

## MEDICO LEGAL ASPECTS OF DYING DECLARATION

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### Abstract

This paper deals regarding the concept of medico legal aspects of dying declaration. A dying declaration is an statement created by a decreasing individual with regards to the explanation for his passing or on any conditions of the exchange that caused his dying. The decreasing affirmation shapes the only real premise of conviction on the off probability that it's free from any style of uncertainty and on the off probability that it's been recorded within the approach as gave underneath the law. It have to be compelled to rouse full trust in its honesty and accuracy. Not recording of biting the mud revelation can create unnatural birth cycle of equity in light-weight of the very fact that the casualty being for the foremost half the most observer in an exceedingly real wrongdoing, the rejection of the announcement would go away the court while not a chunk of proof. it's for the court to envision that withering assertion moves full certainty because the producer of the decreasing affirmation is not accessible for spherical of questioning. this text focus on the medico-lawful and ethical views intimate whereas recording biting the mud statement and its weightage within the official court. This paper additionally deals regarding the recording of dying declaration and therefore the person authorised to record the dying declaration.

**Key Words:** Compos mentis, Courts, Dying declaration, Magistrate, Police officer

**Objectives:**

- To have a brief study about dying declaration
- To know about the legal aspects of dying declaration

**Hypothesis:**

Medico legal aspects of declaration is a conclusive proof.

**Material and methods**

The study is collected from national and international journals, books and publications from various websites which give importance to the abolition of death sentence under international law.

**Sources of study:**

The researcher has referred books, research articles, unpublished thesis and e-sources as a part of secondary sources for the writing of the project.

**Limitations:**

The researcher is unable to trace the primary sources needed to write about the topic as the topic demands research in the archives which is not available to the research as admission to the government archives is not allowed.

**Review of literature:****Book:****The indian evidence act, 1872, bare act with short notes edition 2018**

This bare act is very useful for me to do my research work it contains with all the provision and ammendments which relevant case law for the sections. With comments and illustration.

**The indian evidence act 1872, Avatar Singh ccentral law publication 22<sup>nd</sup> edition 2016**

This book is very useful for me to do my my research work it contain some case law in this book they explain in a detail way with explanation.

## Introduction

A dying declaration is "an announcement, composed or verbal created by a person with regards to the rationale for his or her passing or with regards to the conditions of the exchange transfer concerning his or her demise". It depends on the rule that withering statements square measure created within the furthest purpose once the gathering is at the aim of death, and every expectation of this world has gone, once every thought method to deception is quieted and therefore the psyche is instigated by the foremost capable contemplations to speak reality. A circumstance therefore serious so terrible is taken into account by the law as creating a commitment akin to what's forced by a positive vow controlled during a court of equity. during this means the vow is not managed once kicking the bucket assertion is recorded. Its acceptableness has been processed within the space thirty two (1) of Indian proof Act. there's an inexpensive refinement between the assessment of kicking the bucket statement underneath the Indian law and therefore the English law. the assumption and pertinency of biting the dirt announcement underneath land law is simply once the declarant is in miserable condition and underneath the need for death. Anyway in Indian law it's not important that the terminated at the season of giving the announcement need to be underneath the need for death and therefore the withering affirmation is permissible on account of crime yet as in common suits. underneath land law, the tolerability of kicking the bucket affirmation is unbroken to criminal allegations of murder or killing because it were.

## Declaration in english and indian laws:

In spite of the very fact that the withering revelation underneath Indian law is established on English law there square measure contrasts between the legitimate frameworks:

- underneath English law the withering presentation in common cases is not acceptable. it's acceptable in common cases in Asian nation.
- In English law the withering presentation is affirmation in homicide case "where the passing of the terminated is that the subject of the charge and conditions of the end, the topic of the decreasing statement." underneath Indian Law if the rationale for death of the testifier comes being observed his withering revelation is critical freelance of the concept of continuous. There need to be nexus between the conditions expressed by the casualty and his/her passing.

