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**VIRTUAL STORE LAYOUTS AS TRADE DRESS- PROTECTING  
BRAND IDENTITY IN THE METAVERSE**- Ishika Sehgal<sup>1</sup>**Abstract**

Digital environments including augmented reality, virtual reality, and metaverse platforms have changed how brands build and communicate the identity of their sources of goods and services. Larger Corporations are building replicas of physical stores with carefully curated retail environments in the virtual space to maintain continuity of customer experience and brand recognition. Virtual store layouts are more than a place to shop, they serve as a major commercial signifier, similar to trade dress in the context of traditional trademark law<sup>2</sup>.

Intellectual property regimes as they currently exist were developed for tangible marketplaces and therefore, it will be difficult for the current intellectual property system to sufficiently protect spatial forms of branding that exist only in the digital realm. This Article will discuss the extent to which virtual store layouts can be protected as trade dress under the current law and the doctrinal, evidentiary, and jurisdictional issues that arise when looking for such protection under Indian Trademark Law

This article examines the principles governing trade dress- non-functionality, distinctiveness, and secondary meaning, within immersive environments and how virtual interactions change existing legal principles that have developed over time from judicial decisions. Specifically, this article focuses on the Indian Trade Marks Act 1999 and contends that while it provides academia overall with conceptual flexibility to recognize virtual trade dress, the procedural and evidential mechanisms in place to protect virtual trade dress are inadequate at present.

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<sup>2</sup> International Trademark Ass'n, *Trademarks in the Metaverse White Paper* (Apr. 12, 2023), [https://www.inta.org/wp-content/uploads/public-files/perspectives/industry-research/METAVERSE\\_REPORT-070323.pdf](https://www.inta.org/wp-content/uploads/public-files/perspectives/industry-research/METAVERSE_REPORT-070323.pdf)

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This article further argues that protecting virtual layout of a digital store as trade dress is essential to protecting the integrity of a brand and makes specific recommendations to help implement a system of protection for virtual store layouts as trade dress.

**Keywords:** *Trade Dress, Metaverse, Virtual Retail, Trademark Law, Digital Branding, Immersive Environments, Indian IP Law.*

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## Introduction

Digital commerce has transitioned into a new era as a result of the proliferation of digital interconnected worlds, collectively known as the metaverse. As such, brands have evolved beyond traditional web-based and social media platforms to establish fully interactive digital shopping experiences in the metaverse that simulate or reinterpret an actual physical store. These immersive environments have strategically incorporated experiential elements designed to help create a connection between brand identity and familiarity with the consumer while also creating a continual experience of the brand across both digital and traditional retail locations.

In the context of trademark law, there has been an increase in concern regarding the protection of indicators of the place where goods and/or services are commercially available to consumers and include terms, logos, images and/or trade-style names, which provide consumers with a way to differentiate between products. One of the primary reasons for providing such protections through trademarks is to help consumers avoid confusion when making purchases, as well as to protect the goodwill created by a business through continued use of the trademarked product or service.

Over time, courts recognized that brand identity could also be conveyed by means other than words and logos and that the totality of the overall impression of a particular trademark could also be communicated to consumers through the physical appearance and ambience of the property or business that the product or service is sold at. As this realization gained traction,

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the concept of trade dress was created which allows for the extension of trademark protection to include the total appearance or impression of a tangible product.<sup>3</sup>

Trade dress protection has advanced greatly within the judiciary- for example, in the case of *Two Pesos, Inc. v. Taco Cabana, Inc.*<sup>4</sup>, the Supreme Court stated that restaurant interior decor could identify the source of the restaurant, distinct from any logo or brand name. In today's world, the global domination of product branding, such as Apple, Nike, and Gucci, brands create retail spaces as an opportunity for consumers to have an immersive branded experience, rather than simply being a transaction point with no reference to the product sold at that location.

