

ANALYSIS AND REMARK ON REVISIONAL JURISDICTION OF HIGH COURT OVER ITS SUBORDINATE COURT

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ABSTRACT

This paper deals about the Revisional power (Section 115) of High Court over its subordinate court. Section 115 of Civil Procedural Code says about the power of the High Court may call for record of any case which has been decided by subordinate court to high court and in which no appeal lies. The scope of Section 115 of the Code in exercise of revisional power and remedy by the way of revision cannot be denied in any case and it has to satisfy the conditions stated under Section 115 of the Code. The importance of Revision by High Court and in order to avoid possibility of miscarriage of justice in case where no right of appeal is available. High Court has ample jurisdiction to revise interlocutory orders and to set them aside although such orders may be attacked in appeal from the final decree or order in proceeding. In case of any illegality committed by civil judge like exercising jurisdiction not vested to him or not following the procedure lay down by statute, then High Court rectify the error in exercise of its Revisional jurisdiction. This Revisional court exercising its power under Section 115 of the Code should dispose the case on merits and not on account of non appearance of the parties.

Key Words:-

Section 115 of the Code - Revisional Jurisdiction - Justice - High Court - Subordinate Court - No Right to appeal - Reverse an order - Eliminate errors in Jurisdiction.

Materials and methods:-

The research more on relied on the secondary source of data such as book, journals, e-sources, articles and newspapers. Due to the shortage of time, the researcher in which primary source of the data such as interview and field research is not more adequate in result of data collection and interpretation in which parameters so described under this counteractive action and early intercession structure, immense research is being directed to figure out which of the numerous current projects are genuinely powerful.

Results:-

The High Court shall not under the section 115 of the Code , vary or reverse any decree or order against which an appeal lies either to the High Court or to any other Subordinate thereto including any order made, or any order deciding an issue in the course of the suit or other proceeding.

Conclusion:-

Section 115 of the Code of Civil Procedure empowers a High Court to entertain a revision in any case decided by any subordinate court in certain circumstances. This jurisdiction is known as revisional jurisdiction of the High Court. Section 115 is to prevent subordinate courts from acting arbitrarily, capriciously and illegally or irregularly in the exercise of their jurisdiction.

INTRODUCTION

Revision implies reexamination of case which includes illegal assumption, non exercise or irregular exercise of jurisdiction. In order to maintain a strategic distance from the likelihood of any unsuccessful labor of justice in cases where no right of appeal is accessible the code has conceived another review procedure, specifically Revision. Section 115 of the Code of Civil Procedure empowers A High Court to engage a revision regardless chose by a subordinate Court in specific circumstances Revisional jurisdiction does not present any substantive right and right of revision is only a benefit conceded to a bothered. The powers of revision presented upon the

higher courts are wide and are absolutely discretionary in nature. In revision court can meddle, if case brought before it is chosen case by subordinate court, when the same is appealable. The particular point about revision which must be made is that the power of revision is exercised by a better court than a court which chooses a case, however the power of review is exercised by a similar court which passed the decree or order. Power of revision is exercised just when there is no appeal to the High Court. The revisional powers however are very wide, have been delineated by specific limitations. In practicing the power of revision, which is discretionary, the court ought to dependably hold up under as a main priority the limitation that snatch of practicing its power of revision; it can't particle impact exercise the power of appeal despite statutory preclusions. The High Court exercises its powers under this section remembering the enthusiasm of justice and accommodation of the gatherings. It is to be guaranteed that superfluous burden isn't caused to any party. This jurisdiction is known as revisional jurisdiction of the High court.

Aim of the paper:- To ensure proper administration of justice through Revisional Jurisdiction under Section 115 of the Code and Revisional power should not be misused by the parties in order to extend the suit.

Research Questions:-

Problem: Whether Revision ensure proper administration of Justice and avoid miscarriage of justice in proceedings?

Intervention: How Civil Procedural Code and Constitution of India empower High Court in Revision?

Comparison: How Appellate jurisdiction differs from Revisional jurisdiction?

