

Centre for Alternative Dispute Resolution, Rajiv Gandhi National University of Law

CADRadar

CENTRE FOR ALTERNATIVE DISPUTE RESOLUTION

Quarterly Newsletter

Volume VI, Issue 2



October - December 2024

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About **CADR**

CENTRE FOR ALTERNATIVE DISPUTE RESOLUTION

The Centre for Alternative Dispute Resolution, RGNUL (CADR) is a research centre dedicated to research and capacity-building in Alternative Dispute Resolution (ADR). CADR's ultimate objective is to strengthen ADR mechanisms in the country by emerging as a platform that enables students and professionals to further their interests in the field.

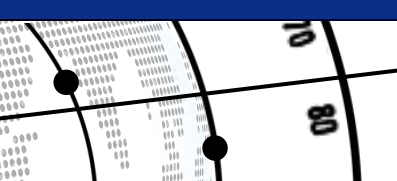
In its attempt to further the objective of providing quality research and information to the ADR fraternity, the CADR team is elated to present the Second Edition of the Sixth Volume of its quarterly newsletter, "The CADR Radar."

The Newsletter initiative began with the observation that there exists a lacuna in the provision of information relating to ADR to the practicing community. With an aim to lessen this gap, the Newsletter has been comprehensively covering developments in the field of ADR, both national and international.

Additionally, the newsletter documents the events at CADR and the achievements of RGNUL students in ADR competitions. The CADR Radar is a one-stop destination for all that one needs to know about the ADR world; a "quarterly dose" of ADR News.

NEWS UPDATES

Catch up on the latest developments in the fields of
Domestic Arbitration, International Commercial
Arbitration, Investment Arbitration and Mediation



Domestic Arbitration

-Kavya Jain & Syed Raiyyan

Draft Arbitration and Conciliation (Amendment), 2024

The most significant development regarding arbitration in India has been the release of the Draft Arbitration and Conciliation (Amendment) Bill, which seeks to redefine and modernize the arbitration setup in the country. The Bill promotes institutional arbitration over ad-hoc arbitration, a major lacuna in the Indian Arbitration laws. The Bill defines arbitral institutions and authorizes them to change arbitrators and determine specific timelines. The Bill also attempts to limit judicial intervention by imposing stringent deadlines for courts to consider applications under Sections 8 and 11. A deliberate attempt to speed up arbitration proceedings is indicated by the implementation of time-bound appeals under Section 37. There is still a lot to be done to bring these admirable reforms into practice, nevertheless, the Bill certainly marks a pivotal moment for the country. [Read more](#)

An Application Under Section 29A (4) Maintainable even after Expiry of the Twelve-Month or the Extended Six-Month Period

The Court has settled the law regarding the interpretation of Section 29A of the Arbitration and Conciliation Act, 1996. The provision had been in question since the High Court of Calcutta ruled that the application for extension of time under Sections 29A (4) and 29A (5) of the Act can only be entertained if filed before the expiry of the mandate of the arbitral tribunal. This interpretation went against several judgments of various other High Courts. The Supreme Court has disposed of the appeal challenging the aforementioned judgment of the Calcutta High Court. It held that the applications for extension of time under Section 29A of the said Act can be filed even after the expiry of the tenure of the Arbitral Tribunal. It further set aside the impugned judgment and revived the arbitration petition praying to extend the mandate of arbitration before the Calcutta High Court. [Read more](#)

Supreme Court Upholds Arbitration Clause Despite Eviction Order under Public Premises Act

The Supreme Court upheld the High Court's decision to refer a dispute to arbitration, despite an eviction order under the Public Premises Act. The case involved a warehousing agreement between the appellant and respondent, with an arbitration clause for disputes. The respondent invoked the arbitration clause over non-renewal of the agreement due to unpaid fees. The Court ruled that the Public Premises Act, which addresses unauthorized occupation, does not interfere with the arbitration process for contractual disputes. The appeal was dismissed, and the appellant was ordered to pay Rs. 50,000 in costs for unnecessary litigation. [Read more](#)

Government Entity Can't Be Given Differential Treatment While Staying Operation Of Arbitral Award: Supreme Court

The Supreme Court disapproved of a High Court decision allowing a government entity to deposit only the arbitral award amount, excluding interest and costs, to stay enforcement of the award. Citing *Pam Developments Pvt Ltd v State of West Bengal (2019)*, the Court emphasized that arbitration law applies equally to government and private entities. It rejected the High Court's reliance on the entity's statutory status, ruling that all parties in arbitration must comply equally with legal provisions. The appeal was allowed, modifying the High Court's order. [Read more](#)

Supreme Court Rules Unilateral Appointment Clauses Violate Article 14

The Supreme Court, in a five-judge bench led by CJI Dr. DY Chandrachud, ruled that unilateral appointment clauses in public-private contracts violate Article 14 of the Constitution. This decision overruled the precedent set in *Central Organisation for Railway Electrification v. ECI-SPIC-SMO-MCML (2020)*, which had previously upheld such clauses. The Court clarified that allowing only one party to appoint an arbitrator compromises impartiality and fairness, fundamental to arbitration proceedings.

The bench also addressed the broader question of whether a party disqualified from serving as an arbitrator can appoint one, concluding that such appointments are invalid. This ruling strengthens the constitutional guarantee of equality before the law in arbitration practices. [Read more](#)

Supreme Court Clarifies Criteria for Determining Seat of Arbitration in International Disputes

The Supreme Court ruled that the seat of arbitration must be determined based on the express designation in the arbitration agreement, not on abstract factors like the governing law of the contract. The "Closest Connection Test" was explicitly rejected as a method for identifying the seat. In this case, although the petitioner preferred India as the seat, the Court held that Dubai was appropriate since the contract specified Dubai law and arbitration rules. The ruling emphasized that when the arbitration seat is clearly designated, courts must respect that choice. Consequently, the petition was dismissed, reinforcing the principle of party autonomy in international arbitration. [Read more](#)

Bombay High Court Reaffirms Binding Nature of Emergency Arbitrator's Decision, Grants Interim Relief U/S 9 Of Arbitration Act

The Bombay High Court reiterated that parties agreeing to institutional arbitration rules and participating in emergency arbitration proceedings cannot later dispute the binding nature of the Emergency Arbitrator's decision. The Court held that the Emergency Arbitrator's ruling qualifies as an "order," not a "final award," and thus can be enforced under Section 9 of the Arbitration and Conciliation Act, 1996. The Court granted interim relief to the petitioners, noting that obstructive behavior by the opposing party is a relevant factor in deciding such applications. This decision underscores the enforceability of emergency arbitration in India. [Read more](#)

Clarification on Award Can Be Issued Even After Arbitral Tribunal Becomes Functus Officio: Supreme Court