The design of the space, including the choice of architectural minimalism, lighting designs, the arrangement of the products, and the overall spatial arrangement of products, is all designed to connect emotionally with their values e.g., luxury, innovation or exclusivity. People often recognize brands within their environment, even though there are no visible trademark indicators, thereby confirming that the branded environment serves as a powerful commercial identifier/indicator, and as a result of this, brand companies now consider the physical design of a retail store to be a strategic intellectual property asset that helps to define their brand.

With the emergence of augmented reality , Virtual Reality and the metaverse; brands have now taken this into the digital world by recreating or redesigning physical stores in an immersive, virtual environment, allowing for continued consumer interaction and deeper connections with digitally native consumers. These virtual places function similarly to physical trade dress by providing visual and spatial cues representing where brands originate. However, their intangibility creates an unanswered legal issue as to whether a purely digital spatial configuration, where an avatar experiences the space rather than a person being present in it, can satisfy the legal requirements of distinctiveness, non-functionality, and source identification when determining the trade dress. Therefore, as spatial branding migrates to virtual platforms, this will create a primary legal question as to whether a virtual

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<sup>3</sup> *Store Layouts: The New Trademark on the Block*, SpicyIP (Sept. 7, 2020),

<https://spicyip.com/2020/09/store-layouts-the-new-trademark-on-the-block.h>

<sup>4</sup> *Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763 (1992).

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store layout that does not have physical embodiment can also meet the criteria needed to be protected as trade dress within current definitions of trademark law.

### **Trade Dress Doctrine and Spatial Branding**

The purpose of trade dress is to provide a means to protect the non-functional, visually distinctive elements of a product or service which identifies to consumers a commercial source. The Courts have historically assessed the arrangement of stores, colour scheme, lighting and architecture of the store in order to determine if a consumer associates those characteristics with a specific brand or product. Examples of physical retail environments demonstrating the operation of this principle can be seen in Apple's clean-line glass storefronts and Taco Cabana's colourful festive décor style, both illustrate how the physical space communicates the branding of a product, without using a logo or word mark. The legal basis for this type of protection is based on consumer perception; once the store's layout is a source indicator, it becomes de facto trademark-like in nature. Likewise, virtual retailers provide consumers with this same opportunity to identify with a brand through branded immersive environments encountered by users who are exploring the experiential platform, as their experience is intended to promote brand recognition and brand loyalty. Therefore, in theory, virtual environments will meet the foundational principles of trade dress protection, the problem lies in translating this theory into a workable legal definition.

### **The Digital Dilemma- Translating Physical Doctrine into Virtual Space**

The entrance of trade dress into the virtual world challenges longstanding beliefs concerning trademark law. While there are naturally occurring limitations on physical aspects of space, movement etc. surrounding the physical world, virtual worlds have no such limitations as they are composed entirely of programmable endless structures that have no physical reality. Increasingly, companies are establishing branded storefronts that mirror their shops in 'brick and mortar' stores within augmented and virtual environments for branding purposes. However, courts have yet to rule upon whether any type of virtual world qualifies as a type of marketed commercial resource. Because of this, both businesses and competing entities face considerable doubt as to how they will operate in virtual marketplaces. The entire crux of the matter hinges on whether traditional principles associated with protecting the appearance of a

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product can be applied to products that are purely virtual objects used for sale to consumers and serve the same purpose that would be performed by a physical product<sup>5</sup>.

### **Functionality in Virtual Environments**

Functionality is a key limitation of trade dress protection and prohibits the monopolization of elements that are necessary for the operation of a product or for competition under trademark law. In the context of a physical retail store, aisle widths and shelf placement may be viewed as functional elements because they allow the customer to move around the store. In the case of a virtual environment, however, functionality becomes highly abstract as avatars do not move physically. This raises questions as to whether navigation design in a virtual environment is purely utilitarian or serves solely as a form of aesthetic branding. Regulatory bodies, such as the German Trademark Office, have already had to address similar questions, for example, with Apple's retail layout. The trademark office initially asked whether the layout registered by Apple showed where the goods originated or simply conveyed the brand value. These types of questions become even more pronounced in virtual environments due to the seamless merging of utilitarian and aesthetic elements in navigation design. Therefore, there needs to be a new definition of functionality for trade dress protection. A virtual design can only be considered functional if, when removed, it significantly impairs navigation, has standard components that make up the interface architecture, or provides a performance or gameplay benefit. If not, it should qualify as a form of branding that is only expressive<sup>6</sup>.