Outcome: It is discretion of High Court to examine decision of its Subordinate court and no appeal lies from an order made in revisional jurisdiction.

Objectives:-

1. To analyse the scope of Revision.
2. To study on the circumstance when Revision can be applied.
3. To find out the power of High Court under Constitution.
4. To study on difference between Revision and Review.

5. To study on difference between Revision and Appeal.

Hypothesis:-

The Revisional Jurisdiction under the Civil Procedural Code said under the Section 115 is ensuring proper administration of justice and avoiding miscarriage of justice.

Materials and Methods:-

The present research is conclusive, descriptive and based on non-empirical design. Qualitative data was generated to test the research hypothesis. In order to collect the data on the dimension of the study , a research instrument was designed. The study was conducted on secondary source of data books, articles, journals, e-sources, theories and the relevant provisions with decided case laws. Focusing on these three areas put forward specific research problems.

Research Methodology:-

The author has used doctoral method of study. It is a theoretical research and it is pure in nature. The author has used secondary sources of study. The materials used for the purpose of this study include various statistical reports, various studies made by eminent organizations, legislations and e-sources.

Chapterization:-

This paper is divided into two chapters

Chapter 1: **Nature, Scope and Power of Revision under Section 115 of Code.**

Chapter 2: **Powers empowered by Indian Constitution under Section 115 of the Code.**

CHAPTER 1**NATURE, SCOPE AND POWER OF REVISION UNDER SECTION 115 OF THE CODE****Nature and scope:-**

In Major S.S Khanna v. Brig F.J Dillon, the Court expressed "The section comprises of two sections, the main recommends the conditions in which the jurisdiction of the High Court emerges, i.e. there is a case chose by a subordinate Court in which no appeal misleads the High

Court, the second sets out the circumstances in which no appeal deceives the High court, the second out the circumstances in which the Jurisdiction might be exercised."

For the viable exercise of the High court's superintending and visitorial powers over subordinate courts, this revisional jurisdiction has been presented by the High Court under S.115; the powers given are obviously constrained to the keeping of subordinate courts inside the bound of their jurisdiction. It is a piece of general investigative jurisdiction of the High court however the jurisdiction is entirely limited by the terms of S.115 contributing it. Though revisional Jurisdiction is just a piece of redrafting jurisdiction, it can't be likened with full that of an undeniable appeal.

In the exercise of revisional powers it isn't the obligation of the High Court to go into the benefits of the evidence; it has just to see whether the necessities of the law have been appropriately and legitimately obeyed by the court whose order is the subject of the revision and whether the irregularity as to disappointment or exercise of jurisdiction is, for example, to legitimize interference with the order. The cure by method for revision can't be denied in a case where the order isn't appealable and in which either condition expressed in S. 115 is satisfied.

Grounds for Revision:-

Civil revision request of u/s 115 of cpc just lies in higher discussion. There are two approaches to document a civil revision request of e.g. to document a request of or suo disputable. There are just three grounds specified in section 115 of cpc and these are:

1. when lower court meditate on issue on which it has no authority.
2. Jurisdiction was there however it was not exercised.
3. Jurisdiction was illegally or irregularly applied.

Given that in regard of cases emerging out of unique suits or different procedures of any valuation, chose by the District Court, the High Court alone should be able to make an order under this section. The further that the High Court or the District Court should not, under this

section, change or switch any order choosing an issue, made over the span of a suit or other continuing, having respect to the suggestions made by the Law Commission in its Fourteenth and Twenty-seventh Reports, the Committee prescribed that S. 115 of the Code ought to be held subject to the alteration that no revision application should lie against an interlocutory order unless both of the accompanying conditions is fulfilled, specifically

- (i) the order, if so fluctuated or turned around, would at long last discard the suit or other continuing; or
- (ii) That the order, if permitted to stand, is probably going to event a disappointment of justice or cause hopeless damage.

