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NYĀYA LOGIC AND JUDICIAL REASONING: APPLYING THE FIVE-MEMBER SYLLOGISM TO INDIAN JUDICIAL DECISIONS

AUTHORED BY - VELUGUBANTLA UMIKA

ABSTRACT

This paper examines whether the classical Nyāya five-member inference can provide a useful analytical framework for understanding judicial reasoning in India. Nyāya presents inference for another person through five members: *pratijñā* (proposition), *hetu* (reason), *udāharāṇa* (example or statement of concomitance), *upanaya* (application), and *nigamana* (conclusion). The five-member form is not simply a longer Western syllogism. Its importance lies in making visible the movement from a disputed claim, through a reason and a publicly intelligible basis for that reason, to application of the basis to the facts and finally to a conclusion. Indian judgments, although not written in Nyāya vocabulary, frequently perform comparable argumentative operations. Courts identify legal propositions, state reasons, rely on statute, precedent or evidentiary principles, apply those materials to facts, and formulate conclusions. The paper therefore proposes a functional use of the *pañcāvayava* structure. It applies the framework to Indian decisions concerning circumstantial evidence, the duty to give reasons, statutory interpretation and constitutional proportionality. It concludes that Nyāya offers an indigenous vocabulary for testing the transparency, coherence and justificatory integrity of judicial decisions, while recognising that modern adjudication cannot be reduced to a single syllogistic form.

Keywords: Nyāya; Indian logic; judicial reasoning; pañcāvayava; pratijñā; hetu; udāharāṇa; upanaya; nigamana; precedent; legal reasoning; Supreme Court of India.

1. INTRODUCTION

Judicial decisions are often described as conclusions reached after the application of law to facts. That description is accurate but incomplete. A judgment is also a public argument. It must identify what is to be decided, explain why the court accepts particular propositions, identify the legal or normative principles that connect those reasons to the issue, apply those

principles to the facts before it, and state the result that follows. The legitimacy of adjudication therefore depends not only upon the authority of the institution delivering the decision but also upon the intelligibility of the reasoning through which the decision is justified. The Supreme Court of India has repeatedly treated reasons as a necessary link between the materials considered and the conclusions reached. A reasoned decision enables the parties to understand why they have won or lost and permits an appellate or reviewing court to determine whether the decision rests upon a rational and legally permissible basis.¹

This concern with the structure of reasoning creates an opportunity to revisit classical Indian logic as a resource for contemporary legal theory. The Nyāya school developed a sophisticated account of knowledge, inference, debate and rational justification. Its theory of inference (anumāna) distinguishes inference for oneself from inference articulated for another. The latter, parārthānumāna, is conventionally expressed through five members or avayavas: pratijñā, hetu, udāharaṇa, upanaya and nigamana.² The familiar example is the inference that a hill has fire because it has smoke: the proposition identifies what is to be proved; the reason identifies smoke as the inferential mark; the example articulates the relevant concomitance between smoke and fire; the application connects that general relation to the hill; and the conclusion restates the proposition as established.³

The central claim of this paper is not that Indian judges consciously employ Nyāya syllogisms, nor that every judgment can be reduced to five propositions. Such a claim would be historically and analytically overstated. Rather, the pañcāvayava structure can be used as a functional model for reading judicial reasoning. It can expose gaps that are sometimes concealed by the rhetorical form of judgments: an asserted conclusion without a sufficiently articulated reason; a reason that is not supported by an adequate legal rule or precedent; a legal principle stated at a high level of abstraction but never properly connected to the facts; or a conclusion that is stronger than the premises actually establish.⁴

¹ Union of India v Mohan Lal Capoor (1973) 2 SCC 836, 853; Kranti Associates (P) Ltd v Masood Ahmed Khan (2010) 9 SCC 496, paras 47–51.

² Nyāya Sūtra 1.1.32; see also Jonardon Ganeri, 'Ancient Indian Logic as a Theory of Case-Based Reasoning' (2003) 31 Journal of Indian Philosophy 33, 35–39.

