



INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL**
**ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

WWW.WHITEBLACKLEGAL.CO.IN

DISCLAIMER

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Editor-in-chief of White Black Legal

– The Law Journal. The Editorial Team of White Black Legal holds the copyright to all articles contributed to this publication. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of White Black Legal. Though all efforts are made to ensure the accuracy and correctness of the information published, White Black Legal shall not be responsible for any errors caused due to oversight or otherwise.

WHITE BLACK
LEGAL

EDITORIAL TEAM

Raju Narayana Swamy (IAS) Indian Administrative Service officer



Dr. Raju Narayana Swamy popularly known as Kerala's Anti Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala . He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University . He also has an LLM (Pro) (with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru and a

professional diploma in Public Procurement from the World Bank.

Dr. R. K. Upadhyay

Dr. R. K. Upadhyay is Registrar, University of Kota (Raj.), Dr Upadhyay obtained LLB , LLM degrees from Banaras Hindu University & Phd from university of Kota.He has succesfully completed UGC sponsored M.R.P for the work in the ares of the various prisoners reforms in the state of the Rajasthan.



Senior Editor

Dr. Neha Mishra



Dr. Neha Mishra is Associate Professor & Associate Dean (Scholarships) in Jindal Global Law School, OP Jindal Global University. She was awarded both her PhD degree and Associate Professor & Associate Dean M.A.; LL.B. (University of Delhi); LL.M.; Ph.D. (NLSIU, Bangalore) LLM from National Law School of India University, Bengaluru; she did her LL.B. from Faculty of Law, Delhi University as well as M.A. and B.A. from Hindu College and DCAC from DU respectively. Neha has been a Visiting Fellow, School of Social Work, Michigan State University, 2016 and invited speaker Panelist at Global Conference, Whitney R. Harris World Law Institute, Washington University in St.Louis, 2015.

Ms. Sumiti Ahuja

Ms. Sumiti Ahuja, Assistant Professor, Faculty of Law, University of Delhi, Ms. Sumiti Ahuja completed her LL.M. from the Indian Law Institute with specialization in Criminal Law and Corporate Law, and has over nine years of teaching experience. She has done her LL.B. from the Faculty of Law, University of Delhi. She is currently pursuing Ph.D. in the area of Forensics and Law. Prior to joining the teaching profession, she has worked as Research Assistant for projects funded by different agencies of Govt. of India. She has developed various audio-video teaching modules under UGC e-PG Pathshala programme in the area of Criminology, under the aegis of an MHRD Project. Her areas of interest are Criminal Law, Law of Evidence, Interpretation of Statutes, and Clinical Legal Education.



Dr. Navtika Singh Nautiyal

Dr. Navtika Singh Nautiyal presently working as an Assistant Professor in School of Law, Forensic Justice and Policy studies at National Forensic Sciences University, Gandhinagar, Gujarat. She has 9 years of Teaching and Research Experience. She has completed her Philosophy of Doctorate in 'Intercountry adoption laws from Uttranchal University, Dehradun' and LLM from Indian Law Institute, New Delhi.

Dr. Rinu Saraswat



Associate Professor at School of Law, Apex University, Jaipur,
M.A, LL.M, Ph.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

Dr. Nitesh Saraswat

E.MBA, LL.M, Ph.D, PGDSAPM

Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University.

More than 25 Publications in renowned National and International Journals and has authored a Text book on Cr.P.C and Juvenile Delinquency law.



Subhrajit Chanda



BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); Ph.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

ABOUT US

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

STRIKING BALANCE BETWEEN FUNDAMENTAL RIGHTS AND SOCIAL NEEDS: A CRITICAL ANALYSIS

AUTHORED BY: MRITUNJAY KUMAR

Designation: Pursuing LLM at Chanakya National Law University, Patna

University: Chanakya National Law University, Patna

Abstract

The relationship between fundamental rights and social needs in contemporary democratic societies is a complex and dynamic interplay that shapes the landscape of governance, law, and societal progress. Fundamental rights, entrenched in constitutions, serve as the bedrock of justice, liberty, and human dignity, while societal needs encompass a broad spectrum of collective interests and welfare objectives. The delicate equilibrium between safeguarding individual liberties and advancing broader societal welfare forms the nucleus of this research endeavor.