Conditions for Revision:-

The High Court's revisional powers can't be summoned unless the accompanying conditions exist:

- (1) There must be a case chose;
- (2) The court choosing the case must be subordinate to the High Court;
- (3) No appeal should deceive the High Court against the choice;
- (4) In choosing the case the subordinate court must seem to have:
 - (a) Exercised a jurisdiction not vested in it by law; or
 - (b) Failed to exercise a jurisdiction vested in it by law; or
 - (c) Acted in the exercise of its jurisdiction illegally or with material irregularity.

Jurisdiction:-

The word 'jurisdiction' is a verbal layer of numerous colour. Section 115 gives power of revision on the High Court in a case not subject to appeal thereto. Section 115 applies to jurisdiction alone, the irregular exercise or non-exercise of it or its illegal supposition. Be that as it may, the negligible actuality that the choice of the lower court is wrong, regardless of whether it be upon an issue of reality or law, does not add up to an illegality or material irregularity.

Lawful Provisions of Section 115 of Code of Civil Procedure 1908, (C.P.C.), India – Revision

(1) The High Court may require the record of any case which has been chosen by any court subordinate to such High Court and in which no appeal lies thereto, and if such subordinate court shows up

- (a) To have exercised a jurisdiction not vested in it by law, or
- (b) To have neglected to exercise a jurisdiction so vested, or
- (c) To have acted in the exercise of its jurisdiction illegally or with material irregularity.

The choice of the subordinate court on all inquiries of law and reality not touching its jurisdiction is last and anyway mistaken such a choice might be, it isn't revisable under sub-ss. (a) and (b) of S. 115, C.P.C. Then again, if by a mistaken choice on an issue of certainty or law touching its jurisdiction, e.g., on a preparatory actuality upon the presence of which its jurisdiction depends, the subordinate court expect a jurisdiction not vested in it by law or neglects to exercise a jurisdiction so vested, its choice isn't last, and is liable to review by the High Court in its revisional jurisdiction under the sub-section.

Accordingly, where the court by a wrong or mistaken finding expect jurisdiction which it has not, or declines to exercise a jurisdiction which it should exercise then the issue ends up revisable by the High Court. Where a court has acted by imagining a run of procedure for itself which isn't justified by law, the High Court isn't just able to meddle however ought to meddle in its revisional jurisdiction. So the High Court can meddle where a civil court has wrongly engaged a suit cognizable by an income court, or where the lower court has exercised a jurisdiction not vested in it by law under a misguided judgment of the law of limitation.

Revisional jurisdiction might be exercised in cases including inquiries of jurisdiction, i.e., questions with respect to the irregular exercise or non-exercise of jurisdiction or the illegal suspicion of jurisdiction by a court and isn't coordinated against finish of law or actuality in which inquiries of jurisdiction are not included. In this manner, the High Court won't meddle in the exercise of its revisional jurisdiction just in light of the fact that the lower court wrongly chooses that a specific suit is barred by res judicata, or that it is banished by limitation or on the grounds that it continues upon a mistaken development of the different arrangements provisions of an Act.

Discretionary power:-

The Supreme Court has seen in Major S.S. Khanna v. F.J. Dhillon, A.I.R. 1964 S.C. 497, that the exercise of jurisdiction under S. 115, C.P.C., is discretionary and that the court will undoubtedly meddle just on the grounds that the conditions in provisions (a), (b) and (c) of S. 115 are fulfilled.

Again the exercise of revisional jurisdiction under this section is simply discretionary and regardless of whether the lower court has acted without jurisdiction or acted illegally in the exercise of jurisdiction, the High Court won't meddle if the aftereffect of an irregularity has been to advance justice. The powers may be exercised for the aversion of injustice. Section 115 gives powers to be exercised with a view to subserve and not to crush the closures of justice.

At that point, the revisional powers won't conventionally be exercised insofar as there is some other cure accessible either by suit or appeal. The High Court won't meddle if another helpful cure is available to the candidate. However, it might meddle if such course is fundamental in light of a legitimate concern for justice. Power of the court to add or decline to add a gathering to a procedure is a discretionary power vested in the court, however the carefulness must be a legal tact and if legal caution has been exercised either for adding a gathering or declining to include a gathering under Order I, Rule 10 thinking about every one of the certainties and circumstances of the case, the High Court, in revision, won't meddle with the exercise of such a legal attentiveness.