The Supreme Court ruled that an Arbitral Tribunal, even after becoming *functus officio* (having fulfilled its mandate), retains limited jurisdiction to clarify or correct errors under Section 33 of the Arbitration and Conciliation Act, 1996. The case involved an appeal against the Delhi High Court's decision, which permitted the respondent to seek clarification on whether post-award interest under Section 31(7)(b) should be calculated on the principal amount alone or include pre-award interest. The Supreme Court upheld the High Court's decision, emphasizing the Tribunal's authority to address ambiguities post-award. [Read more](#)

Clarification on Award Can Be Issued Even After Arbitral Tribunal Becomes *Functus Officio*: Supreme Court

The Supreme Court ruled that Section 14 of the Limitation Act, which allows exclusion of time spent in *bona fide* proceedings in a wrong forum from limitation calculations, applies to arbitration-related cases. The Court emphasized the need for a liberal interpretation of limitation provisions, considering the limited window for challenging arbitral awards. This decision ensures that parties who mistakenly pursue remedies in incorrect forums are not unduly penalized, thus promoting fairness in arbitration procedures. [Read more](#)

Disputes Falling Exclusively Within Jurisdiction of Statutory Authorities Aren't Arbitrable: Supreme Court

The Supreme Court reaffirmed that disputes falling exclusively within the jurisdiction of statutory authorities are non-arbitrable. In this case, the Court ruled that issues related to employee wages and termination must be handled by statutory bodies under the Payment of Wages Act, 1936, and the Industrial Disputes Act, 1947. The decision reinforces the principle that certain disputes, due to their statutory nature, cannot be resolved through arbitration, ensuring that specialized tribunals maintain their exclusive authority over such matters.

[Read more](#)

International Commercial Arbitration

– Anusha Agarwal & Kartikey Tripathi

ICC Registers 29,000th Arbitration Case

On October 23, 2024, the International Chamber of Commerce (ICC) marked a significant milestone by registering its 29,000th arbitration case. The dispute involves Brazilian parties from the power and energy sector, governed by Brazilian law, with the seat in Rio de Janeiro. Originally, the parties had opted for ad hoc arbitration under UNCITRAL Rules, with ICC as the appointing authority. However, they later transitioned to ICC arbitration. This milestone reflects ICC's continued role in international dispute resolution and its widespread adoption across industries. The institution remains a preferred forum due to its structured processes and neutrality. [Read more](#)

Dubai Court Invalidates Unilateral Arbitration Clauses

On October 29, 2024, the Dubai Court of Cassation ruled that unilateral arbitration clauses are unenforceable under UAE law. The court reasoned that such clauses lack mutual consent, which is fundamental to a valid arbitration agreement. Unilateral clauses, which allow only one party the right to choose arbitration, have been controversial in multiple jurisdictions. While offshore courts in the UAE, such as the DIFC Courts, have previously upheld them, this decision reinforces the principle that arbitration agreements must be fair and reciprocal. The ruling could impact existing contracts containing such clauses and influence arbitration practices in the region. [Read more](#)

Gazprom Initiates Arbitration Against Linde

Russian state-owned gas company Gazprom has filed an \$880 million arbitration claim against German engineering firm Linde in the Arbitration Court of Amur Oblast, Russia. The dispute stems from Linde's suspension of operations in Russia following geopolitical tensions. The claim centers around the construction of a gas processing facility in Amur, crucial for fuel exports to China.

Linde halted work on the project due to Western sanctions imposed on Russia, leading Gazprom to seek damages. This case underscores the impact of international sanctions on commercial contracts and highlights the challenges foreign companies face when exiting Russian markets. [Read more](#)

Singapore Proposes Appellate Court for SICC

Singapore's Parliament has introduced a bill to establish an appellate court within the Singapore International Commercial Court (SICC). The proposed 'International Committee' would hear appeals from specific jurisdictions, strengthening SICC's role in transnational commercial litigation. The initiative aligns with the Singapore-Bahrain Bilateral Treaty signed in May 2024, which established the Bahrain International Commercial Court (BICC). Under this treaty, the newly proposed appellate court may serve as the primary appeal body for BICC cases, further integrating Singapore into the global dispute resolution framework. If implemented, the reform could make SICC a preferred forum for complex international disputes. [Read more](#)

OMV Secures \$243 Million Award Against Gazprom

Austrian oil and gas company OMV AG has won a \$243 million arbitration award against Gazprom for non-fulfillment of gas supply contracts. The dispute arose when Gazprom significantly reduced gas deliveries starting in September 2022, leading OMV to suffer financial losses. An ICC tribunal, with arbitrators from Egypt, Switzerland, and Turkey, ruled in favor of OMV, awarding compensation of €230 million. The decision could impact OMV's long-term contracts with Gazprom and may lead to a complete cessation of gas supplies. The ruling highlights the ongoing legal challenges between European energy firms and Russian suppliers amid geopolitical tensions. [Read more](#)

Dutch Court Enforces \$1.4 Billion Award Against Indian Entity

On November 20, 2024, the Amsterdam Court of Appeal upheld enforcement of a \$1.4 billion ICC arbitration award against an Indian state-owned entity in favor of Devas Multimedia. The dispute stems from India's cancellation of a satellite contract with Devas, which had previously won multiple arbitration rulings.

The court ruled that enforcing the award aligns with international arbitration principles under the New York Convention. The decision is a significant development in Devas's long-running legal battle, as it continues efforts to recover damages from Indian government-linked entities. It also reinforces the Netherlands' position as a pro-arbitration jurisdiction. [Read more](#)

GAR-LCIA Roundtable Recommends Arbitration Reforms

On November 16, 2024, the GAR-LCIA Roundtable released key recommendations aimed at improving arbitration efficiency. The panel, chaired by J. William Rowley KC, emphasized better case management, tribunal oversight, and stricter witness statement regulations. The discussion also highlighted concerns over rising arbitration costs and delays. Participants suggested clearer document production guidelines and proactive tribunal interventions to streamline proceedings. The recommendations reflect growing efforts to enhance arbitration's accessibility and cost-effectiveness. If implemented, these reforms could significantly impact how arbitral tribunals handle complex disputes across multiple jurisdictions. [Read more](#)

India's Supreme Court Clarifies 'Seat' vs. 'Venue' in Arbitration

In December 2024, the Supreme Court of India clarified the distinction between 'seat' and 'venue' in arbitration agreements in *M/S Arif Azim Co. Ltd. v. M/S Micromax Informatics FZE*. The court ruled that when a contract designates a foreign seat along with foreign governing law, Indian courts lack jurisdiction, even if arbitration hearings occur in India. This ruling reinforces the significance of clear contractual terms in arbitration clauses. By affirming that 'seat' determines supervisory jurisdiction, the judgment strengthens India's alignment with global arbitration practices and aims to prevent unnecessary judicial intervention in international arbitration. [Read more](#)

