



**A DESCRIPTIVE STUDY ON THE
CONTEMPT OF COURT IN INDIA
WITH REFERENCE TO CASE
STUDIES**

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INTRODUCTION:-

Definition: “Contempt in common language means any wilful disobedience to, or disregard of, a court order or any misconduct in the presence of a court; action that interferes with a judge's ability to administer justice or that insults the dignity of the court as the ethos of contempt reduces the efficacy of reasonable justice to the people.”¹ Contempt of Court is a term related to the conduct of a person during the proceedings of a court or even towards a court or the entire judiciary system. When any person disobeys the orders of the court or undermines the powers of the Court, they can be held for contempt of Court. Such a person may be imprisoned for a brief period and fined along with that. Contempt of Court has often been the point of discussion as there exists a small difference between contempt of Court and Freedom of an individual.

As per Section 2 of The Contempt of Courts Act, 1971, Contempt of Court can be split into Civil and Criminal Contempt. Civil Contempt is when a person disobeys any order or judgment delivered by the Court.² Criminal Contempt is when a person publishes or talks about the court in a demeaning or derogatory manner.³ Mere

criticism or report of a judgment or Court is not to be considered as contempt of court.⁴

Article 129 of the Constitution of India talks about the power of the Supreme Court to punish for contempt. Parallel to the ‘Court of Record’ of Supreme Court, Article 215 talks about the power of the High Court to punish for contempt. Article 142(2) of the Constitution of India also briefly talks about contempt of Court. This article affirms the powers of the Supreme Court to punish a person for contempt.

Essentials of Contempt of Court: 1. In case of civil contempt, the person must have “wilfully” disobeyed the proceedings of a Court.

2. In case of criminal contempt, the ingredient is publication in any form i.e., words, signs or any form of representation.

3. There must be an order of the court which the respondent must have knowledge of.

4. Respondent’s actions must be acted on purpose and must be demeaning to the order given by the Court.

Punishment: As per Section 12(1) of The Contempt of Courts Act, 1971, a person who has been prosecuted for the offence of Contempt of Court can be imprisoned upto six months or be fined upto two thousand rupees, or both. In such a scenario, the respondent must be apologetic for their actions and the apology must be made in good faith. If the apology is conditional, it may be rejected. It is pertinent to note that the Court cannot exceed the punishment stated for Contempt of Court.

¹ Black’s Law Dictionary

² Section 2(b) of The Contempt of Courts Act, 1971

³ Section 2(c) of The Contempt of Courts Act, 1971

⁴ Section 4 and 5 of The Contempt of Courts Act, 1971



A person can only be punished for Contempt of Court if the act performed interferes with the due course of Justice.⁵

REVIEW OF LITERATURE:-

1. Re: Arundhati Roy: “In the offending portion of her affidavit, the respondent has accused the court of proceeding with absurd, despicable and entirely unsubstantiated petition which, according to her, amounted to the court displaying a disturbing willingness to issue notice. She has further attributed motives to the court of silencing criticism and muzzling dissent by harassing and intimidating those who disagree with it. Her contempt for the court is evident from the assertion ‘by entertaining a petition based on an FIR that even a local police station does not see fit to act upon, the Supreme Court is doing its own reputation and credibility consideration harm’. In the affidavit filed in these proceedings, the respondent has reiterated what she has stated in her earlier affidavit and has not shown any repentance. She wanted to become a champion to the cause of the writers by asserting that persons like her can allege anything they desire and accuse any person or institution without any circumspection, limitation or restraint. Such an attitude shows her persistent and consistent attempt to malign the institution of the judiciary found to be most important pillar in the Indian democratic set up. This is no defence to say that as no actual damage has been done to the judiciary, the proceedings be dropped. The well-known proposition of law is that it punishes the archer as soon as the arrow is shot no matter if it misses to hit the target. The respondent is proved to have shot the arrow, intended to damage the institution of the judiciary and thereby weaken the faith of the public in

general and if such an attempt is not prevented, disastrous consequences are likely to follow resulting in the destruction of rule of law, the expected norm of any civilised society.”⁶

