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## Scripting Resistance: Rape and the Avenging Woman in Hindi Cinema

By Isha Karki<sup>1</sup>

### Abstract

This article considers how contemporary Hindi cinema engages with traditional cinematic representations of rape and the extent to which it inscribes resistance by rewriting dominant cultural scripts. It analyses Pan Nalin's *Angry Indian Goddesses* (2015) and Aniruddha Roy Chowdhury's *Pink* (2016) by locating them within the tradition of the avenging woman genre in 1980s Hindi popular cinema. It argues that the historical avenging woman genre was unable to successfully dismantle dominant rape scripts, and that these contemporary films, by subverting the genre, offer alternatives to the problems inherent in the visualisation of rape. It explores issues of eroticisation and spectacle in relation to the sexual violation of women and their retaliatory violence, suggesting that neither can escape commodification in a commercialised film industry.

*Keywords:* Hindi cinema, avenging woman genre, feminism

### Introduction

This article considers how contemporary Hindi cinema engages with traditional cinematic representations of rape and the extent to which it inscribes resistance to dominant cultural scripts through an analysis of Pan Nalin's *Angry Indian Goddesses* (2015) and Aniruddha Roy Chowdhury's *Pink* (2016). I position the films within the tradition of the 1980s avenging woman genre, which followed a formulaic structure: films opened with "happy" family settings, an absence of paternal figures and the heroine as a working woman, the heroine is then raped, denied justice through the legal system, and forced to avenge herself, usually by delivering a violent death to her rapist. I focus on B. R. Chopra's *Insaaf Ka Tarazu* (1980; hereafter *Insaaf*), and argue that the 1980s avenging woman genre was unable to dismantle cultural rape scripts to achieve its feminist potential. In comparison, *Angry Indian Goddesses* (hereafter *Angry*) and *Pink* subvert the genre, and offer alternatives to its inherent problems of eroticisation and spectacle. I consider whether it is possible to construct an ethical model of representation when we visualise rape without sliding into eroticisation, sensationalist commodification, and a spectacle where the woman's body is repeatedly violated. I suggest that women's retaliatory violence becomes yet another commodified spectacle in a commercialised film industry, and that it is essential to consider how the identity politics of a filmic imaginary constructed largely through middle-class feminist politics impacts notions of victimhood.

I locate my work alongside contemporary criticism of rape-revenge narratives, such as Alexandra Heller-Nicholas's (2011) study of rape-revenge films around the world and Claire Henry's (2014) interrogation of the ethics of visual rape and revenge, whilst also significantly

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expanding their limited discussions of Hindi cinema. Whilst South Asian critics, such as Lalitha Gopalan (2008) and Jyotika Viridi (2003), have explored the avenging woman narrative, their discussions centre largely on Hindi cinema before the millennium. Recent film criticism by Shreerexha Subramanian (2018) has spotlighted the female avenger, but not necessarily interrogated the visualisation of rape and revenge. My analysis of *Angry* and *Pink* as a rewriting of the traditional rape-revenge narrative seeks to address these gaps in feminist film scholarship. I develop Gopalan's (2008) analysis of the 1980s avenging woman genre, Viridi's (2003) discussion of the changing representations of women in Hindi cinema, and Henry's (2014) exploration of the difference between individual victim-avengers and avenging collectives.

*Pink*, a low-budget mainstream Hindi film, is a traditional courtroom drama in which three friends, Minal, Falak and Andrea, are accused of prostitution, assault and extortion by Rajiv and his friends.<sup>2</sup> The accusation is a ploy to deflect from the sexual assault which took place when Rajiv, left alone with Minal in his hotel room, attempts to rape her and Minal retaliates by smashing a bottle on his head. *Angry*, an independent Hindi film dubbed to be India's first female buddy movie, follows seven friends as they gather in photographer Freida's home in Goa to celebrate her impending marriage to Nargis. The film explores female sexuality and everyday misogyny, ending in the brutal rape and murder of Joanna, Freida's half-British cousin and aspiring Bollywood actress. I consider these films in dialogue with one another and analyse them through their socio-political contexts to assess how successful they are in scripting resistance to dominant rape scripts. I borrow the term 'rape script' from Wendy S. Hesford to highlight the ways in which historical, geopolitical, and cultural struggles, narratives and fantasies shape 'the materiality of rape and its representation' (1999:192). I suggest that these films construct rape scripts, particularly victim-blaming rhetoric and narratives of the "good" rape victim, in order to dismantle them. I argue that Hindi cinema intersects with socio-political life and is integral in 'reimagin[ing] the nation' (Viridi, 2003:xiv), with its focus on urban elites, promoting the "India Shining" narrative and presenting India as a global economic power.<sup>3</sup> I locate *Angry* and *Pink* in the shifting discursive field of Hindi cinema which subverts traditional scripts of womanhood, suggesting this shift is integral to the "India Shining" narrative: an attempt to rewrite India as a nation of modernity and social justice, particularly significant considering global perspectives of India after the 2012 Delhi rape which branded it "rape capital" of the world.<sup>4</sup>

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<sup>2</sup> *Pink*, produced on a budget of INR 23 crores, is low-budget in relation to blockbusters with budgets of INR 100-200 crores.

<sup>3</sup> "India Shining" developed as a government slogan in the early 2000s to promote India as an affluent global power. I focus on the slogan's socio-political implications which suggest India is a nation of liberal progress and modernity.

