ACCESS TO CIVIL JUSTICE FOR THE POOR: A STUDY OF THE LAW RELATING TO SUITS BY INDIGENT PERSONS (PAUPER SUITS) UNDER ORDER XXXIII OF THE CODE OF CIVIL PROCEDURE, 1908, IN THE LIGHT OF CONSTITUTIONAL GUARANTEES

Logeshwaran R, B.A., LL.B., The Central Law College, Salem

ABSTRACT

Justice that is priced beyond the reach of the poor is justice in name only. The Code of Civil Procedure, 1908 ("CPC") addresses this problem through Order XXXIII, which allows a person who cannot afford the prescribed court fee to institute a suit as an *indigent person* – a proceeding traditionally, and still commonly, known as a *pauper suit* – and through Order XLIV, which extends a similar facility to appeals. This paper examines the concept of indigency under the CPC, the procedure for seeking permission to sue without payment of court fee, the grounds on which such permission may be refused or withdrawn, and the financial consequences that follow the final decision of the suit. It then places these provisions within the constitutional framework, in particular the Preamble and Articles 14, 21, 22(1), 32, 38, 39A and 226 of the Constitution of India, and analyses how the Supreme Court has read free legal aid and access to justice into the right to life and personal liberty. The paper also considers the Legal Services Authorities Act, 1987 as a complementary mechanism. It concludes that although Order XXXIII is a well-designed enabling provision, its practical effect is limited by delay, narrow scrutiny of means, lack of awareness and inadequate legal representation, and it offers suggestions for reform.

Keywords: indigent person; pauper suit; Order XXXIII; Code of Civil Procedure; court fee; access to justice; free legal aid; Article 39A; Article 21.

Introduction

A civil court cannot ordinarily entertain a plaint until it is presented on paper bearing the court fee fixed by law. For a person of means this is a formality; for a person without means it can be an absolute barrier – the right may exist, but the remedy is out of reach. Procedural law recognised this problem long before the Constitution of India was adopted, and the CPC therefore contains a special procedure by which a poor litigant may sue without first paying the court fee.

This procedure is contained in Order XXXIII of the First Schedule to the CPC, titled "Suits by Indigent Persons."[1] Such a proceeding is what the older law described, and what practitioners in many States still colloquially call, a *pauper suit*, the applicant being referred to before 1976 as a "pauper."[2] The Order does not give the poor a free suit; it gives them a suit in which payment of court fee is postponed and, depending on the result, recovered either from the opposite party, from the plaintiff, or out of the subject matter of the suit. The provision therefore balances two concerns: protecting the poor from exclusion, and protecting the public revenue from abuse of the facility by persons who can in fact pay.

Since 1950 the subject has acquired a constitutional dimension. Article 39A, inserted by the Constitution (Forty-second Amendment) Act, 1976, directs the State to ensure that the legal system promotes justice on the basis of equal opportunity and to provide free legal aid so that opportunities for securing justice are not denied by reason of economic or other disabilities.[3] The Supreme Court has read this directive together with Articles 14 and 21 to hold that access to justice and legal aid form part of a fair procedure. Order XXXIII (the pauper-suit provision) must therefore be understood not as a mere concession, but as a statutory means of realising a constitutional promise.

Objectives, Research Questions and Methodology

Objectives

1. To explain the meaning of "indigent person" and the test of indigency under the CPC.

[1] Code of Civil Procedure, 1908, Order XXXIII.
[2] The Code of Civil Procedure (Amendment) Act, 1976 substituted "indigent person" for "pauper" throughout Order XXXIII; the expression "pauper suit" nonetheless remains in common professional and judicial usage as a synonym for a suit instituted under this Order.
[3] The Constitution of India, art. 39A.

2. To analyse the procedure under Order XXXIII (pauper suits) and Order XLIV, Rule 1 of the CPC.

3. To identify the constitutional provisions supporting access to justice for the poor.

4. To evaluate the effectiveness of the existing framework and suggest reform.

Research Questions

1. Does the statutory test of indigency adequately identify persons who cannot afford court fee?

2. How have constitutional guarantees influenced the interpretation of the right to legal aid?

3. What practical obstacles prevent indigent litigants from using Order XXXIII effectively?

Methodology

This is a doctrinal study relying on primary sources – the CPC, the Constitution of India, the Legal Services Authorities Act, 1987, and judgments of the Supreme Court – and secondary sources such as commentaries, committee reports and academic writing. The method is descriptive and analytical.

