

RIGHT OF PRIVATE DEFENCE OF HUMAN BODY UNDER INDIAN PENAL CODE

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There are circumstances when the state mechanism may not be accessible to the citizens to defend themselves in case of impending danger and in those situations, a person is allowed to employ force to avert the impending threat. People have the right to protect themselves when state aid cannot be obtained and this right is called the right of private defence of body. This right is provided under sec. 96-106 of Indian Penal Code. However, this right can only be exercised when the circumstances justify it and not otherwise. The right of private defence is subject to restrictions given under section 99 of the IPC. Section 99 provides that the right to private defence cannot be availed when there is sufficient time to take recourse to the public authorities, and also not against a public servant acting in good faith under a legal duty unless reasonable apprehension is caused. It also provides that force used must not be excessive than is necessary to ward off the impending threat.²

In certain circumstances, the right of private defence also extends to causing death of the person who poses such a danger. This right is provided under sec. 100 of the Indian Penal Code. In order to avail this, there must be reasonable apprehension that death or grievous hurt might be caused, or in case of assault with intention³ of committing rape, abducting, wrongfully confining a person when there is apprehension of throwing or attempting to throw acid.³ Although the law permits causing of death in certain circumstances of private defence, it ensures that the person does not

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²PSA Pillai, Criminal Law 10th ed. 2008, p.199

³RatanlalDhirajlal, The Indian Penal Code(34th ed. 2014) ,p.173

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exceed this right.⁴ This right can only be availed when the danger or the threat is imminent and the force applied must be proportionate to the danger. However, as stated in *Puran Singh v. State of Punjab*⁵ there is no set of scales that determines whether the accused has exceeded the right. It has to be determined from the facts and circumstances of each case.

I. Circumstances in which death may be caused

The right of private defence of the body extends in certain situations to the extent of even causing death of the aggressor. This is recognized by sec. 100, IPC. This right, it must always be borne in mind, is subject to the restrictions imposed under sec. 99, such as the fact that first, this right will not be available against a public servant acting in good faith under colour of office, unless the act causes reasonable apprehension of death or grievous hurt, secondly, the right of private defence is not available if there is time to take recourse to authorities and thirdly, this right does not extend to causing more harm than necessary. So, subject to these conditions, the right of private defence of body extends to the causing of death of the aggressor, subject to further condition enumerated in sec. 100.

Sec. 100 When the right of private defence of the body extends to causing death⁴–

The right of private defence of the body extends under the restrictions mentioned in the last preceding section, to the voluntary causing of death or of any other harm to the assailant, if the offence which occasions the exercise of the right be of the descriptions hereinafter enumerated, namely:

First- Such an assault as may reasonably cause the apprehension that death will otherwise be the consequences of such assault.

Secondly- Such an assault as may reasonably cause the apprehension that grievous hurt will otherwise be the consequence of such assault.

Thirdly- An assault with the intention of committing rape:

Fourthly- An assault with the intention of gratifying un-natural lust:

Fifthly:- An assault with the intention of kidnapping or abducting:

⁴K.N.ChandraSekhran Pillai, *General Principles of Criminal Law* (1st ed. 2003),p.150

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Sixthly- An assault with the intention of wrongfully confining a person under circumstances which may reasonably cause him to apprehend that he will be unable to have recourse to the public authorities for his release:

Seventhly – An act of throwing or administering acid or an attempt to throw or administer acid which may reasonably cause the apprehension that grievous hurt will otherwise be the consequence of such act.

II. Reasonable Apprehension of Death or Grievous Hurt

The first and the second clause of sec. 100 lays down and stipulates that the right of Private Defence to the extent of causing death is available when the assault employed by the assailant reasonably cause the apprehension that death or grievous hurt will otherwise be the consequence of such assault⁵. Such as apprehension must be real and not illusory and the danger must be imminent.⁶And in that event, the accused can go to the extent of causing death of the assailant in the exercise of right of private defence even though no actual injury any have been inflicted. The burden is on the accused to prove that he had a right of private defence which extended to causing of death.