- In English law it's important that the declarant had been in real risk of death within the wake of obtaining wounds and he need to have deserted all expectations of convalescence. In any case, "if the declarant neglected to complete his announcement and kicked the bucket, the decreasing affirmation is unacceptable." In Asian nation the declarant's passing a lot of doubtless than not been secure. it's tangential whether or not the declarant was in real peril and he had deserted all expectations of life. within the event that the declarant had been alive, he would are a talented witness.<sup>1</sup>

### **Significance of dying declarations:**

Kicking the bucket Declaration may be a legitimate plan alludes such the announcement that is created by a decreasing individual elucidative the conditions of his death. The word Dying Declaration itself tells the importance. associate announcement by a person United Nations agency is cognizant and realizes that end is up and coming back regarding what he accepts to be the rationale or conditions of his passing. A decreasing announcement is viewed as sound and dependable proof in light-weight of the final conviction that a good many folks United Nations agency understand that their aiming to depart this world "don't lie". Therefore, it's associate exemption to the final manage "prattle", that denies the use of associate announcement created by someone on the other hand the individual United Nations agency rehashed it whereas affirming amid trial. section 32(1) of the Indian proof Act manages the tolerability of biting the dirt announcement, that peruses as follows: Statements, composed or verbal, of applicable certainties, created by a person United Nations agency is dead, or United Nations agency cannot be found, or United Nations agency has clothed to be unequipped for giving proof, or whose participation cannot be secured, at once or value that, considering the current state of affairs of the case, seems to the court irrational square measure themselves pertinent actualities within the concomitant cases:

### **When it identifies justifiably for death:-**

At the purpose once the announcement created by a person with regards to the rationale for his end, or on any of the conditions of the exchange that led to his passing, in cases, during which the rationale for that people's end comes into question. Such explanations square measure applicable whether or not the individual United Nations agency created them was or wasn't, once

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<sup>1</sup> <http://medind.nic.in/jal/t14/i3/jalt14i3p281.pdf>

they were created, underneath want for death, and no matter could be the concept of the procedure during which the rationale for his end comes into question. on these lines, recording of biting the dirt announcement seems to be important.<sup>2</sup>

#### **Perceptions on the difficulty of non-examination of the specialist:**

For a state of affairs the Hon'ble Supreme Court has control that for not inspecting the specialist, the withering presentation recorded by .the Executive justice, United Nations agency may be an impartial witness and is a capable, officer and in so far as there's no material on record to presume that he had any sick can against the goddamned or was in any capability keen on making the decreasing affirmation. No inquiry emerges to checking. the validity of the withering affirmation recorded by the manager justice

#### **Perceptions with regard to recording of, Dying Declaration 'Oral' or in 'Composing':**

A Dying presentation will be oral or in composing and any adequate technique for correspondence whether or not by words or by signs or usually can get the work done gave the sign is bound and positive. WHO will record a Dying Declaration? ,In most cases,,however, such articulations square measure created orally before death follows and is diminished to composing by someone sort of a functionary or a Doctor or a law officer. When it's recorded no vow vital|is crucial} neither is the distance of a functionary utterly important, in spite of the actual fact that to ensure validity it's regular to decision a functionary, if accessible "for recording the announcement of a person reaching to kick the bucket. there's no necessity of law that a withering affirmation ought to primarily be created to a functionary and once a functionary records such clarification, there's no predefined statutory form for such account.<sup>3</sup>

#### **Rule**

Under space thirty two make sure given by a person in {an exceedingly|in a very} legal continued or before a person approved by law to require make sure is applicable to prove in an succeeding legal continued reality of the actualities expressed therein. It forces limitations upon the acceptableness of articulations created by people that cannot be sent beneath the steady gaze of the court to convey prove. As there's no higher proof accessible the announcements created

<sup>2</sup> <http://medind.nic.in/jal/t14/i3/jalt14i3p281.pdf>

<sup>3</sup> <http://medind.nic.in/jal/t14/i3/jalt14i3p281.pdf>

beneath this phase square measure conceded as guideline of would like." at the top of the day composed or verbal explanations of great realities created by a man: <sup>4</sup>

- Who is dead;
- Who cannot be found;
- Who has clad to be incomprehensible of giving confirmation; or
- Whose participation cannot be obtained straight off or price, square measure applicable beneath the incidental to conditions of the case.