2. Justice C.S Karnan vs The Hon’ble Supreme Court of India: “We have given our thoughtful consideration to the factual position noticed hereinabove, as also, the submissions advanced by learned counsel, who assisted us during the course of hearing. We have carefully examined the text of the letters written by Shri Justice C.S. Karnan, from time to time. We have closely examined the suo-motu procedure adopted by him, whereby he passed orders which were derogatory to the administration of justice, before he was issued notice for contempt, by this Court. We have also carefully analysed the orders passed by Shri Justice C.S. Karnan suo-motu (in the purported exercise of the jurisdiction vested in him under Article 226 of the Constitution of India, read with Section 482 of the Code of Criminal Procedure), even after the issuance of the contempt notice to him, by this Court. His demeanour was found to have become further aggressive, after this Court passed orders from time to time, in this case. The contents of the letters addressed by him contained scandalous material against Judges of High Courts and the Supreme Court. This correspondence was addressed to the highest constitutional authorities, in all three wings of governance - the legislature, the executive and the judiciary. His public utterances, turned the judicial system into a laughing stock. The local media, unmindful of the damage it was causing to the judicial institution, merrily rode the Karnan wave. Even the foreign media, had its dig at the

⁵ Section 13 (a) of The Contempt of Courts Act, 1971

⁶ Paragraph 40 of the judgment



Indian judiciary. None of his actions can be considered as bona fide, especially in view of the express directions issued by this Court on 8.2.2017, requiring him to refrain from discharging any judicial or administrative work. To restrain his abuse of suo-motu jurisdiction, a further order had to be passed by this Court on 1.5.2017, restraining Courts, Tribunals, Commissions and Authorities from taking cognizance of any order passed by Justice Karnan.”⁷

3. Prashant Bhushan Case: “We have given deep thought as to what sentence should be imposed on the contemnor. The conduct of the present contemnor also needs to be taken into consideration. In the present matter also not on one occasion but on several occasions, we not only gave opportunity but also directly or indirectly persuaded the contemnor to express regret. Not only that the learned Attorney General had also suggested that it was in the fitness of things that a contemnor expresses regret and withdraws the allegation made in the affidavit in reply, which request was not heeded to by the contemnor. The contemnor not only gave wide publicity to the second statement submitted before this Court on 24.08.2020 prior to the same being tendered to the Court, but also gave various interviews with regard to sub judice matter, thereby further attempting to bring down the reputation of this Court. If we do not take cognizance of such conduct it will give a wrong message to the lawyers and litigants throughout the country. However, by showing magnanimity, instead of imposing any severe punishment, we are sentencing the contemnor with a nominal fine of Re.1/ (Rupee one).”⁸

4. R.K.Anand, The Concept of Contempt of Court in India (2012)- The researcher discusses the concept of contempt in India. The researcher looks into the various kinds of contempt of court in our country, the procedure that must be followed in contempt cases, the judgments delivered by the Court and the current thought process regarding the concept.

RESEARCH PROBLEM:-

Contempt of Court is an offence where a person disobeys or disrespects any decision or judgment delivered by the Court. Showing disrespect towards the court and willingly disobeying the court attracts Contempt of Court proceedings. This concept has been highly criticised lately. The reason being, seeing the current cases of contempt, it is clear that the court has been over-sensitive regarding matters that allegedly concern them. Every citizen is entitled to freedom of speech. It's in the human nature to give opinions, especially regarding controversial matters. In the recent times, it has been noticed by several authorities of the Court itself that judges have been misusing the jurisdiction of contempt. Seeing the current scenario, if the judiciary continues to demonstrate their power in such a manner, they would only instil fear and invade the right to freedom and speech of a common man. Incorrect judgments would only lead to more criticism of the judiciary until the branch has lost respect of its own people. The judiciary must not demand respect, it must earn it. Unless and until the common man has faith in the judiciary, the judiciary is powerless. The researcher aims to look into the recent case laws and analyse the approach taken by the judiciary.

⁷ Paragraph 33 of the judgment

⁸ Paragraph 92 of the judgment



RESEARCH QUESTIONS:-

1. How did the concept of contempt become legitimate in India?
2. What are the laws of contempt in countries such as USA and UK?
3. Whether the judiciary has applied the contempt laws incorrectly?
4. Whether Contempt of Court goes against the Freedom of Speech and should be abolished as a law?

RESEARCH OBJECTIVES:-

1. To examine the law of contempt in the United States and United Kingdom.
2. To highlight the flaws of Contempt laws.
3. To analyse various case laws of Contempt of Court.
4. To discuss the role of media in Contempt cases.

