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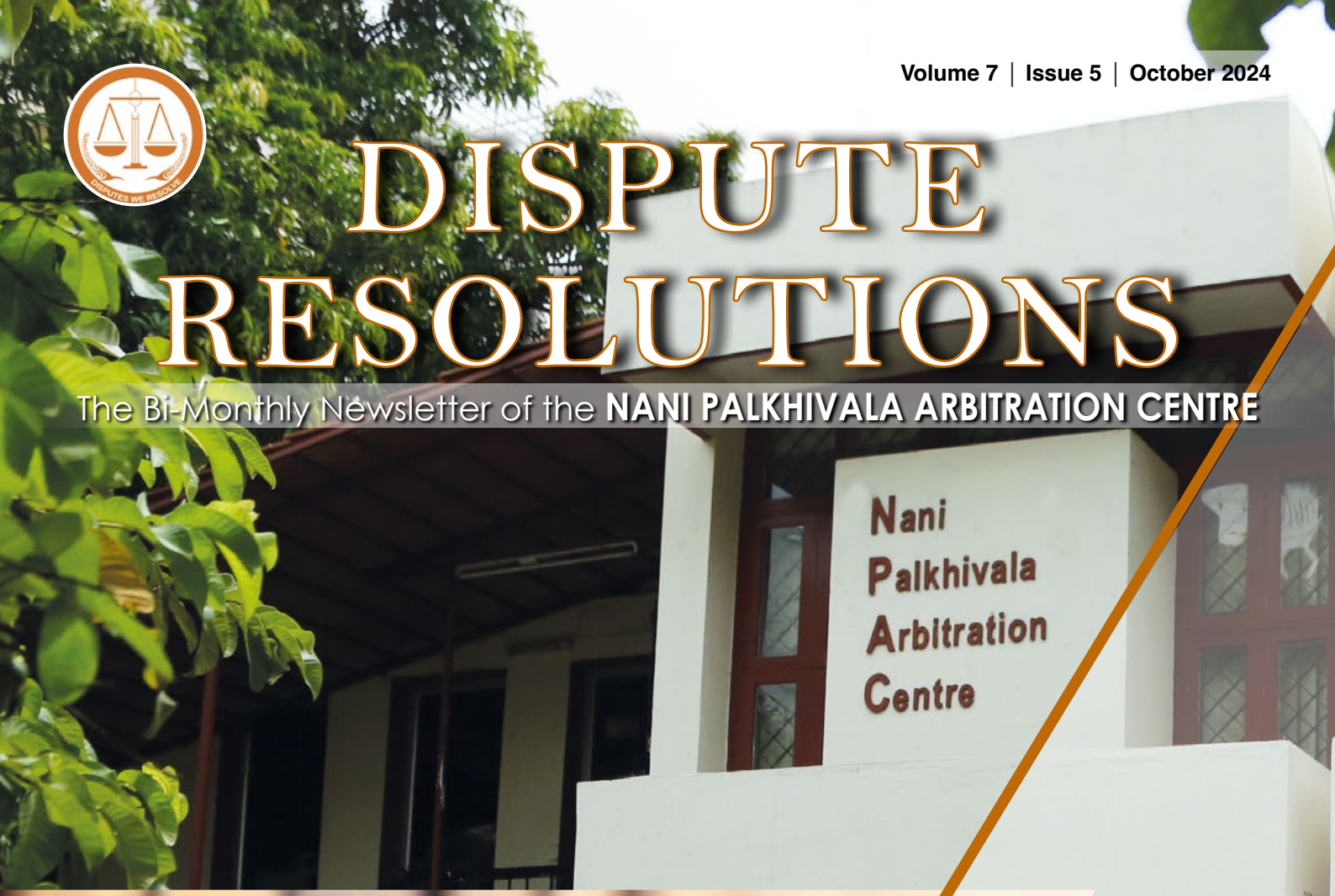
DISPUTE RESOLUTIONS

The Bi-Monthly Newsletter of the **NANI PALKHIVALA ARBITRATION CENTRE**



MESSAGE to the READERS

Bias as a challenge to International Arbitration awards

An interesting article by Advocate Rishi Kumar Duggar, draws attention to a recent ruling of Ontario's SCJ in the case of ***Ballantry Construction Management Inc. vs. GR (CAN) Investment Co. Ltd.,*** on the question of an arbitrator's bias.

