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Un-Constitutionalism of the British Raj

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Abstract. This research paper examines the concept of constitutionalism in the context of British colonial rule in India, focusing on the narrative of Saadat Hasan Manto. Constitutionalism, as a principle, advocates for limited government power and adherence to legal constraints, encompasses civil rights, freedom of expression, equality, and due process of law as safeguards against state abuse. Manto's firsthand experiences of the Empire's atrocities reveal the exploitative nature of the laws enforced during colonial rule. Rather than upholding the basic human rights of the native population, these laws were designed to suppress dissent and legitimize the colonizers' dominion. The research centers around Manto's short story, "Nayā Qānoon" (The New Constitution), which takes place against the backdrop of the Government of India Act 1935. Employing a New Historicist approach, this study examines "Naya Qanoon" alongside the Act of 1935 and relevant historical documents. By critically analyzing the narrative, contextualizing it within the broader socio-political climate of the time, and scrutinizing the intentions behind the British Empire's laws, this research aims to shed light on the unconstitutional nature of the colonial regime. This research aims to enhance our understanding of the Empire's exploitative mechanisms and their impact on the civil rights of the native population.

Keywords. Constitutionalism, Resistance, Civil Rights, Progressive Writers, Urdu Progressive Writers.

Saadat Hassan Manto, one of the most renowned short story writers of South Asian literature, was born on May 11, 1912, in Sambrala, a village in the Ludhiana district of Punjab. Coming from a family of Kashmiri descent that had settled in Punjab for generations, Manto grew up during a tumultuous period marked by significant political events. As a young child, he witnessed the devastating massacre at Jallianwala Bagh in 1919, which left an indelible impact on his consciousness (Flemming 2-4). The revolutionary activities and Marxist ideas that permeated the atmosphere of

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Punjab during that time became sources of inspiration for Manto, as evident in his essay "Bari Sahib" (Mr. Bari).

Manto holds a notable position in the literary landscape, distinguished by his vivid depiction of reality, profound psychological insights, and incisive critique of politics and so-called socio-religious norms (Azeem 1). Manto deliberately departed from traditional storytelling conventions by choosing protagonists from the margins of society, such as prostitutes, thieves, and daily wage workers. However, this unconventional approach garnered him criticism and led to legal trials (Naim; Coppola 12). For Manto, the role of a writer was that of an observer, tasked with portraying life in all its harsh and unvarnished reality. He believed that the purpose of literature was not to present an idealized version of life but to capture it as it truly is, stirring readers to engage with the political and social realities around them. Manto's philosophy of literature, as articulated in his own words, underscores its role as a mirror to society's ailments and triumphs. Through his assertion that "Literature is not a sickness, but rather a response to sickness. It is also not a medicine. Literature is a measure of temperature, of its country, of its nation. It informs of its health and sickness" (Quoted in Flemming 32).

Manto positions himself in alignment with the progressives' view of literature as a tool for societal critique and reform but his relationship with the Progressive Writers' Association encapsulates a complex interplay of ideological alignment, reluctant engagement, and eventual divergence.

Manto's encounter with the Progressive Writers' Movement occurred during his time in Bombay, where he frequented meetings and engaged with the progressive ideas propagated by the Urdu Progressive Writers Association. Flemming notes that "Manto was in substantial agreement with the aims of these organizations, at least as they were initially expressed" (Flemming 10). but his reluctance to formally join reflects his commitment to literary independence. Perhaps it was Manto's reluctance to formally align himself with the Urdu Progressive Writers that led to criticism from the progressives on his short stories. Flemming's observations highlight how Manto's divergence from the progressive orthodoxy earned him ridicule and, at best, grudging acceptance from progressive critics (Flemming 11).

Manto's dissatisfaction with the PWM became evident when his post-partition work, "Siyāh Hāshiye", was branded as reactionary by progressive writers, and which he declared in very clear words typical of Manto: "Finally, I want to say that I don't care at all about 'Progressivism', but the back-and-forth leaps of famous Progressives hurt a lot." (Manto, *Chughad*, 175). His clear disavowal of 'Progressivism' and frustration with the

oscillating attitudes of prominent progressives underscored his commitment to his own artistic vision.

