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A Comparative Study of Administrative Tribunal Systems: India, USA, UK, and France

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Abstract
The paper explores the historical development of tribunals in various leading nations of the world including USA, UK, France and India. It provides a comprehensive understanding of how tribunals work in these countries and contribute to the development of their legal system. Administrative tribunals are quasi-judicial bodies that provide speedy and specialized adjudication of disputes. Tribunals are considered as part of regular judicial system in USA and UK. But as the legal framework of both the nations are very different from each other, thus, the tribunals work differently in both the nations. The tribunal system we know today has its origins in France's droit administratif system. France was the first country to develop a structured and comprehensive system in which administrative matters were entirely removed from the jurisdiction of ordinary courts. In India, tribunals have constitutional recognition. Today, there are various tribunals working in different fields. The paper concludes with the observation that one of the features common all the jurisdictions is that the object of establishing the tribunals across the nations remains the same i.e. to provide speedy and effective justice. Also, in most of the jurisdictions, the judiciary has played a proactive role to maintain the rule of law during administrative adjudication.

Keywords: Administrative tribunals, France, India, USA, UK

Introduction

The establishment of tribunals is not limited to any particular legal system but it is a feature which runs across the legal system of various nations across the globe. The traditional courts have failed the test of time largely due to their structural limitation and the ever-increasing case workload. These specialised adjudicatory bodies are established to deliver efficient, expert, and accessible justice. They are not substitutes of traditional courts but play a complimentary role. While their underlying objective is largely similar, but the difference in the constitutional framework, the working of various doctrines like separation of power makes their functioning distinct in different nations. This research paper undertakes a comparative examination of tribunal systems in India, the USA, the UK, and France in order to analyse how diverse legal traditions—common law and civil law alike—have shaped the structure and functioning of administrative adjudication.

England

The development of tribunals in England is contributed to the adoption of state welfare policy. The National Insurance Act, 1911 empowered administrative adjudication to decide disputes related to the implementation of social security programs. Subsequently, the traditional judicial bodies were being replaced by more and more of such tribunals as the traditional bodies failed in providing effective remedies. Since, 1929 the number of tribunals have expanded greatly due to increase in governmental activities which have given even more occasions of dispute between individuals and administration (Littlewood, 1959). Although courts were in existence and accessible but they were time-consuming and followed cumbersome procedure[1]. Thus, there was a need to establish a mechanism which would deal with these matters effectively and efficiently which gave rise to the establishment of tribunals. Thus, slowly and gradually the number of tribunals increased having expertise in the different domains. Few examples of tribunals that functioned in UK were employment tribunals that handle disputes between private parties and companies, and leasehold valuation tribunals that handle disputes between lessors and lessees regarding property valuation or service fee[2]. However, there was lack of uniformity in the functioning of these tribunals. While for some tribunals, the chairman of the tribunal was legally trained personnel while for others he could be one even without a legal training, on the other hand, there was provision of appeal against the decision of the tribunals while for others there was no such provision.

Until 1958, there was no provision for control of these administrative tribunals in England by any superior administrative tribunal as in the continent[3]. The Committee on Ministers Power, 1932 was established to look into the matter. Submitting its Report in 1932, the Committee highlighted the significance of the courts in maintaining rule of law and suggested that the judiciary should be given power to control the functioning of tribunals. Further, another committee was constituted in 1955 under the leadership of Lord Franks to examine Administrative Tribunals. The Committee highlighting the advantages of tribunals like cheapness, accessibility, freedom from technicality, expedition, expert adjudication asserted that the decisions ought to be rendered by a court, unless there are specific reasons that make a tribunal a more appropriate choice. On the other hand, the Committee also predicted the role of tribunals to expand in future. The Committee gave some of the valuable suggestions like- The tribunal should be seen as a body established by Parliament for the purpose of adjudication, rather than as a component of the administrative system, Creation of an advisory non-departmental public body known as “Council on Tribunals” to supervise the constitution and operations of the several Tribunals, The tribunal's chairman should possess legal qualifications, A tribunal should issue a written decision along with the reasons supporting it, The Committee suggested three fundamental principles in adjudication of disputes by tribunals: openness, fairness and impartiality.The Tribunals and Inquiries Act of 1958 was passed to implement several recommendations made by the Franks Committee like the Council on Tribunals was created to offer advisory and oversight roles for the tribunals already in operation. Thereafter, it was superseded by The Tribunals and Inquiries Act, 1971 but it makes no substantive changes. By the year 2000, it was evident that the Council on Tribunals has failed in its working as the tribunal practices lacked uniformity. Reviewing the current Tribunal system in 2001, Sir Andrew Leggatt Committee produced a report under the heading "Tribunals for Users – One System, One Service". The report advocated for independence of tribunals and proposed creating a Unified Tribunal Service, a centralized administrative body similar to the court service. The tribunal system in England became even more effective and prominent with the passing of Tribunals, Courts and Enforcement Act 2007. The Act has incorporated the recommendations of Leggatt Report. Prior to the passing of this Act, the tribunals were look down upon with suspicion and also highlighted the poor relation between the tribunals and regular courts however, the Act reformed the tribunal system by bringing reforms such as increasing the security of tenure of tribunal judges, giving them same guarantee of judicial independence as court judges, and shifting administrative responsibility for tribunals from their “sponsoring” government departments to HM Courts and Tribunals Service, an executive agency of the Ministry of Justice[4]. Further, the Act created two tribunals: the First-tier Tribunal (FT) and the Upper Tribunal (UT). It grants the Lord Chancellor the authority to assign these two new bodies the jurisdiction of the current tribunals. Furthermore, the Lord Chancellor can assume certain statutory powers and responsibilities related to tribunal administration. Additionally, the Act required the Lord Chancellor to support the new tribunals

