

# THE SOVEREIGN

The Official Newsletter of Indian Society for Legal Research



## HANS KELSEN

11 October 1881 - 19 April 1973

IN THIS ISSUE

### ARTICLES

This issue features two articles on the work of Hans Kelsen. Dr. Thamil Venthan Ananthavinayagan in his article titled "*Can International Justice Create Peace? Reflection on Kelsen's Thoughts on International Law and the Judiciary*" refers to the question of how Kelsen envisaged to create world peace through justice.

### LEGAL NEWS

Avantika Banerjee in her article "*Kelsen's Anatomization of United Nations*" explores the critic of UN by Hans Kelsen in his book; *The Law of United Nations: A Critical Analysis of Its Fundamental* (1951). Banerjee argues that Kelsen's criticism can help in revamping the model of the United Nations.

### TEST YOUR KNOWLEDGE

### UPCOMING EVENTS

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## Editor's Note

**“Great ideas have the power to shift perception to create value where it didn't exist before”**

**-Alan Philips**

We are very happy to present before you the second Issue of ISLR'S newsletter- The Sovereign. We at ISLR wanted to provide our readers with a monthly compilation of the current legal issues and relevant news of both national and International importance, that will educate our readers and enhance their knowledge. Also our aim is to provide information about various upcoming opportunities that will boost and strengthen your path. Be a regular visitor of our newsletter and grab the opportunity.

Happy Reading to all !!

## About ISLR

Indian Society for Legal Research (ISLR) is a rapidly growing community of niche academicians, thinkers, activists, lawyers, professors, legal volunteers, paralegals and legal entrepreneurs who stand apart from the rest of the community with their zeal for deep thinking, leadership skills, and dedication for bringing innovation to the legal field.

Previously, ISLR has conducted First Global Ambassadors Programme (2019-20) and an empirical survey of the judgments of the ICJ and the PCIJ. ISLR has also offered one month online certificate course for UG & PG

students on International Courts & Tribunals, International Humanitarian Law and Merger & Acquisition. ISLR also organised various webinars during pandemic which was conducted virtually. ISLR published first blog series titled "Mapping the Constitutions". In this blog series the authors have analysed the various aspects of almost 179 constitutions. ISLR has successfully conducted First Virtual Summer School on International Legal System in the Age of Pandemic, 2020.



## CAN INTERNATIONAL JUSTICE CREATE PEACE? REFLECTIONS ON KELSEN'S THOUGHTS ON INTERNATIONAL LAW AND THE JUDICIARY



**Dr. Thamil Venthan Ananthavinayagan**  
**Lecturer- Griffith College, Dublin**

Hans Kelsen, an Austrian jurist born into a family of Jewish faith, never wanted to become a legal academic. He rather wanted to become a physicist, mathematician or philosopher. But his decision to enter the legal profession was driven by practicability. And yet: his eventual decision in favour of the law bestowed upon him the accolades as one of the most significant international legal academics of the 20th century. Surely, his Jewish belonging, the trials and tribulations he faced during the First and Second World War had greatly influenced him to become such a renowned international legal academic. Against this backdrop, Kelsen's views on centralising the judiciary, his vision on the United Nations and, last but not least, an all-encompassing World Court generated much scholarly debate and greatly influenced the evolution of the international legal order as we know it today.

To this end his -inter alia- *The Law of the United Nations*, *Introduction to the Problems of Legal Theory* and *What is Justice?* had profound impact on future legal theorists, practitioners, academics and law students. Kelsen understood international law as a law of its own right.

In this short article, the question to consider is: how did Kelsen envisage international justice to defuse disputes, end anarchy and create peace through international justice?

Kelsen acknowledged the enhanced importance of the courts for the purpose of developing international law, which is confirmed with the growing number of international judicial bodies in the second half of the 20th century. One of these was the International Military Tribunals for the Far East. One of the judges who had worked on this Tribunal was Justice R. Pal, who had later enunciated at a meeting of United World Federalists in Japan in 1966 as follows:

*"I have a firm faith in the mission of law in the matter of world peace. If we are sincerely cherishing a desire for creating a peaceful world-order, we must look to law. Such a world-order will be possible only if we succeed in bringing the world society under the reign of law, – under the might of that most reasonable force which alone can check the fatal unhinging of our social faculties. Law alone is entitled to claim recognition as the most reasonable of the forces which can help shaping the human society in the right form."*

So, how to argue for peace through law in the Kelsenian manner? It was Hans Kelsen who had argued that the system of law should be mutually consistent and win force from a fundamental Grundnorm (i.e. basic norm). To this end, the distinctive features of Kelsen's jurisprudence are that '(1) that the nature of law is essentially tied to its use of sanctions, and (2) that the normative force of law was only explicable by reference to a non-natural transcendent fact, what Kelsen called the Grundnorm.'