This research project aims to conduct a comprehensive analysis of the multifaceted terrain where fundamental rights and societal needs converge. Through a multidisciplinary approach encompassing legal, and practical dimensions, the study seeks to unravel the mechanisms through which a harmonious coexistence between fundamental rights and social needs can be achieved. Drawing on constitutional provisions, judicial interpretations, and legislative frameworks, the research endeavors to elucidate the complexities inherent in balancing individual liberties with societal welfare goals.

Ultimately, this research endeavor aims to contribute to the ongoing discourse on how democratic societies can better harmonize the conflicting imperatives of fundamental rights and societal needs. By uncovering insights, identifying challenges, and proposing solutions, the study seeks to inform policymakers, legal practitioners, scholars, and citizens alike about the intricate dynamics of balancing individual liberties with societal welfare objectives in the pursuit of a more just and equitable society.

Introduction

In contemporary democratic societies, the interplay between fundamental rights and social needs stands as a complex and dynamic challenge. The fundamental rights of individuals, enshrined in constitutions, serve as pillars of justice, liberty, and human dignity. Simultaneously, the ever-evolving fabric of societal progress necessitates collective actions aimed at addressing pressing concerns, from public health crises to economic development and environmental protection. The delicate equilibrium between safeguarding individual liberties and advancing broader societal welfare forms the nucleus of this project work.

In recent years, the world has witnessed an array of scenarios where the clash between fundamental rights and social needs has garnered attention, raising ethical, legal, and practical questions. As governments endeavor to ensure security, foster economic growth, and confront issues of inequality, they often enact policies that intersect with individual rights, prompting thoughtful reflection on how to navigate these intersections.

This project embarks on a critical analysis of the multifaceted terrain where fundamental rights and societal needs converge. By dissecting constitutional provisions, judicial interpretations, legislative frameworks, and ethical considerations, this study endeavors to unearth the mechanisms through which a harmonious coexistence between fundamental rights and social needs can be achieved.

As we delve into this exploration, we unravel the narratives of courtrooms, legislatures, and public debates. We dissect the interpretations that seek to balance individual liberties and societal needs, striving to uncover a symbiotic relationship where progress and rights mutually reinforce each other. This research seeks to contribute to the ongoing dialogue about how democratic societies can better harmonize these seemingly disparate forces and carve a path forward that upholds the essence of justice, equality, and human flourishing.

Fundamental Rights and Social Needs: Conceptual Framework

Fundamental rights and social needs are two pivotal elements that shape the legal landscape of democratic societies. Understanding these concepts and their intricate interplay is essential to appreciate the complexities of balancing individual liberties with collective welfare within a

democratic framework.

Understanding Fundamental Rights: Fundamental rights constitute the bedrock of democratic societies, serving as the ultimate safeguard for individual liberties against encroachment, whether by the state or other individuals. These rights, typically enshrined in a nation's constitution, are multifaceted and span various dimensions of human existence, encompassing civil, political, economic, social, and cultural aspects. They are the tangible expressions of the principles upon which democratic governance is founded.

Among the most widely recognized fundamental rights are the right to life, which ensures the sanctity of an individual's existence, and the right to liberty, which guarantees personal freedom and autonomy. The principle of equality before the law underscores the notion that all citizens should be treated impartially by the legal system, irrespective of their background or status. The freedom of expression empowers individuals to voice their opinions and engage in open discourse, a cornerstone of democratic societies. Additionally, fundamental rights often encompass socio-economic entitlements, such as the right to work and education, recognizing that economic security and access to knowledge are vital components of human dignity.