**Nemo moriturus praesumitur mentire:** It infers that a person WHO is on death bed wouldn't advise a mislead venally involve honest individual. no one at the aim of death is tried to consist light-weight of the actual fact that a person will not meet his Maker with a consist his mouth—is the rationality in law basic permission in proof of passing on affirmation. A withering revelation created by individual nearly his ending has associate degree uncommon holiness as at that grave minute, a person is most far-fetched to place forth any false expression. The shadow of looming passing is while not anyone else's input the reassurance of reality of the announcement created by the perished with reference to the causes or conditions prompting his ending. Once the announcement of the withering individual and therefore the proof of the witnesses vouching for similar finishes the trial of watchful investigation of the Courts, it turns into an important and a solid little bit of confirmation and if the Court is consummated that the decreasing revelation is valid and free from any frivolity such a withering assertion, freelance from anyone else, will be adequate for recording conviction even while not sorting out any verification

### **Suitability**

It isn't usually very important that a decreasing revelation need to be confirmed by a specialist before dependence might be attack an equivalent. Yet, at that time with none such endorsement, the Courts need to be consummated that from the fabric on record it's secure to place dependence on such uncertified revelation.

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<sup>4</sup> [https://www.researchgate.net/publication/292881283\\_Medico-legal\\_aspect\\_of\\_dying\\_declaration\\_in\\_India](https://www.researchgate.net/publication/292881283_Medico-legal_aspect_of_dying_declaration_in_India)

Unless the statement of a individual would fall among the preview of Section 32(1) of the Indian proof Act, there's no alternative provision beneath that an equivalent will be admitted obvious. so as to create the statement of a individual admissible (written or oral), the statement should be on the reason for her death or on any of the circumstance of the transactions that resulted in her death, in cases during which the reason for death comes into question.<sup>5</sup>

#### **Fir just in case and dying declaration:**

If there ought to arise an event of deah of the witness, FIR taxi be used as substantive proof on the off probability that it identifies with the rationale for death of the supply or things of the exchange transfer concerning theinformant's passing with within the significance of sec. thirty two (1) of I.E. Act.<sup>6</sup>

#### **Damodar Prasad v. Territory of U.P. AIR 1975 SC 757**

At the purpose once the announcement is formed by a person with regards to the rationale for his passing., or on any of the condition of the trnsaction that led to his ending, in cases during which the rationale for that individual's passing comes into question.

Such proclamations square measure pertinent whether or not the individual WHO madde them was or wasn't, after they were created, beneath want for the ending , and no matter may well be the concept of the procedure during which the rationale for his passing comes into question.

In no alternative case FIR will be used as a substantive confirmation. FIR delayed by the expired is allowable U/S – 323(1) because the announcement of a person since deceasaed characteristic with the conditions of the exchange that led to his ending. Kapoor Singh v. Head (AIR 1930 Lahore 450)

#### **RECORDING DYING DECLARATIONS:**

Rule 33 of Criminal Rules of observe manages the thanks to be trailed by the official whereas recording Dying Declarations: It peruses as takes after:

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<sup>5</sup> [https://www.researchgate.net/publication/292881283\\_Medico-legal\\_aspect\\_of\\_dying\\_declaration\\_in\\_India](https://www.researchgate.net/publication/292881283_Medico-legal_aspect_of_dying_declaration_in_India)

<sup>6</sup> *ibid*

- whereas chronicle a Dying Declaration, the official ought to confine see the approach that the question of such announcement is to induce from the declarant the explanation for death or the conditions of the exchange that caused death.
- Before transferral down the assertion, the official ought to uncover his character and moreover raise the declarant whether or not he's rationally equipped for creating a revelation. He ought to likewise place easy inquiries to evoke reply from the declarant with a read to knowing his perspective and will record the inquiries and replies, signs and signals in conjunction with his own explicit call within the issue. He have to be compelled to likewise acquire at no matter purpose conceivable a testament from the medic with regards to the status of the declarant.
- The statement have to be compelled to be brought down within the expressions of the declarant on the far side what several would take into account attainable. The official ought to decide to get from the declarant particulars necessary for characteristic proof of the charged. every inquiry place to the declarant and every answer or sign or motion created by him in answer ought to be recorded.
- when the announcement is recorded, it ought to eb scan over to the declarant and his mark got later on, if conceivable, and afterward the official may sign the announcement.

Rule 33 of Criminal Rules of observe itself says with regard to the insurances to be taken by the official whereas recording the Dying announcements. they're as per the subsequent

- The official ought to uncover his character to the declarant initial.
- He may raise the declarant whether or not he's rationally equipped for creating a presentation.
- He ought to build basic inquiries to evoke answers from the declarant to grasp his perspective.
- Magistrate may record inquiries and replies, signs and motions in conjunction with his own call.