<sup>4</sup> In December 2012, 23-year-old student Jyoti Pandey was brutally gang raped and tortured on a private bus in Delhi. She died from her injuries two weeks later; the incident received global media coverage and led to widespread national protests.

## The 1980s Avenging Woman and Rape Scripts: Resistance and Collusion



**Figure 1. Joanna in the traditional Bollywood “victim” role<sup>5</sup>**

*Angry*'s opening sequence, which introduces the female characters responding to sexual harassment with aggression, exemplifies how contemporary Hindi cinema is attempting to disrupt cultural scripts of femininity and Indian womanhood.<sup>6</sup> Joanna's opening scene (Fig.1) where she appears as a typical village belle wearing ghagra choli, kidnapped by goons and crying out for the hero to save her, satirises Bollywood's long tradition of casting women as the perpetual “victim”.<sup>7</sup> The fictional director says to Joanna:

Have you read the script? This is the hero's fight scene [...] You just have to be the victim [...] the damsel in distress. [...] That is the test of your acting.

However, Joanna keeps deviating from her script. Instead of screaming ‘Nahin!’ and ‘Bachao!’ (No! Help!), she punches and kicks the goons. The director must cry ‘Cut!’ repeatedly to contain Joanna's acts of subversion which compromise his script, and the traditional Bollywood “script”. Using this film-within-a-film technique, *Angry* employs metatextuality to critique the victimised figure of the woman as imagined by Bollywood. Viridi discusses the simultaneous ‘hypervisibility and metaphorical silence’ of women in popular Hindi cinema (2003:122). Joanna's pleading dialogue is intended as a mouthpiece for well-known scripts of womanhood and victimhood;

<sup>5</sup> Source: T-Series. [www.youtube.com/watch?v=5IBmiy3epb4](http://www.youtube.com/watch?v=5IBmiy3epb4)

<sup>6</sup> Historically, the filmic imaginary constructed Indian womanhood through essentialised gendered roles. For example, Mehboob Khan's *Mother India* (1957) typifies the conflation of women with motherhood and the nation, and R.K. Nayyar's *Pati Parmeshwar* (1989) reveals how the figure of the self-sacrificial woman captured the national imagination. See Mehta (2009) for a discussion of the latter.

<sup>7</sup> Mainstream Hindi-language cinema is popularly known as Bollywood. See Desai and Dudrah (2008) for an overview of the criticism around use of the term.

however, *Angry* transcends the 'metaphorical silence' through the resistance which Joanna, as fictional actress, and Nalin, the real-life director, both enact. When the director tells Joanna to be 'more sexy', she retaliates: 'You have no idea about women, and neither does anyone else in this fucking Bollywood industry!' Joanna's outburst thus ruptures the 'metaphorical silence' imposed on Bollywood's women.

Just as *Angry* challenges traditional gendered roles in Bollywood, the 1980s avenging woman genre, which depicted female victims of sexual assault as vigilantes, emerged as an antithesis to Bollywood's prolific narratives of self-sacrificial women. From the 60s to the 80s, Bollywood's discourse on womanhood went 'from reverence to rape, then revenge' (Virdi, 2003:176). The genre subverted mainstream movies which used rape as a plot catalyst for the male lead, instead envisioning women as avenging agents. It featured the courtroom significantly to demonstrate the State's inability to convict rapists and 'precipitate a narrative crisis', allowing the heroine to metamorphose from a 'sexual and judicial victim to an avenging woman' (Gopalan, 2003:98-99). Significantly, the courtroom drama pushed rape into the public domain, eschewing Bollywood's traditionally elliptical references which rooted rape firmly as a private matter, thus resisting the erasure of both rape and women's rage.

*Insaaf, Pratighat* (dir. N. Chandra, 1987) and *Zakmi Aurat* (dir. Avtar Bhogal, 1988) are emblematic examples of the genre. *Insaaf*, particularly, through its dichotomous exploration of a good-bad victim and conflation of sex with rape, highlights how rape scripts are constructed in the filmic imaginary.<sup>8</sup> *Insaaf* arrived in theatres in the historical moment of the 1979 Mathura and Rameeza Bee rape case: both exposed miscarriages of justice by the State and a legal system which, instead of protecting, violated women.<sup>9</sup> It is not surprising that *Insaaf* which depicts another rape victim failed by the justice system and a rapist bolstered by it, literalises a revenge fantasy, imagining a solution to rape which transgresses the boundaries of a corrupt State. Bharti, a successful model, is raped by Gupta, previously shown as a respectful admirer, whilst her sister, Nita, a schoolgirl, walks in on the rape. While Nita's testimony should be crucial to winning Bharti's case, the defence lawyer rewrites Nita's anxious responses, arguing her youth renders her unable to differentiate between coercion and consent. Gopalan suggests Nita is framed as 'a horrified voyeur witnessing a primal scene', infusing the scene with both 'fear of, and pleasure in, sexual knowledge, instead of recognising it [purely] as sexual violation' (2008:100). However, while Nita may be interpreted as such, the film is explicitly violent in depicting Bharti's rape: she is beaten, choked and slammed against walls. By allowing viewers to witness the brutality of Bharti's rape, the film attempts to contain any "confusion" viewers may have between coercion and consent.

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<sup>8</sup> In the courtroom scenes of *Insaaf*, rape is consistently euphemised as 'mohabbat', the word for love, undermining the issue of consent and eroticising assault.