In 1945, two years after the publication of *Dhuāṉ*, Manto's rift with the Progressives became visible when Sajjad Zaheer wanted to publicly condemn him for his short story "Boo" at the All-India Conference of Urdu Progressive Writers held at Hyderabad (Jalil 46). It is interesting to note that the same people who defended *Aṉgarey* became critical of Manto's stories which were not very different in theme from their own work. Manto was an artist who wrote on impulse and he did not recognize his work to align clearly with the manifesto of any literary movement. As he aptly expressed his stance in the following words:

> At first, the Progressives said Manto was one of them. I said, fine. Now the *ḥalqa-e arbāb-e zauq* people have made me one of their members. I say, fine. If anyone should ask me what group l am in, I will say that I am alone, in every respect alone. I will give up writing the day my twin is born, although I do not object if some group is proud to include my name on its list (Quoted in Tufail 22).

This sentiment underscores Manto's dissatisfaction with the progressives and other writers' associations, revealing his staunch belief in artistic freedom and independence. Despite external attempts to bind him within the confines of literary manifestos, Manto remained resolute in his commitment to writing on impulse, guided solely by his own creative instincts.

One distinguishing aspect of Manto's style is his use of straightforward, unadorned language in his narratives. Despite the apparent simplicity of his language, Manto's works are rich with layers of depth and nuance, inviting readers to delve deeper into the complexities of his narratives. As Waqar Azeem aptly notes: "Manto has the simplest words for the most intense emotions, and the words are arranged in such a manner that renders simplicity to the sentence structure but enhances its meanings" (Azeem 36). Manto's seemingly uncomplicated prose serves as a vehicle for exploring complex themes and exposing the intricacies of human experiences. Furthermore, his portrayal of characters delves deep into their inner psyche, revealing the complexities of human nature.

Manto's progressive approach is normally associated with gender politics, which also gained him popularity, but he is not limited to that. He has a very clear anti-colonial sentiment that received comparatively less attention than his other works. His uncompromising stance against colonial oppression is vividly portrayed in his stories which expose the brutality of

the British Empire. In particular, his stories "Tamāsha" (The Fair) and "1919 Kī Ek Bāt" (An Incident of 1919) serve as powerful reminders of the violent methods employed by the colonial power to quash the peaceful protests of Indian citizens against the oppressive Rowlatt Act.

"Tamāsha" (The Fair) was the first short story written by Manto in 1934. It was published in a newspaper *Khalq* (Creation) edited by Abdul Bari Alig. Later on, it was published along with a few other stories in a collection named *Ātish Pārey* (Sparks) in 1938. Narrated through the innocent eyes of a six-year-old boy named Khalid, the story depicts the escalating tensions in Amritsar following the Rowlatt Act of 1918. The Act, triggering nationwide protests, led to a critical situation in Amritsar. The city was handed over to Brigadier-General Dyer by the civil government with a note from deputy commissioner Miles Irving saying, "No gathering of persons nor processions of any sort will be allowed. All gatherings will be fired on. Any persons leaving the city in groups of more than four will be fired on" (Colvin 165). The city witnessed a strict curfew and a ban on public gatherings, mirroring the events described in Khalid's experience: closed shops, deserted streets, and school closures.

The story begins with Khalid talking to his father about the planes that keep flying over the houses all day long. He expresses his desire to fire at the planes with his toy gun. He finds himself captured in an unusual situation where he is not allowed to go outside, the shops are closed and the people have abandoned their activities because of the curfew. He is bored and sits at the window but only finds empty streets and market. Unable to grasp the situation, Khalid expresses his desire to attend school, only to be met with the news of unexpected holidays. To find a clue of the situation, the young boy asks questions from his father but he is pacified with fabricated stories. A plane drops pamphlets stating a ban on political gatherings but the adults shield Khalid from the truth by fabricating a story about a fair from the pamphlets which actually announce the ban. This fabricated story fuels his excitement, and he eagerly anticipates a visit to this imaginary event. In the evening, he sees a lot of people going towards the ground and then he hears loud reports of guns. Rushing to the window, Khalid witnesses a young boy lying wounded on the street, a sight that leaves him traumatized. This juxtaposition between the child's excitement and the brutal reality becomes a powerful indictment of the violence. By using a child's viewpoint, Manto offers a poignant portrayal of the Jallianwala Bagh massacre's devastating impact, particularly on the vulnerable population.