Exercise of watchfulness must be lawful and general, not self-assertive, whimsical or dubious. To charge regard, caution ought to be educated by customs, methodised by similarity and taught by framework. It is exercised to a great extent on the actualities and circumstances of a given case, with the outcome that usually it is neither conceivable nor doable to figure an inflexible recipe equipped for fitting all circumstances.

Principles of Law set down in Amir Hasan v. Sheo Baksh Singh, (11 I.A. 237):-

The inquiry at that point is, did the judges of the lower courts in this case, in the exercise of their jurisdiction, demonstration illegally or with material irregularity. It gives the idea that

they had consummate jurisdiction to choose it. Regardless of whether they chose it rightly or wrongly, they had jurisdiction to choose the case and regardless of whether they chose wrongly they didn't exercise their jurisdiction illegally or with material irregularity.

The Judicial Commissioner had no jurisdiction in the case. It was as needs be held that the appeal is permitted, judgment of the Judicial Commissioner be switched and respondents pay the expenses caused before the Judicial Commissioner and furthermore of the Privy Council appeal

CHAPTER 2

POWERS EMPOWERED BY INDIAN CONSTITUTION UNDER SECTION 115 OF THE CODE

Powers given under Indian Constitution for Revision:-

Article 226 of Indian Constitution empowers the high courts to issue, to any individual or authority, including the administration (in fitting cases), directions, orders or writs, incorporating writs in the idea of habeas corpus, mandamus, denial, quo warranto, certiorari or any of them-

- For the authorization of any of the basic rights presented by part III of the Constitution or
- For some other reason.

This article is as vital as article 32 and various cases have been chosen in this issue. It ought to be noticed that the high court can issue a writ under the condition (an) above just when it is demonstrated that the abused party has a basic right which has been encroached and under proviso (b) above simply in the wake of finding that the oppressed party has a legitimate right which has qualified him for any of the aforementioned writs and that such right has been encroached. The extent of this article has been the subject of extraordinary contention in various cases chose by different High courts and the Apex court. The agreement conclusion is that a man can move the High court just when he has no other similarly sufficient, helpful and quick cure accessible.

Article 227 of Indian Constitution , we can presume that it confirms that each High court should have superintendence over all courts and tribunals all through the regions in connection to which it exercises jurisdiction (with the exception of a court framed under a law identified with military).

For this reason, it might

- Call for comes back from such courts,
- Make and issue general standards and endorse shapes for directing the training and proceedings of such courts.
- Prescribe shapes in which books, passages and records shamm be kept by the officers of any such courts.
- Settle tables of charges to be permitted to the sheriff and all representatives and officers of such courts.

This jurisdiction is exercised sparingly. It can be exercised to remedy blunders of jurisdiction, however not to annoy unadulterated discoveries of the reality, which is inside the area of a redrafting court as it were. This is the place the power of revision comes into picture. The motivation behind revision is to empower the revision court to fulfill itself with regards to the accuracy, lawfulness or legitimacy of any discovering, sentence or order recorded or passed and with regards to the consistency of any proceedings of the inferior criminal court. Amendment by Act No.46 of 1999 with impact from 01.07.2002 in Section 115 of Code of Civil Procedure can't and does not influence in any way the jurisdiction of the High Court under Articles 226 and 227 of the Constitution.

Difference between a writ of certiorari under Article 226 and supervisory jurisdiction under Article 227:-

The contrast between Articles 226 and 227 of the Constitution was well brought out in Umaji Keshao Meshram and Ors. Versus Smt. Radhikabai and Anr., (1986) Supp. SCC 401. Proceedings under Article 226 are in exercise of the first jurisdiction of the High Court while proceedings under Article 227 of the Constitution are not unique but rather just supervisory. Article 227 significantly imitates the provisions of Section 107 of the Government of India Act, 1915 aside from that the power of superintendence has been reached out by this Article to

tribunals too. Despite the fact that the power is much the same as that of a common court of appeal, yet the power under Article 227 is planned to be utilized sparingly and just in fitting cases to keep the subordinate courts and tribunals inside the limits of their authority and not for rectifying unimportant mistakes. The power might be exercised in cases occasioning grave injustice or disappointment of justice, for example, when

- the court or council has expected a jurisdiction which it doesn't have,
- has neglected to exercise a jurisdiction which it has, such disappointment occasioning a disappointment of justice, and
- the jurisdiction however accessible is being exercised in a way which tantamounts to exceeding the points of confinement of jurisdiction.