STATEMENT OF HYPOTHESIS:-

The researcher hypothesizes the meaning of Contempt of Court and the variety of judgments delivered by the Courts based on the same concept. Additionally, the researcher highlights the flaws in the concept.

CHAPTER I: ORIGIN OF CONTEMPT OF COURT

During the rule of Kings in India, there was an existing rule where no council could go against the King. If they did, they would face consequences for the same. It can be said that India had the system of contempt since a long time, but it had not been recognised for a while. The Monarch at the time was considered the highest judge of justice, much like the Supreme Court in the present day (under Article 129 and 142 of the Constitution of India). Contempt of Court ensures that anyone abusing the powers and the spirit of judiciary would be held liable for the same.

Our contempt laws have been created after looking for laws from other countries. The Contempt of Court Act, 1926 was the initial act that provided contempt laws for the first time in the state of Rajasthan and Saurashtra. Later, this act was repealed by the Contempt of Court Act, 1952. This act was the first act which brought about contempt laws in the country. Even after this act was enacted, there was a lot of underlying issues and ambiguity as to the definition of contempt.

Soon, the government realised that the act needed changes and therefore, a special committee was formed to look into the act. This committee was formed by H.N.Sanyal in the year 1961. A report was submitted in 1963 which led to formation of the current act, The Contempt of Courts Act, 1971. This act deals with civil contempt as well as criminal contempt in a different manner.

The Act of 1971 brought in several improvements. The term 'Contempt' was defined under this act. There was a clear distinction between Civil and Criminal Contempt. This act gave various situations when it cannot be considered contempt of court. The Act also lays down limitations where it is not applicable.

CHAPTER II: COMPARATIVE STUDY

1. United States:-

Title 18 U.S.C. §§ 401 talks about the Power of Court. It states the categories under which a person can be prosecuted for the offence of Contempt of Court. A person who misbehaves and causes any hurdles in the administration of justice would be held liable under this code. An officer misbehaving in their official capacity can also be held liable for contempt of court. Lastly, a person who disobeys the command of a court may be



punished for contempt. It is important to note that such a person must “wilfully disobey” the process or order given by the Court.

Punishment: A fine for contempt must be paid proportionate to the damage caused. The maximum amount of fine paid does not exceed more than \$1000. A person can be imprisoned for a period of six months.⁹

Criticism: The laws of contempt are criticized in the United States due to the absence of jury in criminal contempt matters.

2. United Kingdom:-

Contempt of Court in the United Kingdom¹⁰ is considered when a person's actions influence a trial in an unjust manner. Such an action must affect the outcome of a trial. Therefore, it includes creating a nuisance in the court, disobeying the court, and commenting on an ongoing trial on public platforms such as newspapers and social media.

In the United Kingdom, media is allowed to criticise the judiciary as long as they present reasonable arguments for their statements.

Commenting on an ongoing trial would be considered as contempt in the following situations-

- i) when a person comments on whether they believe a person is guilty or not.
- ii) when they refer to the previous charges on a person
- iii) when a person names an anonymous person from the trial
- iv) when a person reveal the identity of offenders under the age of 18 years.
- v) when a person reveals the identity of sexual harassment victims
- vi) when a person shares evidence of a private case

Punishment: If a person is found liable for contempt, they could be imprisoned for a period of 2 years or be fined a sum, or both.

CHAPTER III: IMPACT OF MEDIA IN CONTEMPT CASES

In the recent times, the influence of media has been evident. Media has been actively involved in court proceedings. They have been spreading awareness regarding issues that require the support of the society as a whole. Media has the right to press under Article 19(a) of the Constitution of India and are considered the fourth pillar of democracy.

With the increasing number of public platforms, the impact of media has proportionally increased. Social media also plays an important role as to how people view the news with a different approach. Media has successfully gained a following after getting justice to the victims of many, many cases. Such cases would have been left uncovered if the media had not intervened. Media does not create hurdles for the judiciary, but they speak for the citizens and demand for justice that every citizen has a right to obtain.

In the past, media has successfully highlighted people that have been in contempt of court. These people are often classified as influential people that are not held liable for their actions due to their powers or reputation. Media highlights this misuse of position and has identified such people. Example- Justice CS Karnan, Arundhati Roy, etc.