(a) Reasonable Apprehension of danger

Reasonable apprehension of danger is one of the essential pre-requisites of the right of private defence. The apprehension should be reasonable to a man of normal state of mind. It should not be that of a coward or timid man.

The right of private defence arises as soon as an assault reasonably causes the apprehension of death or of grievous hurt.¹⁰ But what constitutes a reasonable apprehension of death or grievous bodily injury is always a question of fact to be decided upon facts and circumstances of each case.

The source of apprehension may be the weapon, the manner of its use, the mental and the physical attitude of the person uttering the threat, his capacity to execute the threat. The relative strength of the combatants is, sometimes, material.

⁵K.D. Gaur, The Indian Penal Code (4th Ed. 2009) p. 109

⁶Inserted by the Criminal Law (Amendment) Act, 2013 (12 of 2013), S.2 (w.e.f. 3-2-2013)

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The standard of gravity of apprehension which would be required for raising right of private defence varies from case to case. A person who is living in a lonely house or among a lawless population or who is traveling by night on an unprotected road, will be justified in acting upon apprehension of danger which would be insufficient, if he was dwelling in all the security of a civilized town, the standard in such circumstances is not the standard of a cool-bystander. The actual assault is not what matters, but it is the apprehension in the mind of the accused that has to be taken into consideration. The working of the mind of the accused cannot be gauged by a theoretical appraisal of the situation of a bystander.

Section 100 of the Indian Penal Code does not lay down that grievous hurt must be actually caused by the assailant the section 100 lays down is that the person claiming the right of private defence must be under a bona-fide apprehension or fear that death or grievous hurt would otherwise be the consequence of the assault on him, if he does not defend himself.

III. Justifiable Homicide

Homicide in self defence is justifiable under Sec. 100 subject only to restrictions contained in sec. 99. Consequently, it may be justifiable irrespective of the fact that the party killing was guilty of an assault, or was engaged in an unlawful contest, provided (i) that the party killing did not either commence or provoke the attack with intent to kill or do grievous bodily harm; (ii) that he declined further conflict and quitted and retreated from it so far as was practicable with safety; (iii) that he killed the assailant because he had reasonable cause for believing it to be necessary to do so, in order to avoid immediate death, or the other offences here enumerated. A person who apprehends that his life is in danger or his body in risk of grievous hurt, is entitled to defend it by killing his assailant, but in order to justify his act the apprehension must have been reasonable, and the violence used not more than what was necessary for self defence. Nor should it be used towards unconnected with the assault; actual or threatened.⁷

⁷Dr. Hari Singh Gour's Penal Law of India, 11th Edition, Vol. I, 2016, Page no. 920

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James Martin v. State of Kerala lay down that there are a number of factors that need to be considered to find whether the right of private defence is available or not. Factors such as injuries received by the accused, imminence of danger to his safety, injuries that are caused by the accused and also the circumstances in which the injuries were caused are taken into consideration. It also noted that the person who is apprehending danger cannot weigh in golden scales on the spur of the moment as to what amount of force is required to ward off the threat of the assailant. It is difficult to expect a person to be composed and measure the force required. Such situations are pragmatically viewed keeping in mind normal human reaction and conduct.

In a case of murder, if the accused has the right of private defence of person or property and if he acts within the limits prescribed by law, he is not guilty of any offence. But if the accused acting in the exercise of private defence, exceeds the limit prescribed, the offence of murder is reduced to one of Culpable Homicide not amounting to murder.