In Chandrasekhar Singh and Ors. Versus Siva Ram Singh and Ors., (1979) 3 SCC 118, the extent of jurisdiction under Article 227 of the Constitution came up for the thought of this Court with regards to Sections 435 and 439 of the Criminal Procedure Code which forbids a moment revision to the High Court against choice in first revision rendered by the Sessions Judge. On a review of prior choices, the three-Judges Bench summed up the situation of law as under :-

- (i) that the powers gave on the High Court under Article 227 of the Constitution can't, in any capacity, be diminished by the provisions of the Code of Criminal procedure;
- (ii) the extent of interference by the High Court under Article 227 is limited. The power of superintendence gave by Article 227 is to be exercised sparingly and just in proper cases in order to keep the subordinate Courts inside the limits of their authority and not for redressing insignificant blunders;
- (iii) that the power of legal interference under Article 227 of the Constitution isn't more noteworthy than the power under Article 226 of the Constitution;
- (iv) that the power of superintendence under Article 227 of the Constitution can't be conjured to amend a blunder of certainty which just a predominant Court can do in exercise of its statutory power as the Court of Appeal; the High Court can't, in exercise of its jurisdiction under Article 227, change over itself into a Court of Appeal.

State, through Special Cell, New Delhi Vs. Navjot Sandhu Afshan Guru and Ors., JT 2003 (4) SC 605, para 28. This Court held :

- (i) the jurisdiction under Article 227 can't be constrained or chained by any Act of the state Legislature;
- (ii) the supervisory jurisdiction is wide and can be utilized to meet the finishes of justice, likewise to meddle even with interlocutory order;
- (iii) the power must be exercised sparingly, just to move subordinate courts and Tribunals inside the limits of their authority to see that they comply with the law. The power isn't accessible to be exercised to redress insignificant mistakes (regardless of whether on the certainties or laws) and furthermore can't be exercised "as the shroud of an appeal in mask".

We are of the feeling that the diminishing of revisional jurisdiction of the High Court does not take away and couldn't have taken away - the protected jurisdiction of the High Court to issue a writ of certiorari to a civil court nor the power of superintendence presented on the High Court under Article 227 of the Constitution is brought away or whittled down. The power exists, unhampered by the amendment in Section 115 of the CPC, and is accessible to be exercised subject to standards of self-control and practice which are very much settled.

Difference between Revision and Review:-

Revision:

1. Section 115 deals with the Revision.
2. The High Court can only do revision of any case which has been decided by any court subordinate to it.
3. Revisional powers can be exercised by the High Court on an application or even suo motu (of its own motion).
4. An order passed in the exercise of revisional jurisdiction is not appealable.
5. Revisional power can be exercised by the High Court only in a case where no appeal lies to the High Court.
6. The Conditions: (a) A case must have been decided; (b) the Court which has decided the case must be a Court subordinate to the High Court; (c) The order should not be an appealable one;

(d) The subordinate court must have – (i) exercised jurisdiction not vested in it by law; or (ii) failed to exercise jurisdiction vested in it, or (iii) acted in the exercise of its jurisdiction illegally or with material Irregularity.

Review:

1. Section 114 Order 47 deals with Review.
2. Any court, which passed the decree or made order, can review the case.
3. The review can be made only on an application by an aggrieved party.
4. The order granting the review is appealable.
5. Review can be made even when an appeal lies to the High Court.
6. The grounds for review are: (a) discovery of new and important matter or evidence; (b) mistake or error apparent on the face of the record; (c) any other sufficient reason.