On the question of tests applicable to determine bias the author observes, "*With regard to the test applied by the Court in determining bias, it is worth noting that the common law distinguishes between "actual" and "apparent" bias. Whilst courts will assess both tests from a factual lens, the determination of "apparent" bias requires a constructive approach for which two English law legal tests dominate the scene: the stringent "real danger of bias," originally laid down in* ***R v Gough (Robert)****, and the more lenient "reasonable apprehension of bias," applied under* ***Magill v Porter****. Like the UK Supreme Court decision in* ***Halliburton v Chubb****, the Court reiterated the application of 'reasonable apprehension of bias' when dealing with "apparent" bias. In contrast to the position in Ontario, the stricter 'real danger of bias' test still finds its application in section 17(2) of the British Columbia Arbitration Act.*

In March of last year, the Court issued its decision in ***Aroma Franchise Company v Aroma Espresso Bar Canada****, with regard to a challenge for setting aside two, this time international, awards. The Court also applied the test of 'reasonable apprehension of bias' to find that the awards should be set aside on the ground that the arbitrator has failed to comply with his disclosure obligations Section.12(1) of the UNCITRAL Model Law, Sch. 2 to the Ontario's International Arbitration Act) concerning a prior engagement by counsel in another separate and ongoing arbitration. As in Ballantry, 'context' was important to determine bias in Aroma.*"

Ontario SCJ applied the 'real bias test' and found the allegations of bias as applied to that case were baseless.

Though there is some broad consensus about the applicability of the concept of bias in various courts across the world, in actual application, courts in various countries use different tests and thresholds to determine the presence of bias. In India, our Supreme Court has recognized this difficulty and has tried to put some method

to the determination of the appropriate test applicable especially while considering challenges to International Arbitration awards. In the case ***Avitel Post Studioz Ltd. vs. HSBC PI Holdings (Mauritius) Ltd.*** reported ***(2021) 4 SCC 713*** **(Avitel case)**, the Supreme Court of India directed courts to adopt international best practices instead of domestic standards while determining bias in cases arising out of international commercial arbitration.

The Court observed that India was one of the earliest signatories to the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, 1958 (New York Convention), which had superseded the Geneva Convention of 1927. It further observed that Article V(2)(b) of the New York Convention provides that the recognition and enforcement of an arbitral award may be refused if the competent authority in the country where recognition and enforcement is sought finds that such an act would be contrary to the public policy of that country. Therefore, interestingly the test of bias must be applied bearing the public policy of that country in mind.

The Indian Supreme Court also noted that countries such as France followed international dimensions instead of their domestic ones when applying public policy to New York Convention awards. However, Article V(2)(b) of the New York Convention necessitated the evaluation of the award as per the public policy of the country where the award was enforced, not the country where the award was passed. In this context, it is important to note that the Court in the case of ***Renusagar Power Electric Co. Ltd. vs. General Electric Co.*** reported in ***1994 Supp (1) SCC 644*** had noted that there was no uniform understanding of what constituted international public policy, and hence it sought to lay out a definition for "public policy of India" basis which judges were to apply while deciding challenges to arbitration awards. Also, the Court in the case of ***Shri Lal Mahal Ltd. vs. Progetto Grano Spa*** reported in ***(2014) 2 SCC 433*** had held that the wider interpretation given to "public policy of India" in the domestic sphere under Section 34(2)(b)(ii) of the Arbitration and Conciliation Act, 1996 would not apply to the enforcement of the international awards under Section 48(2)(b) of the Arbitration and Conciliation Act, 1996.

It follows that the scope of "public policy" as a ground for resisting enforcement of a foreign award is narrower than the scope for challenging a domestic award. Thus, in the **Avitel case**, the Court concluded that since India was a signatory to the New York Convention, it had to adopt an "internationalist approach" by clearly distinguishing between the standards applicable for domestic arbitration and international commercial arbitration for public policy, including bias. The Court was cautious in this approach and highlighted that there was no single international test to decide allegations of bias and that different thresholds existed across different jurisdictions, like "real possibility of bias" in the UK, "real danger of bias" in Australia, and "reasonable suspicion" in Singapore.

Therefore, the takeaway from all this is twofold. First, while determining a challenge based on bias the context has to be borne in mind. Second, concepts on "bias" adopted by various courts across the world will have to be appreciated by the court before which the challenge is filed and principles of public policy applicable.