In the above cases, the media enlightened people regarding the offence committed by the people, the underlying issues behind their

⁹ 18 U.S.C. § 402- Contempts constituting crimes

¹⁰ United Kingdom's Contempt of Court Act, 1981



contempt, and the proceedings of the case until the final verdict.

In the chapters ahead, the researcher would discuss case laws of Contempt of Court and their application.

CHAPTER IV: RE: ARUNDHATI ROY CASE¹¹

Facts: The respondent in this case is a writer and an activist. The respondent had written an article regarding orders given by the Court in the petition filed by Naramada Bachao Andolan in the Outlook Magazine called 'The Greater Common Good' and partly in her book as well. The respondent's article mainly raised concerns regarding the environmental impact of constructing a dam as well as the people that would have to abandon their land for the government construction process. It also included the resentment of the respondent towards the order of the court to increase the height of the dam. Several protests were held and the respondent had actively taken part in them. After reading the article written by the Respondent, the Court felt it was a "misrepresentation of Court proceedings" and "tends to interfere with the administration of justice". Another allegation was later put upon the respondent in Contempt Petition No.2 alleging that the respondent assaulted, attacked and abused the petitioners.

In the affidavit, the respondent mentioned the hypocrisy of the Court. In one of her averments, the respondent mentioned how the Chief Justice of India did not allow a single judge to look upon the judicial enquiry into the Tehelka scandal, but have an ample amount of time to hold activists for contempt

of court. The respondent commented on how the judiciary believed in intimidating those who fail to agree with the Court. By doing so, the judiciary would be harming their own reputation.

Reasoning: The Court believed that the respondent had committed the offence of Contempt of Court. The judges believed that despite her initial actions, the respondent demeaned the court in her affidavit as well. As per the Court, the respondent portrayed the court to be her enemy and as though the "judiciary was carrying out a personal vendetta" against the respondent.

Therefore, when the Court asked the respondent to show cause as to why she should not be held liable for contempt, the respondent reverted claiming her right to freedom of speech. The respondent further mentioned that as a writer, she is entitled to her views and opinions and in no way are they disregarding the authority of the court. The respondent further went on to explain her article and point out the hypocrisy of the judiciary in case of the Tehelka scandal. The respondent refused to apologise for her actions as she believed that she had been dragged to court on false charges.

Judgment: The respondent was convicted by the Supreme Court for contempt and was sentenced to imprisonment for a day and had to pay two thousand rupees as a fine.

Analysis: The principles of Natural justice demands speaking order. Speaking order is when a party is fairly heard and then the case is decided. In this case, the Supreme Court turned a blind eye to the respondent and did not give the respondent a fair chance to put

¹¹ AIR 2002 SC 1375



forth her case. Not to mention the fact that the Supreme Court did not take into consideration other important national interests of the country and decided to waste their time in a contempt case against the respondent. The actions taken by the Supreme Court in this case show us the glaring and obvious issue with the Contempt laws.

In the case of P.N.Duda vs P. Shiv Shankar¹², the respondent was a minister at the time and had formerly been a judge of the High Court. The respondent had critically expressed his opinions regarding the Court. The Court in this case held that since the respondent was a former judge, his statements could not be considered demeaning to the system. Through this case, the court makes a clear distinction between people belonging from the judicial background and the common man. This divided approach of the court is an attack to the right of equality that has been promised by the judiciary, time and again. The Supreme Court in the present case observed that the respondent (Grundhati Roy) had no working knowledge in the field of law nor has she made any study regarding the same and therefore, can be held liable for her actions. Once again, the court violates the rights of a citizen to their free speech.

Not only did the Court convict the respondent for contempt, they illegally imprisoned her for one day on the grounds that the contempt committed by the respondent had interfered with the due course of judgment. In retrospective, this judgment reflects a poor image of our judiciary and our laws.

A parallel case in the United States would be New York Times vs Sullivan¹³. In this case, the court held that the government policies

and officials can be criticised by the press, thereby broadening the scope of free speech. The court further held that errors made by the press cannot be considered as mala fide and therefore, should not be used for contempt suits. The Court further clarified in this case that only wilful statements made with a malicious intention could be the ground basis for a contempt suit.

