

KnowLaw Journal

Socio-Legal and Contemporary Research

A Publication of KnowLaw

Volume 01 Issue 01

KnowLaw

She said, He sued – A defamation movement born out of the #MeToo movement.

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Abstract

The #MeToo movement has witnessed the sexual assault survivors increasingly turning the laws of defamation against their assaulters and vice versa. This has led to an increase in the defamation suits in the courts and increased an overall the pendency of suits in the country. It also challenges the court to distinguish the actionable fact from the non-actionable opinion, but such a distinction does not shield from defamation liability when the plaintiff aims to prove the eye-witness testimony about a factual matter and the false statement. However, the objective of this paper is to study the relation between the #MeToo movement and the defamation suits, and thereby give a detailed analysis with reference to India in particular and the world in general.

Introduction

Defamation refers to publishing a dishonouring statement or false statement in the form of a written statement, oral or visual representation without any lawful justification, against another; through which such person's reputation is lowered. It is recognized as a tortious offence as well as a criminal offence under Section 499 of the IPC (Indian Penal Code), 1860.³

Defamation is of two kinds mainly, civil and criminal, where one statement can be liable under both. There is no codified law which deals with civil defamation, the victim of defamation can

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³ § 499, Indian Penal Code, 1860.

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claim for monetary compensation under civil law but imprisonment as a remedy is available only under criminal defamation suit.

The essentials to constitute a suit of defamation can vary from state to state but there are certain essentials which are universal in order to constitute a suit of defamation. They are:

1. False Statement - The statement filed to be defamatory has to be proved by the plaintiff to be false, failing which the suit of defamation shall be quashed.⁴
2. Publication of the Statement – The statement has to be published i.e. either in written\permanent form which is called as libel or in the form of gestures\or orally through words which is called as slander and should have come to the knowledge of a third party.⁵
3. Injury to the Plaintiff – The statement made must be proved to have caused injury to the reputation of the plaintiff in the eyes of a reasonably prudent person.⁶

There are a few defences using which a person can escape liability from defamation. They are truth, fair & bonafide comment, privilege and public interest. Therefore, defamation is supposed to protect people's reputation from unfair attacks in furtherance of which, it allows people to sue the ones who publish malicious and false statement. Hence, defamation is considered as a guardian of one's reputation.

The defamation law suits are not limited only to torts but are also filed in relation to sexual harassment, where the court accepted such cases and decided accordingly. In *Doe v. Superintendent of Sch. of Stoughton*⁷, the claims of assailants of sexual harassment for defamation under civil suit were upheld and damages were awarded. In *Kennedy v. Cannon*⁸, the court allowed defamation suit against the attorney who told the newspaper that the

⁴ *Charleston v. News group Newspaper Ltd.*, (1995) 2 All ER 313.

⁵ *Theaker v. Richardson*, (1996) 1 WLR 151.

⁶ *Bryne v. Deane*, [1937] 1 KB 818.

⁷ *Doe v. Superintendent of Sch. of Stoughton*, 767 N.E.2d 1054 (Mass. 2002); *Schaer v. Brandeis Univ.*, 735 N.E.2d 373 (Mass. 2000).

⁸ *Kennedy v. Cannon*, 182 A.2d 54 (Md. 1962).

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defendant accused of rape said that the plaintiff had submitted herself to his wilful advances. The court held it to be defamatory as well as injurious to the plaintiff's reputation as the claims were proved to be false. Thereby, these cases gave new outlook for such issues of harassment under defamation.

#MeToo movement giving rise to defamation suits

#MeToo Movement

It all started way back in 2006, when Tarana Burke had started a movement on social media on 'Myspace' to help the young women who were victims of sexual harassment. These young women were called the 'survivors'. Later, Burke dubbed the movement 'Me Too' to make women understand that they were not alone in all of this. In October 2017, 'Me Too' gained importance on social media when Alyssa Milano encouraged the survivors on Twitter to use the hashtag #MeToo. This movement grew to become viral after the sexual-abuse allegations against Harvey Weinstein by Alyssa Milano⁹ in October 2017 internationally. This movement's vision from the beginning was to address both, the dearth in resources for survivors and the need to build a society of advocates run by these survivors, who will be at the forefront of creating solutions so as to curb sexual violence. The aim was to hold the perpetrators of - children, young adults, queers, transgenders, disabled folks, black women and girls, and all communities of colour, accountable.