N.L. Rajah
Senior Advocate
Madras High Court

LEGAL UPDATES

Madurai Bench rejects condonation of delay in arbitration appeal

In the case of the ***Project Director, NHAI vs. M. Mallika Begum*** in C.M.P.(MD) No.11260 of 2023 at the Madurai Bench of the Madras High Court, the National Highways Authority of India (NHAI) sought to condone a 950-day delay in filing an appeal challenging a 2018 arbitration ruling. NHAI attributed the delay to the transfer of case files between Project Implementation Units and administrative changes, including the absence of a full-time Project Director.

The Madurai Bench of the Madras High Court, however, rejected the petition, stating that administrative delays and the impact of COVID-19 could not justify such a significant delay. The Court emphasized that the appeal was due long before the pandemic, rendering the COVID-related extension of limitation inapplicable.

Citing previous similar cases, the Court ruled that the reasons provided were vague and insufficient. As a result, the petition was dismissed, and the appeal was rejected at the SR stage.

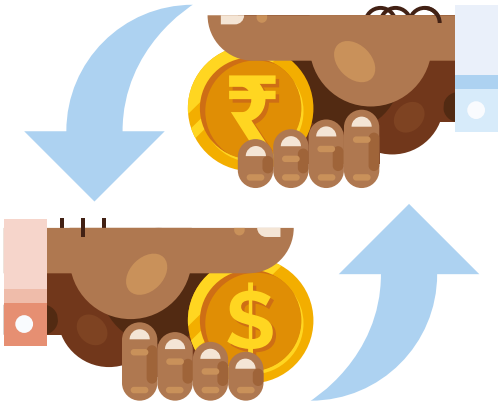
Karnataka High Court rules that settlement arising from a contract with an arbitration clause must go to arbitration

In ***M/s Akshaya Private Limited vs. M/s S P Sai Technologies*** in Commercial Appeal No. 189 of 2024, the Karnataka High Court held that disputes arising from a contract containing an arbitration clause must be resolved through arbitration, even if a settlement is claimed. The Respondent had filed a recovery suit, asserting the matter was settled, while the Appellant contested the court's jurisdiction, citing the arbitration agreement.

The Trial Court had rejected the arbitration claim, ruling that the settlement negated the need for arbitration. However, the High Court overturned this decision, stating that the settlement stemmed from the original contract, which contained an arbitration clause. It emphasized that the Respondent had not shown any cancellation of the arbitration agreement.

As a result, the High Court directed the dispute to be resolved through arbitration, setting aside the Trial Court's order and dismissing the suit. The decision reaffirmed that settlements connected to contracts with arbitration clauses must be enforced through arbitration.

Supreme Court clarifies conversion of foreign currency arbitral awards to Indian Rupees



In a recent ruling in the case of ***DLF Ltd. (Formerly Known as DLF Universal Ltd.) vs. Koncar Generators and Motors Ltd.***, reported in ***2024 INSC 593*** the Supreme Court addressed the issue of converting arbitral awards expressed in foreign currency to Indian currency. The Court determined that the appropriate date for conversion is when the award becomes enforceable, i.e., when all objections to its enforceability are resolved. This decision aligns with the principles outlined in the case of ***Forasol vs. Oil and Natural Gas Commission*** reported in ***1984 Supp SCC 263***, which also established the enforceability date as key for determining conversion rates.

The Court also considered the situation where the award debtor deposits money during the proceedings. If the award holder withdraws the amount, the conversion is based on the date of deposit. However, for any remaining amounts, the conversion happens on the enforceability date. The Court clarified that the deposited sum must be adjusted against the principal and interest pending under the award, and that the award holder cannot claim a higher exchange rate by delaying the conversion.

In the case at hand, the respondent argued that the exchange rate for a partial deposit should be decided upon enforcement. The Court rejected this, stating that even if the amount was not withdrawn, it should be converted on the date of deposit to prevent the award holder from unfairly benefiting from a later, more favorable exchange rate.

Bombay High Court provides clarity on Courts that can extend arbitration deadlines

The Bombay High Court in the case of ***Sheela Chowgule vs. Vijay V Choowgule*** reported in ***2024 SCC OnLine Bom 1069*** has clarified the jurisdiction of courts in extending arbitration deadlines under Section 29-A(4) of the Arbitration and Conciliation Act. The Court ruled that when the High Court appoints an arbitral tribunal, it retains jurisdiction to extend the time for completing the arbitration process. If the tribunal was formed through an agreement between the parties, the Principal Civil Court of original jurisdiction, which includes both district courts and the High Court, can handle the time extension application.