## CAN INTERNATIONAL JUSTICE CREATE PEACE? REFLECTIONS ON Kelsen's THOUGHTS ON INTERNATIONAL LAW AND THE JUDICIARY

Insofar any hierarchy of law exists, every legal rules must be defined and applied with reference to the legal system of which it is a part. This begs the question as how the binding force of the judiciary becomes evident and why had it failed at the time of his writings?

Kelsen argued that 'the binding nature of law and its entire existence lie in the objectivity of its validity'. In his view, the failure to create just conditions and deter war was located in the simple fact that the executive was favoured over the judiciary. So, for Kelsen, peace could 'be guaranteed only by an international court of justice operating in relation to disputes between states as a higher, impartial third party, with an international police force under its command.'<sup>[ii]</sup> For him, a supranational judicial organ with decisive actions should be in the position to encounter war much far more than diplomatic, political or economic subscriptions.

Referring to the opening question for this article - as how Kelsen envisaged to create peace through justice- the short answer to this complex topic in light of the scope of the article is: legal cosmopolitanism. Kelsen argued for a community united and inspired by a common humanity. He furthered that universal morality, universal law and universal state are the constitute elements of a compact normative unity. Surely, Kelsen achieved a system that is able to foster normative consistency, disregarding the content of its operation. The law holds the currency to fundamentally change the world. Nonetheless, further consideration has to be accorded to the question if international law is solely a self-fulfilling prophecy, where the judiciary is propounding and extending hegemony.

However, this would invert the idealism of Kelsen: normativity is defining for every legal system, while legal normativity can be differentiated from moral normativity.<sup>[ii]</sup> Insofar as the judiciary values the normative content of law, no moral normativity is accorded to it, Western or non-Western. In the end, as Kelsen had envisaged, the goal is the creation of peace through the law.

### References

- [1] Andreas Kley and Esther Tophinke, *Hans Kelsen und die Reine Rechtslehre*, JA 2011, Issue 2, p. 169.
- [2] Jochen von Bernstorff, *Hans Kelsen on judicial law-making by international courts and tribunals: A Theory of Global Judicial Imperialism?*, p.2, Conference Paper No. 8/2015, 2015 Annual Conference, Oslo, 10-12 September 2015.
- [3] Radhabinod Pal, *World Peace Through World Law, United World Federalists of Japan*, 1967, p. 1.
- [4] Brian Leiter, *Why don't American philosophers of law talk about Kelsen?*, online at: <https://leiterlegalphilosophy.typepad.com/leiter/2007/10/why-dont-amer-1.html>, last visited 18.10.2020.
- [5] Ryan Mitchell, *International Law as coercive order. Hans Kelsen and the transformations of sanction*, *Indiana International Law and Comparative Law Review*, Vol. 29, p. 245.
- [6] *Das Problem der Souveränität und die Theorie da Völkerrechts. Beitrag zu einer Reinen Rechtslehre* (1920), p. 317.
- [7] Danilo Zolo, *Hans Kelsen: International Peace through International Law*, *EJIL* 9 (1998), p. 319.
- [8] María Cristina Redondo, *Legal normativity as a moral property*, *Revus [Online]*, 37, 2019, p. 60.

## KELSEN'S ANATOMIZATION OF UNITED NATION

**Written by**

**Adv. Avantika Banerjee**

### ***The High Court of Judicature at Allahabad***

Hans Kelsen was born in Prague on 11th October 1881. He was from a middle-class Jewish family. He completed his doctorate in 1908. Kelsen's first book *Die Staatslehre des Dante Alighieri* was published in 1905. Kelsen served as the professor of Public and administrative law in the University of Vienna from the year 1919, therein, Kelsen served a successful tenure as guided many scholars like Alf Ross, Erich Voegelin among others. Unfortunately, in 1933 when the Nazis seized to power Kelsen had to pay heavy price of Jewish Ancestry and he was removed from the post of professor of International Law in University of Cologne. Kelsen then moved to Geneva and started a new academic career there, wherein he focused on topics like relation between the state law and international law, customary law and revision of Covenant of League of Nations. After the beginning of the Second World War Kelsen moved to United States in 1940 and delivered lectures at Harvard Law School. In 1945 Kelsen played an active role in preparing the legal aspect of Nuremberg Trial and in the drafting of the UN Charter.