Hong Kong Introduces Outcome-Related Fee Structures for Arbitration

Hong Kong has implemented new legislation allowing outcome-related fee structures (ORFS) for arbitration, marking a shift towards flexible dispute resolution funding. This model enables parties to agree on contingency fees, success fees, or hybrid arrangements, aligning Hong Kong with other major arbitration hubs like Singapore and London. The reform aims to enhance Hong Kong's attractiveness as an arbitration center by providing parties with alternative funding mechanisms. It is expected to benefit businesses seeking cost-effective solutions while maintaining Hong Kong's reputation as a leading dispute resolution jurisdiction in Asia. [Read more](#)

SIAC Reports Record Case Filings in 2024

The Singapore International Arbitration Centre (SIAC) announced a record number of case filings in 2024, highlighting its increasing appeal as a global arbitration hub. The surge is attributed to SIAC's efficient case administration, neutrality, and strategic location within Asia. With a growing caseload involving parties from multiple jurisdictions, SIAC continues to solidify its position as a premier venue for resolving international disputes. The institution's success reflects broader trends in Asia's expanding arbitration landscape, as businesses increasingly turn to SIAC for commercial dispute resolution. [Read more](#)

Investment Arbitration

– Krtivee Sharma & Adamyia Rawat

Spain loses Sovereign Immunity Appeal in Renewable Energy Arbitration

The Court of Appeal in London has dismissed Spain’s appeal to invoke sovereign immunity in relation to a €101 million arbitration award granted to investors Infrastructure Services Luxembourg and Energia Termosolar under the Energy Charter Treaty. The dispute arose after Spain reduced incentives for renewable energy, negatively impacting the investors’ interests. Spain argued that sovereign immunity should protect it from having to enforce the award. However, the court ruled that countries that have ratified the ICSID Convention cannot use sovereign immunity as a defense to avoid honoring such awards. This decision sends a clear message that states must uphold their commitments under international arbitration agreements. In a related case, Zimbabwe’s appeal over expropriation claims was also dismissed, though it was sent back to the High Court for further review. [Read more](#)

Insights from Delhi Arbitration Weekend 2024: ISDS Reforms and Challenges

The Delhi Arbitration Weekend 2024 featured two insightful panel discussions on Investor-State Dispute Settlement (ISDS), focusing on its current landscape, emerging challenges, and potential reforms. The panels delved into the growing concerns surrounding the legitimacy of ISDS, particularly among countries like India, which has significantly redefined its approach through measures such as the 2016 India Model Bilateral Investment Treaty (BIT). Key issues discussed included the impact of ISDS on sustainability, the phenomenon of regulatory chill—where states hesitate to implement public interest regulations due to fear of investor claims—and the critical need for maintaining impartiality in arbitration proceedings.

Panelists highlighted the delicate balance between safeguarding investor rights and preserving state sovereignty, emphasizing the importance of reforms to address economic vulnerabilities and environmental priorities. India's ISDS approach, shaped by domestic and global experiences, is seen as a model for global reform. [Read more](#)

Finnish Court freezes \$4.25 billion of Russian assets in Naftogaz dispute

A Finnish court has ordered the freezing of \$4.25 billion in Russian assets in Finland in connection with a legal dispute initiated by Ukraine's state-owned energy company, Naftogaz. The case stems from Naftogaz's claim for compensation following Russia's expropriation of its property in Crimea after the 2014 annexation. Finland's National Enforcement Authority has executed the court's order, targeting a range of Russian assets, including real estate and other holdings. Some of these assets are claimed by Russia to be diplomatic properties, which are typically protected under international law, raising potential legal complexities. This development is particularly significant as it represents the first known instance of a successful asset freeze outside Ukraine related to arbitration awards concerning Crimea. In response, Russia has strongly protested the decision, summoning Finland's ambassador to express its discontent and vowing to challenge the enforcement actions through legal and diplomatic channels. [Read more](#)

UNCTAD Reports Surge in Investor-State Dispute Settlement (ISDS) Compensation Awards

The United Nations Conference on Trade and Development (UNCTAD) has reported a significant surge in the average size of compensation awarded in Investor-State Dispute Settlement (ISDS) cases. According to data from the UNCTAD ISDS Navigator Database, as of August 15, 2024, the average value of damages has quadrupled, rising from approximately USD 68 million during the 2000–2009 period to over USD 250 million in the past decade.

Notably, nearly 25% of the recent awards have exceeded USD 100 million, reflecting a sharp increase in the financial stakes involved in such disputes. This trend highlights the growing complexity and high-value nature of contemporary investment arbitration cases, often tied to sectors like energy, infrastructure, and technology. The report affirms the growing financial exposure of states in ISDS cases, emphasizing the need for comprehensive legal frameworks and strategic policy measures to effectively address the evolving dynamics of investment arbitration. [Read more](#)

Telefonica Secures \$380 million Award Against Colombia

Spanish telecommunications giant Telefónica has secured a \$380 million arbitration award against the Colombian government, following a ruling by the International Centre for Settlement of Investment Disputes (ICSID). The dispute arose from regulatory measures imposed on Telefónica, which resulted in substantial financial penalties levied against the company in 2017. Telefónica initiated arbitration proceedings, claiming that Colombia's actions violated the bilateral investment treaty (BIT) between Spain and Colombia. After a thorough review, the ICSID tribunal concluded that Colombia had indeed breached its obligations under the BIT, particularly concerning the fair and equitable treatment of foreign investors. In addition to the \$380 million award, the tribunal ordered Colombia to compensate Telefónica for its legal costs and granted 5% compound interest on the awarded amount. The ruling reaffirms the binding nature of bilateral investment treaties and the enforceability of arbitral awards under international law. [Read more](#)

UK Arbitration Bill nears Enactment, Introducing Key Reforms

The UK's Arbitration Bill, reintroduced by the Labour government in July 2024, passed the House of Lords and underwent its first reading in the House of Commons (HC) on November 6, 2024, without debate. at for arbitration.