This clarification arose from a disagreement between two Single Judges of the Bombay High Court regarding which court had the authority to extend arbitration deadlines. The Court examined the provisions of the Arbitration Act, including Sections 2, 11, and 29-A, to address the issue. The judges concluded that the court that appoints the arbitrators under Section 11(6) has the jurisdiction to extend the time period for making an arbitral award, ensuring consistency in the arbitration process.

The ruling aligns with the principles of party autonomy and minimal court intervention, both of which are key objectives of the Arbitration Act. The court emphasized that extending arbitration deadlines is not a mere formality but requires judicial scrutiny, ensuring that arbitrations are completed efficiently without unnecessary delays.

Supreme Court states that Referral Courts should not engage in complex fact determinations at arbitration referral stage

The Supreme Court, in a recent judgment in the case of ***Cox & Kings Ltd. vs. Sap India Pvt. Ltd. & Anr.***, reported in ***2024 INSC 670*** reaffirmed that courts at the referral stage should not delve into contested or complex factual questions when an arbitration agreement exists. The ruling emphasized the principle of competence-competence under Section 16 of the Arbitration and Conciliation Act, 1996, which allows arbitral tribunals to determine their jurisdiction. Courts, while appointing arbitrators under Section 11(6), should limit their inquiry to confirming the presence of a valid arbitration agreement and leave the complex factual matters for the tribunal.

In this case, the dispute centered around whether Respondent No. 2, a non-signatory to the main agreement, could be included in the arbitration. The respondents argued against their inclusion, but the Supreme Court held that such complex questions should be decided by the arbitral tribunal. The court ruled that since the arbitration agreement's existence was undisputed, the referral court should not venture into the merits of the case or the complex fact of whether Respondent No. 2 was bound by the agreement.

The Court also cited previous rulings, such as ***Cox and Kings vs. SAP India Pvt. Ltd.***, reported in **(2022) 8 SCC 1** to highlight that the arbitral tribunal is the primary body to assess questions of arbitrability and jurisdiction. The court allowed the petition, appointing an arbitrator, and directed that any objections regarding the scope or parties to the arbitration be raised before the tribunal.

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- Seat and Venue in Arbitration
- Issues in Sector Specific Arbitrations

December 21, 2024

to

December 23, 2024

9.30 am to 5.30 pm

Who Can Attend?

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Satya Hegde Essay Competition, 2024

The Satya Hegde Essay Competition, organized by NPAC was centered around the theme "***Extending Curative Jurisdiction to Arbitration Matters – Exploring the Consequences***." This nationwide competition drew participation from students across various colleges and universities in India, offering them an opportunity to delve into the intricate legal subject of curative jurisdiction in the realm of arbitration. With the Indian judiciary's evolving role in arbitration, particularly in light of landmark judgments in that aspect, the competition aimed to foster critical analysis and innovative perspectives on the implications of judicial intervention in arbitral matters. There were about 50 participants who had submitted their essays. The essay entries reflected a diverse array of opinions on balancing justice, autonomy, and the global positioning of India as a hub for arbitration. Among the many impressive entries, the following are the abridged versions (as provided by the students) of the submissions that secured the top positions:

First Prize – Ms. Avantika Tewari, National Law School of India University (NLSIU), Bangalore: In her well-researched essay, Ms. Avantika has made a comparative analysis examining the arbitration frameworks in India, the USA, and Singapore, advocating for a more consistent and judicious application of curative jurisdiction by the Indian judiciary to safeguard against miscarriages of justice.

Abridged version:

With the Indian Government's aims of projecting India as an investor friendly destination with efficacious methods of alternate dispute resolution, the Indian Supreme Court's stance on recognizing arbitral awards, especially via the invocation of Article 142 of the Indian Constitution has been ambiguous. The Apex Court has adopted a pro-arbitration stance in *NHAI v. Mohammed Hakeem*, while assuming a diametrically opposite position in *Devas v. Antrix*, by altogether ignoring the arbitral awards won by the defending parties in the larger interest of the Indian public.

In light of this inconsistent jurisprudence, this article briefly reviews the Section 34 regime in India, in terms of the supervising court's power of quashing an arbitral award. Thereafter, the article examines the grounds and procedure in existence in the United States of America ('USA') for the purposes of courts to set aside arbitral awards. The article further scrutinises the Singaporean framework of challenging and quashing arbitral awards by the courts therein.