The second story, "1919 Kī Ek Bāt" (A Tale of 1919) is set in the back drop of protests ignited by Rowlatt Act offers a scathing critique of British

colonialism in India. Narrated by an unnamed traveler on a train, the story centers on Thaila Kanjar, a young man from a family of prostitutes. Manto utilizes a powerful narrative device_ a first-person narrator of unknown reliability. This technique allows him to explore the emotional response to the events rather than provide a purely objective account.

In this story Manto depicts the violent strategies employed by the British Empire to suppress the peaceful protests against the infamous Rowlatt Act. The unnamed narrator tells the story of a peaceful protest that was being held in Amritsar in front of the city hall. Thaila emerges as a leader, mobilizing the crowd towards the city hall. He walks ahead of the crowd and talks passionately against the Rowlatt Act. However, he is met with brutal violence as the British cavalry opens fire on him from a very close range. The first bullet pierces his chest, but he does not stop and turns round to encourage the crowd to come forward. The second bullet hits his back and the third again hits the chest. Despite being wounded, Thaila displays remarkable defiance and engages with a soldier on horse taking him down and grasping his neck. According to the narrator, when his dead body was separated from the soldier, his hands were still grasping his neck and the soldier was dead too. In the whole incident six Europeans are killed and a lot of protestors lose their lives to the firing of the cavalry. Manto's narrative takes a particularly disturbing turn when the British officers, in a grotesque act of revenge, exploit the vulnerabilities of Thaila's sisters. The narrator goes on to tell that after getting the dead body of Thaila pierced with bullets, his sisters were ordered by the British officers to attend their party as prostitutes and present a dance to take revenge for the act of their brother against the empire. The prostitute sisters had no other way but to follow the orders. This incident serves as a potent symbol of colonial cruelty, highlighting the humiliation and subjugation inflicted upon marginalized communities.

Manto's literary oeuvre thus stands as a powerful testament to his unwavering commitment to exposing the injustices perpetuated by colonial forces and advocating for the freedom and dignity of his fellow countrymen. Mohammad Asim Siddiqui is on the point in his statement, "All through his writings, Manto evinces a critical attitude to any kind of power which results in the subordination of an individual, a class or a nation" (Siddiqui 5).

This research paper focuses on one of his short stories, Naya Qanoon (The New Constitution), to explore the powerful anti-colonial sentiment while simultaneously shedding light on his political vision. In this story, Manto skillfully problematizes the constitutionalism of the British empire, exposing how it was manipulated to exploit and suppress the rights of the

subject people rather than safeguard their most basic rights. By illuminating this disconcerting reality, the author invites readers to critically examine the historical context and intricacies of colonial rule, challenging conventional notions and encouraging a deeper understanding of the complex dynamics between colonizers and the colonized.

Saadat Hasan Manto's short story, The New Constitution, written in the backdrop of Red Shirt Movement in the Frontier, offers a poignant exploration of disillusionment and the complexities of colonial power dynamics in pre-independence India. Through the story of Ustad Mangu, an illiterate t*onga-wala,* Manto weaves a tale of misplaced hope and his profound disillusionment with the promise of the Government of India Act 1935.

Mangu, despite lacking formal education, aspires to be politically informed. His political awareness, however, is a warped construct, pieced together from overheard conversations with his passengers_ lawyers and students. These snippets of information, filtered through his own dreams and grievances, morph into grand narratives that bear little resemblance to reality. His illusions about the new constitution are the outcome of one such incident when he heard two barristers talking about the new constitution, being promulgated on 1st April 1935, that will bring reforms in the electorate.