Kelsen's most significant contribution to legal jurisprudence is his 'Pure theory of Law' where he provides the Concept of Basic norm (Grundnorm). The idea of Grundnorm is that it forms the underlying basis for a legal system. The motive behind the theory of Grundnorm is to determine the origin point of law whether it is International Law or Municipal Law. Kelsen belongs to analytical school of law which primarily focuses on 'LAW AS IT IS' rather than what 'LAW OUGHT TO BE'. Kelsen was a monist. He believed that the only weapon people of a nation possess to combat the horrors of dictatorship is by strengthening of the international community as one which ultimately became the motive behind

establishing the United Nations. Although he supported the idea of the UN but could not convince himself that the structure of United Nations was adequate and competent to deal with the problems of the international peace and security.

In order to analyze the working of the UN and point out its limitations, Kelsen published 'The Law of United Nations' in 1950. In this book he analysed the functioning of the organs of the United Nations with a juristic approach. Kelsen applied positivist jurisprudence while writing this book wherein he affirms that the book deals with the Law of the Organisation as it is and not with its desired role in International Law. The book has thoroughly revised the entire working model of the UN on the premise of the UN Charter according to its making and the ideas expressed in it. However, not all of those ideas hold water today as these bodies have defined their roles over the decades. The book begins with a critical comment on the Preamble of the United Nations. He says, "The preamble of the United Nations states some but not all the purposes of the United Nations". He emphasizes that the preamble is an inclusive part of the UN Charter and has the same binding force and the preamble declares as an 'end' of the UN is to 'save the succeeding generations from the scourge of war' which is identical to the means to reach this end.

Kelsen remarks that the organs of the UN have a theoretical rather than legal character. According to him the idea of providing different classes of organs in Article 7 does not provide a real distinction per se. He says that the Article recognises the Secretariat as a body with similar significance as that of the General Assembly, Security Council whereas in reality the Secretariat in fact does not have any independent function to perform like the other organs.

## KELSEN'S ANATOMIZATION OF UNITED NATION

Kelsen further points out the difference in structure and functioning of the General Assembly in comparison with the League of Nations. He acknowledges that the equality-based approach where every State shall have one vote and five representatives which is more than that of the League of Nations which had three votes for each State. He criticises the procedure of selection of the president of General Assembly as a very vague process, in the sense, that the charter does not clearly denote as to who can be elected as the President.

He portrayed the charter as a weak law by comparing the Sanctions under the Pact of Paris and the UN charter, he Comments – “The Pact of Paris obliges the parties not to resort to war as an instrument of national policy and expressly permits war against a state which has violated the Pact which implies the case of individual and collective self-defence. The UN Charter obliges them to refrain from any threat or use of force and permits in principle the use of armed forces only as an enforcement action taken by the Organisation as reaction against a threat to, or breach of, the peace and in case of individual or collective self-defence”.

One of the important obligations is stipulated in Article 2(j) is that the Members of the United Nations agree to accept and carry out the decisions of the Security Council in accordance with the present Charter. The formula 'The Members of the United Nations agree ' means: The Members ' shall ' or ' ought to.' It expresses the idea that the Members are ' obliged ' to carry out the decisions of the Security Council. The words ' to accept ' are superfluous. If the Members are obliged to carry out the decisions of the Security Council they need not 'accept ' them The Charter does not provide for disarmament by the state as an objective to maintain world peace. In fact, nowhere in the Charter the obligation has been imposed on the states to not to use weapons or shed its possession at.

best, Kelsen looks at the premise as an utter hypocrisy of the UN charter. On the functioning of the International Court of Justice Kelsen comments that the organisation of the International Court of Justice is almost the same as that of the Permanent Court of International Justice. Only a few unimportant changes have been made. He renders the powers possessed by the ICJ as unimportant as they do not impose any obligations on the parties to carry out its decision and they have the right to withdraw from the ongoing suit at any point which only enables ICJ as an advisory body and not make any conclusive judgements.