<sup>9</sup> Both were cases of custodial rape: police constables accused of raping Mathura, a Dalit minor in custody, received impunity, with the verdict suggesting that Mathura's previous sexual activity predicated her consent; and Rameeza Bee, a Muslim woman, was raped by four policemen and her husband subsequently murdered for protesting. The cases led to nationwide protests, resulting in the amendment to Indian rape laws in 1983 (Virdi, 2003:160).



**Figure 2: The painting in Bharti's bedroom presented as "evidence".<sup>10</sup>**

Yet, by portraying a violent rape, *Insaaf* also creates a spectacle of violence, open to sadomasochistic scopophilic pleasure. During the court case, *Insaaf* consistently elides the lines between consent and rape-as-erotic-spectacle. The defence lawyer exhibits the painting of a nude woman in bondage (Fig.2), seen in Bharti's bedroom during her rape, as evidence she is interested in, and consented to, bondage as erotic play and to confuse her rape with eroticised representations of rape. By zooming in on the painting as a fade-to-black during Bharti's rape, the film itself elides the lines between eroticism and rape. The lawyer rewrites Bharti's rape by narrating an alternate series of events where the ties restraining her are refigured as erotic play, 'escalating our masochistic identification' with the rape scene (Gopalan, 2008:100). Bharti and Gupta are visually cast in new roles of lovers, looking longingly at each other (Fig.3 and 4), overlaying this fabricated scene with the actual rape scene in viewers' imaginations.

<sup>10</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)



**Figure 3: Bharti and Gupta rewritten as consenting lovers.<sup>11</sup>**



**Figure 4: Bharti and Gupta rewritten as consenting lovers engaged in erotic bondage<sup>12</sup>**

<sup>11</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)

<sup>12</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)

The narrative of Bharti's rape is further complicated when her modelling career (implied to be predicated on the voluntary sexualisation and exhibit of the female body, thus not "respectable") is utilised as "evidence" of her deviant sexuality. Photos of her modelling and non-sexual encounters with Gupta are exhibited as evidence of a prior relationship and reread as precluding consent (Fig.5).



**Figure 5: Photos of Bharti modelling, and with Gupta, exhibited in court as evidence**<sup>13</sup>

The lawyer's exploitation of rape scripts, which locate blame on the woman's body, represents Bharti's violation as consenting erotic spectacle. It is only when the virginal Nita is raped by Gupta that the film presents what Gopalan calls 'an unambiguous rape' (2008:100), allowing Bharti's violent retaliation. Whilst Bharti's murder of her rapist is a powerful challenge to the failure of the State, her transformation to avenger is only enabled once Gupta has defiled an indisputably "innocent" victim. Further, Nita's rape scene, unlike Bharti's, parades her almost-nude body on screen, creating a titillating spectacle (Fig.6). Though *Insaaf* attacks viewers' internalisation of misogynistic rape scripts, we cannot ignore its eroticised representations of rape nor its ultimate reconstruction of the "good" rape victim.

<sup>13</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)





**Figure 6: Gupta forcing Nita to undress before he rapes her.**<sup>14</sup>

Further fissures appear when we examine the film's script. That *Insaaf* finds it necessary to include three rape scenes to justify the punishment of one rapist reveals a misogynistic demand to show "evidence" of women's violation and pain. Whilst *Insaaf* encourages women to report their rapists through Bharti, who demands justice despite her lawyer cautioning her of victim-blaming, it simultaneously upholds gendered politics of honour. *Insaaf* opens with a rape scene in which well-known Bollywood actor Dharmendra cameos as killer-of-rapists and defender-of-honour; the film sets up this male "hero" before presenting Bharti, the female "hero", as if it cannot succeed without being bracketed by the conventional vision of a "hero". Dharmendra likens his murder of the rapist to his duty as a soldier to protect 'Bharat Mata' (Mother India). The 'izzat' (honour) of every mother and sister, he says, is the country's izzat. Not only does his impassioned speech reify essentialised roles for women, it conflates them with the nation, making them symbols of national honour. Similarly, Bharti's final speech in court likens women to temples of worship: each time a woman is violated, she says, a religious shrine is desecrated. Thus, in the film's opening and closing scenes, women are reiterated as signifiers of religious communities and repositories of communal honour. Instead of continuing to undermine rape scripts, *Insaaf* retracts from its challenge and rejects rape, not because it is a violent assertion of men's power, but because women are religious shrines. This unchallenged rhetoric of honour and shame in films like *Insaaf* fails to subvert traditional scripts of Indian womanhood and rape.

The visualisation of rape itself is, arguably, the problem inherent in the 1980s avenging woman genre. It relies on convincingly meting out vigilante revenge that must 'equal, or even surpass, the horror of rape' (Gopalan, 2008:102). The horrific rapes in *Insaaf* are supposedly balanced by Bharti riddling Gupta's body with bullets (Fig.7). However, I argue it is not possible to equalise or surpass the 'horror of rape' by *any* violent action: it cannot erase the visualisation of

<sup>14</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)

that ‘horror’ which becomes a spectacle to be consumed. Instead, the rape-revenge device in the avenging woman genre became another route through which filmmakers bypassed censorship regulations to portray sex: portrayals that fulfilled sadomasochistic scopophilic pleasure in the visual violation of women. While these revenge narratives provided actresses with dominant roles, women’s access to avenging power was predicated on the ‘violent assertion of masculine power in the form of rape’ (Gopalan, 2008:103). A world of female agency was imagined where women *became* powerful, and utilised what was coded as masculine power, *because* of their violent initiation into victimhood – and even then, their rage had to be justified by their identity as “good” victim. The avenging woman genre can be considered a ‘giddy masculine concoction’ with the rape scenes providing ‘a conventional regime of scopophilic pleasure’ (Gopalan, 2008:103). The visual representation of rape which centralises women’s body as sexual object, thus upholds that violent fetishistic regime.