³ Bimal Krishna Matilal, Jonardon Ganeri and Heeraman Tiwari (eds), The Character of Logic in India (State University of New York Press 1998) 31–59.

⁴ Jonardon Ganeri, 'Ancient Indian Logic as a Theory of Case-Based Reasoning' (2003) 31 Journal of Indian Philosophy 33.

2. NYĀYA INFERENCE AND THE PAÑCĀVAYAVA STRUCTURE

Nyāya is ordinarily introduced as one of the classical systems of Indian philosophy, but its treatment of reasoning is more than a catalogue of logical forms. Its central concern is the production of valid cognition and the conditions under which an inference can legitimately establish a conclusion. Inference is linked to the notion of *vyāpti*, an invariable or sufficiently established concomitance between the inferential reason and the property to be proved. In the standard example, smoke is a reason for inferring fire because smoke is understood to be pervaded by fire in the relevant circumstances. The hill is the *pakṣa*, the subject under consideration; fire is the *sādhya*, the property to be established; and smoke is the *hetu*, the reason or inferential mark.⁵

The five-member form is expressly associated with inference presented for the purpose of convincing another person. The Nyāya Sūtra identifies the members as thesis, reason, example, application and conclusion.⁶ Their sequence is significant. The *pratijñā* states the disputed proposition. The *hetu* identifies the feature of the case that is said to support the proposition. The *udāharaṇa* supplies the relevant general relation and an illustrative instance. The *upanaya* states that the case under consideration possesses the relevant feature in the manner contemplated by the rule. The *nigamana* then confirms the proposition as the conclusion of the inferential process.⁷

The apparent redundancy of the first and fifth members has sometimes encouraged comparison with shorter Western syllogisms. That comparison can be useful, but it should not obscure the dialogical character of the Nyāya structure. The five-member form makes the inferential path explicit to an interlocutor. Jonardon Ganeri's account of Indian logic as case-based reasoning is especially helpful here: the example is not merely decorative but performs an epistemic and communicative function, because reasoning is situated within a context in which participants must have access to sufficiently shared information.⁸ Bimal Krishna Matilal similarly emphasised that Indian logical traditions cannot be adequately understood by reducing them to abstract formal validity; debate, challenge, counterexample and the conditions of rational communication are integral to the tradition.⁹

⁵ Kisor Kumar Chakrabarti, *Classical Indian Philosophy of Mind: The Nyāya Dualist Tradition* (State University of New York Press 1999) 115–140.

⁶ Nyāya Sūtra 1.1.32; see also Stephen H Phillips, *Classical Indian Metaphysics: Refutations of Realism and the Emergence of 'New Logic'* (Open Court 1997) 30–34.

⁷ Bimal Krishna Matilal, *Perception: An Essay on Classical Indian Theories of Knowledge* (Clarendon Press 1986) 214–225.

⁸ Ganeri (n 2) 39–44.

⁹ Matilal, Ganeri and Tiwari (eds) (n 3) 1–30.

The five members can therefore be understood as five argumentative tasks rather than five isolated sentences. Pratijñā fixes the question. Hetu identifies the basis on which the answer is proposed. Udāharaṇa makes explicit the general relation that renders the reason probative. Upanaya establishes that the present case falls within that relation. Nigamana states the result. This structure makes it possible to ask, at each stage, a distinct question of justification.

The Nyāya tradition also provides a sophisticated account of defective reasons, or hetvābhāsas. A reason may fail because it is not established in the subject, because it is inconsistent with the proposition, because an equally strong contrary reason exists, or because the purported relation between reason and conclusion is not properly established.¹⁰ For legal reasoning, this is particularly valuable. A court may possess a fact that is genuinely proved but still draw an impermissible inference from it. The existence of a fact and the sufficiency of that fact as a legal reason are not identical questions.