CHAPTER V: JUSTICE C.S KARNAN VS THE HON'BLE SUPREME COURT OF INDIA¹⁴

Facts: Justice Karnan has time and again been involved in a controversy regarding his behaviour. His behaviour towards his peers can be called as ruthless. In the year 2014, he openly wished to file an affidavit as he believed the appointment of certain judges was unfair and unjust. He has also caused interruption during ongoing proceedings in the Madras High Court. The Supreme Court did not agree with this contemptuous behaviour, but kept silent on the matter. In August, 2014, Justice Karnan commented on the unjust appointment of the Chief Justice of Madras High Court. Frustrated by the behaviour of Justice Karnan, 20 judges sent a memorandum to the Chief Justice of India asking him to transfer Justice Karnan.

In January, 2017, Justice Karnan wrote an open letter addressed to the Prime Minister naming 20 judges (including retired judges) and accused them for being involved in corruption.

In May, 2017, Justice Karnan held the CJI Jagdish Singh Khehar and seven other judges of the Supreme Court, guilty under the SC/ST Atrocities Act, 1989 and sentenced them for

¹² 1988 AIR 1208

¹³ 376 U.S. 254 (1964)

¹⁴ AIR 2017 SC 3191



five years or imprisonment. A day later, a seven judge bench of the Supreme Court along with the CJI ordered Justice Karnan to be arrested for the offence of Contempt of Court. They believed that Justice Karnan had become a threat to the judicial system and kept questioning the legitimacy of the system. Justice Karnan was subsequently transferred to the Kolkata High Court.

Judgment: The Supreme Court in their judgement against Justice Karnan state that he has lost all his judicial powers. The Court states that Justice Karnan had been given multiple opportunities to be heard, but his conduct made it clear that his intentions were mala fide. Therefore, Justice Karnan was found guilty for his actions and was sentenced for a period of 6 months. The maximum punishment a person gets for contempt is a period of 6 months.

Analysis: It is clear from Justice Karnan's actions that he was in contempt of court. Not only did he deliver judgments that were in bad taste, but also challenged the working of judiciary from time to time. Justice Karnan went to the extent of sentencing the Chief Justice of India, imprisonment for a period of five years. He challenged the authority of his seniors. Justice Karnan was clearly a misfit for the position of a judge. The Supreme Court in their judgment held that Justice Karnan would be stripped off his judicial duties. This order passed by the Court does not give enough clarity on the issue. This order is unclear and does not go hand-in-hand with the Constitution. As per Article 124 (4), a judge can be removed only by attaining majority vote in the Parliament. The decision of removal of a judge is of the Parliament, not

the judiciary. Therefore, when the Court gave their orders of taking away the judicial duties of Justice Karnan, it is not clear whether he would still be considered a judge or not. He cannot be a judge as his judicial duties were taken away, but he cannot be removed as the judge since the judiciary holds no power in impeachment of a judge. This inconsistency is important to be addressed as the Supreme Court themselves passed this order and if the highest form of justice creates ambiguity, we cannot expect any better from the lower courts. Even though the court has the power of suo motu, it cannot be at odds with the Constitution. The Court here sets a precedent that is grave and dangerous. When there is a disparity, the precedence must be given to the Constitution.

CHAPTER VI: PRASHANT BHUSHAN CASE¹⁵

Facts: Prashant Bhushan has been an advocate for more than 30 years. He practises in the High Court of Delhi and Supreme Court. Mr. Bhushan has been vocal about his opinions regarding legal matters. He has been well-known for highlighting important public issues by way of grievances, PIL petitions that are filed or argued by him. In the past, he has made controversial statements regarding the Supreme Court and the judges. In 2009, he commented that most of the previous 16-17 CJIs had been corrupt officials. Due to his constant criticism of the judiciary, Mr. Bhushan has consistently managed to gain a spot in the limelight.

This year, 2020, Mr. Bhushan tweeted the following-
“CJI rides a 50 Lakh motorcycle belonging to a BJP leader at Raj Bhavan Nagpur, without

¹⁵ SUO MOTU CONTEMPT PETITION (CRL.)
NO.1 OF 2020



a mask or helmet, at a time when he keeps the SC in Lockdown mode denying citizens their fundamental right to access justice!”

“When historians in future look back at the last 6 years to see how democracy has been destroyed in India even without a formal Emergency, they will particularly mark the role of the Supreme Court in this destruction, & more particularly the role of the last 4 CJIs.”