**Figure 7: Gupta’s bullet-riddled body<sup>15</sup>**

*Angry* and *Pink*’s refusal to depict a rape scene can be read as a feminist solution to the eroticised spectacle in films like *Insaaf*. Significantly, *Pink* shows us flashbacks of the sexual assault only during the end credits, *after* the court has found the men guilty. As the film presents us with no “evidence” (like that of Bharti and Nita’s on-screen rape) but the testimonies of the women, it challenges the rape script that women “cry” rape. Reading *Angry* and *Pink* in the tradition of the avenging woman genre allows us to explore how contemporary Hindi cinema addresses these issues in the classic tradition.

<sup>15</sup> Source: Venus Movies. [www.youtube.com/watch?v=PKYBy0jb1co](http://www.youtube.com/watch?v=PKYBy0jb1co)

## The Modern Avenging Woman: An Ethical Alternative?



**Figure 8: Joanna acting out an “item song”<sup>16</sup>**

In *Angry* and *Pink*, the avenging woman genre is reconstructed into a modern feminist project. Both films textually and visually challenge reductive portrayals of the good-bad rape victim and dismantle notions of deviant female sexuality. In *Angry*, Joanna is coded, simultaneously, as virginal and expressive of her sexual desires. As an aspiring Bollywood actress, she utilises the scopic potential of her body, which we see in her semi-nude re-enactment of an item number (Fig.8);<sup>17</sup> she has a child-like crush on the Hot Neighbour but also has a sexual fantasy about him. *Angry* unapologetically celebrates female sexuality and desire.<sup>18</sup> *Pink* can be read as a filmic descendant of *Insaaf*: a courtroom drama which exposes how rape scripts are constructed on a woman’s appearance. Minal, Falak and Andrea are accused of prostitution: ‘Looking at the girls’ clothes and behaviour, I told my boss these aren’t respectable couples,’ a male waiter testifies. The prosecuting lawyer’s method of attack is a character assassination of Minal, tying in her dance career, choice of dress, and male acquaintances into notions of respectability and sexual deviance. When Rajiv accuses Minal of propositioning him, his evidence is her ‘frank’ behaviour: ‘She was being very frank, smiling at me, touching me while talking.’ However, unlike *Insaaf*, *Pink* is explicit in its challenge of these culturally-coded “facts”. Sehgal, the women’s defence

<sup>16</sup> Source: T-Series. [www.youtube.com/watch?v=5IBmiy3epb4](http://www.youtube.com/watch?v=5IBmiy3epb4)

<sup>17</sup> Item numbers, commercially popular Bollywood songs, are musical sequences often with no relevance to the plot, which feature hyper-sexualised female dancers, referred to as item girls.

<sup>18</sup> The character is referred to as ‘Hot Neighbour’ in end credits, a metatextual reference to, and reversal of, the way women are reduced to “hot” bodies.

lawyer, ironically speaks of the need of a ‘A Girl’s Safety Manual’, exposing the absurd demands placed on women to “save” themselves:

Rule No. 2: No girl should over-smile when talking to a boy or touch him as he will understand it as a *hint*. Her smile is a yes and her natural human behaviour makes her seem indecent.

Sehgal’s safety manual criticises the victim-blaming rhetoric of “respectability”. Further, rather than allowing the prosecuting lawyer to use it as a shaming tool, Sehgal directly asks Minal whether she is a virgin. In choosing to answer publicly rather than in closed court, Minal affirms she has not ‘done anything wrong’ by having sex in a prior consensual relationship. *Pink* fulfils the potential of the courtroom drama by challenging the cultural silence imposed on women’s sexuality; it disrupts the cultural script branding female sexuality deviant and indicative of perpetual consent and brings the crucial conversation of consent to the big screen.

In delivering justice to the three women, *Pink* bolsters the State, presenting a utopic vision of modern India. By remaining within the courtroom, *Pink* deviates from its predecessor, *Insaaf*, and demands that the justice system stop failing women, calling into accountability its historical failures, and refusing to conclude until it achieves its goal. This subversion of the revenge plot allows *Pink* to counteract the violent spectacle found in the classic avenging woman genre. However, whilst *Pink*’s representation of the judiciary is positive, the film is also not naïve. When Minal goes to file a FIR, the policeman spends considerable effort dissuading her:

Police officer: Even the guy has a case [...] You’ve committed assault. [...] These threats are nothing [...] A decent girl like you [...] You want free will. You all do it. But after, the feminist brigade come after us. Candle marches and all.

The policeman rewrites Minal’s act of self-defence into a crime and trivialises the risk of the threats: *Pink* makes a direct link between this dismissal and Minal’s subsequent kidnapping to highlight the danger of women’s complaints being ignored. Significantly, the policeman references the ‘feminist brigade’ and ‘candle marches’, locating *Pink* in the aftermath of nation-wide protests which followed the 2012 Delhi gang rape. In his re-scripting of the protests as the demands of a ruthless feminist army, *Pink* exposes a legal system at odds with public calls for justice.