India wasn't alienated from this movement. The use of #MeToo spread quite quickly on social media. In the light of this movement, there were attempts by Social NGOs to teach the Indian women about workplace rights like that of Vishakha Guidelines¹⁰ and safe reporting, as well as educate men regarding scope of the problem. It heightened when this movement was simultaneously being connected with the 2012 Delhi Gang Rape where 'Nirbhaya'¹¹ was killed

⁹ Erika Federis-Cox, *The law does not condone anonymous online abuse*, Entertainment Law Review, Ent. L.R. 2019, 30(5), 160-162.

¹⁰ Visakha v. State of Rajasthan, (1997) 6 SCC 241.

¹¹ Prachi Bhardwaj, *Nirbhaya Case*, SCC ONLINE (Apr.6, 2021, 12:10 AM)
<https://www.sconline.com/blog/post/tag/nirbhaya-case/>.

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in a brutal incident. During this time, the discussions about ‘consent’ intensified and further how some men were also being abused.

In September 2018, former actress Tanushree Dutta was in hot soup after she had accused Nana Patekar of sexual harassment¹². And then in October 2018, the Minister of state for External Affairs, MJ Akbar as well was accused by his female colleagues of sexual assault through this movement¹³. At the same time Anu Malik, former music director was also accused of the same and was therefore, suspended from the jury panel of the famous television show, Indian Idol¹⁴.

Policies and Laws

Our legal system has several gaps. These along with discriminatory social norms enable sexual violence at the workplace. According to the 2018 World Bank Report¹⁵, 59 out of 189 economies of the world had no specific legal provisions providing women with protection from sexual assaults at workplace. The #MeToo Movement has in a way forced the businesses and governments to introduce change. In India, Visakha Guidelines¹⁶ set a standard for procedural rules and guidelines on sexual violence at the workplace i.e., Prevention, Prohibition and Redressal Act, 2013. Years later, a wave of #MeToo movement threw light on the gaps in the framework of laws that govern such critical issues. To go a step beyond, so as to pursue justice directly, women and men on both the sides of #MeToo started manipulating the tool of Defamation. This opened an alternate legal battleground for accusations and trials of sexual misconduct.

¹² <https://www.indiatoday.in/movies/celebrities/story/tanushree-dutta-vs-nana-patekar-sexual-harassment-case-two-witnesses-say-actors-were-several-feet-apart-1552582-2019-06-20>. Last accessed Apr.7, 2021.

¹³ Tushita Patel, *MJ Akbar, stop with the lying. You sexually harassed me too. Your threats will not silence us*, SCROLL (Apr.7, 2021, 12:09 PM) <https://scroll.in/article/898460/mj-akbar-stop-with-the-lying-you-sexually-harassed-me-too-your-threats-will-not-silence-us>.

¹⁴ HT Correspondent, *Shweta Pandit on why she didn't accuse Anu Malik of sexual harassment when she was 'a school kid in 2001'*, HT (Apr.6. 2021, 10:AM) <https://www.hindustantimes.com/music/shweta-pandit-on-why-she-didn-t-accuse-pervert-anu-malik-of-sexual-harassment-when-she-was-a-school-kid-in-2001/story-oDNXLA1eFIYKzoFzPL2sMP.html>.

¹⁵ Saraj Iqbal, *Women, Business, and the Law 2018*, THE WORLD BANK (Apr.6, 2021, 10:17 AM) <http://documents.worldbank.org/curated/en/926401524803880673/Women-Business-and-the-Law-2018>.

¹⁶ Id. at 10

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Media Coverage

About 40% of the reported cases regarding sexual assault gain attention from news-media outlets. Out of this 40%, majority of them involve celebrities or other high-profile individuals. An article about sexual harassment by Harvey Weinstein on Ashley Judd¹⁷ and other women as well gained tremendous support. But there were instances of false reports as well, they may give the public a false impression and about 2%-10% cases reported are false accusations. Media played an important role in defamation suits as well, in the high-profile sexual harassment case involving RK Pachauri – he filed a defamation suit against lawyer Vrinda Grover and the other involved media houses for publicly revealing the statements of the women who had accused him¹⁸. In November 2017, an American director and producer Brett Ratner sued a woman for defamation after she went onto to social media for accusing him. Such instances made defendants plead through defamation suits¹⁹.