The right of private defence when the person concerned is faced with apprehension of grievous hurt is dealt with by clause II of sec. 100, of the Indian Penal Code, 1860. Four cardinal conditions must have existed before the taking of the life of a person is justified on the plea of self defence:

Firstly- the accused must be free from fault in bringing about the encounter;

Secondly, there must be present an impending peril to life or of great bodily harm, either real or so apparent as to create honest belief of an existing necessity;

Thirdly, there must be no safe or reasonable mode of escape by retreat; and

Fourthly, there must have been a necessity for taking life. The extended right of private defence under section 100 of the Indian Penal Code, 1860 up to the voluntarily causing of death to the assailant arises only if the offence which occasions the exercise of the right to be of any of the descriptions mentioned therein.⁴⁶ This right of private defence of the body then extends to the voluntary causing of death or of any other harm to the assailant, if the assault is such as may reasonably cause apprehension that grievous hurt will otherwise be the consequence of such assault. Thus, it is clear that it is not only sustaining the grievous hurt that brings the case of accused within the ambit of section

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100, IPC but even an apprehension of the grievous hurt may extend the right to voluntary causing the death or any other harm to the assailant.

The accused just has to show that he was faced with a reasonable apprehension and whether the apprehension was reasonable or not, is to be determined from the facts and circumstances of each case.

In *Darshan Singh v. State of Punjab*⁸, there was a dispute between the two brothers regarding the agricultural field. Gurcharan Singh the deceased was the brother of Bakhtawar Singh and uncle of Darshan Singh. According to the prosecution story, Gurcharan Singh and his son were irrigating their field when Gurcharan Singh and Darshan Singh came to their field and started abusing the complainant party. They had gun and gandasa with them. Bakhtawar Singh gave a gandasi blow to Gurcharan Singh and in order to save himself, he also caused injury on the head of Bakhtawar Singh. After that, Darshan Singh fired two shots at Gurcharan Singh as a result of which, he died. However, according to the accused version, it was Gurcharan Singh who first inflicted injury on Bakhtawar Singh and then, in order to protect himself, Darshan Singh fired shots at Gurcharan Singh. The accused pleaded Right of private defence. The trial Court considered the defence of the version as more probable and acquitted the accused and put forth two questions as to who was the aggressor and who had the motive to open the attack. The place where incident happened belonged to the accused. On this basis, it justified its decisions. However, the High Court reversed the judgement without giving any cogent reasons. Consequently, the appeal was allowed and the decision of the High Court set aside. It was held that a mere apprehension is enough to put the right of private defence into operation and actual commission is not required. And in this case Darshan Singh had reasonable apprehension that Gurcharan Singh might also injure him. Also, it was held that even though the accused may not plead the right of private defence, still it needs to be given to him.

Law permits taking of the life of another for prevention and not for punishment. It is a right essentially of defence and not of retribution. The right of self-defence is exercisable in the face of actual or imminent danger. It is available only to

⁸Ram Saiya v. Emperor, AIR 1948 All, 205

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those who act honestly and in good faith. In no case, can it be employed as a shield to justify aggression. The accused cannot invoke self defence as device or pretence for provoking an attack in order to slay his assailant and then claim exemption on the ground of self-defence.

The necessity justifying exercise of the right must be urgent and the danger of loss of life or great bodily harm, imminent. The right exists if the attack is either actual or threatened. The courts will naturally view the circumstances from the stand point of the accused and not from that of a cool bystander.

The accused is not given the benefit of this section if he does the act with the intention of taking revenge or in a sudden altercation as in that case there would be no reasonable apprehension of any kind as held in case of Vishvas Aba Kurane v. State of Maharashtra, in which a scuffle took place between Jaywant and Akram in a local cinema where the deceased, Raghunath and few others intervened to solve the matter. Two days later, when Jaywant went to the bazaar to purchase something, he was given as blow with stick and axe by the accused. On hearing the cry of Jaywant, Raghunath along with his brother rushed to the bazaar. On seeing them, the accused started running behind them and caught hold of them assaulting them badly. As a result of which, Ragunath died. The trial court held that after the first assault on Jaywant, he turned back towards the accused with view to retaliate and threw one of the accused on the ground, as a consequence of which, the accused has acquired a right of private defence. Also as against the deceased, the court held that the accused assaulted the deceased in the heat of moment and sudden fight and thereby it amounted to culpable Homicide not amounting to murder. However, the High Court interfered with the findings of the trial court. The plea of the appellants that they have exercised the right of private defence in causing the death of the deceased was rejected because, in this case, the accused failed to prove that there were circumstances giving rise to reasonable grounds for apprehending that either death or grievous hurt would be caused to him.