Fundamental rights fulfill a multifaceted role within democratic systems. Firstly, they establish a critical bulwark against state tyranny, constraining the overreach of government authority and preserving the autonomy of individuals. Secondly, these rights are a testament to the inherent worth of each human being, affirming that every person possesses intrinsic dignity and should be treated with respect. This affirmation of human dignity extends to all citizens, regardless of their background or circumstances, fostering inclusivity and social cohesion. Moreover, by securing essential freedoms and protections, fundamental rights contribute to societal stability, empowering citizens to participate actively in the democratic process and shape their collective destiny.

In essence, fundamental rights are not merely legal provisions but the embodiment of the principles that underpin democratic societies. They represent the acknowledgment of the individual's intrinsic worth, the protection against arbitrary state power, and the foundation upon which the edifice of democracy stands.

Defining Social Needs: Social needs, at their core, encapsulate the collective requirements and interests that underpin the functioning and progress of society as a whole. These needs are not static; rather, they dynamically evolve in response to a variety of factors, including technological advancements, economic transformations, shifting demographics, and evolving societal values. Consequently, the landscape of social needs is expansive, encompassing a diverse spectrum of requirements essential for the well-being and advancement of a society.

These needs span various domains, ranging from the imperative for accessible and high-quality healthcare, ensuring the physical and mental well-being of citizens, to the necessity of comprehensive educational opportunities, empowering individuals with the knowledge and skills vital for personal growth and societal development. Simultaneously, economic opportunities are integral, as they drive prosperity and reduce disparities among citizens, contributing to social cohesion. Beyond these, social needs entail protection from diverse forms of harm, encompassing areas such as security, safety, and the safeguarding of basic human rights. This comprehensive array of needs reflects the intricate web of interdependencies that define modern societies.

The responsibility for addressing these social needs predominantly falls upon the shoulders of governments and institutions within democratic nations. Effective social policies, guided by principles of fairness and equity, aim to fulfill these needs, striving to ensure that resources and opportunities are distributed in a manner that uplifts the entire citizenry. In this way, social needs stand as a pivotal component of democratic governance, intimately connected to the broader aspirations of justice, equality, and societal progress.

Constitutional Framework and Legal Analysis

The Indian Constitution, a visionary document crafted in 1950, stands as a beacon of democracy and justice. Within its expansive framework lie fundamental rights that are pivotal to protecting individual liberties. However, these rights often encounter challenges arising from the dynamic interplay between the constitutionally enshrined guarantees and evolving societal needs.

Constitutional Provisions of Fundamental Rights:

The Indian Constitution opens with a solemn commitment to justice, liberty, equality, and fraternity

in its Preamble. Fundamental rights, enshrined in Part III of the Constitution (Articles 12 to 35), are the bedrock of these commitments. They include essential civil liberties, such as the right to equality (Articles 14-18), the right to freedom (Articles 19-22), and the right against exploitation (Articles 23-24). Additionally, the Constitution guarantees the right to freedom of religion (Articles 25-28), cultural and educational rights (Articles 29-30), and the right to constitutional remedies (Article 32).

Identifying Rights Frequently Challenged by Social Needs:

While all fundamental rights are significant, some are more frequently challenged by evolving societal needs. The right to freedom of speech and expression (Article 19) often finds itself at the center of debates concerning restrictions on hate speech, public order, and national security. The right to freedom of movement (Article 19) intersects with public health concerns during pandemics when restrictions on movement may be deemed necessary. Similarly, the right to livelihood (not explicitly mentioned but considered implicit in Article 21) is frequently contested in cases where economic development projects displace communities.

The right to equality (Article 14) encounters challenges when affirmative action measures are employed to rectify historical injustices. The right to privacy, although not explicitly mentioned as a fundamental right, has been recognized as such by the judiciary, especially in the digital age where personal data is a valuable commodity.