Historical Development

Provision for suits by poor litigants is old in Indian civil procedure. Earlier nineteenth-century Codes contained provisions for suits by "paupers," and the Code of 1908 consolidated this tradition in Order XXXIII, so that a pauper suit and a suit by an indigent person denote, historically, the very same proceeding.[4] The Code of Civil Procedure (Amendment) Act, 1976 replaced "pauper" with "indigent person" to remove the stigma attached to the older word, without altering the substance of the proceeding.

The 1976 amendments coincided with the constitutional recognition of legal aid through Article 39A. They introduced a formal inquiry into the means of the applicant (Rule 1A), additional grounds of rejection, a provision for assigning a pleader to an unrepresented indigent person

[4] See C.K. Takwani, *Civil Procedure with Limitation Act, 1963* (Eastern Book Company) for an account of the pre-1976 "pauper" terminology.

(Rule 9A), and an enabling provision for government arrangements for free legal services (Rule 18). The Expert Committee on Legal Aid headed by Justice V.R. Krishna Iyer (1973), the Committee for Implementing Legal Aid Schemes headed by Justice P.N. Bhagwati, and later the Legal Services Authorities Act, 1987, shaped the transformation of the old pauper-suit rule into a broader legal aid policy.

Meaning of "Indigent Person"

The Explanation to Rule 1 of Order XXXIII defines an indigent person – the person entitled to bring what was formerly called a pauper suit – by two alternative tests:

- Fee test. A person is indigent if he is not possessed of sufficient means to pay the fee prescribed by law for the plaint in the suit.
- Property test. Where no fee is prescribed, a person is indigent if he is not entitled to property worth one thousand rupees, other than property exempt from attachment in execution of a decree and the subject matter of the suit.

Property acquired by the applicant after presentation of the application and before its decision is also taken into account, and property exempt from attachment under Section 60 of the CPC (such as necessary wearing apparel and specified essential belongings) is disregarded, so that a litigant need not strip himself of the necessities of life to qualify.[5]

Poverty is Relative to the Fee

The fee test makes indigency relative rather than absolute. A person may own modest property and yet be indigent if the ad valorem court fee on a large claim exceeds what he can pay; conversely a person of modest income suing for a small sum, on which the fee is small, may not qualify. Court fees are governed by the Court-Fees Act, 1870 and State enactments such as the Tamil Nadu Court-Fees and Suits Valuation Act, 1955, so the practical threshold varies from State to State.

[5] Code of Civil Procedure, 1908, s. 60 and Order XXXIII, r. 1, Explanation.

Nature of the Burden

The burden of establishing indigency lies on the applicant, and the court takes a practical view of the material before it. The Supreme Court has held that at this stage the court examines only the applicant's means and whether the plaint discloses a cause of action; it is not a trial of the merits of the underlying dispute.[6]

The Two Tests of Indigency at a Glance

Figure 1 depicts, in outline, how the Explanation to Rule 1 arrives at the status of "indigent person" – and hence at eligibility to bring a pauper suit – through either of two independent routes.