Mangu's deep-seated animosity towards the British, stemming from unpaid fares and personal mistreatment by a soldier, fuels a strong belief in the constitution's transformative power. He becomes an enthusiastic advocate, spreading his embellished version of the new constitution among his peers, weaving in his personal desires for social and economic justice. Mangu is inspired by Marxist ideas and aspires social equality due to which he thinks that this exploitation will end as soon as the new constitution is implemented.

The arrival of 1st April, 1935 marks a turning point for Mangu and he eagerly awaits for it. The long-awaited day finally arrives and he starts with new zeal, patting his horse and putting a new plume on its head, he heads towards the district courts to see the new constitution being implemented. He is filled with a newfound sense of empowerment and entitlement believing himself to be immune to the injustices he previously endured and considering himself a free man who has respect. While waiting for customers in cantonment, he encounters the same British soldier who had assaulted him and emboldened by his imagined liberation, demands his rightful fare which angers the British soldier. The ensuing altercation becomes a symbolic clash: Mangu, fueled by his misconceptions about the new constitution, believes he now possesses the power to challenge

authority figures previously untouchable. His "victory" reinforces his delusion, leading him to proclaim the supremacy of the non-existent law.

The authorities are called, and Mangu's euphoria is shattered by the arrival of the police and his subsequent arrest. In the confines of the lockup, he continues to invoke the power of the "new constitution," till a police officer reprimands him, disclosing that there is no new law. The brutal reality of colonial power structures dawns on him as a police officer punctures his inflated sense of freedom. The revelation that no new constitution exists leaves Mangu disillusioned and exposed and his aspirations for social and political change remain unfulfilled.

The New Constitution transcends a simple story of a misguided individual. By employing a darkly humorous tone and focusing on a marginalized protagonist, Manto exposes the devastating effects of colonialism not just on the political landscape but also on the psyche of the colonized. The idea of the 'New' plays with the psyche of the colonized creating an impression of something better than the previous one and serving as a ray of hope, while the colonizer uses constitutionalism as a tool of exploitation, perpetuating its colonial dominance over the subject people rather than safeguarding their rights.

Constitutionalism can be defined as the doctrine that governs the legitimacy of government action, and it implies something far more important than the idea of legality that requires official conduct be in accordance with pre-fixed legal rules (Barnet 5). This suggests that the government should be legally limited in its powers and its legitimacy is dependent on it observing these limitations. Furthermore, the spirit of constitutionalism suggests: supremacy of the Parliament, the distribution of power, respect for civil rights while exercising power, and the accountability of the government by the citizens (Barnet 6). This means that the laws are designed by the parliament, which is the source of power of masses, and these laws are designed in a way that they distribute power among the pillars of state_ legislative, executive, and judicial and impose certain limits on them which are manifested in the form of civil rights, freedom of expression, equality, and due process of the law. In other words, constitution ensures the rights of the people who are threatened by the unlimited power of the laws imposed by the government.

In the light of the above discussion on constitutionalism, it is argued that the British Empire strategically employed the façade of constitutionalism to mask its true intention of maintaining colonial control and suppressing the aspirations of the Indian people. Instead of serving as instruments of justice and protection, these constitutions were viewed as cunning language traps, deceiving the natives into believing they were

governed by the rule of law rather than brute force. The colonizer seeks to gain control over the minds of the natives in addition to their resources and Ngugi observes that by dictating language, culture, and self-perception, colonizers ensured their dominance wouldn't be challenged (Thiong'o 16). Language then, itself becomes a tool manipulated by the Empire, with the deliberate use of legal vocabulary to legitimize their otherwise illegitimate presence on Indian soil. A glaring flaw of these constitutions was the blatant disregard for civil rights and limitations on power. Rather than upholding the principles of individual freedom and checks on authority, the laws were meticulously designed to exert unchecked dominion over the indigenous population. The true essence of constitutionalism, encompassing accountability, respect for individual rights, and the dispersion of power, was conspicuously absent from these imperial constructs to perpetuate the unbridled power of the imperial rulers over the natives, perpetuating a system of subjugation and exploitation. An abridged analysis of all these constitutions further substantiates this claim.