The Bill introduces significant reforms, including a carve-out for non-ICSID investor-state arbitration agreements and codification of case law on arbitral appeals under Clause 13. Attempts to amend provisions related to corruption and costs were debated but ultimately withdrawn. With the Christmas recess approaching, the Bill is expected to receive Royal Assent by year-end, potentially becoming the Arbitration Act 2024. This legislative overhaul aims to preserve London's position as a premier seat for arbitration. [Read more](#)

Jailed Oligarch Drops Defense in Billion-Dollar LCIA Claim

Ziyavudin Magomedov, a Russian oligarch serving a 19-year prison sentence, has withdrawn his defense in a billion-dollar LCIA arbitration involving his company, Maple Ridge. The case, filed by FESCO subsidiary Halimeda, sought to recover a loan related to Magomedov's acquisition of a US\$8.8 billion stake in FESCO. While Magomedov previously argued that the loan enforcement was part of a Russian conspiracy to seize his assets, he has now dropped this defense in arbitration. Despite this, Magomedov continues to pursue these allegations in UK litigation worth US\$14 billion, aiming for full disclosure in his claims against FESCO and other involved parties. [Read more](#)

Arbitration Institute of the Stockholm Chamber of Commerce (SCC) Introduces Policy on Arbitration Seats for Intra-EU Disputes

On November 5, 2024, the Arbitration Institute of the Stockholm Chamber of Commerce (SCC) announced a new policy regarding the selection of arbitration seats for intra-EU investment treaty disputes. This policy shift responds to recent rulings by the Court of Justice of the European Union (CJEU), particularly the Achmea and Komstroy decisions, which questioned the validity of intra-EU arbitration under bilateral investment treaties (BITs). The SCC's policy aims to provide clarity and consistency, helping parties navigate legal uncertainties around the enforceability of intra-EU awards.

It encourages the selection of arbitration-friendly jurisdictions outside the EU to reduce risks of CJEU interference. The policy also emphasizes procedural neutrality and safeguards investor rights while aligning with evolving EU legal frameworks. Experts view this move as the SCC's strategic effort to maintain its prominence in international arbitration, ensuring effective dispute resolution amid shifting legal landscapes within the EU. [Read more](#)

SICC Sets Aside ICC Award in Landmark Case Over Breach of Natural Justice

In a significant ruling, the Singapore International Commercial Court (SICC) recently set aside an International Chamber of Commerce (ICC) award involving a Government of India freight network company, citing a breach of natural justice. The case, led by PSL Advocates & Solicitors alongside Duxton Hill Chambers, challenged the award on the grounds of apparent bias and lack of impartiality. The tribunal had copied significant portions from previous awards in parallel arbitrations, without offering the Respondent an opportunity to respond. This ruling underscores the critical importance of due process and impartiality in arbitration, highlighting its broader implications for the integrity and fairness of future international arbitration proceedings.

[Read more](#)

Zenith Energy Triumphs in ICSID Arbitration Against Tunisia

Zenith Energy Ltd. has received a favorable ruling in its ICSID arbitration against the Republic of Tunisia. On December 23, 2024, the ICSID Arbitral Tribunal dismissed Tunisia's request for bifurcation, rejecting it in strong terms. This decision marks a crucial step in Zenith's ongoing legal battle, with claims amounting to US\$503 million. The arbitration, initiated in June 2023 due to Tunisia's failure to honor the 1989 Investment Treaty, will proceed with an accelerated procedural timetable. Zenith's legal team, including Clay Arbitration and Charles Russell Speechlys, continues to push for compensation for the damages suffered due to Tunisia's conduct. The final ruling is expected between 2025 and 2026. [Read more](#)

Devas v. Antrix: Ninth Circuit's Stricter Jurisdictional Test for Enforcing Arbitration Awards against Foreign States

The Ninth Circuit's decision in *Devas v. Antrix* on December 11, 2024, reinforced the requirement for minimum contacts in enforcing arbitration awards against foreign states. This ruling diverges from other circuits, which typically do not impose this standard. The case centers around a \$1.3 billion award from an ICC arbitration between Devas Multimedia and Antrix Corp., which was initially confirmed in the District Court but reversed by the Ninth Circuit. The court emphasized that, beyond the Foreign Sovereign Immunities Act (FSIA), plaintiffs must show that a foreign state has sufficient U.S. ties. This ruling complicates enforcement in the Ninth Circuit, particularly for award creditors, who now face stricter jurisdictional hurdles. [Read more](#)

Hong Kong Court Grants Anti-Suit Injunction against Russian Bank despite Lugovoy Law

The Hong Kong Court of First Instance (CFI) has granted an anti-suit injunction against a Russian bank that initiated proceedings in Russia despite an arbitration agreement designating Hong Kong as the seat. In *Bank A v Bank B [2024] HKCFI 2529*, the Russian bank sought to challenge jurisdiction based on Hong Kong's Basic Law and the impact of EU sanctions. The CFI dismissed the challenge, reaffirming Hong Kong's pro-arbitration stance and rejecting public policy arguments. This ruling reinforces Hong Kong's role as a neutral seat for Russia-related disputes, even amid the jurisdictional conflicts arising from Russia's Lugovoy Law. [Read more](#)

Mediation in Arbitration Cases: Gujarat High Court launches India's First Med-Arb Centre

The Gujarat High Court Arbitration Centre inaugurated its Med-Arb Centre on August 15, 2024, following the Flag Hoisting Ceremony. The event was presided over by Hon'ble Mrs. Justice Sunita Agarwal, Chief Justice of the Gujarat High Court, alongside Hon'ble Mr. Justice Biren A. Vaishnav and other dignitaries.

This first-of-its-kind Centre introduces Med-Arb, a two-stage hybrid process blending mediation and arbitration, especially in commercial disputes. Gujarat, being a commercial hub, is expected to benefit significantly from this model. Earlier, a May 2024 conference on Med-Arb and specialized lawyer training underscored its importance for cost-effective dispute resolution. [Read more](#)

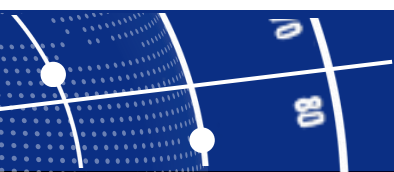
International Arbitration & Mediation Centre Hyderabad signs MoU with The Russian Arbitration Centre in Dubai

IISD has developed a model inter se agreement to neutralize the sunset clause between the EU and non-EU contracting parties of the Energy Charter Treaty. This model agreement is aimed at reducing legacy ISDS risks emanating particularly from fossil fuel investors affected by energy transition policies. While the UK-EU relations may be a likely place to start implementing such an agreement, the text is designed to be open for subsequent accessions by any other ECT contracting party. In practice, an inter se agreement could help prevent claims such as the one filed by UK-based electricity distribution investors against Finland that ICSID registered in August 2024. [Read more](#)

East Meets West: A Legal & Mediation Dialogue between Portuguese-Speaking Countries & Singapore

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CCI must respect Mediation process: Delhi High Court sets aside probe against JCB