Institutional reforms of the United Nations are being demanded worldwide as a result of the dissatisfaction regarding its functions and restriction of power with few States. The debate of shift of power is more relevant today than ever as the world faces unprecedented economic and social crisis because of the prevailing Covid-19 Pandemic. The inaction of the UN on several occasions has created distrust among the States. The organs of the UN have systematically failed to provide relief to aggrieved nations on several occasions thereby, compelling people to think if the current model is adequate to meet the present-day Challenges.

Hence, Kelsen's writings are relevant here as he was among the first thinkers to foreground the lacking of the UN from its very conception, and he also provided a detailed analysis of the same. It will not be an exaggeration to say that Kelsen's criticism can revamp the model of in the restructuring of the United Nations. With Kelsen's analytical approach of taking the law 'as it is' is needed not only to form new laws but also to scrutinize the existing covenants of International Law which speaks highly of Human dignity and freedom but failed to deliver the same on several instances.



### **1.October.2020 : SC orders states to supply dry ration to sex workers**

Dry rations to be provided to sex workers identified by the National AIDS Control Organisation and district legal authorities without insisting on the production of identity documents like ration card amid the pandemic.

### **2.October.2020 : Delhi ranks first in crimes against women according to data released by the NCRB**

The data states that Delhi accounted for 28% of the total figure, followed by Mumbai at 14.3% and Bengaluru at 7.7%. It says 1,231 cases of rape were reported in the Capital in 2019.

### **2.October.2020 : Allahabad HC takes suo motu cognizance of Hathras Rape incident and summoned top government official**

A bench of justices Rajan Roy and Jaspreet Singh issued summons to the Uttar Pradesh Additional Chief Secretary, DGP and ADGP, telling them to be present before the court on 12 October to explain the case. The bench further directed the Hathras District Magistrate and SSP to appear before it. The bench told all officials to come prepared with all the relevant material and documents to apprise the court of their versions of the case.

### **6.October.2020 : 'An undertrial can't be kept in jail for an unlimited period of the mercy of the prosecution', MP HC**

The applicant was arrested on 22-12-2016 in connection with Crime for the offences under I.P.C. registered by Police Station Lateri, Distt. Vidisha. Even after order by the court, the SP or his gazetted officers did not act in its compliance to monitor the case, leading to court opining that the undertrial cannot be kept in jail for an unlimited period of the mercy of the prosecution.

### **7.October.2020 : 70 detained in Haryana over protests against farm laws**

Police detained around 70 people, most of them farmers in Haryana's Sirsa, who were squatting on a road leading to Deputy Chief Minister Dushyant Chautala's residence, demanding his resignation from the post against the Centre's agriculture sector laws.

### **8.October.2020 : 3 scientists share nobel physics prize for Black Hole Research**

The 2020 Nobel Prize for physics has been awarded to Roger Penrose for black hole discovery and Reinhard Genzel and Andrea Ghez for discovering "a supermassive compact object at the centre of our galaxy."

### **8.October.2020 : UGC declares 24 universities as fake: maximum from Uttar Pradesh followed by Delhi**

"Students and public are informed that currently 24 self-styled, unrecognised institutions are functioning in contravention of the UGC Act, which have been declared as fake universities and these are not empowered to confer any degree," UGC Secretary Rajnish Jain said.

### **8.October.2020 : Project Dolphin-**

The Maharashtra government has decided on an action plan to conserve oceanic dolphins along its 720-km coastline in line with centre's Project Dolphin programme. In his address on the occasion of 74th Independence Day of the nation, the PM had announced two projects, Project Lion and Project Dolphin, to preserve the biodiversity of the nation.



**9.October.2020 : Freedom of speech may be most abused freedom in recent times: CJI SA Bobde**

A three-judge bench headed by CJI was hearing pleas of Jamiat Ulama-I-Hind and others alleging that a section of the media was spreading communal hatred over the Tablighi Jamaat congregation during the onset of COVID-19 pandemic. When senior advocate Dushyant Dave pointed out to that the affidavit filed by the Centre claims that the petition attempts to muzzle the freedom of speech, CJI Bobde responded, "They are entitled to make any argument like you people are. This freedom of speech may be the most abused freedom in recent times".