Lastly, the article comprises a comparison of the jurisdictions with regards to the setting aside of arbitral awards and a categorization of the three regimes in accordance with Mirjan Damaska's conceptualization of procedural systems of justice. These three nations were chosen owing to their similar common law systems and the similarities evident in their laws on arbitral awards. The article eventually concludes that the extension of curative jurisdiction by the Supreme Court to arbitration was justified as a singular instance in the *DMRCL Case*, to prevent the miscarriage of justice under Article 142.

Second Prize – Ms. Anushka Narvekar, Thakur Ram Narayan College of Law, Mumbai: Ms. Anushka makes a compelling case for the expansion of judicial intervention in arbitration in her. Her essay proposes that extending curative jurisdiction can enhance fairness and transparency, thereby boosting India's credibility on the global arbitration stage.

Abridged version:

Arbitration is widely regarded as an effective alternative dispute resolution method. However, deficiencies in its mechanisms highlight the need for further refinement of the framework overseeing it. Extending curative jurisdiction to arbitration could ensure holistic oversight over the resolution process, with its journey culminating in justice. I support this view and advocate for expanding judicial intervention under the Arbitration Act to encompass cases across India where there are clearly defined instances of patent illegality, as already practiced in Jammu and Kashmir and Ladakh. Additionally, maintaining strict judicial review standards for arbitral awards, especially when it comes to instances involving perverseness and irrationality, is crucial.

The Supreme Court has previously intervened in arbitration matters to uphold justice, including revisiting its own judgments to overturn awards. This in turn has highlighted how addressing the subjectivity inherent in judicial review is also essential with respect to arbitration.

While improvements in arbitration will evolve gradually, implementing an interim mechanism like curative jurisdiction alongside strict parameters is necessary to address immediate concerns during this transitional period, which will help balance the need for justice with the development of arbitration's autonomy.

To achieve its ambition of becoming a leading arbitration hub, India must principally address current system shortcomings. Concerns about curative jurisdiction potentially hindering international arbitration are currently misplaced in my opinion, as it is essential to first address issues of fairness, transparency, and accessibility. Balancing true justice with finality will enhance arbitration's credibility and global respect, supporting India's goal of becoming a prominent arbitration destination.

Third Prize – Ms. Adyasha Syam, National Law University, Delhi: In her essay, Ms. Adyasha thoughtfully explores the delicate balance between judicial restraint and justice protection in arbitration, focusing on the Hon'ble Supreme Court's evolving approach to curative jurisdiction in arbitral matters.

Abridged version:

The Supreme Court of India utilises its power of curative jurisdiction to ensure 'complete justice' as per Article 142 of the Constitution of India. This power is limited to two specific scenarios: the abuse of process and the gross miscarriage of power. Recently, the judiciary has focused increasingly on the scope of its curative jurisdiction in arbitration.

The Indian Arbitration and Conciliation Act of 1996 regulates judicial involvement in arbitral proceedings, with curative jurisdiction availed against an award only after the conclusion of the review stage. The Indian judiciary strongly supported this independent operation of arbitration until 2023, when the Supreme Court's verdict in *Delhi Metro Rail Corporation Limited v. Delhi Airport Metro Express Private Limited* discontinued an arbitral award through curative powers. The judgement paved the way for a more active role of the judiciary in arbitral proceedings, prompting a multitude of concerns. Numerous stakeholders feared the consequential weakening of arbitral autonomy, increased legal inconsistencies, procedural delays, and verdicts favouring the State.

The Supreme Court, however, has clarified that curative powers should not be exercised in the ordinary course. Led by Chief Justice Chandrachud, the judiciary continues to emphasise that domestic Courts cannot normally intervene in arbitral proceedings without a mandate. Additionally, Article 142 and the Arbitration Act impose rigorous restrictions on this form of judicial interference. With strict adherence to these statutory limitations, in line with the judiciary's cautious approach, the Supreme Court's curative powers can serve to facilitate the implementation of justice in arbitration, regardless of its extrajudicial nature.