These are some difference prevail among the Revision and Review.

Differences between Appeal and Revision:-

- (1) Appeal is a legal right of a party but revision depends on the discretion of the Court, therefore it cannot be claimed as a matter of right.
- (2) An appeal may lie on the point of law as well as on facts but a revision generally lies on the question of law only.
- (3) In case of appeal, the appellant is heard, but it is not necessary in case of a revision petition.
- (4) In case of appeal, the Appellate Court can neither increase the sentence nor pardon the appellant but both these are possible in case of revision.
- (5) In appeal, the higher court may convert discharge of the accused into his conviction but this cannot be done in case of revision.
- (6) The courts have extensive powers of interference in criminal appeals but the power of courts is very limited in revision.
- (7) There is only one procedure involved in appeal but there are two procedures involved in case of revision, i.e., preliminary and final.

Interim or interlocutory orders:-

The Supreme Court has decided that in spite of a boycott under corrected Section 115 of Civil Procedure Code (CPC), the High Courts under writ jurisdiction can hear petitions looking for revision of trial court's choice on requests against its interim orders. Accepting the Malimath Committee suggestions to accelerate snail paced trial proceedings in civil cases, the Center in 1999 had corrected Section 115, CPC forbidding recording of petitions in High Courts looking for revision of a trial court's order choosing an appeal against its interim order in a civil suit. The altered Section 115 became effective from July 1, 2002. The amendment was acquired after the Government felt that revisional jurisdiction of the High Courts was being abused by gatherings to defer the proceedings by testing a wide range of interim orders made by a trial court amid the pendency of a case. The peak Court controlling on the issue went ahead an appeal documented by Surya Devi Rai, whose request of against an interim order of the trial Court was not engaged by the High Court in perspective of the corrected Section 115 of CPC.

"Interlocutory orders, go by the courts subordinate to the High Courts, against which cure of revision has been barred by the CPC amendment are in any case open to challenge in, and keep on being liable to, certiorari and supervisory jurisdiction of the High Court, the High Courts that the power to issue a writ of certiorari and the supervisory jurisdiction were to be exercised "sparingly and just in proper cases where the legal soul of the High Court manages it to act for fear that a gross disappointment of justice or grave injustice should event. "Care, alert and vigilance should be exercised, when any of the two jurisdiction is tried to be conjured amid the pendency of any suit or proceedings in a subordinate court.

Buddhu Lai v. Mewa Ram, and Lai Chand Mangal Sen v. Beharilal Mehar Chand, The Calcutta High Court has gone to the length of holding that the High Court has abundant jurisdiction to overhaul interlocutory orders and to set them aside, albeit such orders might be assaulted in an appeal from the last decree or order in the proceeding.

Limitation for Revision:-

Limitation of revision is 90 days for recording civil revision appeal. What's more, the court charge is Rs.15 when revision is recorded against interlocutory order in different cases Rs.25000

is court expense. High Court exercise its Revisional power on application made by aggrieved party, but in certain case, Suo motu(own motion) is taken.

CONCLUSION AND SUGGESTION

Section 115 of the Code of Civil Procedure empowers a High Court to entertain a revision in any case decided by any subordinate court in certain circumstances. This jurisdiction is known as revisional jurisdiction of the High Court. Section 115 is to prevent subordinate courts from acting arbitrarily, capriciously and illegally or irregularly in the exercise of their jurisdiction. It clothes the High Court with the powers to see that the proceedings of the subordinate courts are conducted in accordance with law within the bounds of their jurisdiction and in furtherance of justice. It enables the High Court to correct, when necessary, errors of jurisdiction committed by subordinate courts and provides the means to an aggrieved party to obtain rectification of a non-appealable order. In other words, for the effective exercise of its superintending and visitorial powers, revisional jurisdiction is conferred upon the High Court. Revisional Jurisdiction is not intended to allow the High Court to interfere and correct errors of fact or of law. Revisional jurisdiction of High Court must not be misused by parties to delay their proceedings

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