### **Establishing Secondary Meaning in the Metaverse**

Often, trade dress protection requires evidence of secondary meaning, or evidence that consumers associate the design with one commercial source. Traditionally, evidence of secondary meaning is established over time through consistent use of the trade dress and marketing. Virtual environments make this evidence more difficult to obtain. There is a

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<sup>5</sup> Suvansh Majmudara, *Evocative Analysis of Intellectual Property Rights*, 2 JCLJ 516 (2021)

<https://www.juscorpus.com/wp-content/uploads/2021/10/49.-Suvansh-Majmudar.pdf>.

<sup>6</sup> Scott D. Locke, *Trade Dress in the Age of E-Commerce: The Challenge of Protecting the "Look and Feel" of Websites and Mobile Apps*, 27 Alb. L.J. Sci. & Tech. 213, 217–18 (2017)

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fragmented user experience across platforms such as Roblox or Decentraland, so users may not see the brand through their interaction with the platform continuously. This makes collecting evidence to prove consumer association more difficult than in a brick-and-mortar retail environment. The difficulties of establishing secondary meaning in virtual environments can be illustrated by the Godrej's retail format trademark, which had to demonstrate significant use in the physical environment before being registered. To establish evidence of secondary meaning in virtual environments, alternative metrics will need to be developed, including user engagement data, revisit frequency, perception of the brand in the media, and brand consistency across multiple platforms. Thus, secondary meaning in virtual environments should shift from establishing evidence through time in the physical environment to establishing evidence through measurable digital interactions.

### **Cross-Jurisdictional Enforcement Challenges**

The trademark is typically a territorial right but the metaverse is a global platform. Therefore a single virtual store can potentially violate multiple trademark rights covering multiple jurisdictions thus creating the potential for enforcement fragmentation. The case of *Hermès v. Rothschild*<sup>7</sup> demonstrated both the capability and limitations of the enforcement of trademarks in the virtual world, as well as the risk of the trademark owner continuing to suffer from infringement after the judgment was entered due to the lack of efficient enforcement mechanisms in decentralized digital environments. Therefore brand owners must pursue takedowns, file complaints against platforms, and litigate against the infringing party in each jurisdiction, resulting in an expensive and ineffective manner of enforcing their rights<sup>8</sup>.

### **Free Speech and Artistic Expression**

Trademark protection in the virtual environment implicates First Amendment rights to freedom of expression. Courts in the United States often utilize the Rogers Test from *Rogers*

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<sup>7</sup> *Hermès Int'l v. Rothschild*, 89 F.4th 132 (2d Cir. 2023).

<sup>8</sup> Timothée Charneil, *Enforceability of Trade Mark Rights in Metaverse: Where Virtual Worlds Meet Legal Realities*, 19 J. Intell. Prop. L. & Prac. 860 (2024), <https://doi.org/10.1093/jiplp/jpae080>.

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v. Grimaldi<sup>9</sup> to determine how to weigh trademark rights against artistic expression. An example of this can be seen from *ESS Entertainment v. Rockstar Games*<sup>10</sup>, where the use of a real-world establishment in the video game was found to be an expressive use versus infringing use. Therefore, similar reasoning can be applied to virtual replicas which are arguably considered parody or artistic commentary.

This creates an inherent legal tension, as immersive commercial environments increasingly create a grey area between artistic expression and commercial exploitation, courts must understand that immersive spaces have dual purposes, both as forms of artistic expression and as commercially identifiable sources.