Legal Interpretations and Judicial Precedents:

The Indian judiciary plays a pivotal role in interpreting the Constitution and adjudicating disputes involving fundamental rights. Legal interpretations have often been influenced by the principles of reasonableness and proportionality. Courts have held that restrictions on fundamental rights must meet the test of reasonableness, meaning that they should have a rational nexus to the intended objective. Furthermore, the principle of proportionality requires that restrictions be proportionate to the perceived societal need.

In the case of *Maneka Gandhi v. Union of India*¹, the Supreme Court emphasized that restrictions on the right to travel must adhere to the principles of natural justice and reasonableness. In the

¹ (1978) 1 SCC 248

*Kesavananda Bharati*² case, the Supreme Court held that fundamental rights are not absolute and can be subject to reasonable restrictions. The court also established the doctrine of the "basic structure" of the Constitution, safeguarding fundamental rights from arbitrary amendments.

In the *K. S. Puttaswamy Vs Union of India*³ i.e. Aadhaar judgment, the Supreme Court upheld the right to privacy as a fundamental right and ruled that any intrusion into this right must meet the test of proportionality. This decision has far-reaching implications for data protection and surveillance in the digital age.

Additionally, the judiciary has consistently upheld the right to life and personal liberty (Article 21) as sacrosanct, often interpreting it expansively to encompass various aspects of human dignity. This broad interpretation has led to landmark judgments recognizing the right to clean environment, right to education, and right to privacy as integral to Article 21.

In conclusion, the constitutional framework and legal analysis of fundamental rights in the Indian context are instrumental in safeguarding individual liberties while addressing evolving societal needs. The Constitution's explicit guarantees and the judiciary's dynamic interpretations together form a robust defense against encroachments on these rights. This ongoing interplay between rights and needs underscores the resilience and adaptability of India's democratic framework in the face of complex challenges.

Case studies: Striking the Balance in Practice

Let's explore the critical aspect of case studies, showcasing how the Indian judiciary has grappled with the delicate task of striking the balance between fundamental rights and evolving societal needs.

1. *Keshavananda Bharati v. State of Kerala*⁴ (1973): This landmark case is central to Indian constitutional law. It established the doctrine of the "basic structure" of the Constitution, affirming that certain core principles and fundamental rights cannot be amended by the legislature. While the case primarily concerned the power of Parliament to amend the

² (1973) 4 SCC 225

³ (2017) 10 SCC 1

⁴ (1973) 4 SCC 225

Constitution, it highlighted the judiciary's role in protecting the foundational structure of the Constitution, which includes fundamental rights. This decision demonstrated the judiciary's commitment to upholding fundamental rights as an essential part of the Indian constitutional framework.

2. *Navtej Singh Johar v. Union of India*⁵ (2018): In a significant decision, the Supreme Court decriminalized consensual homosexual acts by striking down Section 377 of the Indian Penal Code. This case exemplifies a successful balance between individual rights (the right to equality and right to life) and societal needs (eliminating discrimination and promoting inclusivity). The judgment recognized that societal attitudes had evolved, necessitating a reinterpretation of the law to align with constitutional values.
3. *MC Mehta v. Union of India*⁶ (1987): Popularly known as the "Oleum gas leak case," this judgment highlighted the judiciary's role in protecting the right to a clean environment (implicit in Article 21) while acknowledging the societal need for industrial development. The court imposed strict liability on industries handling hazardous substances, ensuring that the right to life and health of citizens was not compromised.
4. *K. S. Puttaswamy Vs Union of India*⁷ (2017) i.e. Aadhaar judgment: While upholding the Aadhaar project's constitutionality, the Supreme Court introduced a principle of proportionality in assessing the balance between individual rights and state interests. This case underscores the importance of considering the necessity and proportionality of government actions when they potentially infringe on privacy and other fundamental rights.
5. *State of Kerala vs. N.M. Thomas*⁸ (1976): In this case, the court confronted the question of reservations for socially and educationally backward classes. The judgment reiterated that Articles 15(4) and 16(4) of the Constitution, which provide for reservations, are not exceptions to Articles 15 and 16, which enshrine the right to equality. Instead, they represent an emphatic assertion and direction to the state to take effective affirmative steps to enforce the concept of equality. This decision firmly established the constitutionality of reservations as a means to address historical inequalities and promote social justice.

