83. *DEVIDAS* (Bimal Roy Prod. 1955). Roy filmed two other Chattopadhyay stories and discusses the appeal of translating literary works to film in a 1956 essay in RINKI BHATTACHARYA, *BIMAL ROY: A MAN OF SILENCE 30–34* (1994).
84. The Yash Raj DVD package incorrectly identifies Vyjayanthimala as playing Paro. Vyjayanthimala plays the prostitute Chandramukhi. See RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 211, 238.
85. In Roy's and Bhansali's film versions, Devdas's father opposes the marriage. In the novel, however, Devdas's father is presented more sympathetically, especially in his fondness for Paro. CHATTOPADHYAY, *supra* note 81, at 8, 38.

¶70 *Devdas* contains implicit social-political criticism relevant for students of law and film,<sup>86</sup> but its larger significance for a Hindi film collection lies in its formative effect on South Asian film culture.

#### Pyasa

¶71 *Pyasa*,<sup>87</sup> directed by Guru Dutt, presents the story of the poet Vijay (played by Dutt), who, scorned by family and society, lives on the streets where he is befriended by a prostitute (Waheeda Rehman). When Vijay is believed dead, his poetry becomes wildly popular and his former detractors claim to have been his friends. When they learn he is still alive, they deny he is who he says. The climax occurs when Vijay disrupts a public memorial held in his honor. The film ends with Vijay and the prostitute joining together to leave the hypocritical world.

¶72 Dutt's film is memorable for its technical mastery, artistic innovation,<sup>88</sup> and effective fusion of sentimentalism and social criticism. One famous song sequence, set in the red-light district, deglamorizes prostitution and protests the failure of post-colonial politicians to end commercial sexual exploitation of women.

#### Mother India

¶73 The superhit *Mother India*,<sup>89</sup> directed by Mehboob Khan, has been described as "an Indian *Gone with the Wind*, massively successful and even seen as a national epic."<sup>90</sup> Radha (Nargis) raises two sons, one dutiful and law abiding, the other disobedient and rebellious. When the criminal son threatens a woman in the village, his mother defends female honor and kills her son. Nargis's performance cemented her status as the iconic mother-figure for Indian nationalism.<sup>91</sup>

#### Phir Bhi Dil Hai Hindustani

¶74 *Phir Bhi Dil Hai Hindustani*,<sup>92</sup> directed by Azi Mirza, explores the vulnerability of legal process to manipulation by corrupt police and politicians. Two feuding television reporters (Shah Rukh Khan and Juhi Chawla) learn that the killer of a politician was not a terrorist but rather the distraught father of a woman who had been raped by the politician. While corrupt officials and television networks con-

86. BARNOUW & KRISHNASWAMY, *supra* note 2, at 81 ("To some extent *Devdas* was a film of social protest. It carried an implied indictment of arranged marriage and undoubtedly gave some satisfaction on this score to those who hate this institution.").

87. PYAASA (Guru Dutt Films 1957).

88. For an excellent discussion of Gutt's innovative use of song picturization, see Daisy Rockwell, *Visionary Choreographies: Guru Dutt's Experiments in Film Song Picturisation*, 1 S. ASIAN POPULAR CULTURE 109 (2003).

89. MOTHER INDIA (Mehbood Khan Prod. 1957).

90. RAJADHYAKSHA & WILLEMEN, *supra* note 2, at 350.

91. SALMAN RUSHDIE, *THE MOOR'S LAST SIGH* 139 (1995) (Nargis "became . . . the living mother-goddess of us all.").

92. PHIR BHI DIL HAI HINDUSTANI (Dreamz Unlimited 2000).

nive to execute the man, the reporters, with the assistance of a bumbling crime boss, lead a demonstration that prevents the prisoner from being hanged.

## Appendix

### Top Twenty Recommended Bollywood Law Films

*Ab Dilli Dur Nahin*. Directed by Amar Kumar. R.K. Films, 1957.

*Adalat*. Directed by Kalidas. Kwatra Films, 1958.

*Afsana*. Directed by B.R. Chopra. Shri Gopal Pics, 1951.

*Amar*. Directed by Mehboob [Khan]. Mehboob Productions, 1954.

*Anāri*. Directed by Hrishikesh Mukherjee. L.B. Films, 1959.

*Andaz*. Directed by Mehboob Khan. Mehboob Productions, 1949.

*Awāra*. Directed by Raj Kapoor. R.K. Films, 1951.

*Baazi*. Directed by Guru Dutt. Navketan, 1951.

*Bandini*. Directed by Bimal Roy. B.R. Films, 1963.

*Bardaasht*. Directed by E. Niwas. Film Folks, 2004.

*Boyfriend*. Directed by Naresh Saigal. NS Films, 1961.

*Dāminī*. Directed by Rajkumar Santoshi. Cineyog, 1993.

*Dev*. Directed by Govind Nihalani. Entertainment One India Ltd, 2004.

*Dharam Karam*. Directed by Randhir Kapoor. R.K. Films, 1975.

*Do Aankhen Baarah Haath*. Directed by V. Shantaram. Rajkamal Kalamandir, 1957.

*Do Ustad*. Directed by Tara Harish. Sheikh Mukhtar Productions, 1959.

*Kala Pani*. Directed by Raj Khosla. Navketan, 1958.

*Kanoon*. Directed by B.R. Chopra. B.R. Films, 1960.

*Moksha*. Directed by Ashok Mohta. Ashok Mohta, 2000.

*Veer-Zaara*. Directed by Yash Chopra. Yash Raj Films, 2004.