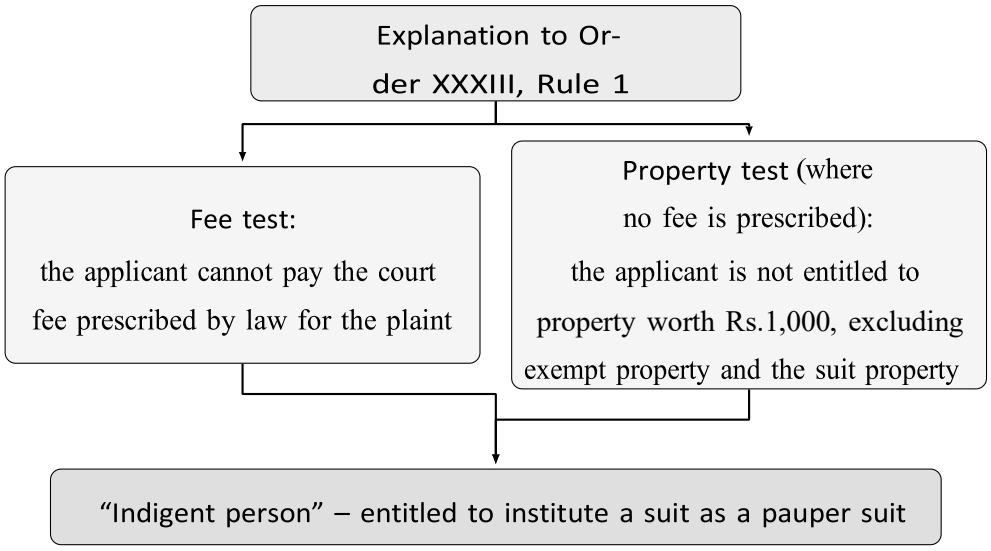


Figure 1: The two alternative tests of indigency under the Explanation to Order XXXIII, Rule 1, CPC

Statutory Framework: Order XXXIII, CPC

Order XXXIII sets out a complete procedure for pauper suits. Table 1 summarises the principal rules.

[6] *Solomon Selvaraj & Ors. v. Indirani Bhagawan Singh & Ors.*, Civil Appeal No. 8885 of 2022 (SC, 2 December 2022), 2022 LiveLaw (SC) 1004, applying *Kamu alias Kamala Ammal v. M. Manikandan*, (1998) 8 SCC 522.

Rule	Substance of the provision
1	Suits may be instituted by an indigent person (pauper suit); Explanation defines "indigent person" by the fee test and the property test.
1A	Inquiry into the means of the applicant is made, in the first instance, by the Chief Ministerial Officer of the court, unless the court otherwise directs.
2	Contents of the application: particulars required for a plaint, with a schedule of movable and immovable property and its estimated value, signed and verified like a plaint.
3	Presentation by the applicant in person, unless exempted from appearing, in which case by an authorised agent able to answer material questions.
4	Examination of the applicant, or the agent, regarding the merits of the claim and his property.
5	Rejection of the application on the specified grounds (Table 2).
6	Notice to the opposite party and the Government Pleader of the day fixed for receiving evidence of indigency.
7	Procedure at hearing: evidence is taken, arguments heard, and the court allows or refuses permission to sue as an indigent person.
8	If admitted, the application is numbered and registered as the plaint; the suit proceeds ordinarily, the plaintiff being exempt from court fees.
9	Withdrawal of permission to sue as an indigent person ("dispaupering").
9A	Assignment of a pleader to an unrepresented indigent person where the circumstances so require.
10	Where the plaintiff succeeds, the court fee that would have been payable is recoverable by the State from the party ordered to pay it, and is a first charge on the subject matter of the suit.
11	Where the plaintiff fails, is dispauperised, or the suit is withdrawn or dismissed on specified grounds, he must pay the court fee.
15	Refusal of permission bars a subsequent like application, but the applicant may sue in the ordinary manner after paying the costs of the opposition.

18	The Government may make supplementary provisions for free legal services to indigent persons.

Table 1: Principal rules of Order XXXIII, CPC (pauper suits)

Grounds for Rejection (Rule 5)

The court must reject the application where:

(a) it is not framed and presented as required by Rules 2 and 3;

(b) the applicant is not an indigent person;

(c) the applicant has, within two months before presentation, fraudulently disposed of property, or disposed of it in order to be able to apply as an indigent person;

(d) the allegations do not show a cause of action;

(e) the applicant has agreed to give another person an interest in the subject matter of the suit;

(f) the allegations show the suit would be barred by law; or

(g) another person has agreed to finance the litigation.

The Supreme Court has confirmed that grounds (d) and (f) permit the court to look at whether the suit discloses a cause of action and is not barred, for example by res judicata, even while the application concerns only leave to sue as an indigent person.[7]

Procedure for a Pauper Suit

Figure 1 sets out the stages through which an application under Order XXXIII moves from presentation to registration as a plaint.

[7] *Solomon Selvaraj v. Indirani Bhagawan Singh*, *supra* note 6.

