- Commuting Accident Compensation: Retrospective Nexus
  - Bare Facts of the Case
    - Deceased Employee: Shahu Sampatrao Jadhavar
    - Accident: Motorcycle, 5 km from factory
    - Dependants: Widow, 4 children, mother
    - Initial Claim: EC Act, 1923
    - Defence: Outside factory, not in course of employment
    - Commissioner's Ruling: Awarded £3,26,140 + 12% interest
    - High Court's Reversal: Relied on Francis De Costa (1996)
    - Appeal to Supreme Court: By family members
  - Supreme Court Holding
    - Central Question: 'Arising out of and in course of employment'
    - Section 51E, ESI Act, 1948
      - Introduced: 1st June 2010
      - Deems commuting accident as employment-related if nexus established
      - Neutralised Francis De Costa
      - Character: Clarificatory
      - Effect: Retrospective
    - 'In Pari Materia' Principle
      - EC Act and ESI Act
      - Both aim for social security
      - ESI Act interpretation applicable to EC Act
    - Interpretation of 'Arising Out Of and In Course Of Employment' (EC Act)
      - Includes commuting to/from work
      - Condition: Nexus (circumstances, time, place) with employment
    - Nexus Found in Jadhavar's Case: Clear link to employment
    - Outcome: Appeal allowed, High Court judgment set aside
    - Award Restored: Commissioner's original compensation + penalty