- He have to be compelled to likewise acquire at no matter purpose conceivable AN authentication from the medic with regards to the status of the declarant
- The statement have to be compelled to be brought down within the expressions of the declarant on the far side what several would take into account attainable.
- The official ought to endeavor to induce from the declarant the particulars necessary for characteristic proof of the charged.
- Every question place to the declarant and every answer or sign or motion created by declarant in answer ought to be recorded.
- After recording proclamation, it would be perused to the declarant and his mark have to be compelled to be nonheritable consequently if conceivable. <sup>7</sup>

#### **Who will record dying declarations**

Govern thirty three of Criminal Rules of observe throws obligation on official to record the Dying Declarations. Sub Rule (d) of Rule a pair of of Criminal Rules of observe says "Boss Judicial official" incorporates the Chief Metropolitan Magistrate,m "Justice" incorporates the Metropolitan official, and "Extraordinary official" incorporates Special Metropolitan Magistrate. on these lines, below Rule thirty three of Criminal Rules of observe, Judicial official is enabled to record the Dying Declarations. Be that because it might, in a very few sections of the Country, govt Magistrates square measure recording the Dying Declarations.

If there ought to arise an event of non-accessibility of the official and in perspective of the direness, many times the Dying Declarations recorded by the cops and therefore the Medical Officers operating there, the Courts square measure tolerating the Dying Declarations recorded by the cops and therefore the Medical Officers.

The best attainable technique for recording kicking the bucket affirmation by a official or a specialist or a police official is that they must see that the declarant is in a very match perspective to present revelation. within the event that the declarant is not in a very match

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<sup>7</sup> [http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32\(1\)-of-Indian-Evidence-Act.html](http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32(1)-of-Indian-Evidence-Act.html)

condition to present rationalization, the official ought not continue promote past creating a note that the declarant wasn't in a very match condition to present articulation. The underwriting of the requirement specialist is in addition equally imperative

### **Forms of dying declaration**

There is no arrangement therein capability of biting the dirt announcement neither the assertion ought to be of any long nature or absolutely organized. Actually, culminate formulation ANd handily organized kicking the bucket assertion reach an unfriendly impression and build a doubt within the brain of the Court since biting the dirt shows need not be drawn with numerical accuracy. The declarant have to be compelled to have the capability to recall the circumstance transferral regarding the accessible scenario.<sup>8</sup>

#### **A decreasing affirmation could be within the concomitant structures:**

- Written shape;
- Verbal shape;
- Gestures and Signs form. For the case "Ruler versus Abdulla", it had been control that if the injured individual cannot speak, he will build passing on presentation by signs and motions in lightweight of the inquiry.
- If a person is not appropriate talking or composing he will build a motion as affirmative or no by gesturing and even such style of passing on presentation is legitimate.
- It is favored that it have to be compelled to be composed within the vernacular that the patient comprehends and talks.

A kicking the bucket revelation can be as portrayals. If there ought to arise an incident of a withering assertion is recorded as portrayals, nothing is being angry and everything is coming back thus from the psyche of the individual creating it.

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<sup>8</sup> [http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32\(1\)-of-Indian-Evidence-Act.html](http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32(1)-of-Indian-Evidence-Act.html)

### **Value of a Dying Declaration**

By authorizing section thirty two the assembly in its information has set a decreasing affirmation keeping pace with prove on vow for the rationale that once a person is in risk of losing himself it's not doubtless that he would speak a lie and embody a pure individual. there's no supreme management of law neither is there any run of reasonability that has matured into a decide of law that a decreasing revelation cannot frame the only premise of a conviction unless it's supported by free proof. The conditions that loan quality and affirmation to a decreasing revelation area unit as per the following:

- That it absolutely was recorded by a skillful official within the wake of avoiding potential risk.
- That it absolutely was brought down within the correct words within which it absolutely was talked.
- That it absolutely was created shortly once the attack once there was no likelihood of its being shaded by impressions got from others.
- That perished had plentiful likelihood of perception.
- That the prevalence occurred in associate degree adequately lit place.
- That the perished had place forth in more than one expression and each one in all them were reliable with regards to the conditions of the event and also the character of the aggressors.<sup>9</sup>

### **Evidentiary worth of Dying Declaration**

Biting the mud statement could be a substantive little bit of confirmation and might be utilised against the denounced, once there's nothing to propose that the perished had substituted a pure individual established of real bad person. thus passing on statement once designedly underneathstands looming dying and under conditions whereby the terminated is not likely to be entailed, is worthy of extraordinary weight. Be that because it might, passing on statement that is insufficient and incompletely touched-up by endowed people cannot be depended upon.