Nyāya also resists the idea that inference is merely formal manipulation. The quality of an argument depends upon the epistemic status of its premises and the relation between them. In this respect, it can illuminate judicial reasoning more effectively than a simple major-premise/minor-premise/conclusion model. A judicial judgment rarely consists only of formal deduction. It combines evidence, legal propositions, precedent, interpretation and normative evaluation. The pañcāvayava framework can nevertheless isolate each inferential movement and ask whether the court has adequately justified it.

3. FROM PAÑCĀVAYAVA TO JUDICIAL REASONING

The first step in applying Nyāya to judicial decisions is to avoid a literal equation between the five-member syllogism and a judgment. A judgment may contain dozens of propositions and multiple chains of reasoning. The appropriate unit of analysis is therefore the judicial inference: a proposition that the court seeks to establish from identified legal and factual reasons. Each such inference can be reconstructed through a functional equivalent of the five avayavas.

The pratijñā corresponds to the proposition that the court must establish. In adjudication, this may be expressed as an answer to the legal issue: a statutory provision applies to the facts; a constitutional restriction is disproportionate; a particular item of evidence is sufficient; or a

¹⁰ See Nyāya Sūtra 1.2.4–1.2.8; Karl H Potter (ed), Encyclopedia of Indian Philosophies, vol 2: Indian Metaphysics and Epistemology: The Tradition of Nyāya-Vaiśeṣika up to Gaṅgeśa (Motilal Banarsidass 1977) 234–252.

particular interpretation is legally preferable. The discipline of identifying the pratijñā requires the court to distinguish the actual issue from surrounding observations. It also helps prevent a judgment from moving imperceptibly from a broad proposition to a narrower conclusion.

The hetu corresponds to the reasons offered for accepting the proposition. These reasons may be statutory language, precedent, constitutional principle, evidence, institutional practice or a combination of these. The important point is that the reason must have a rational and legal connection with the proposition. A judgment is not adequately reasoned merely because it contains authorities or facts. The court must explain what work those authorities or facts perform.

The udāharaṇa is the most difficult member to translate into modern judicial practice because legal judgments do not ordinarily announce universal concomitance through empirical examples. Its functional equivalent, however, can be identified in at least three forms. First, it may be a controlling precedent that demonstrates how a legal principle operates in a comparable situation. Secondly, it may be a statutory or doctrinal proposition whose operation is illustrated through prior decisions. Thirdly, in evidentiary reasoning it may take the form of an established inferential regularity, such as the principle that a particular circumstance, when combined with other circumstances, may support a conclusion. The purpose is not simply to provide an example but to make the bridge between the reason and the proposition publicly intelligible.

The upanaya is the application stage. It asks whether the facts of the case actually possess the characteristics contemplated by the legal rule, precedent or inferential principle relied upon. This is where judicial reasoning most visibly becomes adjudication. A judgment can correctly state a legal rule and correctly describe the evidence yet still fail at the application stage. The court may say what proportionality requires but not identify the actual burden imposed by the impugned measure; it may state a rule concerning circumstantial evidence but not test each circumstance against alternative explanations; or it may cite a precedent without demonstrating why the present factual situation falls within the precedent's ratio.¹¹

The nigamana is the conclusion. It should be the conclusion warranted by the preceding reasoning, rather than a new proposition introduced without support. The conclusion also performs an institutional function: it tells the parties what follows from the court's reasoning and defines the operative legal result.

This reconstruction fits closely with the modern judicial requirement that reasons provide

¹¹ Sharad Birdhichand Sarda v State of Maharashtra (1984) 4 SCC 116, 153–54.

a rational nexus between materials and conclusions. In *Union of India v Mohan Lal Capoor*, the Supreme Court described reasons as the links between the materials considered and the conclusions reached.¹² Later decisions have repeatedly treated the giving of reasons as an important safeguard against arbitrary decision-making and as a means of enabling effective judicial review.¹³ Read through the Nyāya framework, the requirement is not simply that a judge write more. It is that the judge make the inferential chain sufficiently visible.