MeToo and Defamation

The #MeToo Movement's power rests totally on the women who come forward to speak up and recite their stories of sexual harassment and assault. Some of the alleged “accused” of assault, sexual harassment and rape, under the #MeToo movement have resorted themselves to the defamation laws. They argue that such an allegation has caused gross damage to their reputation and have relied on the penal provisions under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Indian Penal Code that replace the Vishakha Guidelines on sexual harassment.

At times, the women also file an additional suit in civil law for strengthening their claims but usually the men accused of harassment file the defamation suits claiming it to harm their reputation and so far, it has been seen that about 100 defamation suits have been filed since

¹⁷ <https://www.refinery29.com/en-us/2018/05/198042/ashley-judd-weinstein-lawsuit-timeline-metoo-movement>. Last accessed Apr.6, 2021.

¹⁸ <https://www.barandbench.com/news/delhi-hc-notice-rk-pachauri-vrinda-grover>. Last accessed Apr.7, 2021.

¹⁹ <https://www.latimes.com/business/hollywood/la-fi-ct-brett-ratner-allegations-20171101-htmlstory.html>. Last accessed Apr.6, 2021.

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2014 by such men accused of sexual abuse/misconduct. Thus, these cases of defamation act as a wall for the accused from being socially criticized under the #MeToo movement and in addition sue the victim.

Cases across the Globe

The Donald Trump Case²⁰

Mr. Trump was accused by several women for assault, rape and harassment. A special emphasis is made on the claims of Summer Zervos, where she accused him for sexually assaulting her and making sexual advances towards her. While, Trump denied all her claims and called her a liar. Summer Zervos filed a suit of defamation against Trump for calling her a liar and the case is still in proceedings.

The Johnny Depp Case²¹

Johnny Depp was accused by his ex-wife Amber Heard for sexual assault and harassment. She also read out the letter that she wrote to her sisters about the harassments she suffered during her marital life with Johnny Depp in the annual meet of #MeToo. Johnny Depp claimed that the act was done to defame him and denied all the allegations put on him. Thus, he filed a suit of defamation against her, which is still under trial.

India's #MeToo Story

It was in 2018 when our country saw the rise of the #MeToo movement. Inspired by what we can call the global campaign, women across the country showed up by sharing their stories about their sexual harassment. Women started exposing their alleged abusers on social media by posting screenshots of inappropriate messages and anything of the sort. But nearly two years after the movement exploded across India, today some of the activists are frustrated. One of the reasons being, that, in one of the cases, the accuser has put herself on trial for defamation.

²⁰ <https://www.bbc.com/news/world-us-canada-38658622>. Last accessed Apr.7, 2021.

²¹ Eriq Gardner, *Johnny Depp Heads to U.K. Defamation Trial Over "Wife Beater" Story*, HOLLYWOOD REPORTER (Apr.6, 2021, 10:10AM) <https://www.hollywoodreporter.com/thr-esg/johnny-depp-heads-uk-defamation-trial-wife-beater-story-1282901>

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This movement saw a bigger phase when a woman accused the Chief Justice of India of sexual assault. He stands as the highest-ranking alleged offender to date who was later even exonerated²².

The reason behind filing such defamation suits is to deter victims of such abuse from reporting their ordeal, or so as to prompt them to retract their complaints. But this, in reality, is not desirable as it could potentially rule out a judicial intervention. Taking wider aspects into consideration, in our opinion defamation laws should be restricted to actual complains and not social media blogs or comments as this further gives perpetrators the chance to subject women to unnecessary and unwanted victimization via the agony of going through legal proceedings. When laws allow civil defamation action by the accused who has been alleged an offender on social media, the unwanted limelight which falls on women since, makes their identity public which they might have feared in the first place. The Indian audiences' responses were such that they claimed that projected the survivors were 'attention-seeking' women who only did it to get some fame.