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IV. Right against assault with intention of Committing Rape or Gratifying Unnatural Lust

The right of private defence of person only arises if there is an offence affecting the human body are to be found in chapter XVI of Indian Penal Code, which contained section 299 to section 377. Rape and Unnatural offence are also in chapter XVI and are defined in sec.375 and sec. 377 respectively. Under sec. 100(3) death may be caused when there is an assault with the intention of committing rape.

—Rape has been defined in section 375 of the Indian Penal Code.

Section 375 Rape – A man is said to commit "rape" if he;

- (a) penetrates his penis, to any extent, into the vagina, mouth, urethra or anus of a woman or makes her to do so with him or any other person; or
- (b) inserts, to any extent, any object or a part of the body, not being the penis, into the vagina, the urethra or anus of a woman or makes her to do so with him or any other person; or
- (c) manipulates any part of the body of a woman so as to cause penetration into the vagina, urethra, anus or any part of body of such woman or makes her to do so with him or any other person; or
- (d) applies his mouth to the vagina, anus, urethra of a woman or

makes her to do so with him or any other person

Under the circumstances falling under any of the following seven descriptions-

First.—Against her will.

Secondly.—Without her consent.

Thirdly.—With her consent, when her consent has been obtained by putting her or any person in whom she is interested, in fear of death or of hurt.

Fourthly.—With her consent, when the man knows that he is not her husband, and that her consent is given because she believes that he is another man to whom she is or believes herself to be lawfully married.

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Fifthly.—With her consent, when, at the time of giving such consent, by reason of unsoundness of mind or intoxication or the administration by him personally or through another of any stupefying or unwholesome substance, she is unable to understand the nature and consequences of that to which she gives consent.

Sixthly.—With or without her consent, when she is under eighteen years of age.

Seventhly.—When she is unable to communicate consent.

Explanation 1— For the purposes of this section 'vagina' shall also include labia majora.

Explanation 2— Consent means an unequivocal voluntary agreement when the woman by words, gestures or any form of verbal or non-verbal communication, communicates willingness to participate in the specific sexual act:

Provided that a woman who does not physically resist to the act of penetration shall nor by reason only of that fact, be regarded as consenting to the sexual activity.

Exception 1— A medical procedure or intervention shall not constitute rape.

Exception 2- Sexual intercourse or sexual acts by a man with his own wife, the wife not being under fifteen years of age, is not rape.

Similarly in Sec. 100(4) an assault with the intention to gratify unnatural lust may be defended by causing the death of the offender. Section 377 of the Indian Penal Code defines unnatural offences. The attacker's assault must be prove to fall within the meaning of that section.

Section 377 unnatural offences- Whoever voluntarily has carnal intercourse against the order of nature with any man, woman or animal shall be punished with imprisonment for life or with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine.

Explanation- Penetration is sufficient to constitute the carnal intercourse necessary to the offence described in this section.

The leading Supreme Court case of Yashwant Rao v. State of Madhya Pradesh, clarifies the position of law as regard to the third and the fourth clause of s. 100. In this case, the deceased tried to have sexual intercourse with the daughter of the

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accused while she went to the toilet on the rear side of her house. The accused, on seeing the daughter being raped hit the deceased with the spade and the deceased died as a consequence. The Supreme Court held that the accused was justified in exercising the right of private defence of body against the deceased and hence was given the acquittal. Here it can be seen that the assault that took place on the daughter was sufficient to create reasonable apprehension in the mind of the accused and thereby his act was justified under section 100. The right of private defence was exercised by the accused to protect the body of another.⁹