The framework can therefore be formulated as five questions for reading a judicial decision: What exactly is the court claiming? What reason supports the claim? What legal, precedential or evidentiary basis establishes the connection between that reason and the claim? How does that connection apply to the facts before the court? What conclusion follows? The value of these questions is diagnostic. They can identify argumentative gaps without imposing a foreign formalism upon Indian adjudication.

This is also why the Nyāya model should not be treated as equivalent to the classical Western syllogism. The Aristotelian syllogism is primarily concerned with formal relations between propositions. Nyāya's inferential theory gives greater prominence to the conditions under which a reason is probative and to the communicative presentation of the inference.¹⁴ Contemporary legal reasoning similarly involves questions of authority, interpretation and institutional competence that cannot be captured by formal deduction alone. The contribution of Nyāya is therefore methodological: it encourages courts and scholars to examine the stages through which a conclusion is justified.

4. APPLYING THE FIVE MEMBERS TO INDIAN JUDICIAL DECISIONS

The usefulness of the framework becomes clearer when it is applied to actual Indian judicial reasoning. Three areas are particularly revealing: circumstantial evidence, reasoned decision-making, and constitutional proportionality.

4.1 Circumstantial evidence

Indian criminal jurisprudence provides a natural setting for analysing inference because the court frequently moves from established circumstances to a conclusion concerning guilt. In *Sharad Birdhichand Sarda v State of Maharashtra*, the Supreme Court restated the well-known

¹² *Union of India v Mohan Lal Capoor* (1973) 2 SCC 836, 853.

¹³ *Kranti Associates (P) Ltd v Masood Ahmed Khan* (2010) 9 SCC 496, paras 47–51; *Shroff v Mistry* (2011) 2 SCC 380, para 17.

¹⁴ Ganeri (n 2) 35–45; Matilal, Ganeri and Tiwari (eds) (n 3) 31–59.

five principles governing cases based on circumstantial evidence. The circumstances from which guilt is inferred must first be fully established; the established facts must be consistent with guilt; the circumstances must be conclusive; they must exclude other reasonable hypotheses; and the chain of evidence must be complete enough to exclude a reasonable basis consistent with innocence.¹⁵

The structure can be mapped onto the Nyāya model without claiming that the Court was using Nyāya. The ultimate pratijñā is the proposition that the accused is guilty. The hetu consists not of one fact but of the set of circumstances proved by the prosecution. The udāharaṇa, in functional terms, consists of the principles governing when such circumstances can legitimately support an inference of guilt. The upanaya requires the court to determine whether the particular circumstances in the case satisfy those principles. The nigamana is the final conclusion of guilt or acquittal.

This mapping reveals why the Supreme Court insists upon a complete chain. If one circumstance is proved but the prosecution cannot establish the necessary inferential relationship between that circumstance and guilt, the hetu is insufficient. If the facts are consistent with an alternative hypothesis, the application stage fails because the legal standard for circumstantial inference has not been satisfied. The celebrated distinction between “may be” and “must be” guilty is therefore a demand for inferential necessity rather than mere suspicion.¹⁶

The framework also clarifies why a false defence cannot automatically cure a weak prosecution case. The prosecution's own inferential chain must be established before an additional circumstance arising from the accused's explanation can be used. Otherwise, the court risks allowing the conclusion to supply the missing reason. In Nyāya terms, the argument would be circular: the conclusion would be used to validate the inferential basis that is supposed to establish the conclusion.

4.2 The judicial duty to give reasons

The second field is the general duty to give reasons. Indian public law has consistently regarded reasons as an important component of fairness, accountability and judicial review. *Kranti Associates Pvt Ltd v Masood Ahmed Khan* synthesised this jurisprudence and emphasised that reasons should disclose how the decision-maker applied the relevant material

¹⁵ Sharad Birdhichand Sarda (n 11) 153–54.

