- Summoning Additional Accused: CrPC 319 and Evidence Standards
  - Extraordinary Power Under Section 319 CrPC
    - Ensures no guilty person escapes
  - Standard of Satisfaction Required
    - Higher than a prima facie case
    - Less than level needed for conviction
  - Lower Court Errors (Mini-Trial)
    - Prematurely testing credibility of evidence
    - Constitutes impermissible mini-trial at summoning stage
  - Dying Declaration (Sec 32 Evidence Act)
    - Deceased's statement recorded under Sec 161 CrPC
    - Admissible as Dying Declaration
    - Admissible regardless of time gap to death
    - Admissible without medical fitness certificate
  - Appeal Outcome
    - Allowed based on prima facie evidence of complicity
    - Respondents ordered to be summoned