**10.October.2020 : Nobel Peace Prize**

The Norwegian Nobel Committees has decided to award the Noble Peace Prize for 2020 to the World Food Programme (WFP) for its efforts to combat hunger, for its contribution to bettering conditions for peace in conflict-affected areas and for acting as a driver force in efforts to prevent the use of hunger a weapon of war and conflict.

**11.October.2020 : Corruption in Judiciary worse than that in Public Departments: Madras HC calls for strengthening of vigilance system, surprise visits, inspections**

While making observations regarding the corrupt practices in the Public administration of the Government Departments, the Madras High Court endorsed the fact that the judiciary also is not exempted from corrupt practices. "The conscience of this Court would not permit it, if this Court fails to mention the increasing corrupt practices in the Judiciary Department as well as in Court premises", remarked Justice S. M. Subramaniam.

**12.October.2020 : Eight beaches in India have been awarded the prestigious Blue flag certification**

The eight Indian beaches which got this tag are Shivrajpur (Dwarka, Gujarat), Ghoghla (Diu), Kasarkod and Padubidri (Karnataka), Kappad (Kerala), Rushikonda (Andhra Pradesh), Golden Beach (Puri, Odisha) and Radhanagar (Andaman & Nicobar Islands). The Blue Flag beaches are considered the cleanest beaches of the world.

**13.October.2020 : "Article 19(1)(a) cannot be used as a shield against commission of crime": Mumbai Police tells Republic TV's Plea against investigation in TRP Scam Case**

The Mumbai Police has filed an affidavit before the Supreme Court, urging it to dismiss, with exemplary costs, the petition filed by Republic TV (AGR Outlier Media Pvt Ltd) and Arnab Goswami challenging the Mumbai Police investigation against the channel in the TRP Scam case. The Mumbai Police has contended that investigation in to an alleged crime cannot be urged as a ground for violation of Article 19(1)(a).

**14.October.2020 : SC closes plea against Cow slaughter, Elephant Poaching, Animal killing for crop protection and religion sacrifices.**

Supreme Court held that it is for Executive to take action towards enforcement and therefore closes plea against Cow slaughter, Elephant Poaching, Animal killing for crop protection and religion sacrifices.

**17.October.2020 : High court erred in refusing to protect rights of Sanatani Hindus**

Plea moves in supreme court against char dham law upheld by Uttarakhand High court.



## TEST YOUR KNOWLEDGE!!!



**1) According to Article 30 'minorities' have the right for the administration of educational institutions:**

- A. which have been established by them only
- B. which not necessarily have not been established by them but belong to their religion or language
- C. Article 30 does not speak about minority but deals with Scheduled Tribes only
- D. none of the above.

**2) A instigates his 6-year-old son B to take away from C, a purse containing Rs 5500. In this case which one of the following statements is correct?**

- A. B commits theft and A abets theft
- B. A commits no offense but B commits theft.
- C. Both A and B commits no offense
- D. B does not commit any offense but A commits abetment of theft

**3) Culpable homicide is not murder if...**

- A. Death is caused through provocation given by a public servant in the lawful exercise of his powers.
- B. The offender loses self-control by grave and sudden provocation which is voluntarily sought.
- C. The offender being a public servant exceeds the powers given to him by law and causes death with ill-will.
- D. The victim is above the age of eighteen years takes the risk of death with his own consent.

**4) Preparation and attempt are two stages of the commission of the crime. Preparation is not punishable generally but an attempt is. One basic reason as to why preparation is not punishable is that there...**

- A. Is no nexus between preparation and attempt.
- B. Can be chances of change of mind before commission of offense.
- C. Is absence of intention?
- D. Is absence of an attempt?



**5) Rioting means use of force or violence by an unlawful assembly, or by a member thereof, in prosecution of the common object of such assembly, as per:**

- A. Section 144 of IPC
- B. Section 145 of IPC
- C. Section 146 of IPC
- D. Section 148 of IPC.