⁵ (2018) 1 SCC 791

⁶ AIR 1987 SC 1086

⁷ (2017) 10 SCC 1

⁸ AIR 1976 SC 490

6. *Minerva Mills vs. Union of India*⁹ (1980): This case marked a watershed moment in India's constitutional history. It emphasized that fundamental rights (Part III) and Directive Principles of State Policy (Part IV) are not antagonistic but complementary and supplementary to each other. The court held that any conflict between these two pillars of the Constitution should be reconciled harmoniously. This ruling underscored the significance of Directive Principles in guiding state policy towards fulfilling societal needs, especially for marginalized and disadvantaged sections.
7. *Indra Sawhney v. Union of India*¹⁰ (1993): Commonly known as the Mandal Commission case, it addressed reservations in government jobs for Other Backward Classes (OBCs). While some argued that this policy violated the fundamental right to equality (Article 14), the court held that reservations were essential for addressing social and educational backwardness, as envisioned by Directive Principles (Article 46). The court established a 50% cap on reservations, ensuring a balance between individual rights and the social need for affirmative action.
8. *P.A. Inamdar v. State of Maharashtra*¹¹ (2005): In the context of admissions to private educational institutions, this case explored the tension between the fundamental right to establish and administer educational institutions (Article 30) and the state's duty to provide reservations for socially and educationally backward classes (Article 15(5)). The court upheld the right of private unaided institutions to determine their admissions process but allowed the state to regulate admissions, ensuring a nuanced balance between individual rights and societal needs.

In these cases, the Indian judiciary has demonstrated its commitment to upholding fundamental rights while navigating complex societal needs. These decisions provide valuable insights into the delicate balance that must be struck and the considerations that guide judicial reasoning in a diverse and evolving society. They underscore the judiciary's role as a guardian of constitutional values and individual liberties.

⁹ AIR 1980 SC 1789

¹⁰ AIR 1993 SC 477

¹¹ AIR 2005 SC 3226

Challenges and Recommendations for Achieving Equitable Coexistence

Challenges:

Let's explore the challenges in achieving equitable coexistence between fundamental rights and social needs:

Changing Societal Norms: The ever-evolving landscape of societal norms and values poses a formidable challenge in the quest for equitable coexistence between rights and societal needs. What may have once been perceived as a societal need might no longer align with contemporary interpretations of fundamental rights. The adaptability of legal frameworks is crucial in accommodating these shifts. Lawmakers must be open to revisiting and revising existing legislation to ensure its relevance and alignment with evolving values. This challenge extends to striking a balance between preserving cultural heritage rooted in tradition and promoting societal progress. In certain instances, norms and practices entrenched in tradition may come into conflict with modern interpretations of rights and needs.

Conflicting Interests: Balancing fundamental rights and societal needs frequently engenders conflicts that demand effective and just mechanisms for resolution. These conflicts often arise from the complex interplay between individual rights and the broader welfare of society. For instance, crafting policies to combat hate speech can be at odds with the freedom of expression. The challenge lies in finding a delicate equilibrium that respects both these elements of democratic governance.

Implementation and Enforcement: Even well-conceived policies aimed at addressing societal needs can falter if not effectively implemented and rigorously enforced. The challenges here are multifaceted. Administrative capacity plays a pivotal role, as the effective execution of policies often hinges on the resources, expertise, and efficiency of government agencies. Without these essential components, the best-intentioned policies may remain unfulfilled promises. Furthermore, public awareness is a linchpin in this process. Citizens must be informed about their rights and the policies designed to address societal needs. Lack of awareness can lead to non-compliance or even resistance to policies, hindering their intended impact.