### **Economic Stakes and Innovation Risk**

Virtual retail has significant commercial importance. Metaverse fashion marketplaces have an anticipated significant increase in development over the next few years, along with millions of users and considerable revenue already generated from branded virtual spaces. The disparity between the costs of creating a professional-quality virtual store versus the costs of copying the layout of a store on an open platform is quite high, and the result is that there is little legal protection to encourage new businesses to invest their money to develop new brands. This situation creates a risk that digital brand architecture will become a public good that can be exploited by others, as there are no enforceable rights.

### **Indian Legal Framework- Gaps and Opportunities**

India's intellectual property regime offers a foundation for protecting elements of virtual retail environments, yet its protection remains fragmented and doctrinally incomplete when applied to immersive digital spaces such as the metaverse. Many of the requirements for registering a trademark assume some type of tangible business or commercial environment, so they can be difficult to apply to the concept of spatial branding when it has no physical (i.e., real-world) existence. The Trade Marks Act, 1999 is the best place to seek protection because its definitions of a trademark are relatively broad and flexible. Under Section 2(zb)

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<sup>9</sup> *Rogers v. Grimaldi*, 875 F.2d 994 (2d Cir. 1989).

<sup>10</sup> *E.S.S. Entm't 2000, Inc. v. Rockstar Games, Inc.*, 547 F.3d 1095 (9th Cir. 2008).

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of the Act<sup>11</sup>, a trademark can take on the form of not just traditional types of word or logo based marks but also shapes and packaging, combinations of colours, and the overall get-up or visual appearance of a trademark that is used to distinguish goods or services provided by one provider from those provided by another. Furthermore, Indian courts have traditionally taken a broad interpretation of Section 2(zb), so there is trade dress protection as well, which means that courts have extended the principles of trademark law to cover non-traditional identifiers like product configuration, store décor, and visual presentation. In theory, therefore, a virtual store layout should be covered by the same broad interpretation if it can be established that the layout could act as an identifier of the source of the goods or services. Virtual retail environments serve the same function of communicating the branding of goods or services through spatial designs, aesthetic consistency, and consumer recognition as do physical store environments. However, although the Trade Marks Act is not beyond the realm of possibility with respect to providing for the registration of trademarks/digital environments, the overall statutory and procedural framework does not provide express guidance as to how to register such environments, leaving potential applicants uncertain about what will be required to prove registrability and what the evidentiary thresholds for establishing registrability will be.

While the Copyright Act, 1957 offers limited and indirect protections, it does have legal protection for certain forms of original creative expression including digital artwork, products, and video assets that are used to create a virtual environment. Thus, different parts of a virtual store for example, 3D visual renderings, architectural visualizations, event graphics, etc. that would qualify as original creative expression under copyright law and are therefore protected against unauthorized duplication of these works. However, copyright only protects creative works in terms of how those works are created and not the fact that the works function as a point of origin or brand representation in the marketplace. Copyright does not protect layout as a branding tool of origin nor prevent a competitor from independently creating a comparable layout which has the same overall commercial impression. Therefore, even though copyright does not prevent an identical duplication of a

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<sup>11</sup> Section 2(zb) of the Trade Marks Act, 1999 defines a trade mark as a mark capable of being represented graphically and capable of distinguishing the goods or services of one person from those of others, and includes the shape of goods, their packaging, and combination of colours. The definition reflects the dual requirements of graphical representation and distinctiveness, thereby accommodating both traditional and non-traditional marks within the statutory framework.

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digital asset, it does not prevent a competitor from creating confusion for the consumer through using imitative brand identity through spatial design.

In regard to the Designs Act, 2000 the protections under this statute are even more limited than those under the Copyright Act. This statute provides protection to the aesthetic features that are incorporated into products which are produced by industrial processes; however, this statute was written with the assumption that the aesthetic features provide a physical embodiment and thus products that do not have a physical embodiment, such as virtual stores, will fall outside of the statutory definition of a design. Consequently, despite involving significant artistic creativity, immersive environments that have an incorporated aesthetic creation cannot currently receive design protection through Indian law. This exclusion highlights the broader structural limitation of legislation drafted prior to the emergence of digital and metaverse commerce.