**6) The right of private defence**

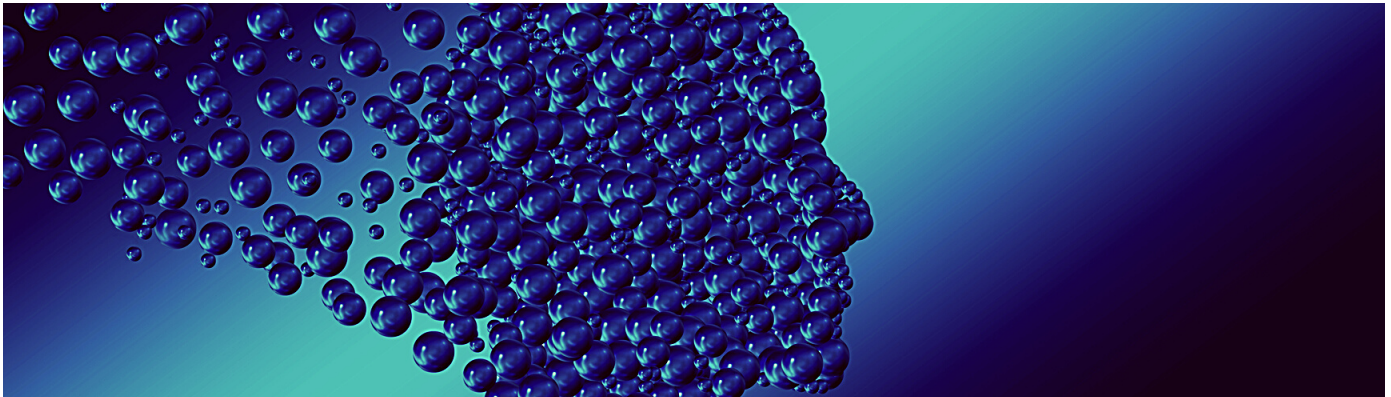
- A. Is not a right of defence but of retribution
- B. Is a right of defence but not a right of retribution
- C. Is a right of defence as well as right of retribution
- D. Is neither a right of defence nor a right of retribution

**7) The word 'wrong' in a defence of insanity refers to:**

- A. a legal wrong
- B. a civil wrong
- C. a moral wrong
- D. moral as well as legal wrong

**8) Section 162 of the Code of Criminal Procedure, 1973 is for the protection of**

- 
- A. Accused
- B. Witnesses
- C. Police officer
- D. Magistrate



**9) The term “taking cognizance” under the provisions of Code of Criminal Procedure, 1973 means-**

- A. Starting a trial
- B. Completing preliminary requirements for starting a Criminal trial
- C. Taking notice of the matter judicially
- D. An administrative action to decide if criminal trial is required

**10) Under the provisions of section 202 of the Code of Criminal Procedure, 1973 the Magistrate cannot-**

- A. Conduct the inquiry himself
- B. Ask the police officer to conduct an investigation
- C. Ask a person who is not a police officer to conduct an investigation
- D. Use judicial discretion

**11) Section 304 of Cr.P.C deals with**

- A. Protection to accused against double prosecution for the same offence
- B. Withdrawal from prosecution
- C. Legal aid to the accused at State expenses
- D. Order to release on probation of good conduct

**12) Which of the following documents is NOT a public document?**

- A. Registered power of attorney
- B. Records of Nationalised banks
- C. A death certificate
- D. Certified copy of annual return of the Company is a public document

**13) A Summons issued by a Court must be in:**

- A. Duplicate
- B. Triplicate
- C. Writing and Duplicate
- D. Writing and Triplicate

**14) A marriage certificate -**

- A. Is proof of a valid marriage per se
- B. Is a determining factor regarding the validity of the marriage
- C. Is of great evidentiary value in family matters
- D. All of the above

**15) Which of the following sections of the Indian Evidence Act, 1872 deals with ‘without prejudice’ rule?**

- A. Section 21
- B. Section 22
- C. Section 23
- D. Section 24

**16) A confession made by a person while in police custody is inadmissible as per:**

- A. Section 25 of Evidence Act
- B. Section 26 of Evidence Act
- C. Section 27 of Evidence Act
- D. Section 30 of Evidence Act.

**17) A dying declaration is admissible:**

- A. Only in criminal proceedings
- B. Only in civil proceedings
- C. In civil as well as criminal proceedings both
- D. In criminal proceedings alone & not in civil proceedings.





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- Two-Days Virtual Conference on Law, Courts and Politics during Covid-19 Pandemic: (19th – 20th December, 2020)

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