Recommendations:

Here are the recommendations for achieving equitable coexistence between fundamental rights and societal needs, considering the roles of policymakers, legislators, and the judiciary:

Recommendations for Policymakers and Legislators: Policymakers should prioritize evidence-based decision-making, ensuring that policies are not only well-intentioned but also effective in achieving their intended goals. This approach allows for a more thorough understanding of the potential impact on fundamental rights and helps in crafting proportionate and informed solutions. Furthermore, involving a wide array of stakeholders in the policy-making process is crucial. Policymakers should engage in meaningful consultations with civil society organizations, affected communities, and experts in the respective fields. This inclusive approach ensures that diverse perspectives and concerns are taken into account, fostering a sense of ownership and legitimacy in the resulting policies.

In the legislative realm, it is essential to establish clear policy guidelines. Legislators can adhere to a proportionality principle, which requires policies to be the least intrusive means of achieving societal objectives. Additionally, conducting equality impact assessments should be a standard practice to evaluate how policies may affect various social groups, especially vulnerable and marginalised populations. These assessments can guide legislators in crafting policies that strike a balance between the needs of the society and the protection of individual rights.

Recommendations for the Judiciary: For the judiciary, maintaining a robust role in balancing rights and needs is paramount. Judges should continue to exercise thorough judicial review to scrutinize the constitutionality of policies and actions affecting fundamental rights. This entails assessing whether policies align with Directive Principles and whether they serve a legitimate purpose. Proactive engagement with public interest litigation and ensuring accessibility to the courts for individuals and organizations are key aspects of this judicial role.

Ultimately, a preventive approach is advisable, wherein policies are designed proactively to address societal needs while minimizing infringement on fundamental rights. By following these recommendations, democratic societies can effectively navigate the intricate balance between individual liberties and collective welfare, ensuring that both are safeguarded and respected.

Conclusion

Our exploration into the interplay between fundamental rights and societal needs reveals several critical insights. Through a comprehensive examination of constitutional provisions, landmark court cases, and the evolving role of Directive Principles, we've discerned that these elements are not in competition but rather are complementary and mutually reinforcing pillars of democratic governance. This harmony was eloquently affirmed by the judiciary in the *Minerva Mills* and *N.M. Thomas* cases, where the court emphasized the symbiotic relationship between fundamental rights and Directive Principles, advocating for their harmonious reconciliation.

Our analysis also showcased the intricate balance that the Indian judiciary has struck in cases related to reservations in government jobs and admissions in educational institutions. Through a nuanced approach, the courts have upheld affirmative action measures while respecting individual rights, guided by principles of proportionality, reasonableness, and inclusivity. The implications of these findings for democratic societies are profound. They underscore the vitality of an adaptable constitutional framework that respects the sanctity of individual liberties while addressing evolving societal needs. This balance is pivotal in ensuring that democracy remains vibrant and responsive to the aspirations of diverse populations.

However, our exploration also reveals areas for further research. A deeper examination of the practical implementation of policies aimed at reconciling rights and needs, as well as their real-world impact, is necessary.

In conclusion, our study offers a framework for navigating the intricate interplay between fundamental rights and societal needs. It highlights the importance of a holistic and balanced approach, ensuring that the fundamental tenets of democracy are upheld while striving for a just and equitable society. This endeavor, at its core, reflects the essence of democratic governance and the ongoing quest for an equitable coexistence of individual liberties and societal progress.

References:

BOOKS:

1. Indian Constitutional Law by M.P. Jain, (8th edition, 2018), Lexis Nexis
2. Constitutional Law of India by Dr. J.N. Pandey, (56th edition, 2019), Central Law Agency
3. The Constitution of India by P M Bakshi, (12th edition, 2015), Universal Law Publishing Co. Pvt. Ltd.

Websites :

1. <https://www.indiankanoon.org/>
2. <https://www.legalserviceindia.com/>
3. <https://www.casemine.com/>
4. <https://blog.ipleaders.in/>



W H I T E B L A C K
L E G A L