Whilst *Pink* ultimately reinstates its faith in the justice system, presenting a hopeful conclusion, we must explore whether a reliance on the State is a feminist solution at all. Gopalan criticises the avenging woman genre precisely for this: though the narrative crisis is produced by the failure of justice and the narrative imagines

a transgressive vigilante path [...] this unfettered power is undercut by finally reeling in the authority of the State and revealing avenging woman’s own overwhelming investment in the restoration of the social imaginary (2008:103-4).

Thus, a reliance on the ‘authority of the State’ upholds everything it stands for, including cultural rape scripts and essentialised notions of Indian womanhood; investing in the ‘restoration of the social imaginary’ dilutes women’s resistance to collude with the structures it challenges. Srimati Basu’s discussion of India’s feminist movement and the ‘dilemma for feminist jurisprudence’ is significant in understanding how rape legislation reinscribes gender in terms of heteronormative

scripts of marriage and sexuality (2011:204). The challenge for feminist activists is to have rape recognised as a transgression of bodily integrity and subjectivity to constitute safety *and* sexuality, but having to do so utilising 'exist[ing] signifiers of gender even as they attempt to transform meanings of gender' and in the process 'reinscribing [...] the very meanings they challenge' (Basu, 2011:204). The law, complicit in maintaining patriarchal hierarchies, continuously strengthens State power to police women's sexuality. This focus on legal protection 'proliferates a language of sexual wrongs and consequently sexual negativity, rather than that of sexual rights and pleasure' (Dutta and Sircar, 2013:300). This heteronormative language effaces the rights of queer and gender fluid people and controls women's bodies for their own "protection".

The authority of the State is particularly relevant in relation to the Justice Verma Committee report, dedicated to recommending constitutional changes to the law on sexual violence.<sup>19</sup> The 657-page report made far-reaching recommendations. However, when it was turned into the Criminal Law (Amendment) Bill of 2013, whilst it made leaps in legal reform, with the definition of rape expanded beyond penile-vaginal penetration, and the inclusion of stalking, voyeurism and acid throwing, the State omitted significant recommendations. It failed to criminalise marital rape and continued to identify the victim only as female. Yet, as Dutta and Sircar argue, the 'spectacular attraction of legal reform has only deepened the feminist dilemma of reposing its faith in the law' (2013:302). *Pink* upholds a State which, though incrementally progressive, failed to challenge gendered scripts of victimhood and further enabled the violation of women within patriarchal structures. *Pink's* reliance on the State, then, cannot be read as subversive when read alongside the literal and discursive violence upheld by India's legal system.

Not only does *Pink* restore the power of a patriarchal State, it presents us with a patriarchal figure as the mouthpiece for its feminist manifesto. Gopalan (2008) highlights how the 1980s avenging woman genre turned on the *absence* of patriarchal figures. To an extent, *Pink* imagines that absence as Minal, Falak and Andrea share an apartment, living independently of their family units. Both *Pink* and *Angry* present us with female-only spaces. In *Angry*, when the women gather in Goa without husbands and partners, they erase patriarchal presence. Suranjana tells Freida, 'I feel free', a sentiment, though not explicitly articulated, shared by all the women who are shown rediscovering their identities and ambitions. When the narrative is interrupted by male presence, it is uncontrollably violent: for example, Joanna's rapists. When *Angry* presents non-violent male intrusion (Mad's boyfriend and the Hot Neighbour), it does so to display female desire, reversing the way female characters are usually utilised as desired objects for male leads.

However, whilst male intrusion in *Pink* is largely violent, the film centralises Sehgal, played by the most recognised male actor in the Bollywood industry: Amitabh Bachchan. The film poster (Fig.9) exhibits the significance of Bachchan's presence in the plot: Bachchan's image looks over and *overlooks* the three women. In commercial terms, it is unsurprising that a low-budget film casts one of the most popular actors of the industry as its "hero", capitalising on his star-text.<sup>20</sup> Amrita Goswami discusses how in 'New Bollywood' Production House culture, the film is a 'brand' which accrues clout and popularity through recognisable celebrities as cast members, producers or promoters: stars become 'brand ambassadors' and stardom a crucial aspect

<sup>19</sup> The Committee was set up after the global protests and media attention for the 2012 Delhi gang rape.

<sup>20</sup> Sunny Singh discusses how star texts are created in Hindi cinema as 'vehicles for star performances which in turn build on images in other films [...] to give them roles as national icons of beauty, desire and utopian beings' (2010:213-4).

determining the success of a film (2016:185-9). Thus, having Bachchan as its ‘brand ambassador’ is a crucial reason for the success of *Pink*.



Figure 9: Promotional film poster for *Pink*<sup>21</sup>

Yet, Bachchan is also recognised in the filmic imaginary as *the* quintessential patriarch, often appearing in conservative and nationalist roles.<sup>22</sup> When a feminist film like *Pink* cashes in on a star-text like Bachchan's, it props up a male saviour, one often scripted as the mouthpiece for tradition and cultural values, contingent on essentialised gender roles. *Pink* ends with Bachchan's voice reciting its feminist manifesto:

Break all restrictions and make them your weapons [...] Raze the social norms  
[....] Start a revolution.

<sup>21</sup> Source: [www.bollywoodhungama.com/movie/pink/](http://www.bollywoodhungama.com/movie/pink/) (Fair use license)

<sup>22</sup> Bachchan as patriarch appears from 2000 onwards in films such as *Mohabbatein* (2000), *Kabhi Khushi Kabhi Gham* (2001), *Baagban* (2003), *Sarkar* (2005), *Baabul* (2006), and *Piku* (2015).