The Delhi High Court recently quashed an inquiry by the Competition Commission of India (CCI) against JCB and its Indian subsidiary, initiated over alleged dominance abuse (*JCB India Ltd. v. Competition Commission of India*). Justices Prathiba M Singh and Amit Sharma criticized the CCI for proceeding despite Bull Machine's withdrawal of its complaint after a mediated settlement with JCB. Emphasizing the importance of respecting mediation outcomes, the Court underscored that regulatory bodies, including the CCI, should uphold such settlements to encourage amicable dispute resolution. The Court also reinforced intellectual property holders' rights and advised CCI against overstepping into IP-related disputes pending in higher courts. [Read more](#)

Supreme Court launches Online Mediation Training Web Portal

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New AFNIC Mediation Procedure: Fast & Free Dispute Resolution for Domain Name Holders

The 2024 edition of the Afnic Legal Meetings was held on 26 September 2024 in the association's new headquarters in Guyancourt, Yvelines. This was the occasion to present the first annual report on Afnic's mediation service. This amicable resolution service for domain name disputes was launched in July 2023 as a complement to the PARL Expert and Syreli alternative dispute resolution (ADR) procedures. After one year of operation all the indications are that the introduction of this simple, rapid, free service has been a success.

[Read more](#)

Delhi High Court orders Constitution of review Committee to consider DDA cases for Resolution through Mediation

The Delhi High Court, addressing a longstanding contempt petition, instructed the Delhi Development Authority (DDA) to promptly resolve its backlog of disputes. Justice Dharmesh Sharma directed DDA panel lawyers to identify at least ten cases each, focused on issues like property mutation, leasehold conversions, flat allotments, and unauthorized construction. The cases will be screened by a newly established review committee, which will seek inputs from various departments and assess resolutions through Lok Adalats or the Delhi High Court Mediation Centre. Regular weekly or biweekly meetings will ensure ongoing review, with monthly reports documenting case progress and settlements. [Read more.](#)

UNDP highlights its support to Regional Insider Mediators on International Day of Peace

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Mediation

– Swastika Saha Chowdhury & Aarav Singhal

Alabama Judge Appoints Mediator to Resolve Prolonged Dispute Over Medical Marijuana Licensing

Retired Circuit Judge Eugene Reese has been appointed by Montgomery Circuit Judge James Anderson to mediate Alabama's long-standing medical marijuana licensing dispute. The conflict stems from issues with the licensing process that have delayed the implementation of the state's medical cannabis program, approved in 2021. Companies denied licenses allege that the Alabama Medical Cannabis Commission violated administrative procedures and state laws. Meanwhile, companies granted licenses are urging the program's immediate rollout. The mediation aims to establish new investigative standards to address legal issues and expedite the state's medical marijuana program. [Read more](#)

India to Serve as President of the Asian Mediation Association from 2025-2027

India has been appointed as the President of the Asian Mediation Association (AMA) for the 2025-2027 term, marking a significant step in its role in promoting alternative dispute resolution in Asia. The Indian Institute of Arbitration and Mediation (IIAM) will coordinate mediation activities and foster cooperation among member countries. The AMA, which aims to enhance mediation practices and strengthen inter-Asian relations in conflict resolution, has previously organized significant events, such as a major conference led by the Philippine Supreme Court. India's leadership reflects its commitment to advancing mediation frameworks and international collaboration. [Read more](#)

ICSID 2024 Annual Report Highlights Growth in Global Investment Dispute Resolution

The International Centre for Settlement of Investment Disputes (ICSID) 2024 Annual Report highlights its role in mediating and arbitrating international

investment disputes. ICSID handled 341 cases in 2024, including 58 new registrations, with 17 cases under UNCITRAL and other regimes. Of the 88 cases resolved, 29% were settled or discontinued, showcasing mediation's effectiveness in dispute resolution. Equatorial Guinea's accession to the ICSID Convention raised the total number of signatories to 166. The report also noted that nearly half of the cases originated from the Americas, with Energy, Transport, and Construction being the most common sectors. A record 49 nationalities were represented in mediator appointments. Additionally, Martina Polasek succeeded Meg Kinnear as Secretary-General of ICSID. [Read more](#)

CPR International Centre for Dispute Resolution Expands ADR Promotion Efforts

In October 2024, the CPR International Centre for Dispute Resolution integrated the promotion of Alternative Dispute Resolution (ADR) into its core mission. This move underscores the growing recognition of mediation and other ADR methods in resolving disputes outside traditional court systems. CPR aims to increase the use of ADR in both commercial and non-commercial sectors, focusing on conflict resolution, escalation prevention, and fostering mutual cooperation. This initiative aligns with the global trend toward reducing court backlogs and promoting faster, more efficient dispute resolution. [Read more](#)

Qatar Mediates Russia-Ukraine Child Reunification Effort

Amid the ongoing Russia-Ukraine conflict, Qatar successfully mediated the reunification of nine children with their families. Six boys and one girl, aged six to sixteen, were returned to their families in Ukraine, while two young Russian children were repatriated to Russia. These children had been separated due to parental deaths and relocations to conflict zones. Qatar's mediation provided a neutral platform for addressing humanitarian issues, highlighting its role in facilitating communication between the warring nations. This initiative demonstrates mediation's potential in addressing sensitive issues during conflicts and offers hope for future humanitarian collaborations. [Read more](#)

Qatar Withdraws from Gaza Mediation Amid Conflict Escalation and Expels Hamas Officials

Qatar has withdrawn from its mediation role in the Gaza conflict between Israel and Hamas, citing frustration over escalating violence and unsuccessful peace talks. In conjunction with this decision, Qatar has expelled Hamas officials from its territory. Qatar's neutral stance had been pivotal in facilitating dialogue, and its withdrawal underscores the challenges of mediating in complex, high-stakes conflicts. Without Qatar's involvement, the prospects for ceasefire negotiations appear uncertain, highlighting the need for sustained, genuine communication among all parties to avoid prolonged conflict. [Read more](#)

1,489 Cases to Be Resolved Through Mediation at National Lok Adalat

A total of 1,489 cases have been selected for mediation at the National Lok Adalat scheduled for December 14, 2024, in Hubballi, Karnataka. The cases span various issues, including property disputes, matrimonial conflicts, and civil matters. Lok Adalats provide a platform for mediation and settlement outside the traditional court system, emphasizing speedy, cost-effective, and mutually beneficial resolutions. This initiative highlights mediation's growing role in reducing case backlogs, improving access to justice, and promoting social harmony in India. [Read more](#)

Commonwealth Med-Arb Conference 2024 Highlights Integrated Dispute Resolution

The Commonwealth Med-Arb Conference 2024, held in Hyderabad, India, focused on integrating mediation and arbitration (Med-Arb) for more efficient dispute resolution. Discussions emphasized the advantages of combining both methods over traditional litigation, highlighting their speed, flexibility, and adaptability. International perspectives showcased how different Commonwealth countries implement Med-Arb, sharing successes and challenges. The conference also explored the future potential of Med-Arb in resolving international disputes, reflecting a global shift toward cooperative conflict resolution. [Read more](#)