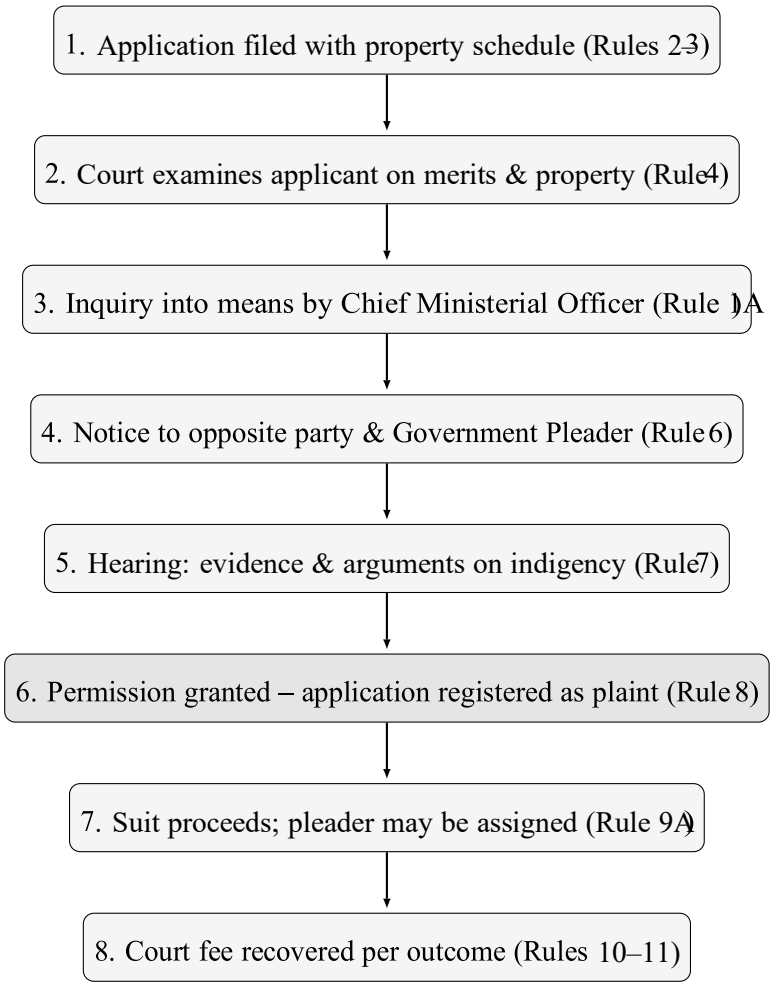


Figure 2: Procedure for institution of a suit by an indigent person (pauper suit) under Order XXXIII, CPC

Dispaupering

Permission once granted is not irrevocable. Under Rule 9, the court may, on notice, withdraw permission if the plaintiff is guilty of vexatious or improper conduct, if his means are such that he ought not to continue as an indigent person, or if he has entered into an agreement of the kind described in Rule 5. The consequence is that the plaintiff must pay the court fee, failing which the suit is liable to be dismissed.

Outcome of the Suit and Recovery of Court Fee

The scheme does not extinguish the court fee; it defers it. If the plaintiff succeeds, the court calculates the fee that would have been payable, and that amount is recoverable by the State from any party the decree directs to pay it, being a first charge on the subject matter of the suit

(Rule 10). If the plaintiff fails, is dispauperised, or the suit is withdrawn or dismissed on specified grounds, he must pay the court fee (Rule 11). Rule 15 bars a fresh like application after refusal, but permits an ordinary suit on payment of the costs of the opposition.[8]

Appeals by Indigent Persons

Order XLIV, Rule 1 extends the pauper-suit facility to appeals: a person unable to pay the fee for a memorandum of appeal may apply for leave to appeal as an indigent person, and the provisions relating to suits by indigent persons apply, so far as may be, to such an application.[9] This ensures that the constitutional value of access to justice extends across the hierarchy of civil courts, and the Supreme Court has itself granted leave to a claimant to pursue an appeal as an indigent person where continuing financial hardship was shown.[10]

Constitutional Framework

Table 2 sets out the constitutional provisions bearing on access to civil justice for the poor.

Provision	Relevance to indigent litigants / pauper suits
Preamble	Secures to all citizens justice, social, economic and political, and equality of status and of opportunity.
Article 14	Equality before the law and equal protection of the laws; equality is illusory if poverty bars access to court.
Article 21	Protection of life and personal liberty except by a procedure that is just, fair and reasonable; free legal aid has been read into this guarantee.
Article 22(1)	Right of an arrested person to consult and be defended by a legal practitioner of choice – the basis of legal aid in criminal matters.
Article 32	Right to move the Supreme Court for enforcement of Fundamental Rights; procedural formalities have been relaxed for the poor.