In the utilisation of his person and voice, in his role as legal defender and as reciter of the feminist call to arms, there is an insidious implication that challenges to rape scripts are only legitimate and palatable when voiced by male patriarchs. Sukanya Gupta identifies a 'new trend' in contemporary Bollywood of the 'passive or missing' male protagonist, linking it to an increased challenge of traditionally represented gender roles (2015:108). Yet, in its upholding of the male saviour and reaffirmation of the patriarchal State, *Pink* reverts to old models of gender representation, taking agential potential away from women, and reinscribing heteronormative scripts of male saviours and female victims.

*Angry* offers a solution to the problem of patriarchal figures and the State through a complete rejection of them. It similarly explores rape scripts utilised by *Pink's* policeman: in *Angry*, the policeman repeatedly shines his torch on the women's legs: 'Have you been wearing this the whole night?' When the women challenge this attempt to script them into "bad" victims, the policeman retaliates: 'You are crossing your limits. You are an educated bunch of people!' Implied is the notion that, as educated women, they should know that 'crossing [their] limits' to enter the public sphere to drink, smoke and party at night predicates consent or "invites" rape. When the women discover photographic evidence of Joanna's rapists, Mad, in a fit of desperate rage, screams: 'Who are we going to show this to? That fucking policeman?!' This damning interaction with the police precipitates the "narrative crisis" traditionally produced by the failure of the courtroom.

However, instead of adhering to the conventional transformation from *victim* to avenging woman, the women refuse to be judicial victims. By limiting their involvement with the law to this initial police report, *Angry* exposes how the State fails women long before a case reaches the courtroom. *Angry* recognises the State as the post-Justice Verma Committee State and knows it cannot deliver a moral and ethical justice for victims of rape. Instead, *Angry* seeks alternative means of justice, one founded on collective social conscience and action. Having experienced a "justice" system imbricated in cultural rape scripts, the grieving group of women seize avenging power for themselves. Henry suggests that the focus of the traditional rape-revenge narrative on the lone victim avenger-heroine can result in a loss of the sense of 'rape as a systemic problem'; instead, an examination of collective trauma or collective response resists that erasure and examines ways of responding to the violence of rape as an 'ethical responsibility' (2014:143-4). *Angry* introduces us to the idea of collective response and responsibility when the women chase down and shoot Joanna's rapists: the night scene and shaky camera angles make it difficult to see who pulls the trigger. In offering a model of collective accountability, *Angry* also suggests an ethical alternative to the horrific spectacle of violence demanded of lone victim-avengers in the avenging woman genre.

Here, I draw on Basu's discussion of 'embodied resistance' from the women of Kasturba Nagar who stormed a courtroom in Nagpur in 2004 during the remand of Akku Yadav, a local gang leader who terrorised and gang raped numerous girls and women with impunity for over a decade. A group of 200 women attacked, castrated, and killed Yadav, declaring their act a 'freedom struggle'. Basu discusses the 'remarkable strategy of plural culpability' at play when scores of women claimed to be the perpetrator, preventing the police from arresting anyone specifically. The women used bodily violence not just to kill but to 'transform the signifiers of victimhood' and challenge the 'power of rape' through a collective and visceral response that 'elide[d] legal punishment, in blatant mockery and rebuke of the law' (Basu, 2011:192). Whilst the Kasturba Nagar case responded to the failure of justice for lower-caste women specifically, a fact I do not

wish to efface, rooting *Angry* in this real-life strategy of plural culpability offers a productive discussion of how the film envisions a social justice located outside the boundaries of the State.

Through their act of collective ‘embodied resistance’, the avenging women of *Angry* also transform the signifiers of victimhood. As in *Kasturba Nagar*, more than their act of bodily violence, it is the subsequent strategy of plural culpability exhibited in the film which is at once subversive and revolutionary. When the policeman reappears at Joanna’s funeral, asking the murderers of the rapists to own up to their crime, the whole congregation stands one by one. The policeman, faced with this absolute rejection of the corrupt structures of justice, turns his face away. *Angry* thus initiates a dialogue about collective responsibility as a means of countering systemic gender-based violence.

*Angry*’s use of embodied resistance is a subversive vision of social justice; however, we must interrogate the extent to which these films create space for violent women to exist in filmic and national imaginaries. Violence, utilised by women, disrupts traditional perceptions of Indian womanhood as nurturing and self-sacrificial. *Pink* demonstrates how even the expression of violence by women is curbed and punished with rape. During a phone call with Rajiv and his friends, Minal departs from the placatory script ascribed to women-as-victim:

Minal: I am sorry.

Men: You started everything... No one forced you. We didn’t carry you there, you came yourself, all decked up.

Minal: I got angry.

Men: Now he’s angry and I’m angry [...] Now we will have our fun with you.

Minal: I am bored, you coward. So, stop talking and show me what you can do.

[Her voice shakes; they cut the call. She runs home.]

Men: She’s asking for it.