In *Bhadar Ram v. State of Rajasthan* where the appellant saved her widow sister in law from the clutches of one Nand Ram and assaulted him with gandasa while he was running was given the exception under clause third of section 100 IPC. In this case, the appellant's sister-in-law was a widow lady who was grappled by Nand Ram in the dead hour of the night in order to outrage her modesty for committing rape. Hearing her hue and cry, ¹⁰the appellant came prepared with a gandasa and assaulted Nand Ram while he was trying to commit rape of the widow lady. It can be seen here that there was reasonable apprehension of danger to the body of appellant's sister and thus the right of private defence in this case was rightly availed against the danger that was real, present and imminent.

The right of Private Defence is available to everyone irrespective of the moral character of the person exercising her right as in the case of *State of Orissa v. Nirupamma Panda*⁵¹ where the woman while preventing herself from the non-consensual sexual intercourse stabbed the person when the deceased tried to rape her and she was given the benefit of this right. It was contended that the character of the accused was in doubt and thereby she should not be given the right of private defence. It was held that she was entitled for an acquittal as she had every right to save her honor even by causing death and her alleged immoral character is of no consequences. The court also observes that while providing the right of private defence under thirdly section 100, the personal character of the accused is immaterial.

⁹AIR 1992 SC 1683

¹⁰(2000) Cr L J 1174 (Raj.)

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V. Circumstances in which other harm except death may be caused

It is no doubt true that nothing is an offence which is done in exercise of right of private defence of person or property, for the purpose of repelling an unlawful aggression within certain limits. In respect of any offence against the human body other than the offences specified in clause (3), (4), (5) and (6) of section 100 the right of private defence of the body extends to the causing to the assailant any harm short of death.

Section 101- When such right extends to causing any harm other than death

If the offence be not of any of the description enumerated in the last preceding section, the right of private defence of the body does not extend to the voluntary causing of death to the assailant, but does extend, under the restrictions mentioned in Sec. 99, to the voluntary causing to the assailant of any harm other than death.

The result stated in this section naturally follows from the provisions of the last section. If the harm be of the serious description described in the last section, the right extends to the causing of death otherwise the harm caused may be any harm short of death. But in causing such harm the restrictions laid down in sec. 99 still apply. Indeed, they are the restrictions which underline the whole law of self defence.

Under section 101, I.P.C., if the offence which occasions the exercise of the right be not one of those enumerated in sec. 100, I.P.C., every person has a right to defend his own body and the body of any other person against the offence affecting the human body. Under section 101, therefore a person is entitled to exercise his right of private defence of the body, as against any assault other than the firstly and secondly of section 100 to the extent of causing grievous hurt. If after the commission of an assault of a simple or grievous nature, there is in any case, no further apprehension of assault, occasion for the exercise of the right of private defence of the body should not arise.

A right of private defence governed by sec. 101, I.P.C. is subject to two limitations. One is that, in exercise of this right of private defence, any kind of hurt can be caused, but not death and the other is that the use of force does not exceed the minimum required to save the person in whose defence the force is used.

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In the instant case, the evidence probabilities the defence version that the deceased and his son had hit the appellant with sticks on his head and the blows landed on his elbows when he raised his hands to protect his head, and that at that stage the appellant picked up one of the theory sticks which were lying at the spot and hit the deceased, to protect himself and not with the intention of killing him. The deceased died two days later on account of the resultant injury. The accused has also stated that he was detained in the police station on the night of 9th, but was shown to have been arrested only on 11th. It is not necessary to go into this aspect as the preponderance of probabilities shows that act of the appellant was in all probability, in exercise of his right of private defence.¹¹