[8] Code of Civil Procedure, 1908, Order XXXIII, rr. 10, 11 and 15.
[9] Code of Civil Procedure, 1908, Order XLIV, r. 1.
[10] See discussion in Drishti Judiciary, *Indigent Person* (analysis of a 2024 Supreme Court order on Order XXXIII and Order XLIV, CPC).

Article 38	State to secure a social order in which justice – social, economic and political – informs all institutions of national life.
Article 39A	State to ensure a legal system that promotes justice on the basis of equal opportunity and to provide free legal aid. Inserted by the 42nd Amendment, 1976.
Article 46	State to promote with special care the educational and economic interests of the weaker sections.
Article 226	Power of the High Courts to issue writs – an additional forum accessible to the economically weak.

Table 2: Constitutional provisions relevant to indigent persons / pauper suits

Article 39A: Equal Justice and Free Legal Aid

Article 39A has two limbs: a general directive that the legal system must promote justice on the basis of equal opportunity, and a specific obligation to provide free legal aid so that economic or other disabilities do not deny justice.[11] Though placed in Part IV and not directly enforceable, it is read harmoniously with the Fundamental Rights and supplies the constitutional foundation for Order XXXIII, Rule 9A and Rule 18 of the CPC, and for the Legal Services Authorities Act, 1987.

Article 21 and Access to Justice

The transformation of Article 21 after *Maneka Gandhi v. Union of India*[12] – which held that a procedure depriving a person of life or liberty must be just, fair and reasonable – opened the door to reading free legal aid into the right to life and personal liberty. Although the early cases concerned criminal proceedings, the same reasoning applies to civil litigation: a procedure that conditions the remedy on a payment the litigant cannot afford is difficult to call fair.

[11] The Constitution of India, art. 39A.
[12] (1978) 1 SCC 248.

Judicial Approach

Constitutional Decisions on Legal Aid

Hussainara Khatoon v. Home Secretary, State of Bihar[13] arose out of a petition disclosing that a large number of undertrial prisoners in Bihar had been in jail for periods longer than the maximum sentence they could have received if convicted. The Supreme Court held that the right to a speedy trial is an essential ingredient of the "reasonable, fair and just" procedure guaranteed by Article 21, and that free legal services to an accused who is too poor to engage a lawyer are equally an essential element of such a procedure, since a trial without representation on one side can hardly be called fair.

M.H. Hoskot v. State of Maharashtra[14] concerned a convict who was denied a certified copy of the judgment and legal assistance to file an appeal. The Court held that the right to legal aid at State expense, at least at the appellate stage, is implicit in the fundamental right to a fair procedure, and directed that this right be read into the machinery of criminal appeals.

Khatri v. State of Bihar[15] – the "Bhagalpur blinding" case – went further and held that the right to free legal aid arises the moment an accused is first produced before a magistrate, and continues at every subsequent stage; the State cannot avoid this constitutional obligation by pleading financial or administrative inability.

Bihar Legal Support Society v. Chief Justice of India[16] emphasised that access to the appellate and constitutional courts must not remain the preserve of the well-resourced litigant, and that the judicial system as a whole must adopt a liberal, participative approach toward the poor and disadvantaged, including through simplified procedures and public interest litigation.

Anita Kushwaha v. Pushap Sudan[17] is the most systematic modern statement on the subject: the Supreme Court held that access to justice is itself a facet of the guarantee under Articles 14 and 21, and identified its essential components as an effective adjudicatory mechanism, reasonable rules of procedure, a fair and speedy trial, and – most relevant here – an adjudicatory

[13] (1980) 1 SCC 81; full text available at https://indiankanoon.org/doc/1373215/.
[14] (1978) 3 SCC 544; available at https://indiankanoon.org/doc/846609/.
[15] (1981) 1 SCC 627; available at https://indiankanoon.org/doc/48414/.
[16] (1986) 4 SCC 767; available at https://indiankanoon.org/doc/1508849/.
[17] (2016) 8 SCC 509; available at https://indiankanoon.org/doc/54697323/.

system that is accessible in terms of distance, procedure and cost.