Causes – Capitalism and Patriarchy

What defines our society? The twin structures of capitalism and patriarchy do. Is it possible to break down patriarchy without addressing the capitalist structures of our society that's producing record levels of inequality? Our economy is causing huge economic inequality. But how does that affect the #MeToo movement? It does, because women from weaker economic backgrounds have to suffer through domestic violence at home, sexual harassment outside, and yet, they have nowhere to go and no way out of this vicious cycle. One of the aims of this paper is to focus on those women who are struggling to survive with less income, unsafe and unstable jobs but still come out of their cocoons to fight against sexual transgressions committed against them only to be silenced by innumerable devils, one of which being defamation.

²² <https://www.scobserver.in/court-case/sexual-harassment-allegations-against-cji>.last accessed Apr.6, 2021.

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The Loopholes

There are a few instances in India where the women have misused the #Metoo Movement. Oberoi, a high-profile figure, accused under #Metoo movement, was criticized extremely on the social media for such behavior, while the case against him was still pending, later certain discrepancies were found in the accuser's story which led to the belief that the accusations were false²³. In such ways, when the men are defamed by the society on false allegations, the laws of defamation come to their rescue. Those suits of defamation help to prove their innocence and re-establish their reputation in the society. Therefore, the suit of defamation against the accusers i.e. the women claiming themselves to be the victims of assault, will stop them from further putting false allegations on the men and damaging their reputation.

But, on the contrary, the victims of assault are likely to succeed in the court. The burden of proof is always on the plaintiff i.e. the accused to prove that the assault did not happen and proving it is very difficult. The defense of truth available in the defamation suit makes the victims of assault more comfortable to reveal the name and details of the accused as any attacker will not afford to risk filing a suit of defamation, since they are aware of what they have done to the victim- or so it is believed.

#MeToo Cases in India

The Alok Nath Case²⁴

Accusation: He was accused of sexual harassment under the #MeToo Movement by Vinta Nanda who is a writer cum producer. Later, several other women like Navneet Nishan, Sona Mohapatra, etc. also narrated their bitter experiences of harassment by Alok Nath.

²³ Outlook Web Bureau, *After What Has Happened With Karan Oberoi, It Is Now Time To Initiate 'MenToo' Movement, Says Pooja Bedi*, OUTLOOK INDIA (Apr.7, 2021, 11:08 AM). [After What Has Happened With Karan Oberoi, It Is Now Time To Initiate 'MenToo' Movement, Says Pooja Bedi \(outlookindia.com\)](https://outlookindia.com/After-What-Has-Happened-With-Karan-Oberoi-It-Is-Now-Time-To-Initiate-MenToo-Movement-Says-Pooja-Bedi).

²⁴ ET Online, *#MeToo: Alok Nath files defamation case against writer-producer*, ET (Apr.7, 2021, 12:00 AM) <https://economictimes.indiatimes.com/magazines/panache/metoo-alok-nath-files-defamation-case-against-writer-producer/articleshow/66192384.cms?from=mdr>.

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Defense: Alok Nath denied all the allegations against him and filed a suit of defamation against Vinta Nanda seeking for a public apology and Rs. 1 as damages²⁵. His wife Ashu also filed defamation suit against Vinta Nanda.

Current status: Following the defamation suit, Vinta Nanda filed an official complaint at Oshiwara PS in Mumbai. The Indian Film and Television Directors Association (IFTDA) issued a notice over harassment allegations against him for which he refused to respond and later he was expelled by the Cine & TV Artists Association (CINTAA)²⁶. The police are likely to close the case due to insufficient evidence to file a charge sheet against the actor.

The MJ Akbar Case²⁷

Accusation: He was accused for sexual misconduct when he was working as a senior editor in various media houses, by several journalists like Priya Ramani, Pallavi Gogai and others under the #MeToo Movement.

Defense: He rejected all the allegations and has in turn accused Priya Ramani of maliciously defaming him. He also denied the allegations of rape made by Pallavi Gogai. He later filed a defamation suit against Priya Ramani.