¹⁶ *ibid* 163–64.

and should reveal a rational nexus between the material considered and the conclusion.¹⁷

The Nyāya model sharpens the meaning of this requirement. A judgment may be lengthy but still fail the pañcāvayava test if its argumentative links are obscured. A court might list ten precedents without explaining which principle each precedent establishes; that would provide authorities but not necessarily an udāharaṇa in the functional sense. Similarly, a judgment might reproduce the facts at length but never explain why those facts satisfy the legal test; the upanaya would be deficient.

Conversely, a concise judgment can be strongly reasoned if each inferential stage is clear. The objective is not verbosity but traceability. A litigant should be able to follow the path from proposition to reason, from reason to legal principle, from principle to facts, and from facts to result.

This perspective is especially useful in appellate review. When a reviewing court asks whether a lower court's conclusion is supported by reasons, it can examine whether the lower court identified the correct proposition, relied upon legally relevant reasons, applied the governing standard and reached a conclusion that follows from its analysis. The model thus reinforces rather than competes with established Indian principles of reasoned adjudication.

4.3 Statutory interpretation

Statutory interpretation provides a more complicated example because the court's "reason" may include text, context, precedent, legislative purpose and consequences. Consider a case in which the court must decide whether a statutory provision covers a disputed factual situation. The pratijñā may be: "Section X applies to the present transaction." The hetu may be the ordinary meaning of the statutory words together with contextual indicators. The udāharaṇa may be prior judicial decisions establishing how similar language has been interpreted. The upanaya then asks whether the present transaction possesses the characteristics identified in those authorities. The nigamana is the holding that the provision does or does not apply.

The analogy exposes a common danger in statutory judgments: treating the citation of precedent as if it automatically proves the conclusion. A precedent is not self-applying. The court must explain its ratio and why the current facts fall within or outside it. The Supreme Court has repeatedly cautioned that precedents must be understood in their factual and legal context rather than converted into isolated propositions.¹⁸ The upanaya stage captures precisely

¹⁷ Kranti Associates (n 13) paras 47–51.

¹⁸ State of Orissa v Sudhansu Sekhar Misra AIR 1968 SC 647, 651; Union of India v Dhanwanti Devi (1996) 6 SCC 44, 50.

this requirement.

The model is also capable of accommodating purposive interpretation. Purpose may form part of the *hetu*, but it cannot by itself establish the proposition unless the court explains why the statutory text and interpretive materials support the purposive reading adopted. Where competing purposes exist, the court must identify the relevant hierarchy or interpretive principle. *Nyāya* therefore encourages the court to distinguish between an asserted purpose and a reason that legally supports the chosen interpretation.

4.4 Constitutional proportionality

Constitutional adjudication presents the greatest challenge to a syllogistic model because rights cases often involve competing values. The proportionality framework developed in Indian constitutional jurisprudence generally requires attention to legitimate purpose, suitability or rational connection, necessity and balancing or proportionality in the strict sense.¹⁹ A court applying the test does not simply derive one proposition from a universal rule. It evaluates the relationship between governmental means and constitutional ends.

Nevertheless, each stage can still be analysed through the *pañcāvayava* structure. The *pratijñā* identifies the constitutional conclusion—for example, that a restriction on a fundamental right is justified or invalid. The *hetu* identifies the governmental objective, the nature of the restriction and the evidence relied upon to justify it. The *udāharaṇa* consists of the constitutional doctrine and precedents that explain what counts as a legitimate aim, rational connection, necessity and proportionality. The *upanaya* applies those criteria to the actual measure and its effects. The *nigamana* states whether the restriction survives constitutional scrutiny.

The advantage of this reconstruction is that it prevents balancing language from becoming conclusory. Saying that a measure is “proportionate” is not itself a reason. The court must identify the burden on the right, the public objective, the alternatives available and the relationship between the two. Each of these elements must be supported. The *Nyāya* model thus works as a discipline against unexplained normative leaps.