NPAC's 15th Annual International Conference on Arbitration

The Nani Palkhivala Arbitration Centre (NPAC) hosted its 15th Annual International Conference on ***"India and Global Arbitration: Opportunities and Challenges for 2025–2030"***, at Shangri-La's-Eros Hotel, New Delhi, on October 18-19, 2024. This event attracted a diverse group of prominent legal practitioners, including partners and associates from both Indian and global law firms, who gathered to share insights on the latest trends and challenges in arbitration.

Fireside Chat: October 18, 2024

An engaging Fireside Chat hosted by Fountain Court Chambers on "***Arbitral Tribunals: An international comparison of the composition, expectations, and approach of arbitral panels***." Moderated by Mr. Alex Taylor, Senior Clerk of Fountain Court Chambers, the panel featured esteemed speakers, including Hon'ble Ms. Justice Prathiba Maninder Singh, Delhi High Court, Ms. Leigh-Ann Mulcahy KC, Fountain Court Chambers, London, Mr. Siraj Omar SC, Managing Director, Drew & Napier, Singapore, and Mr. Mohit Saraf, Founder & Managing Partner, Saraf and Partners, New Delhi. The insightful discussions were followed by a networking dinner, allowing participants to deepen professional connections of all the participants.

The fireside chat speakers: *(From right) Mr. Mohit Saraf, Mr. Alex Taylor, Hon'ble Ms. Justice Prathiba Maninder Singh, Ms. Leigh Ann Mulcahy, Mr. Siraj Omar SC.*

Conference Day: October 19, 2024

The main conference day opened with an inspiring keynote address by Hon'ble Mr. Justice PS Narasimha, Judge of the Supreme Court, setting the tone for the day. Addresses by Mr. S Mahalingam, Former CFO, TCS Limited and Governing Council Member, NPAC; Mr. Arvind P Datar, Senior Advocate, Supreme Court of India and Madras High Court and Director, NPAC and Ms. Payal Chawla, Founder, JusContractus and Director, NPAC highlighted the vision and direction for arbitration in India and globally.

In frame: Hon'ble Mr. Justice PS Narasimha, Judge, Supreme Court

Inaugural Session: *(From right) Ms. Payal Chawla, Mr. Arvind P Datar, Hon'ble Mr. Justice PS Narasimha, and Mr. S. Mahalingam*

The conference featured five in-depth technical sessions chaired by notable judges and legal experts. The themes of the session were categorized as Construction Law Theme, International Session, Issues of Transparency and Disclosure Obligations and Bias of Arbitrators, Current Controversial issues in Arbitration, and Emerging Trends in Arbitration (Young Turks). Each session sparked meaningful debate, as speakers presented case studies and shared perspectives on these dynamic areas. The valedictory session was concluded by a thoughtful address from Hon'ble Mr. Justice R Mahadevan, Judge of the Supreme Court.

The first technical session, focused on 'Construction Law and Arbitration', was chaired by Ms. Binsy Susan, a Partner at Shardul Amarchand & Mangaldas & Co. The panelists were Mr. Viraen Vaswani, Associate at Three Crowns LLP, Singapore; Mr. Alastair Henderson, Partner at Herbert Smith Freehills, Singapore; Ms. Rashna Mistry, Legal Head of Tata Projects; and Ms. Sandya Yadav, Chief of Legal Services at ONGC. This session offered a deep understanding of the unique challenges associated with construction arbitration, with discussions centered on contractual nuances, cross-border arbitration issues, and recent case law developments.

Session I – Construction law theme: *(From right) Ms. Binsy Susan, Ms. Rashna Mistry, Mr. Alstair Henderson, Ms. Sandhya Yadhav, Mr. Viraen Vaswani*

The second session, on 'International Arbitration', was chaired by Hon'ble Mr. Justice Amit Bansal of the Delhi High Court. The panel featured Mr. Daksh Ahulwalia, Founder of AIKYAM Law Offices; Mr. Steven Lim, Barrister at 39 Essex Court Chambers, London; Ms. Ankit Khushu, Partner at Kachwaha & Partners, New Delhi; and Ms. Sudeshna Guha Roy, Partner at Saraf and Partners. The panelists examined India's expanding role in international arbitration, discussing jurisdictional challenges, treaty arbitration, and the supportive role of Indian courts in the enforcement of arbitral awards.