Moroccan Mediation Secures Release of Four French Nationals from Burkina Faso

In December 2024, Morocco successfully mediated the release of four French nationals detained in Burkina Faso on espionage charges. The mediation involved French President Emmanuel Macron, Burkina Faso President Ibrahim Traoré, and Moroccan King Mohammed VI. Morocco's role as an impartial mediator facilitated a peaceful resolution, demonstrating the power of diplomacy in resolving international conflicts. This outcome underscores the potential of mediation to achieve agreements in high-stakes, complex situations. [Read more](#)

IBBI 2024 Report Recommends Mediation to Streamline Insolvency Processes

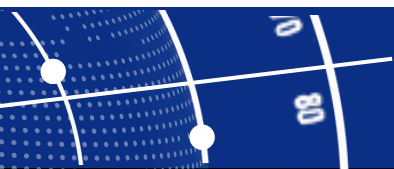
The Insolvency and Bankruptcy Board of India (IBBI) 2024 report recommends incorporating mediation into insolvency proceedings to reduce costs and expedite resolutions. Key suggestions include establishing a mediation cell within the National Company Law Tribunal (NCLT) to offer stakeholders an optional, time-bound dispute resolution mechanism. Mediation's confidentiality and interest-based bargaining distinguish it from adversarial litigation. The report highlights the strategic use of experienced mediators to enhance efficiency in resolving distressed asset issues, aiming to decongest courts and provide a more integrated insolvency management approach. [Read more](#)

Supreme Court of North Carolina Modifies Mediation Regulations

In December 2024, the Supreme Court of North Carolina amended five sets of mediation regulations, effective January 6, 2025. These changes aim to enhance mediation's effectiveness and ensure equitable participation. The new rules provide clearer guidelines for mediators, increase transparency, and expand mediation opportunities. The revisions underscore mediation's growing importance as an efficient, effective alternative to traditional litigation in North Carolina's legal framework. [Read more](#)

Interstate Mediation Begins in Rio Grande Water Rights Dispute

In December 2024, mediation commenced to address the long-standing Rio Grande water rights dispute involving New Mexico, Texas, and Colorado. The conflict centers on the equitable distribution of water for irrigation and public supply in the basin. State attorneys general and water officials are participating in the mediation to avoid prolonged litigation and seek fair, cooperative solutions. Mediation offers a flexible approach to resolving complex interstate issues, with the goal of achieving a sustainable water-sharing agreement amidst growing concerns over drought and resource management. [Read more](#)



BLOG

Judicial Sanctity of Lok Adalat Orders: Can Breach Lead to Contempt?

– Amiya Sachdeva & Ishmeet Kaur

Lok Adalats and their Role in the Legal System

Popularly known as “people’s courts”, Lok Adalats are a form of alternative dispute redressal mechanism in India. They serve as forums where cases—either pending in courts or at the pre-litigation stage—are amicably settled or compromised. A system of Lok Adalats was introduced in India in the year 1982 in Gujarat with the long-term objective of providing access to justice. Soon, this endeavour took the form of an institution that spread across the country. Established to ensure speedy and cost-effective justice, Lok Adalats provide a platform for resolving disputes outside traditional courtrooms through mutual agreement, reducing litigation costs and court backlogs. Their importance is reflected in the growing number of cases they resolve each year. According to the National Legal Services Authority (“NALSA”), Lok Adalats have successfully settled approximately 81.03 lakh cases, comprising 67.37 lakh pre-litigation cases and 13.65 lakh pending cases, as of 2023. These figures underscore the effectiveness of Lok Adalats in providing quick and amicable resolutions.

Lok Adalats were granted statutory recognition through the Legal Services Authorities Act of 1987 (“LSA”), which cemented their role in India’s legal aid movement. Enacted by the Government of India pursuant to Article 39A of the Constitution of India, the LSA Act was established to ensure that all citizens, regardless of economic status, have access to free and competent legal services. This has been instrumental in delivering justice to the weaker sections of society, reinforcing Lok Adalats as a vital pillar of India’s legal framework.

Contempt of Court: Legal Developments

According to Merriam-Webster, contempt is defined as “wilful disobedience to or open disrespect of a court, judge, or legislative body.” In the simplest terms, any attempt at scandalizing the authority of a judicial order, resulting in undermining the pedestal at which it is placed, amounts to contempt of court. Enacted in 1971, the Contempt of Courts Act (“CoC”) was introduced after accepting a majority of recommendations given by a special committee under

under the chairmanship of Mr. H.N. Sanyal. The Act empowers courts to punish individuals for acts of contempt, ensuring that judicial decisions are upheld and respected.

However, in a recent judgement by the Punjab and Haryana High Court, titled Arun Kumar Gupta & Ors. V Karnal Motors Pvt. Ltd., the Hon'ble bench ruled that non-compliance with a Lok Adalat's order does not attract contempt proceedings. The bench reasoned that Lok Adalats cannot be equated to courts under the CoC Act. Despite this ruling, considering the functions and the judicial sanctity of Lok Adalat orders, excluding them from the scope of the CoC Act is unjustified. Therefore, this blog aims to outline the specific reasons why a wilful breach of a Lok Adalat order should rightfully be regarded as contempt of court.

Applicability to Lok Adalats: A Legal Analysis

The CoC Act must include within its ambit the defiance of a Lok Adalat's order lest it should continue to provide a free pass to the parties to defy such orders without any fear of repercussions. Given their binding nature and legal sanctity, a breach of Lok Adalat awards should be considered for contempt proceedings, as explained below.

Firstly, a Lok Adalat's award is deemed to be a decree of a civil court as explicitly stated under Section 21(1) of the LSA Act. Furthermore, Section 22(2) mandates that Lok Adalat awards shall be final and binding on all the parties, with no provision of appeal. This provision implicitly requires strict compliance by the parties without taking it through appellate scrutiny. In furtherance, Section 2(b) of the CoC Act defines civil contempt as "wilful disobedience to any judgement, decree, direction, order, writ, or other process of a court or wilful breach of an undertaking given to a court". Since a Lok Adalat award holds the authority similar to a decree, it logically follows that its wilful breach should, therefore, attract contempt proceedings. The Supreme Court's interpretation in P.T. Thomas v. Thomas Job supports this view. In this judgement, the court emphasized that once a matter is settled before a Lok Adalat, the award is final and binding on the parties, as per Section 21 of the LSA Act.