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<sup>9</sup> [http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32\(1\)-of-Indian-Evidence-Act.html](http://www.legalservicesindia.com/article/1682/Dying-Declaration-Section-32(1)-of-Indian-Evidence-Act.html)

### **Declaration and medical proof**

Just on the grounds that a decreasing announcement is not joined by a therapeutic supposition that the perished once place forth the expression was in an exceedingly work perspective, it doesnot influence the responsibleness. The approach that the withering affirmation is delivered simply amid the trial is unimportant, on the off likelihood that it's supported by the confirmation of the legal document witnesses and also the proof of the specialist.

Where the medicative proof incontestible that the terminated got such wounds that he could not build due for quite 10-30 minutes, nevertheless the withering statement was incontestible by the immediate confirmation of the eye-witnesses, the Supreme Court control that the therapeutic proof could not wipe out the decreasing announcement. The withering statement was accepted and also the blasted were sentenced for charge for kill underneath s 302, IPC.[ Nanahau Ram v. Province of Madhya Pradesh AIR 1988 SC 912]

Where the oral biting the mud presentation was to boot not reliable with the medicative confirmation illustrated for the case, except for the approach that there was in depth inconsistency within the declaration of the observers on the charged oral passing on affirmation, the oral kicking the bucket announcement wasn't acknowledged by the court.

The court might explore for testament of the restorative officer that the witnesser was in an exceedingly work perspective to place forth the expression if some uncertainty creeps into the brain of the court whether or not the witnesser was rationally alert to build proclamation or not for every state of affairs. The withering man might currently and once more, in an exceedingly cognizant minute, place forth some expression to folks show around him that leader even might not be recorded by any person and extremely doubtless unimaginable from that time permitting to the specialist to travel to on him.

It cannot be same while not the endorsement, that the complete rationalization got to be rejected for would like of it, no matter whether or not, typically ascertained to be a real proclamation, thus in judgement a similar the totality of the entire state of affairs got to be investigated and it's equally once doubtful of alert simply to get that if the witnesser was rationally caution and in an exceedingly work perspective to create articulation.

There is no counseled frame to record a decreasing statement and there's no inflexible commonplace for a similar. It should be same that the person World Health Organization records the decreasing assertion should fulfill himself that the witnesser is in an exceedingly work perspective and extremely alarm in creating proclamation characteristic with the injuries maintained by him. a few of oversights within the announcement everywhere, if the announcement is mostly ascertained to be easy and adequate, cannot be same to be a wise ground to dismiss it, and every one the additional on these lines, if completely different actualities mirror a similar to be as a right articulation.<sup>10</sup>

The endorsement, mounted by the specialist, that the terminated was in an exceedingly work perspective, but has a rare material bearing, isn't, while not anyone else's input, definitive. The court will go in the confirmation and see if the perished was in an exceedingly work perspective at the season of recording his announcement. It should be surveyed from the inquiries place and also the route in 'which the perished gave answers, the earnestness of the injuries managed and also the situs at that the injuries were exacted and also the encompassing conditions.

**The law with reference to kicking the bucket statement are often summed as takes after:**

1. a passing on affirmation not being a sworn statement in court, neither created on vow nor among the sight of the denounced and consequently, not tried by spherical of questioning is yet allowable in prove as a special case to the overall govern against the quality of prattle because it is established on the rule of want. The nerveless functions of a withering assertion serve to place a commitment the court to just about examine all the pertinent conditions;
2. a kicking the bucket revelation, if discovered solid, will form the premise of conviction;
3. a court is not rejected from following abreast of AN unsupported passing on presentation for conviction;
4. a decreasing affirmation, as a small amount of proof, remains on AN indistinguishable balance from another little bit of confirmation;