There are also procedural deficiencies in trademarks that complicate the protection of trademark rights. The Indian trademark statute does not presently provide any methods for applicants to submit interactive or immersive specimens or evidence of the use of a trademark in virtual commerce. In traditional trademark applications, substantive evidence of actual use of a trademark is established through static representations i.e. labels, packaging images or photographs of physical use. However, use of virtual trade dress is inherently dynamic and experientially based; the distinctiveness of virtual trade dress arises from users interacting with it, navigating through it, and experiencing it spatially, as opposed to through one static representation. This absence of provisions that allow applicants to submit 3D walkthroughs, virtual reality videos, or interactive demonstrations prevents them from being able to demonstrate to a sufficient degree how they have used their trademark in a virtual environment or how their virtual trademark has obtained distinctiveness or secondary meaning in a virtual environment. Thus, even where the legal theory may be established to permit virtual trade dress, administrative processes will be unable to adequately evaluate the use of a virtual trademark for purposes of trademark law.

Although the obstacles to the protection of virtual trade dress are substantial, the most viable doctrinal vehicle within the Indian legal framework for the protection of virtual trade dress is the doctrine of trade dress. The focus of trademark law on consumer perception and source identification distinguishes it from both copyright and design laws, and translates naturally to

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the context of virtual marketplaces. As commerce continues to move to larger and more immersive environments, virtual layouts will operate as indicators of origin for consumers and will assist in developing trust in the consumer's relationship with a brand, just as physical retail environments do. Therefore, while India's intellectual property regime currently offers only partial protection, interpretive expansion of trademark principles combined with procedural reform holds the greatest potential for effectively safeguarding virtual store layouts as emerging forms of digital brand identity.

### **Global Legal Trends**

International advancements indicate growing acceptance of digital trademarks over time. The EU Intellectual Property Office has started granting multimedia/hologram type marks, allowing for broader protection for brands that focus on an immersive experience. The current litigation regarding NFTs in the United States and virtual and digital goods demonstrates that the courts are willing to award legal recognition to digital assets as a valid form of trademark use. These types of developments provide additional support for the argument that the virtual spatial environment should be viewed as having some trademark protection rights.

### **Policy Recommendations**

To resolve uncertainty regarding how to protect digital brands in the form of virtual store layouts, targeted changes to both doctrine and procedure while essentially using existing trademark law must be made to take into account new ways brands can exist and be used in IMVEs as the world continues to move towards AR, VR and the metaverse. In order for intellectual property to be stored and regulated in the future, it must include protections for spatially-branded items that do not exist in traditional fixed-location retail commerce. To fill these gaps with regard to protecting trademarks and maintaining the original goals of trademark law prevention of customer confusion, protection of brand identity, the following recommendations for policy changes are made.

#### **(a) Creation of a New Registration Category for Virtual Store Layouts**

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It is important to create a new and separate registration category under trademark law to specifically recognize the layouts of virtual stores and immersive commercial spaces. Current trademark processes focus on registering static representations, logos, labels, or photographs that represent the use of that mark or trade dress in a physical space; as such, they fail to adequately recognize the experiential nature of a virtual space. Virtual trade dress is dynamic and interactive; it derives its distinctiveness from the ability of users to interact with the space through movement, spatial orientation, lighting, and the user's involvement, rather than solely from an instantaneous, static image of the trade dress or layout. As a result, trademark agencies should allow for multimedia (within the meaning of 3D, VR, Panoramic, and Interactive) submissions that illustrate to trademark agencies how consumers experience a particular virtual environment. This type of procedural innovation will ensure that the practices in India are aligned with other jurisdictions that have already recognized the continued emergence of multimedia and motion-based trademark systems. It will also establish a separate category for virtual store layouts and immersive commercial space, providing clarity to both applicants and examiners with respect to the registrability standard for this type of trademark.