A person known as Mahek Maheshwari filed a petition before the Supreme Court praying to initiate contempt proceedings against him. On review of the tweets, the court took suo motu cognisance of the matter and therefore, issued a notice to Prashant Bhushan. This notice was sent to him to show cause as to why he should not be held for contempt of court.

Judgment and Reasoning: The Supreme Court believed that the tweets were in bad taste and they lower the authority of the court. The Court further stated that the tweets were not only in relation to the judges but the Supreme Court as a whole. The Court asked Mr. Bhushan to apologise to the Court and express regret, but to no avail. Mr. Bhushan believed that if he retracted his statement, he would consider that as contempt of his conscience as he holds the institution in highest esteem.

The Court is of the belief that when a contemnor refuses to express regret and stand by their statement, it further brings down the reputation of the Court. Therefore, the Court sentenced Mr. Bhushan with a nominal fee of one rupee. If he failed to deposit the sum with the Registry of the Court, he would be imprisoned for a period of 3 months and his

practising license would be suspended for three years.

Analysis: This case shows us a trend that has been followed by the judiciary since the dawn of time. The judges have liberally made use of their suo motu rights to punish people that they have a personal agenda against. The Court holds people in contempt who have only been exercising their right to freedom of speech. The judges must accept constructive criticism or avoid any such cases that suit their own personal vendetta. Forcing people to stay silent on matters by way of contempt is only going to give birth to more contempt. Although Mr. Bhushan has been a critic of the judiciary, he has also served the system since the past 30-35 years. As per the judgment given in the case of P.N Duda vs P. Shiv Shankar¹⁶, since the respondent was a former judge, he was not held for contempt even though this statements were clearly contemptuous. Setting this case as a precedent in this case, Mr. Bhushan is also a judicial officer and should be given the rights to criticise the judiciary. This case clearly shows the personal bias of the judges that delivered the judgment in this case. Constructive criticism has been an important part of democracy. However, judges have failed to understand this concept. A person is held for contempt when their conduct interferes with the working of the Court. Here, it is clear that the statements did not interfere with the Court in any way. The comments made by Mr. Bhushan did not affect the public opinion of the Court either. It is essential that before proceeding with any contempt petition, the Court must look into the matter and distinguish whether the statements made result into demeaning the

¹⁶ Supra Note 12



authority of the court or personally attack the judges of said court.

CONCLUSION AND SUGGESTIONS:-

Contempt of Court is a term related to the conduct of a person during the proceedings of a court or even towards a court or the entire judiciary system. When any person disobeys the orders of the court or undermines the powers of the Court, they can be held for contempt of Court.

Contempt of Court is used as means by the judiciary for uplifting the dignity of the court and to make sure the public does not question the legitimacy or credibility of the judiciary in India. The image of the court in minds of the public must not be brought down. It must be pertinent to understand that contempt is related to the court and not the seat that occupies the court.

The punishment for contempt relies on two fundamental rights which is right to freedom of speech and right to personal liberty. There is no straight jacket rule to determine whether or not a statement was made under the rights of Article 19(2) i.e., Freedom of speech and express or whether it was an exception to the article i.e., Contempt of Court. There can be no strict rule as the background of every case is different.

In case of contempt, the judiciary must be able to recognise the whether a decision would violate the fundamental rights of an individual or whether it would plunge the image of the Court.

Any action which covers the inefficiency of the judiciary must be sanctioned. Contempt of Court was introduced so that the people of the country have faith in the system, but the

current cases that have been analysed in this paper have only created fear in minds of the citizens. The judiciary must understand that if people lose their faith in the system, the courts would have no meaning left.

There are several lacunas that have been looked past in the contempt laws. The lower courts must also have the power to contempt, as long as the provisions allow a fair hearing. The Courts must realise that although the court has the power of suo motu, it cannot be at odds with the Constitution. In such cases, the Court sets a precedent that is grave and dangerous. When there is a disparity amongst laws, the precedence must be given to the Constitution.

Constructive criticism has been an important part of democracy. However, judges have failed to understand this concept. It must be introduced as a concept so that the judiciary does not hold responsible every person that comments on any order given by the Court.

It is essential that before proceeding with any contempt petition, the Court must look into the matter and distinguish whether the statements made result into demeaning the authority of the court or personally attack the judges of said court.