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<sup>10</sup> <https://link.springer.com/content/pdf/10.1186%2Fs41935-017-0018-6.pdf>

5. it should be judged and acknowledged within the light-weight of the surrounding conditions and its weight set by respect to the standards administering the consideration of proof;<sup>11</sup>
6. it's like the producer of the decreasing revelation was accessible within the court making a control expressing the realities contained within the assertion with the excellence that the presentation is not AN announcement on vow and therefore the creator therefrom cannot be subjected to spherical of questioning;
7. if in an exceedingly given case, a selected kicking the bucket statement experiences any diseases each of its own or as undraped by alternative proof showed for matters or conditions attending to its notice, the court could, usually speaking of reasonability, seek for substantiation and if the sicknesses be, for instance, render the withering affirmation therefore decrepit on prick the still, tiny voice of the court, a similar can be declined to be acknowledged as framing safe reason for conviction; and
8. a biting the mud statement created to a cop is allowable in prove. still, the act of kicking the bucket assertion being recorded by AN exploring officers has been pessimistic. the most special case is that the purpose at that the perished was in such AN unstable condition, to the purpose that there was no alternative elective left.

**Related case law:**

**Queen vs abdullah**

**Fact of the case:**

If a person is not capable of speaking or writing ,it can make a gesture in the from of "Yes or No"

A dying declaration may be in form of narration.

**Pakala narayana swami v. Emperor**

It is held in this case if the person who records the statements but this cannot be an in elastic rule. The witness to be proved on basis of mental fit will be accepted.

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<sup>11</sup> <https://link.springer.com/content/pdf/10.1186%2Fs41935-017-0018-6.pdf>

**Diwan singh vs. State**

The court said that the patient is in a condition to give her dying declaration thus , before recording statement, no written endorsement was taken from the doctor.

**Conclusion:**

Awesome significance is connected to a withering statement by courts, and if lawfully recorded basic cognitive process all the elemental fixings, will frame the premise of conviction. selections of upper courts on passing on announcement indicates it's utilised as validating proof because the majority of the recorded articulations have fragmented points of interest that build it invalid. each one of the doctor's facilities have to be compelled to have their commonplace kicking the bucket assertion Performa, therefore each one of the announcements are often completely recorded in it. the explanation behind this can be, no single info are remembered lovingly and therefore the strategy are recorded in an exceedingly excellent approach. an oversized portion of the mistakes in biting the mud assertion square measure thanks to absence of data among cops, that can be restricted via making ready them. The court has to provide applicable rules for recording kicking the bucket statement by plainly characterizing hazy areas. this may enhance the legitimacy and unwavering quality of the announcement to a considerably additional degree. In a proper case, dying declaration may be permissible to convict a person only on the basis of a dying declaration in the light of the facts and circumstances of the case.

**Reference**

1. <https://ifflab.org/>
2. <http://vips.edu>
3. <https://www.ncjrs.gov>
4. <https://en.wikipedia.org>
5. <https://criminalistica.mx>
6. <https://www.researchgate.net>
7. <https://www.nij.gov>
8. <https://studymoose.com>
9. <https://www.scribd.com>
10. <https://criminal-justice.laws.com>
11. Principles of law of evidence, Avatar Singh, Central Law Publication

12. <https://lawschoolnotes.wordpress.com>
13. The indian evidence act 1872, Avatar Singh, central law publication, 22<sup>nd</sup> edition, 2016
14. The law of evidence, M.Monir, 8<sup>th</sup> edition, Universal law Publication co.
15. <http://work.chron.com>
16. <http://citeseerx.ist.psu.edu>
17. <https://juniperpublishers.com>
18. <https://studymoose.com>
19. <https://www.gov.uk>
20. <http://jrja.org>
21. Dr.Lakshmi T and Rajeshkumar S “In Vitro Evaluation of Anticariogenic Activity of Acacia Catechu against Selected Microbes”, International Research Journal of Multidisciplinary Science & Technology, Volume No. 3 , Issue No. 3, P.No 20-25, March 2018.
22. Trishala A , Lakshmi T and Rajeshkumar S,“ Physicochemical profile of Acacia catechu bark extract –An In vitro study”, International Research Journal of Multidisciplinary Science & Technology, Volume No. 3 , Issue No. 4, P.No 26-30, April 2018.