The Government of India Act 1858 was the first constitutional step taken by the British Empire. It was only designed to legitimize British involvement in India. The Act established the office of the Secretary of State, who became the key figure in governing British India. This centralization of power served to consolidate the Empire's control and streamline administrative functions. However, the Act's primary objective was not to grant constitutional rights or protect the interests of the Indian population. Rather, it aimed to reinforce and formalize the British Empire's dominance over India through a veneer of constitutional legitimacy.

The second Act implemented by the British Empire, the Indian Councils Act 1861, purported to introduce Indian representation in the decision-making process of the executive council. It stipulated that the size of the Governor General's executive council should be expanded, with the addition of six to twelve Additional Members from India. However, these Additional Members were granted no real power or authority; they were devoid of the ability to question or propose resolutions (Saeed 39). While on the surface it appeared to be a step towards including Indians in the executive decision-making, it was essentially a façade as the following analysis of the constitution shows.

It is interesting to note that the Governor General handpicked the Additional Members, turning the council into more of a Durbar, or courtly gathering. Furthermore, the individuals chosen as Additional Members primarily consisted of Indian princes, landowners, wealthy merchants, and retired officers who did not truly represent the interests and aspirations of the native population. A glaring example of this lack of genuine

representation was evident in the Vernacular Press Act of 1878, also known as the Black Act or Gagging Act. None of the Additional Members opposed this act, which empowered magistrates to seize the assets of any vernacular newspaper that published critical reports or commentaries against the British Empire.

The Indian Councils Act of 1861 and the subsequent Vernacular Press Act of 1878 exemplify the British Empire's deceptive approach to Indian representation in the Executive Council. While the former created an illusion of inclusivity by appointing Additional Members, their lack of authority and the biased selection process highlighted the absence of genuine representation for the Indian populace. The latter act further exposed the flawed nature of Indian participation in decision-making, as none of the Additional Members voiced opposition to the repressive measures against the vernacular press (Saeed 40). These instances underscore the strategic manipulation of constitutional instruments by the British Empire to maintain control and suppress dissent, rather than truly involving Indians in the governance of their own country.

The Indian Council Act of 1892 marked a cautious extension of the previous 1861 Act by further increasing the number of Additional Members in the executive council to a range of at least ten to sixteen individuals. Unlike the previous Act, this legislation granted some power to the Indian members, allowing them to ask questions on matters of public interest (Saeed 41). However, despite this nominal inclusion, the Act still fell short of providing the Indian members any real authority. Many instances occurred where the questions posed by Indian members went unanswered, and the government proceeded with passing bills, disregarding any opposition from the Indian members. An illustrative case of the Empire's absolute exercise of executive power was witnessed in the Indian Universities Bill of 1905. Despite strong opposition from the Indian members, the government passed the bill, effectively placing all universities under its control (Saeed 43).

The Indian Council Act of 1892 can be viewed as a continuation of the Empire's calculated approach to limited Indian participation in the executive council. While it introduced a semblance of power for Indian members by allowing them to raise questions, the Act failed to empower them in a meaningful way. The Indian members' concerns and objections were often disregarded, exemplified by the Indian Universities Bill of 1905, where executive authority prevailed over Indian opposition. These instances shed light on the nature of executive power exercised by the British Empire, which continued to manipulate the constitutional framework to maintain control and suppress genuine Indian representation

in decision-making processes.

Manto skillfully exposes the exploitative nature of colonial laws through the character of Ustad Mangu, who harbors a deep resentment for the British due to being deprived of his civil rights. This theme becomes particularly evident in the concluding episode of the story, where Mangu encounters the same British soldier who had previously clashed with him the previous year. On that occasion, Mangu did not use force or call the police "… but he had remained passive because he knew that in such quarrels it was the *tongawallas* mostly who suffered the wrath of the law" (The New Constitution, Manto 175). Mangu's helplessness in asserting his rights stems from the knowledge that the natives were not regarded as equals to the British, and the law heavily favored the colonial rulers over the indigenous population. This poignant portrayal highlights the deeply entrenched injustices and disparities within the colonial system, underscoring the extent to which the British Empire exploited and oppressed the natives, denying them their fundamental rights.