Since there is no provision for appeal, the award attains the same status as a decree of a civil court. Similarly, in K.N. Govindan Kutty Menon v. C.D. Shaji, the court ruled that a Lok Adalat's award does not require a separate decree to be drawn by a civil court for execution. The award itself is enforceable in the same manner as a decree under the Civil Procedure Code, 1908 ("CPC"). These rulings reinforce that non-compliance with a Lok Adalat's award is equivalent to defying a court decree, thereby warranting contempt proceedings.

Moreover, Lok Adalats are deemed to be civil courts under the CPC, as provided under Section 22(1) of the LSA Act. Additionally, Section 22(3) of the LSA Act recognizes Lok Adalats as civil courts for the purpose of Section 195 and Chapter XXVI of the Code of Criminal Procedure, 1973 ("CrPC"), or Section 215 of the Bharatiya Nagarik Suraksha Sanhita, 2023 ("BNSS"). This statutory recognition implies that any defiance of a Lok Adalat's order or misconduct should be treated with the same seriousness as contempt of a regular court.

Further reinforcing this argument is the composition of Lok Adalat benches, particularly at the state and national levels. These benches are headed by sitting or retired high court judges, district judges, or other higher judicial officers. Given that high court judges perform constitutional and judicial functions, defiance of orders passed by them undermines the dignity of the judiciary. Disregarding an order passed by a Lok Adalat bench is akin to violating a judicial order issued by a competent court, making it imperative to extend contempt jurisdiction to such violations under the CoC Act.

Furthermore, the proceedings of a Lok Adalat are expressly deemed to be judicial proceedings under Section 22 of the LSA Act. This section explicitly states that "Every proceeding before a Lok Adalat shall be deemed to be a judicial proceeding within the meaning of Sections 193, 219, and 228 of the Indian Penal Code, 1860, and every Lok Adalat shall be deemed to be a Civil Court for the purposes of Section 195 and Chapter XXVI of the Code of Criminal Procedure, 1973."

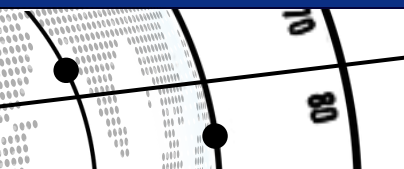
This statutory provision has been upheld by the Hon'ble Supreme Court in Brajnandan Sinha vs. Jyoti Narain, wherein the court emphasized that “It is clear, therefore, that in order to constitute a court in the strict sense of the term, an essential condition is that the court should have, apart from having some of the trappings of a judicial tribunal, the power to give a decision or a definitive judgement that has finality and authoritativeness, which are the essential tests of a judicial pronouncement.” Since Lok Adalat orders possess finality and are considered definitive judgements, they pass the essential tests of a “judicial pronouncement”. This further reinforces the argument that their orders should be treated on par with court decrees, including for contempt proceedings.

Conclusion

In light of the legal framework governing Lok Adalats, their status under the LSA Act, and judicial pronouncements affirming the binding nature of their awards, it is imperative to recognize the breach of Lok Adalat orders as contempt under the CoC Act. The current legal position, which excludes such violations from contempt proceedings, creates a loophole, allowing parties to disobey Lok Adalat awards without fear of repercussions. This not only undermines the effectiveness of the alternative dispute resolution mechanism but also diminishes the sanctity of judicial proceedings conducted by Lok Adalats. Expanding the ambit of the CoC Act to include violations of Lok Adalat orders is necessary to uphold the dignity of the judiciary and ensure strict compliance with its directives. Recognizing such breaches as contempt will reinforce the authority of Lok Adalats, deter wilful non-compliance, and strengthen public confidence in the dispute resolution system. Thus, to preserve the credibility of Lok Adalats and safeguard the integrity of judicial proceedings, it is absolutely essential to bring the breach of Lok Adalat orders within the purview of contempt under the CoC Act. This step will not only prevent offenders from disregarding Lok Adalat awards but will also enhance the prestige and legal sanctity of their proceedings, furthering the objective of accessible and effective justice.

CADR Spotlight

Stay updated on the latest events and developments
from CADR, RGNUL!



Upcoming Events

4th RGNUL National Negotiation Competition

Centre for Alternative Dispute Resolution is all set to organize the “fourth edition” of its flagship National Negotiation Competition from February 7- February 9 2025. This year, the competition is being conducted in association with Shardul Amarchand Mangaldas & Co. and Dr. PC Markanda Chair on ADR. Live Law joins us as the Media Partner, Manupatra as Knowledge Partner and Justice Kuldip Bhandari Foundation as the Chief Advisory Partner. The 4th NegComp will be held in an online mode. The last date for the final registration and payment is January 10, 2025.



Ongoing Events

Online Certificate Course in Sports Law & Mediation

The "*Online Certificate Course in Mediation*," organized by the Centre for Alternative Dispute Resolution (CADR) at RGNUL in collaboration with the Dr. P.C. Markanda Chair on ADR. This is a three-month online course, and participants are expected to complete it within one year. The Course aims to equip the learners with the understanding of Mediation as an evergreen process of dispute resolution and allows them to learn the procedure and framework surrounding it.



Ongoing Events

Online Certificate Course in Sports Law & Dispute Resolution

The "*Online Certificate Course in Sports Law & Dispute Resolution*," is organized by the Centre for Alternative Dispute Resolution (CADR) at RGNUL in collaboration with the Dr. P.C. Markanda Chair on ADR. This is a three-month online course, and participants are expected to complete it within one year. The course comprises discussions on pertinent current issues such as spot fixing and gambling, doping controversies, sports and broadcasting law, dispute resolution of sports disputes. e resolution and allows them to learn the procedure and framework surrounding it.

Centre for Alternative Dispute Resolution,
Rajiv Gandhi National University of Law, Punjab
and
Dr. P.C Markanda Chair on Alternative Dispute Resolution
PRESENTS