The same approach can be used in administrative law. A decision-maker may have statutory power, relevant material and a legitimate objective, but the final decision may nevertheless be unlawful if the reasoning does not establish the connection between the

¹⁹ *Modern Dental College and Research Centre v State of Madhya Pradesh* (2016) 7 SCC 353, paras 59–70; *K S Puttaswamy v Union of India* (2017) 10 SCC 1, paras 310–318 (Chandrachud J).

material and the exercise of discretion. The Supreme Court's insistence upon rational nexus and reasoned decision-making can be understood as a requirement that the inferential bridge be visible to the person affected and to the reviewing court.²⁰

5. THE FIVE-MEMBER TEST AS A METHOD OF JUDICIAL REVIEW

The preceding analysis suggests that the *pañcāvayava* structure can be reformulated as a practical five-member test for analysing Indian judicial decisions. The test is not proposed as a new legal doctrine that courts must mechanically apply. It is an analytical framework for evaluating the justificatory quality of judicial reasoning.

First, the *Pratijñā* test asks whether the judgment has clearly identified the proposition it must establish. Courts frequently decide multiple issues, and ambiguity about the actual proposition can cause the reasoning to drift. A well-formed judicial proposition should be sufficiently precise to be tested against the law and facts.

Secondly, the *Hetu* test asks whether the court has identified reasons that genuinely support the proposition. Reasons must be legally relevant and sufficiently established. A court cannot transform assertion into reason merely by placing it after the word “because”. This stage also captures evidentiary sufficiency: facts relied upon must themselves be established according to the applicable standard.

Thirdly, the *Udāharaṇa* test asks whether the court has adequately disclosed the rule, precedent, doctrinal principle or inferential regularity that connects the reason to the proposition. This is the most important contribution of the *Nyāya* model to legal reasoning. Judicial conclusions often appear persuasive because the middle step is silently assumed. The court states a fact, cites a principle, and moves to a conclusion without explaining the relation between them. Making the “example” or general relation explicit exposes that hidden step.

Fourthly, the *Upanaya* test asks whether the court has actually applied the governing principle to the case before it. This requires attention to factual correspondence. A precedent may establish a general rule, but the present case may differ materially. A statutory purpose may be legitimate, but the impugned measure may not actually advance it. Evidence may be individually credible, but the complete chain may still fail. The application stage therefore prevents courts from treating abstract doctrine as a substitute for adjudication.

Fifthly, the *Nigamana* test asks whether the conclusion follows from the preceding reasoning and whether the operative order accurately reflects the reasons given. A judgment

²⁰ *Kranti Associates* (n 13) paras 47–51.

may contain sound analysis but formulate a broader conclusion than the reasoning permits. Conversely, the reasoning may establish a proposition that the operative order fails to implement. The conclusion must remain tethered to the premises.

This five-member test has a further institutional benefit: it makes judicial disagreement more precise. An appellate court need not simply say that a lower court's decision is "wrong". It can identify the precise inferential defect. The proposition may have been misstated; the evidence may not establish the reason; the precedent may not support the claimed legal relation; the rule may have been incorrectly applied; or the conclusion may exceed the reasoning. Such a vocabulary can improve the quality of appellate review because it distinguishes disagreement over law from disagreement over fact and from defects in inferential structure.

The framework also helps explain the importance of judicial writing style. Headings, issue-framing, identification of authorities and structured treatment of evidence are not merely stylistic preferences. They can make the five inferential stages more visible. A judgment that clearly separates issues, rules, analysis and conclusions effectively performs some of the communicative work that the Nyāya form makes explicit.

At the same time, the test should not become a rigid template. Judicial decisions may proceed through analogy, counterexample, precedent, interpretation, policy and constitutional principle. Some propositions are defeasible rather than universal. A court may also reach a conclusion after comparing competing principles rather than applying one rule. The pañcāvayava model should therefore be applied to argumentative units within a judgment, not to the judgment as a whole as if it were a single syllogism.