When Minal deviates from the traditional script of pleading rape victim, the men abruptly end the call. Not only must her anger be challenged by a more powerful male anger (‘Now he’s angry and I’m angry’), the moment Minal’s aggression is articulated, it is curbed; the male aggressor cannot bear to allow female aggression to enter his script of power. *Pink* exposes how deeply rooted the idea of passive womanhood remains in the national imaginary. The 1980s avenging woman genre exposed how rape was ‘a weapon used against the weak’ by utilising ‘the topos of rape’ as a rhetorical trope to conjure images of ‘power, coercion, and humiliation in conflicts between the culturally powerless and the powerful’ (2003:60; 175). Decades later, *Pink* continues the tradition by highlighting what happens when a woman rejects gendered scripts of passive womanhood: she is threatened with rape, and rape becomes an accepted and expected weapon used to reinforce gender power dynamics. As Basu suggests, it is a ‘feminist axiom to understand rape as an archetype of patriarchal dominance deeply resistant to legal accountability’(2011:185) We see the fallout of Minal’s deviation: she is abducted in broad daylight and her body violated, her harassers representing cultural and socio-political forces which contain and ultimately punish female violence.

As in the 1980s avenging woman genre, women’s rage in *Angry* and *Pink* is predicated on their violation. When the filmic imaginary validates violent women as an avenging force brought into existence by their victimhood, what can we make of the ‘strategy of reversal’ which envisions them as aggressors? Hesford asks whether the strategy



keeps the subject within the confines of patriarchal ideologies and essentialised notions of gender [...]? Do the women, by recouring to violence, reenact the system which oppresses them? Does the feminist embrace of women's counterviolence [...] reinforce or disrupt the ethos of rape culture? (1999:207)

*Pink* contains these questions by erasing the revenge plot, presenting us with one moment of violence used for self-defence. However, in *Angry*, the gun, the enabler of violence, is coded as masculine. The fear exhibited by the women when they discover the weapon in their female space is similar to their responses to aggressive male intrusion. Therefore, use of the gun, and the women's act of vengeance, occurs *within* the 'confines of patriarchal ideologies and essentialised notions of gender'.

Rape-revenge narratives which empower women fall short, Hesford argues, when they simply reverse the 'male/power and female/powerless' binary and rewrite women as the ones who inflict pain (1999:206). A deconstruction of the coding of violence through gendered ideologies is crucial if we are to create feminist representations of violent women. In *Angry*, there are efforts at deconstruction: the women's retaliation with the gun and Laxmi's enraged use of a cricket bat are ultimately presented as part of female identity and subjectivity; 'we all have Kali inside us,' the film suggests (Fig.10). By invoking 'the angriest Indian goddess', *Angry* argues that rage and violence are integral to the female psyche rather than appropriation of male attributes. Throughout the film, the women are vocally and physically aggressive, subverting both the eroticisation of female passivity and cultural scripts which sanitise the female psyche and police "appropriate" female behaviour.



**Figure 10: The women pose as Kali, the vengeful goddess.<sup>23</sup>**

However, in a commercialised film industry, there is a possibility that *any* "resistant" representation, however feminist, will reproduce a spectacle of violence, casting viewers into voyeuristic roles. The 1980s avenging woman genre made not only a spectacle of rape, but also of

<sup>23</sup> Source: T-Series. [www.youtube.com/watch?v=dIdxxvph-Vw](http://www.youtube.com/watch?v=dIdxxvph-Vw)

women's violent revenge, turning itself into a highly commercialised product. Women's resistance, and feminism, thus run the risk of being commodified and utilised as "brands" or "brand ambassadors" to market films and promote "Brand India" in global markets.

### **The Crisis of Representation: Identity Politics and the Dead Female Body**

A reading of these films is incomplete without discussing the politics of representation. *Angry* exposes the issue of identity politics through its "victim" Joanna: as the policeman says to his superior, she is a 'British national' and 'a Katrina type' so the crime is bound to receive 'media attention'.<sup>24</sup> Whilst desperately trying to locate Joanna, her friends ask bystanders if they have seen the 'foreign' girl. The eventual discovery of her violated body, the manifestation of her identity of victimhood, is then inextricably linked to her 'foreign' identity. As feminist critics, we must ask whether Joanna's rape is only given 'media attention' *because* she is British. Does the film present Joanna, the 'foreign', as rape-victim because the public within and without the film are more likely to be sympathetic to her? How would the media have dealt with the rape if Laxmi, the lower-caste maid, was the victim? Is it, in fact, a failure of imagination that films like *Angry* and *Pink* do not present fictional worlds where the violation of lower-caste women is apportioned the same media coverage and outrage? Indeed, films like *Insaaf* were accused of effacing lower-caste women's experience with legal systems. Whilst *Angry* owns Joanna as 'Indian' through its title, it simultaneously casts her as not-Indian. Her not-Indian body is therefore given a cultural and transnational capital not afforded to 'Indian' women who do not fit the urban, modern, socially privileged Indian womanhood the film celebrates.

Situating the films within the feminist politics of the Delhi rape helps interrogate these issues further. In December 2012, unprecedented media campaigns and protests followed the gang rape of Jyoti Pandey. Dutta and Sircar highlight how middle-class protests in Delhi have used the India Gate and candlelight vigils as their protest space and method – notably for the murders of upper-middle-class women, Jessica Lall and Aarushi Talwar – but that these protestors have 'rarely questioned their own privilege or extended their solidarity' to marginalised groups without press (2014:294-5).<sup>25</sup> Instead, Dutta and Sircar criticise media coverage of the 2012 protests for

erasing history, exceptionalising this event in a way that has the capacity to elide not only the rich lineage of feminist activism and struggles against sexual violence, but also the memories of several other, equally brutal experiences of sexual violence against women from marginalized communities (2014:297).