It is due to this dissatisfaction with the existing laws that Ustad Mangu affixes high expectations with the new constitution known as Government of India Act 1935. His hopes with the new constitution reflect the high expectations which the people of India had from the Act of 1935 since it was a result of three Round Table Conferences and Simon Commission's report. Mangu tells his friends, "The new constitution is going to force these white mice (for that was his name for the British) once and for all back into their miserable holes. No longer would they infest the earth" (Manto 168). He, like other Indians, hopes that the new Act will be a step towards freedom and grant of civil rights because the political leadership of India was engaged by the Empire in order to give them representation in the new constitution.

Manto observes that the idea of constitution has an emotional effect and inspires ideas like freedom, equality, justice, or democracy, and this is why the natives pin their hopes on the new laws when they hear about them. The Empire manipulates language for the purpose of political exploitation of the natives. The constitution is a Janus-faced concept when used by the Empire_ exploiting the emotive connotations of the constitution to secure public approval, while covertly leveraging it as a tool to consolidate its power and exert control over the indigenous population.

Upon hearing the word new constitution, the ideas of freedom and equality trigger Mangu's emotions and he becomes excited to share the news with his friends. Manto creates a connection between the new constitution and the happiness which a poor man feels on getting something new. The importance of new constitution is not because of its

contents, instead it is important because it is seen as a watershed that can change things for Mangu and others like him. He thinks that the new law would free him from exploitation because it is different from the old. The new means something pleasing for him and that is why he compares the new constitution with the brass paraphernalia he had purchased for his *tonga*. It is for the same reason he, "... wanted to see colour and light. There was nothing" (Manto 169) on the day of implementation of the new act.

The Act, however, was not different from the other Acts that were implemented by the British Raj over the years after the fall of Mughal rule in Delhi, in 1857. It invested most of the powers in the office of Governor General instead of the native representatives. Although, it proposed freedom of the provinces in decision-making but required an approval from Governor General which means the freedom granted to provinces was nominal. Moreover, the foreign affairs, finance, and railways, which were the most important departments, were under the control of the Governor General who could make decisions without the approval of provinces (Eddy & Lawton 5-10). In this way, the native political leadership was deprived of any chance to invest in the welfare of their people and decide their relations with the world. And most interestingly, there was no Bill of Rights in this Act which clearly shows the lack of will on the part of the Empire to ensure civil rights of the natives.

The Act raised a storm on the political scene. Gandhi met with the leadership of All India Muslim League and they launched a joint struggle against the Act. The New York Times published the news: "Mr. Gandhi is reported to be making common cause with the accredited Moslem leader, Jinnah, whose, "India-for-the-Indians" policy is scarcely less nationalistic than his own" under the heading "See Gandhi Leading War on Constitution" (New York Times 22). This news item fully reflects the reaction of political leadership against the Act. The British government, on the other hand, claimed that this Act was a step towards dominion status.

Manto's poignant critique of the Act of 1935 becomes strikingly evident in the climactic scene of the story, as Mangu engages in a physical fight with a British soldier after being denied fare. Throughout the confrontation, Mangu repeatedly chants "new constitution," reflecting not only his psychological state but also the deep emotions evoked by the very notion of a new constitution. This scene serves as a powerful critique of the Act itself, as it draws a parallel between Mangu's plight and the broader implications of the legislation. Just as the Act placed the finance department under the control of the Governor General, depriving Mangu of his rightful fare symbolizes the larger systemic injustice suffered by Indians. Mangu's subsequent arrest further underscores the Act's shortcomings, as there is

no provision within the constitution to safeguard his civil rights, while the British soldier enjoys protection under the law. Manto suggests that the so-called new constitution is nothing more than a deceptive tool employed by the empire, cloaking its true intentions to exert control over the Indian population while pretending to introduce a reformed constitutional framework. Through this critique, Manto exposes the Act of 1935 as a means of perpetuating colonial dominance and subjugation rather than offering genuine protection of the rights and well-being of the Indian people.

