



INSURANCE

Dependents Beyond Legal Heirs Entitled to Compensation: MP High Court

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Introduction

The Madhya Pradesh High Court, in a recent decision in *Smt. Saroj & Others v. Rajendra Prasad Patel & Others*^[1], revisited the meaning of “legal representative” under the Motor Vehicles Act, 1988. The case presented a compelling question whether individuals who are not legal heirs in the strict sense but can prove financial and emotional dependency on the deceased, are entitled to seek compensation for his death in a motor accident.

The Court adopted a liberal and humanitarian interpretation, reaffirming that the Motor Vehicles Act is a beneficial legislation designed to provide relief to victims and their dependents rather than to be restricted by personal law technicalities. The ruling recognizes the changing social realities where relationships and dependency may extend beyond conventional definitions of marriage or heirship, marking a significant development in accident compensation jurisprudence.

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Background of the Case

The case originated from a tragic motor accident that occurred on 8 December 2010. The Ramakant Patel, was travelling with his friend Dileep Ramanuj on a motorcycle when a Bolero Jeep, driven rashly and negligently by the first respondent, collided with them. The impact caused severe injuries to Ramakant, leading to his death during treatment.

Following the accident, a claim petition was filed before the Additional Motor Accident Claims Tribunal^[2], Amarpatan by Smt. Saroj and her daughter. Smt. Saroj was the widow of Ramakant's brother and claimed that after her husband's death, the deceased Ramakant had accepted her and her daughter as part of his family and was supporting them financially and emotionally. She asserted that they were dependent on the deceased and therefore entitled to compensation under the Motor Vehicles Act, 1988.

However, the Tribunal rejected their claim, holding that since Smt. Saroj was not the legally wedded wife of the deceased and her daughter was not his biological child, they could not be treated as his legal heirs. Instead, the Tribunal awarded compensation of ₹2,38,500 to Sant Kumar Patel, the father of the deceased.

Aggrieved by this decision, Smt. Saroj and her daughter filed an appeal before the Madhya Pradesh High Court under Section 173(1) of the Motor Vehicles Act, contending that the Tribunal had adopted an overly technical view and failed to consider their genuine dependency on the deceased.

Legal Issue

The central question before the High Court was:

Whether a woman who is not the legally wedded wife of the deceased, and her daughter not biologically related to him, can be considered “legal representatives” entitled to claim compensation under the Motor Vehicles Act?

Court's Findings

Presiding over the case, Court emphasized that the Motor Vehicles Act is a beneficial legislation aimed at providing monetary relief to victims and their dependents. Therefore, it warrants a broad and liberal interpretation.

Relying on the Supreme Court's decision in *N. Jayasree v. Cholamandalam MS General Insurance Co. Ltd.*^[3], the Court reiterated that the term “legal representative” is not confined to legal heirs alone. It includes any person representing the estate of the deceased or those who can establish financial dependency, even if there is no formal marital relationship.

The Court observed that the evidence clearly showed that the deceased and appellant Smt. Saroj lived together as husband and wife and that the deceased supported both her and her daughter financially. Hence, they were dependents of the deceased and fell within the scope of “legal representatives” under Section 166 of the Act.

Judgment

The High Court:

- Set aside the Tribunal’s order, which had denied compensation to the appellants.
- Remanded the matter to the Tribunal for reconsideration, directing it to pass a fresh award recognizing the appellants as legal representatives and dependents of the deceased.
- Directed the Tribunal to dispose of the matter expeditiously, preferably within three months.

Author’s View

The judgment in *Smt. Saroj & Others v. Rajendra Prasad Patel & Others* represents a progressive and humane interpretation of the Motor Vehicles Act, 1988. By expanding the scope of “legal representative” beyond the narrow confines of legal heirship, the Madhya Pradesh High Court reaffirmed the principle that substantive justice must prevail over technicalities of personal law.

The Court’s approach acknowledges the realities of modern social relationships, where dependency and familial bonds often exist outside the framework of formal marriage. Many individuals, especially in rural and customary settings, live in domestic arrangements that, while not legally recognized, carry genuine emotional and financial interdependence. Denying such dependents compensation merely because of the absence of a formal marital tie would defeat the beneficial and welfare-oriented purpose of the Motor Vehicles Act.

By aligning its reasoning with the Supreme Court’s decision in *N. Jayasree v. Cholamandalam MS General Insurance Co. Ltd.*, the Court has contributed to the evolving jurisprudence of social justice, emphasizing that the focus should be on dependency and loss, not on the formality of relationships. This ruling ensures that the compassionate intent of the Act to provide relief to those who suffer loss due to road accidents is upheld in both spirit and practice.

For more details, write to us at: contact@indialaw.in

[1] MISC. APPEAL No. 3464 of 2012 MISC. APPEAL No. 3464 of 2012

[2] Case No.34/2021

[3] (2022) 14 SCC 712

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