Decisions Directly on Order XXXIII (Pauper Suits)

Union Bank of India v. Khader International Construction[18] settled two points that had earlier divided the High Courts: first, that a company or other juristic person, and not only a natural person, can apply to sue as an indigent person under Order XXXIII, since the Explanation to Rule 1 does not confine the word "person" to human beings; and second, that an indigent person is simply one who lacks sufficient means to pay the court fee prescribed for the particular plaint the test is relative to the fee payable, not an abstract measure of poverty.

Kamu alias Kamala Ammal v. M. Manikandan[19] held that an application for leave to sue as an indigent person is not a mere formality: if the allegations in the proposed plaint, taken at their highest, do not disclose a cause of action, or if the proceeding is otherwise vexatious or an abuse of the process of the court, the application is liable to be rejected under Rule 5(d) even before the suit is registered.

Solomon Selvaraj & Ors. v. Indirani Bhagawan Singh & Ors.[20] is the most recent authoritative word on the point. The trial court had rejected an application for leave to sue as an indigent person on the ground that the suit was barred by res judicata and amounted to an abuse of the process of the court; the High Court of Madras affirmed this in a miscellaneous appeal. Affirming both courts, the Supreme Court (M.R. Shah and M.M. Sundresh, JJ.) held that while the court considering an Order XXXIII application ordinarily does not enter into the merits of the suit, it may – and indeed must – examine, on the face of the plaint, whether a cause of action is disclosed and whether the suit is ex facie barred by law, applying *Kamu*. At the same time, the Court preserved the applicant's remedy under Rules 15 and 15A, permitting the appellants to institute the suit in the ordinary manner on payment of the prescribed court fee and the costs of the opposition, so that rejection of indigent status did not amount to a final closing of the doors of justice.

[18] AIR 2001 SC 2277; (2001) 5 SCC 22; available at https://indiankanoon.org/doc/1194327/.
[19] (1998) 8 SCC 522; available at https://indiankanoon.org/doc/1427339/.
[20] Civil Appeal No. 8885 of 2022 (SC, 2 December 2022), 2022 LiveLaw (SC) 1004; judgment available at https://indiankanoon.org/doc/51343411/ and commentary at https://www.livelaw.in/top-stori es/supreme-court-indigent-application-res-judicata-order-xxxiii-rule-1-cpc-solomon-selvaraj-vs-indrani-bhagawan-singh-2022-livelaw-sc-1004-215665.

M.L. Sethi v. R.P. Kapur[21] held that the general provisions of the Code relating to the addition of parties (Order I, Rule 10) and the consequences of non-appearance (Order IX) apply equally to a proceeding instituted under Order XXXIII, since, once registered, such a proceeding is treated as an ordinary suit for every procedural purpose save the payment of court fee.

Three propositions recur across these decisions. First, the inquiry at the admission stage concerns the applicant's means and the existence of a cause of action on the face of the allegations; it is not a trial of the merits of the dispute. Second, the applicant must make a full and honest disclosure of his property, and suppression of material assets is itself a ground for rejection or for dispaupering under Rule 9. Third, and importantly for the poor litigant, rejection of an application under Order XXXIII is not the end of the road: Rules 15 and 15A keep open the ordinary remedy of a fee-paid suit, so that the pauper-suit procedure operates as a facility in addition to, and not a substitute for, the ordinary right to sue.

The Legal Services Authorities Act, 1987

Order XXXIII operates in the narrow field of court fee; legal aid legislation operates in the wider field of legal assistance. The Legal Services Authorities Act, 1987, enacted to give effect to Article 39A, constituted the National Legal Services Authority (NALSA), State Legal Services Authorities, District Legal Services Authorities and Taluk Legal Services Committees.[22]Section 12 identifies persons entitled to legal services – including members of Scheduled Castes and Scheduled Tribes, women and children, persons with disabilities, persons in custody, industrial workmen, victims of trafficking or mass disasters, and persons whose annual income is below the prescribed ceiling.[23] Legal services under the Act include payment of court fee, provision of a lawyer, and supply of certified copies of orders and documents; the Act also gives statutory recognition to Lok Adalats, a settlement mechanism free of court fee.

The two schemes are complementary: a person qualifying under Section 12 may obtain a lawyer and meet litigation costs without a separate inquiry under Order XXXIII, while a person outside Section 12 may still qualify as an indigent person – and thus bring what is, in substance,

[21] (1972) 2 SCC 427; available at https://indiankanoon.org/doc/1857896/.
[22] Legal Services Authorities Act, 1987, ss. 3–11.
[23] Legal Services Authorities Act, 1987, s. 12.

a pauper suit – if the court fee on the claim exceeds his means.