Session II – International session: *(From right) Mr. Daksh Ahulwalia, Mr. Steven Lim, Hon'ble Mr. Justice Amit Bansal, Ms. Sudeshna Guha Roy, Ms. Ankit Kushu.*

The third session, on 'Transparency, Disclosure Obligations, and Arbitrator Bias', was chaired by Hon'ble Ms. Justice Rekha Palli of the Delhi High Court. The distinguished speakers were Mr. Charles Bear KC from Fountain Court Chambers, London; Mr. Samar Singh Kachwaha, Advocate, Supreme Court of India; Ms. Divya Harchandani, Associate [Foreign Law] at Wong Partnership LLP, Singapore; and Dr. Akhil Prasad, Group General Counsel at Boeing India. This session explored the evolving standards surrounding arbitrator disclosure, transparency, and neutrality, as well as strategies to address and mitigate bias.

Session III – Issues of Transparency, Disclosure Obligations and Bias of Arbitrators: *(From right) Dr. Akhil Prasad, Mr. Charles Bear, Hon'ble Ms. Justice Rekha Palli, Ms. Divya Harchandani, Mr. Samar Singh Kachwaha*

The fourth session addressed 'Current Controversies in Arbitration' and was chaired by Mr. Sanjeev Kapoor, Partner at Khaitan & Co. The panelists were Ms. Amrita Narayan, Partner at HAS Advocates; Mr. Hemant Kumar, Group Legal Advisor at Larsen & Toubro Ltd.; Ms. Diya Kapur, Advocate, Law Chambers of Diya Kapur, New Delhi; and Mr. V Niranjan, Barrister at One Essex Court Chambers, London. The session dealt with jurisdictional issues, cost allocation, and procedural implications stemming from recent judicial rulings.

Session IV – Current Controversial issues in Arbitration:

(From right) Ms. Diya Kapur, Ms. Amrita Narayan, Mr. Sanjeev Kapoor, Mr. Hemant Kumar

(Mr.V.Niranjan joined the discussion through video conference)

The final technical session, titled 'Emerging Trends in Arbitration (Young Turks)', was chaired by Ms. Manini Brar, an Arbitrator and Independent Practitioner at Arbridge Chambers. The session's speakers were Mr. Anirudh Bakhru, Advocate, Delhi High Court; Mr. Siddharth Jain, Partner at Jain & Saigal Law Offices; Ms. Charanya Lakshmikumaran, Executive Partner at Lakshmikumaran & Sridharan Attorneys and Mr. Ankur Mahindro, Partner at Kred - Jure. The discussion covered emerging trends, technological advancements, and innovative practices in arbitration, emphasizing the contributions of young and dynamic legal minds.

Young Turks – Emerging Trends in Arbitration: *(From right) Mr. Siddharth Jain, Mr. Anirudh Bakhru, Ms. Manini Brar, Ms. Charanya Lakshmikumaran, Mr. Ankur Mahindro*

The conference concluded with a valedictory address by Hon'ble Mr. Justice R Mahadevan of the Supreme Court, who praised the conference for its contributions to the legal and arbitration community. The welcome address was delivered by Mr. NL Rajah, Senior Advocate and Director, NPAC after which Hon'ble Mr. Justice R Mahadevan presented the cash prizes and certificated to the winners of the Satya Hegde Essay Competition, 2024. After that, Mr. Shreyas Jayasimha, Founder Aarna Law LLP and Director, NPAC, proposed the vote of thanks and expressed appreciation to all participants, speakers, and attendees for making this conference a resounding success.

In frame: Hon'ble Mr. Justice R Mahadevan, Judge, Supreme Court

Valedictory Session: *(From right) Mr. R. Murari, Mr. Arvind P Datar, Hon'ble Mr. Justice R Mahadevan, Mr. N.L. Rajah, (Retd.) Justice Rajendran, Ms. Payal Chawla and Mr. Shreyas Jayasimha*

NPAC thanks all participants, panelists, and attendees who contributed to making the 15th Annual International Conference, 2024 an enriching and memorable experience.

Stay tuned for a comprehensive overview of the discussions, debates, and key takeaways from this year's conference in the next issue of the NPAC newsletter 'Dispute Resolutions'!

Hon'ble Mr. Justice R Mahadevan presenting the certificate and cash prize to ***Ms. Anushka Narvekar,*** *the* ***2nd prize winner*** *of the Satya Hedge Essay Competition, 2024.*

Hon'ble Mr. Justice R Mahadevan presenting the certificate and cash prize to ***Ms. Adyasha Shyam,*** *the* ***3rd prize winner*** *of the Satya Hegde Essay Competition, 2024*

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