In the 1979 Mathura case, for example, Mathura's identity as a doubly-disadvantaged Adivasi girl was centralised in public protests. Contrastingly, the 'feminist consciousness of class/caste privilege seem[s] to have waned': Dutta and Sircar suggest that if feminism is about what questions we are asking and how we are framing our responses, the 2012 protests 'were, and are, yet to become feminist' (2014:297). Contemporary films which do not script a feminist consciousness of class/caste privilege are not asking the "right" questions, and thus have *yet to become feminist*. Films can, of course, be viewed in more radically political ways than the filmmaker or the script

<sup>24</sup>This is an allusion to Bollywood actress Katrina Kaif. By referencing her, the policeman reiterates the rape script that dancers, models and actresses, in the business of "selling" their sexualised bodies "invite" rape.

<sup>25</sup>Lall and Talwar's murders captured the cinematic imagination in Rajkumar Gupta's *No One Killed Jessica* (2011) and Meghna Gulzar's *Talwar* (2015) respectively.

intends, but the absence of a layered interrogation of caste privilege is nonetheless notable in urban-centric, middle-class feminist films such as *Angry* and *Pink*.

The ethics of identity politics is crucial when we consider how previous survivors of rape have not met 'the identity criteria'. For instance, in 2005, the gang rape of a 20-year-old Delhi University student from a North-eastern state saw only a few students and members of the North-eastern community protesting. In February 2013, soon after Pandey's death, three minors were raped and murdered in the Bhandara district of Maharashtra with hardly any media coverage; whilst state-sanctioned sexual assaults on marginalised women rarely generate comparable public outrage. Location and identity seem 'essential qualifiers' in determining whose rape is 'worth' the subject of urban, middle-class concern and rage (Dutta and Sircar, 2014:298). Significantly, Pandey was claimed by the Indian media as 'national martyr': she was referred to as 'Amanat' (cherished property), 'Nirbhaya' (fearless), and 'India's brave heart daughter', turning her into national property (Dutta and Sircar, 2014:299).<sup>26</sup> When one figure, with a specific socio-political-ethnic identity, becomes emblematic of a feminist movement, the experience and violation of (O)ther marginalised women, who do not have the same access to media, sympathy and public outrage, become effaced. Films like *Angry* and *Pink*, by restricting the text primarily to and for the urban middle-classes, and thus legitimising certain stories over others, elide multiplicity and difference. We can question how successfully feminist films such as these would be received if targeted at regional, low-caste, and arguably conservative, audiences (perhaps why the industry continues marketing these films at an urban audience). However, that line of questioning risks the fallacy of homogenising the demographic into one "backward" mass. *Angry* and *Pink*, by foregrounding urban, middle-class women's stories become somewhat of a soapbox for middle-class feminism. Though not a solution to this issue of representation, I suggest Hindi films *must* be read in textual dialogue with one another. Isolated texts should not be brandished as Hindi cinema's growing feminist social conscience, however much the industry attempts to market them as such to promote the narrative of "India Shining".

We must also consider the crisis of representation in relation to women and victimhood. At the end of *Angry*, despite the vision of an alternative social justice and a deconstruction of gendered scripts of violence, we are still presented with Joanna's dead body. The brutalised body is presented to us clean, in a virginal wedding dress, as if to scrub our imagination of its violation (Fig.12). Though *Angry* rewrites women as agents of anger, the counternarrative also presents a 'curious inevitability' which 'presumes a victim': the violated female body (Hesford, 1999:194). Joanna's dead body presents us with the essentialised notion of womanhood as victimhood. The ever-present double bind for feminist filmmakers, writers and critics who discuss rape is that the narrative of rape itself is only enabled by women's pain and violation. Hesford identifies the challenge: 'not to reproduce the spectacle of violence or victimization and to not erase the materiality of violence and trauma by turning corporeal bodies into texts' (1999:193). Yet, Joanna's body also exposes the consequences of gendered violence: 'the materiality of violence' which should equally not be erased or sanitised. Visual representations of rape must negotiate the balance between showing the truth of violation, whilst resisting transforming the female body into a 'text' for sadomasochistic scopophilia.

The challenge of victimhood precipitates a representational crisis: the impossibility of writing or portraying victims without colluding with their erasure. Perhaps the solution is to construct a new "script" to discuss sexual violence. Yet, is it possible to create a new script without

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<sup>26</sup>At the same time, the conservative, right-wing Hinduvta political wing criticised Pandey for being out late at night and for being "too modern".

entering the dominant discourse of rape? Hesford suggests the 'strategic enactment' of a dominant rape script can 'potentially open up a gap within which that script can be contested', 'strategies of appropriation' which 'subvert' dominant scripts whilst establishing complicity with them (1999:197). My analysis of *Angry* and *Pink* shows that they script resistance with varying degrees of success. Therefore, instead of seeking narratives which wholly rewrite cultural rape scripts, we should seek 'gaps' where these strategic subversions are occurring. Acknowledging that both of these films are complicit in some ways to dominant cultural scripts does not reduce their resistant potential. Classic narratives of violence, which reproduce the violated female body, a manifestation of women's subject-status as victim, need 'the male to tell its story' (Hesford, 1999:206). By removing or killing the male figure, films like *Angry* (re)appropriate the 'story' of the female body. In the closing funeral scene of *Angry*, Nargis states: 'I am angered by the fact that we cannot write our own stories.' However, by erasing male aggressors from Joanna's story and narrativising her identity through eulogies, the women create alternative scripts for Joanna which aren't controlled by, or limited to, her subject-status as rape-victim.

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