In the powerful concluding sentence of the story, he exposes the true nature of the British Empire's approach, stating: "What rubbish are you talking? What new constitution? It's the same old constitution, you fool" (The New Constitution, Manto 175). This remark unveils the colonial tactic employed by the British Empire to deceive the people of India, highlighting the superficiality of the so-called new constitution. While bearing the name "constitution," it serves as a mere collection of rules that organize but fail to restrain the absolute power of the colonizers.

In conclusion, the examination of Manto's narrative "The New Constitution", in tandem with the political and historical context of the Raj, offers a profound understanding of the colonial mechanisms deployed to exert control over the populace. The protagonist's optimistic anticipation of a new constitution serves as a poignant allegory for the broader deceit propagated by the British Raj. A critical scrutiny of the Government of India Act of 1935 reveals that the so-called "new constitution" was nothing more than a perpetuation of colonial practices, devoid of genuine reform. The Empire's manipulation of the term "constitution" exemplifies their duplicitous approach, utilizing it superficially while disregarding its fundamental principles. By bestowing a constitution upon the masses, the colonial regime aimed to placate the indigenous population, creating a facade of participation in governance and fostering a false illusion of legal order. This disingenuous strategy enabled the British Empire to consolidate their authority, perpetuating systemic oppression under the guise of equitable governance. Manto's insightful narrative sheds light on the harsh reality of the British Empire's unconstitutional tactics, illuminating the enduring legacy of colonial subjugation.

Works Cited

Azeem, Sayed Waqar. *Manto Ka Fun*. New Delhi: Ijaz Publishing House, 1982.

Barnett, Hilaire. *Constitutional and Administrative Law 5*. London: Cvendish Publishing Limited, 3rd edi., 2000.

Colvin, Ian. *The Life of General Dyer*. Edinbugh and London: William Blackwood & Sons Ltd., 1929.

Coupland, R. *Indian Politics 1936-1942: The Second Part of a Report on the Constitutional Problem in India Submitted to the Warden and Fellows of Nuffield College, Oxford*. London: Oxford University Press, 1943.

Eddy, J. P. and F. H. Lawton. *India's New Constitution: A Survey of the Government of India Act 1935*. London: Macmillan and Co., Limited, 1935.

Flemming, Leslie A. *Another Lonely Voice: The Urdu Short Stories of Saadat Hasan Manto*. Center for South and SouthEast Asia Studies University of California, 1979.

India, Council of the Governor General of. *Laws and Regulations*. Vol. 17. 1878. *Government of India Act 1935*. 1935.

India, Governor General Council in. "Indian Universities Act, 1904." *Act No. II of 1905*. n.d. <https://www.indiacode.nic.in/repealed-act/repealed_ act_documents/A1905-2.pdf>.

Government of India Act 1958. n.d. 2023. <https://lawsisto.com/Read-Central-Act/996/GOVERNMENT-OF-INDIA-ACT-1858>.

Indian Councils Act 1861. n.d. <https://lawsisto.com/Read-Central-Act/1094/ INDIAN-COUNCILS-ACT-1861#>.

Indian Councils Acts. Madras: The National Press, 1893.

Jalil, Rakhshanda. "Loving Progress, Liking Modernity, Hating Manto." *Social Scientist* (2012): 43-52.

Manto, Saadat Hasan. *Chughad*. Delhi: Saqi Book Depot, 1991.

---. *Bari Sahib*. Rekhta, n.d.

---. "The New Constitution." *Mottled Dawn: Fifty Sketches and Stories of Partition*. Trans. Khalid Hassan. New Delhi: Penguin Books India, 1997. 165-175.

Naim, C. M.; Coppola, Carlo. "A Short Story By Saadat Hasan Manto." *Mahfil* 1963: 12-19.

Saeed, Ahmad. *Trek to Pakistan*. Lahore: Al-Fouzi, n.d.

Siddiquui, Mohammad Asim. "Saadat Hasan Manto's Poetics of Resistance." *Social Scientist* (2012): 17-29.

Tufail, Muhammad. *Manto Sahab*. Lahore: Idara-e Farogh-e Urdu, 1964.