Challenges in Implementation

- Delay in deciding indigency. The inquiry into means, notice to the Government Pleader, and the hearing may take months, during which limitation may run or the claimant's position may worsen.
- Outdated monetary criteria. The property test (property worth one thousand rupees) in the Explanation to Rule 1 has not kept pace with inflation.
- Risk of cost consequences. Exposure to court fee and costs on failure, and the bar in Rule 15, may deter genuinely poor litigants.
- Quality of representation. Low remuneration and weak supervision affect the quality of assigned counsel under Rule 9A.
- Lack of awareness. Many potential beneficiaries, particularly in rural areas, are unaware of Order XXXIII (pauper suits) or of legal services authorities.
- Scope for misuse. Concealment of assets and financed litigation create a counter-risk that prompts strict scrutiny, occasionally to the detriment of honest applicants.

Suggestions

1. Prescribe a time limit for deciding applications under Order XXXIII, with interim protection (for example, from limitation) while the inquiry is pending.
2. Revise the monetary criteria periodically, linked to a published index, considering actual household income and liabilities.
3. Integrate the Rule 1A inquiry with eligibility certificates issued by Legal Services Authorities to avoid duplicate inquiries.
4. Improve remuneration, training and monitoring of counsel assigned under Rule 9A.
5. Expand legal literacy programmes through District Legal Services Authorities, panchayats

and law-school legal aid clinics.

6. Adopt e-filing and digital verification of means, with adequate privacy safeguards.

Conclusion

Order XXXIII of the CPC embodies a simple but important principle: no person should be shut out of the civil courts merely because he cannot pay the fee. The pauper suit – as this proceeding continues to be known outside its formal statutory name – provides a structured procedure, guards against abuse, and protects the State's interest in court fee through recovery from the opposite party or the plaintiff, as the case may be. Read with Article 39A, Article 21 and the Legal Services Authorities Act, 1987, it forms part of a larger constitutional commitment to equal justice.

Its effectiveness, however, depends on administration. Delay, outdated criteria, weak representation and low awareness reduce its promise. Legislative and administrative reform, coupled with a purposive judicial approach, is necessary if Order XXXIII is to fulfil its constitutional purpose. As the Supreme Court has repeatedly reminded, access to justice is not a charity extended to the poor but a right they hold under the Constitution.

References

Statutes and Constitution

1. The Constitution of India: Preamble; Arts. 14, 21, 22(1), 32, 38, 39A, 46, 226.
2. The Code of Civil Procedure, 1908: s. 60; Order XXXIII (Suits by Indigent Persons / Pauper Suits); Order XLIV, r. 1.
3. The Legal Services Authorities Act, 1987 (Act 39 of 1987), ss. 3–12.
4. The Court-Fees Act, 1870; the Tamil Nadu Court-Fees and Suits Valuation Act, 1955.

Cases

1. *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248.
2. *M.H. Hoskot v. State of Maharashtra*, (1978) 3 SCC 544.
3. *Hussainara Khatoon v. Home Secretary, State of Bihar*, (1980) 1 SCC 81.
4. *Khatri v. State of Bihar*, (1981) 1 SCC 627.
5. *M.L. Sethi v. R.P. Kapur*, (1972) 2 SCC 427.
6. *Bihar Legal Support Society v. Chief Justice of India*, (1986) 4 SCC 767.
7. *Kamu alias Kamala Ammal v. M. Manikandan*, (1998) 8 SCC 522.
8. *Union Bank of India v. Khader International Construction*, AIR 2001 SC 2277.
9. *Anita Kushwaha v. Pushap Sudan*, (2016) 8 SCC 509.
10. *Solomon Selvaraj & Ors. v. Indirani Bhagawan Singh & Ors.*, Civil Appeal No. 8885 of 2022 (SC, 2 December 2022), 2022 LiveLaw (SC) 1004.

Books and Reports

1. Expert Committee on Legal Aid (Justice V.R. Krishna Iyer), *Processual Justice to the People* (1973).
2. C.K. Takwani, *Civil Procedure with Limitation Act, 1963* (Eastern Book Company, latest edn.).
3. D.F. Mulla, *Code of Civil Procedure* (LexisNexis, latest edn.).