#### **(b) Development of a Virtual Functionality Test**

The functionality doctrine continues to shape trademark law by limiting the ability to monopolize features or designs that are essential for competition and functionality; however, trademark law cannot be mechanically applied to virtual environments in the same manner that traditional functionality that was developed for physical products can be applied to those environments. Therefore, the development of a new virtual functionality test is needed when assessing claims of trade dress infringement based on the functionality doctrine. For the purposes of the virtual functionality test, design features should only be found to be functional and thus not protected by trademark law if their removal materially hinders user navigation and usability, they comprise common interface architecture across platforms, or they provide an advantage in gameplay and/or performance. For instance, basic navigation menus and universal interaction controls should be on an unrestricted basis to all designers, while unique aesthetic arrangements that are intended to primarily communicate brand identity, may be able to be protected under trademark law. This recalibration of the

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functionality doctrine will allow trademark law to continue to protect creativity and innovation without hindering technological interoperability and/or accessibility of users.

### **(c) Modified Standards for Proving Secondary Meaning**

The conventional proof of secondary meaning relies largely on a long-standing, physical presence in the market, marketing expenditures and consumer surveys. Conversely, in decentralized virtual ecosystems, brands will achieve secondary meaning through their digital engagement, as opposed to their physical duration. As such, the legal standards of evidence establishing secondary meaning must incorporate new evidence which reflects such online interactions. These new forms of evidence will include digital user engagement analytics, such as time spent in the virtual store, rate of repeat visitation, platform analytics and social media recognition. Evidence of cross-platform consistency of design will also support a user's association of the layout with a specific brand through marketing campaigns emphasizing spatial identity, influencer collaboration and participation in virtual events. By accepting data-based metrics as an appropriate form of legitimate evidence, trademark authorities can more accurately determine distinctiveness as it relates to digital commerce.

### **(d) Platform-Based Enforcement Mechanisms**

Trademark law does not adequately protect stakeholders in the metaverse, because traditional post-infringement litigation in the metaverse is not ideal. Instead, the regulatory framework needs to require that platform operators e.g., Meta's platforms or others assume limited intermediary responsibilities. Platform operators ought to have digital verification mechanisms to identify the official virtual spaces associated with their brands, retain logs of activity for use in investigating infringement and provide public dashboards for intellectual property complaints. Further, tools based on artificial intelligence to detect similarities in the layout of virtual locations can allow platform operators to identify substantially similar virtual spaces before a rights holder needs to do so, thereby reducing the burden on rights holders for enforcing their rights. These measures can serve as a form of safe harbour, thereby balancing platform innovations and accountability and enabling more efficient and faster resolution of disputes.

When taken together, these reforms will update, but not change the basic principles, of trademark administration. By recognizing that immersive environments function as legitimate

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identifiers for commercial purposes and equipping regulators with evidence and enforcement tools that are suitable for regulating metaverse commerce, policymakers will be able to ensure that intellectual property laws will continue to be responsive to the reality of commerce taking place in the metaverse, and to promote fair competition and innovation.

### **Conclusion**

As commerce evolves into immersive digital environments, this poses a challenge to the baseline assumptions that underline trademark law but does not make any existing doctrine irrelevant. Virtual store layouts serve similar functions to physical trade dress; both types of layouts communicate brand origin through visual and spatial identity. Legal systems must therefore change their approach to the adaptation of legal doctrine, rather than resisting its extension. Providing protection to virtual trade dress will foster innovation, reduce copying asymmetries, and bring intellectual property law into alignment with modern-day commercial practices. The question is no longer if virtual environments should be protected in some way; the question is how quickly can legal frameworks evolve to protect the architecture of digital brand identity as the Metaverse economy continues to grow.

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