Current status: The Editors Guild requested Akbar to withdraw his defamation suit but he didn't do so. The case of defamation was filed in Delhi's Patiala House Court where around 20 other journalists came in the support of Priya and urged the court to her them as well. While the case was still pending, M.J. Akbar had to resign from the position as the minister of state for external

²⁵ HT Correspondent, *Alok Nath files defamation suit against Vinta Nanda, demands Re 1 in damages*, HT (Apr. 6, 2021, 10:00 PM) [Alok Nath files defamation suit against Vinta Nanda, demands Re 1 in damages | Hindustan Times](#).

²⁶ Id.

²⁷ <https://www.indiatoday.in/india/story/m-j-akbar-defamation-case-priya-ramani-explains-about-her-article-in-a-magazine-1596723-2019-09-07> last accessed Apr.6, 2021.

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Defence: He challenged the allegations put on him by the victim as well as his co-partners. He then filed a defamation suit against the co-partners and the victim. He claimed Rs. 10 crores as damages. Kangana Ranaut also came in the support against Bahl, seeking the court to take action against him³³.

Current Status: The victim refused to fight against the defamation suit as her allegations were true but the co-partners continued to fight in the court. Meanwhile, they all decided to dissolve their production house. Recently, Vikas Bahl was set free from all the allegations put on him.

Critical Analysis

If the tools available to women to challenge sexual violence against them are tangled within the existing legal framework, what is the way forward? In our country, despite the existence of mechanisms like the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act 2013 or POSH Act, women are still subjected to sexual harassments of all kinds, they continue to exist and thus these mechanisms have been criticized by several activists for their failure as well as blind spots. After all the things a woman goes through, she in the end also subjected to laws which make it incumbent upon her to prove her innocence, with men shouldering zero responsibility. The #MeToo Movement is a reminder to show the inadequacies of the current due process. Defamation suits by accused must be discouraged. In our opinion, the Indian Courts should consider such cases in the nature of Strategic Litigation against Public Participation (SLAPP) suit. SLAPP suits are intended to drain the accused's financial resources by compelling him to incur heavy litigation expenses. In our country, such SLAPP suits are not expressly followed, but after looking at the wider angle of this movement from a woman's perspective, where rape-accused have filed defamation suits against the complainants, they can be considered for such purposes. The law recognizes that a party should be able to defend oneself in a trial without worrying that it will lead to a defamation suit. What about those women who tend to not open up and make allegations which aren't in the context

³³ Shuvrajit Das Biswas, *#MeToo: Kangana Ranaut accuses Vikas Bahl of sexual misconduct*, YAHOO (Apr.6, 2021, 11:02 AM) [#MeToo: Kangana Ranaut accuses Vikas Bahl of sexual misconduct \(yahoo.com\)](#).

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of a lawsuit? Is denying the non-actionable allegation worth risking a defamation suit that opens a can of worms? The defenses i.e. the defense of truth and the defense of privilege may overburden the survivors at times as an accusation of sexual violence is by its very nature “defamatory”. On the other hand, it’s a man’s right to prove himself not guilty if his hands are clean because we have seen circumstances where the platforms given to women are used to take undue advantage. In short, our judiciary as a system has to overcome these obstacles and provide a fair trial to the accused as well as the survivors instead of partially burdening one party.

Conclusion and Suggestion

Some very prominent changes have been brought about by the #MeToo Movement. This movement has brought the suppressed experiences of victims to the lime light and has given them a fresh platform to express what seemed to be inexpressible all these years. While, the men are filing defamation suits to silence this movement and publicly expressing the same. Thereby, it is considered to be a threat to the #MeToo Movement. But at times, the women also take advantage of such movements put false allegations on men, publicly damaging their reputation in the society. Such misuse is also considered to be a threat to the #MeToo Movement. Therefore, concerned measures and recommendations have to be followed in order to eliminate such threats in the near future.

The victim has to be discouraged to publicize the identity of the accused except in special circumstances in order to prevent the defamation of the accused. The government of the country has to make effective laws which allow defamation suit to be filed only after finishing the trial of assault/harassment, so that the pendency of the cases in the court would be reduced. The laws of women protection have to be strictly implemented so as to prevent sexual harassment. The victim should be given the required protection until she is served with the justice. Hence, the above recommendations have to be followed to reduce the threats of the #MeToo Movement and continue to provide justice to the victims as well as to ensure that an innocent person is not punished for defamation.

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