6. LIMITS, OBJECTIONS AND COMPARATIVE VALUE

The first objection is historical. There is no basis for claiming that modern Indian courts consciously derive their reasoning from Nyāya. Indian judges generally work through constitutional text, statutes, precedent and common-law methods. The presence of structural similarities therefore cannot establish intellectual continuity. This paper makes no such claim. Its argument is one of conceptual reconstruction: an indigenous logical tradition can provide a vocabulary through which modern reasoning can be examined.

The second objection concerns the word "syllogism". The five-member Nyāya inference should not be treated as identical to Aristotle's categorical syllogism. Comparative scholarship has shown that Indian traditions developed their own theories of inference, example,

concomitance, fallacy and debate.²¹ The *pañcāvayava* form is embedded in an epistemology and a theory of rational dialogue that cannot be reduced to formal deduction. Calling it a “syllogism” is convenient for comparison but can obscure these differences.

The third objection is that legal reasoning is not always deductive. Judges routinely interpret ambiguous provisions, choose among competing precedents, balance constitutional rights and respond to novel factual circumstances. In these situations, there may be no universal rule that determines the answer. This objection is persuasive against a mechanical version of the model but not against the functional version proposed here. *Nyāya* can be used to interrogate the individual inferential steps within interpretive and balancing arguments even when the overall decision is not deductive.

The fourth objection concerns value judgments. The conclusion in a constitutional case may depend partly on contestable normative judgments. The five-member framework cannot prove the correctness of a value choice. It can, however, require the court to identify the value judgment and show how it is connected to constitutional text, precedent and institutional principles. Transparency about the normative premise is itself an important aspect of reasoned adjudication.

Most importantly, the framework changes the question from “Is this judgment persuasive?” to “Where, exactly, does its persuasive force come from?” That is a more rigorous question. A judicial decision may be authoritative because of the court that delivered it, but authority does not eliminate the need for reasons. The constitutional culture of reasoned adjudication requires that power be exercised through publicly intelligible justification.

7. CONCLUSION

Nyāya's five-member inference provides a distinctive and useful framework for analysing judicial reasoning in India. Its value does not lie in claiming that contemporary courts secretly reproduce an ancient syllogism. Its value lies in identifying five recurring functions of justification: stating the proposition, identifying the reason, establishing the relation that makes the reason probative, applying that relation to the case, and drawing the conclusion.

Indian judicial decisions already reflect these functions in different forms. The jurisprudence on circumstantial evidence requires courts to move carefully from established facts to conclusions of guilt; the duty to give reasons requires a rational nexus between

²¹ Jonardon Ganeri, ‘Ancient Indian Logic as a Theory of Case-Based Reasoning’ (2003) 31 *Journal of Indian Philosophy* 33; Bimal Krishna Matilal, *The Character of Logic in India* (State University of New York Press 1998).

materials and conclusions; statutory interpretation requires courts to connect text and precedent to the facts of the case; and proportionality requires the application of constitutional standards to the actual burden imposed by state action. The pañcāvayava framework makes the structure of those movements more visible.

Its strongest contribution is therefore diagnostic. It can expose a judgment in which the proposition is unclear, the reason is insufficient, the legal bridge is assumed rather than explained, the rule is not properly applied, or the conclusion exceeds what the reasoning establishes. Such a method is compatible with the Supreme Court's established insistence that reasons are the links between material and conclusion.

Nyāya should consequently be treated as an indigenous analytical resource for contemporary legal reasoning. It does not replace precedent, statutory interpretation, constitutional doctrine or modern theories of justification. Rather, it offers a disciplined way of asking whether judicial conclusions have been adequately earned by the reasons that precede them. In a constitutional democracy, where judicial authority depends substantially upon the public justification of coercive decisions, that question remains fundamental.

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