Law views with commiseration the plight of a person who has exceeded his right of private defence.¹² If it has resulted in death his offence is reduced to one of culpable homicide. Where he is one of five or more, the fact that he has exceeded his right does not convert him into a member of an unlawful assembly through he would be individually liable for his excess. The case would, however, be different, if the party had initially exceeded that right or in the case where the exercise of that was mere pretence. In another case the accused, a person of education and wealth living in a town where medical attendance could easily be procured, chained up his brother, who was subjected to fits of violent insanity with lucid intervals. In an unnecessarily cruel way for over three months and apparently would have continued to so confine him indefinitely if the District Judge had not interfered. He was held justly convicted under sec. 344 and he could not be exculpated under this section or section 92 because he had not acted with due care and attention. In other words his act lacked good faith. In one case the deceased descended upon the accused, with a pitchfork in his hand, and commenced to abuse his sister whose son attacked him. Whereupon the accused struck the deceased on the head, of which he died. The blow was unpremeditated and held to be the result of sudden provocation. He was held to have chastised the deceased with undue severity and was, therefore, convicted of grievous hurt.

¹¹CharunguBoipari v. State (1966) Cut. L.T. 530 at p. 540

¹²Munney Khan v. State of Madhya Pradesh AIR 1971 SC 1491

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VI. Limitation upon the right of Private Defence of body

The right of Private defence is not unlimited but it is subject to certain limitations. However, it is difficult to draw distinction between the basic principles and the restrictions, which are the bases for exercise of the right of private defence, because sometimes basic principles and restrictions or limitations are used together.

Be that as it may, these restrictions were imposed because the law-makers were conscious of the fact that if this right was left unrestricted, it could encourage vendetta. The restrictions were, therefore imposed on the exercise of right of private defence. Observed Holloway J:

The natural tendency of the law of civilized states is to restrict within narrowing limits the right of self defence.

There can be no right of private defence, where there is no violation of a legal right. It means that the right occurs only on commission of a crime. It is one of the conditions precedents for the exercise of right of private defence. However there are two exceptions to this rule.

- (i) The acts which would not be offences by virtue of certain exceptions contained in chapter IV of the Indian Penal Code would be considered offences for the purpose of exercising the right of private defence. As a result of this, the right is available even against insane, intoxicated and the like, as they are incapable of committing a crime with mens rea.¹³
- (ii) The right may be exercised even against the innocent person who has nothing to do with the assault on the person exercising the right of private defence. In case of extreme necessity, if a person is compelled to harm an innocent person, he commits no offence. For instance, if the defendant is so situated that he can not effectually exercising the right of private defence without risk of harm to the innocent person, his right of private defence extends to the running of that risk.

¹³In 7 Mad. H.C. Ap. 25 quoted in Habiruddin v. Emperor, 35 Cal. 363

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VII. Section 99 Acts against which there is no right of private defence—

There is no right of private defence against an act which does not reasonably cause the apprehension of death or of grievous hurt, if done, or attempted to be done, by a public servant acting in good faith under colour of his office, though that act may not be strictly justifiable by law.

There is no right of private defence against an act which does not reasonably cause the apprehension of death or of grievous hurt, if done, or attempted to be done, by the direction of a public servant acting in good faith under colour of his office, though that direction may not be strictly justifiable by law.

There is no right of private defence in cases in which there is time to have recourse to the protection of the public authorities. **Extent to which the right may be exercised.**—The right of private defence in no case extends to the inflicting of more harm than it is necessary to inflict for the purpose of defence.

Explanation 1.—A person is not deprived of the right of private defence against an act done, or attempted to be done, by a public servant, as such, unless he knows or has reason to believe, that the person doing the act is such public servant.

Explanation 2.—A person is not deprived of the right of private defence against an act done, or attempted to be done, by the direction of a public servant, unless he knows, or has reason to believe, that the person doing the act is acting by such direction, or unless such person states the authority under which he acts, or if he has authority in writing, unless he produces such authority, if demanded.

This section indicates the limits within which the right of private defence should be exercised. The Madhya Pradesh High Court in *Majin Thomas George v. State of M.P.* Laid down three restrictions on the exercise of right of private defence: First, there must be no more harm inflicted than is necessary for the purpose of defence. Secondly, there must be reasonable apprehension of danger to the body from the attempt or threat to commit some offence.

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