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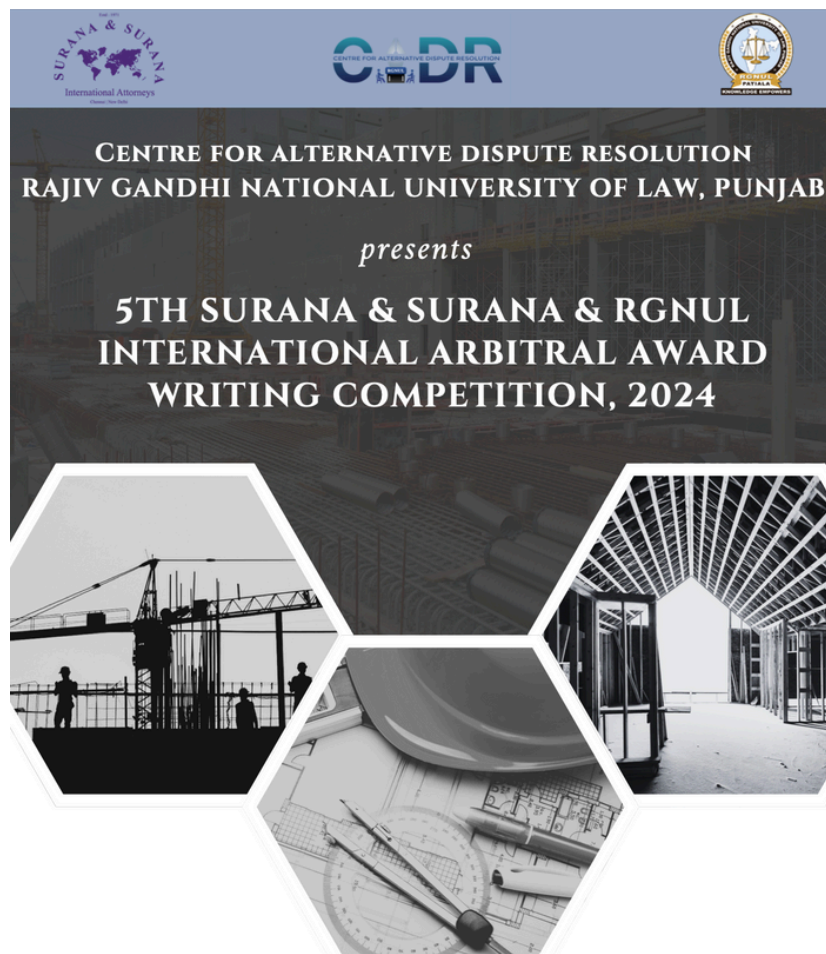
Resource Persons- Module 1

www.rgnulcadr.in

Ongoing Events

5th Surana & Surana & RGNUL Arbitral Award Writing Competition, 2024

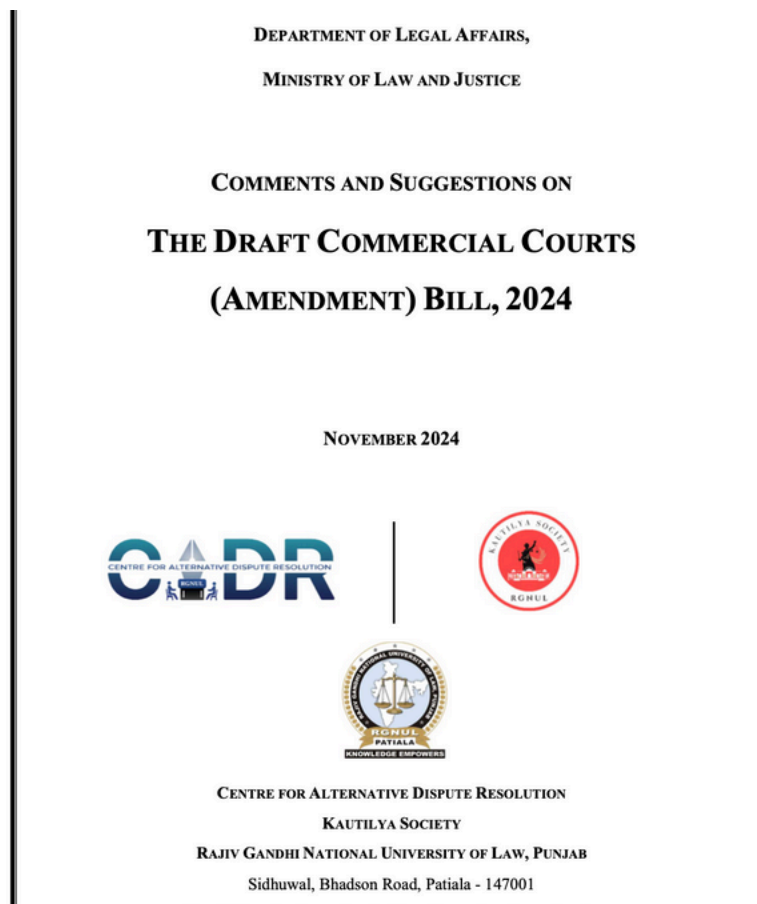
The Centre for Alternative Dispute Resolution (CADR) at RGNUL, in collaboration with Surana & Surana International Attorneys, organised the 5th Surana & Surana and RGNUL International Arbitral Award Writing Competition, 2024. This prestigious competition invited law students worldwide to participate by drafting an arbitral award based on a complex hypothetical case scenario. The competition focused on a proposition surrounding Construction Disputes.



Completed Events

Comments on the Draft Commercial Courts (Amendment) Bill, 2024 in collaboration with Kautilya Society, RGNUL

Centre for Alternative Dispute Resolution and Kautilya Society, RGNUL submitted comments and suggestions on the Draft Commercial Courts (Amendment) Bill, 2024 Bill. The submission analyzed the proposed amendments and suggested improvements in areas such as pre-institution mediation, digital accessibility, arbitration-related appeals, and procedural efficiency in commercial courts. The document was officially sent to the Department of Legal Affairs for consideration.



Completed Events

Comments on The Draft Arbitration and Conciliation (Amendment) Bill, 2024

Centre for Alternative Dispute Resolution comments and suggestions on the Draft Arbitration and Conciliation (Amendment) Bill, 2024. The submission assessed the bill's alignment with international arbitration standards, and examined changes in definitions, appointment of arbitrators, institutional arbitration and enforcement mechanisms. The recommendations included reducing court intervention, ensuring party autonomy, and improving procedural efficiency. The document was officially sent to the Department of Legal Affairs for consideration.



**Rajiv Gandhi National University of Law, Punjab
Centre for Alternative Dispute Resolution
(CADR)**

**Comments on The Draft Arbitration and
Conciliation (Amendment) Bill, 2024**

Achievements

**Winners | 4th NMC, 4th National ADR fest Concordat 4.0,
IFIM Law School**



A team comprising of Anvi Jeph (Batch of '28), Kazi Nishat Mahek (Batch of '28) and Aditi Saxena (Batch of '28) emerged as Winners in the Mediation-Arbitration segment in the 4th National ADR fest Concordat 4.0, organized by IFIM Law School. We applaud the team's achievement and wish them all the best in their future pursuits! We commend the team on this great achievement and wish them continued success ahead!

Achievements

Spirit of the Tournament | 5th NLIU International Negotiation Competition, NLIU Bhopal.



A team comprising of Indrakshi Chaku (Batch of '28) and Natasha Mittal (Batch of '28) emerged as Spirit of the Tournament in the 5th NLIU International Negotiation Competition organised by NLIU, Bhopal. Hats off to the team for their success, and we hope they continue to excel in the future!

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Vice-Chancellor, RGNUL, Punjab

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