[1] Hilaire Barnett, Constitution and Administrative Law 643 (Routledge 9th Edition)
[2] Creyke, Robin, Tribunals in the Common Law World, 20 (The Federation Press, United Kingdom, 2008)
[3] D.D. Basu, “Administrative Law 308(5th edition, Kamal Law House, Calcutta)
[4] M.E Thomas Homas, Tribunal Justice and Proportionate Dispute Resolution, CLJ 297-324 (2012)

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administratively. Both the FT and UT were divided into chambers and included legally qualified judges along with other members. Additionally, each tribunal has the authority to review and reconsider its own decisions. The Act also created a new judicial position called the Senior President of Tribunals, who was responsible for supervising the tribunal judiciary. The Act defines the composition of the tribunals, the appeal rights from tribunal decisions, and introduces new Tribunal Procedure Rules. Additionally, it grants the Upper Tribunal the authority of judicial review in certain cases. Additionally, the Act replaces the Council on Tribunals with the Administrative Justice and Tribunals Council, which will have a wider range of responsibilities that cover the entire administrative justice system.However, Administrative Justice and Tribunals Council was dissolved in response to alliance government's reform of public bodies. This meant that there was no longer a government-affiliated organization that can offer a thorough analysis of the administrative justice and tribunal system in Great Britain. As the concerns were raised following its abolition, a new non-statutory advisory group, the Administrative Justice Forum was created, to review how administrative justice and tribunals work. As an independent scrutiny has been significantly diluted: this has weakened the overall tribunals system and removed a source of challenge to government policies that weaken citizen redress. The case *R v. Medical Appeal Tribunal, ex parte Gilmor*[5] highlighted the principle that judicial review can apply to decisions made by tribunals. The Court held that it did indeed have the authority to issue such an order, affirming that a tribunal's decision could still be reviewed and quashed for legal error, regardless of the statutory finality.

In, *R (Osborn) v. Parole Board*[6] the Parole Board denied parole to the prisoner without giving him the opportunity of hearing. The Court held the action of parole Board as unconstitutional and emphasises on the role of natural justice in tribunal proceedings.

United States

In USA, the concept of administrative adjudication might appear to be as unconstitutional due to strict adoption of doctrine of separation of power and the explicit clause in Art. III, s. 1 stating, *"The judicial power of the United States shall reside in one Supreme Court, and in such inferior courts as Congress may periodically ordain and establish."* Despite this, the practical demands of governance have led to the creation and legitimisation of administrative tribunals through the application of the doctrine of "quasi-judicial" authority[7]. The concept of administrative tribunals in the United States has evolved significantly over time. Early developments can be traced back to the establishment of specialized courts and agencies intended to handle specific types of cases more efficiently than traditional courts. The United States Supreme Court is considered as an Appellate Court and does not perform administrative adjudication since it strictly follows the doctrine of Separation of Powers. In the United States, the administrative tribunals do not have "judicial" power; they merely have "quasi-judicial" power as according to the US Constitution, administrative organisations that are not courts cannot receive judicial power. The major reason for the growth of tribunals in US is the demand for expert adjudication and inability of the courts to provide speedy resolution of disputes. The Administrative Law Special Committee was constituted in 1933 by The American Bar Association, which recommended increased judicial oversight of administrative agencies in its report. President Roosevelt so created the Attorney General's Committee in 1939 to investigate whether administrative law's practices needed revisions. In 1946, the Committee's Report led to the passage of the Administrative Procedure Act, establishing a legislative framework that governed administrative action in the United States. The Act represents a significant milestone in the development of administrative law. The Act allowed the Courts to review decisions rendered by administrative agencies, in relation to legal issues and the application of the laws. Later, Administrative Conference Act, 1964 was passed which established the administrative conference. The Conference, is a permanent and independent federal agency entrusted with advisory and consultative role. Its primary function is to evaluate the efficiency, adequacy, and fairness of the procedures employed by administrative agencies and subsequently offer suggestions for improving those legal processes. These recommendations are directed to the President, federal agencies, Congress, or the judicial conferences of the United States.

In the United States, the tribunals have limited jurisdictions, as they decided only on the issues that do not fall within the category of purely judicial functions.

In *Londoner v. City and County of Denver*[8] the Court held that opportunity of hearing is a constitutional mandate which has to be fulfilled by City Council Board. Thus, imposing tax without giving the petitioner of such opportunity of hearing was held to be bad in law.

In Northern Pipeline Construction Co. v. Marathon Pipe Line Co[9], is a landmark judgment as it delineated the boundary between Article I and Article III adjudicative authority. In the instant case the Bankruptcy Act of 1978, established bankruptcy courts and gave it the power to decide state law contract claims. This provision was challenged. Holding the provision as unconstitutional the Court observed that Congress lacks constitutional authority to permit non-Article III bankruptcy courts to decide state law claims such as the one involved in this case. The Supreme Court held that the extensive jurisdiction conferred upon bankruptcy courts by the 1978 Act was unconstitutional, as it violated Article III of the Constitution because, these courts were not established under Article III and their judges did not enjoy the constitutional guarantees of life tenure and salary protection.

In *Richardson v. Perales*[10], the Court accepted the evidence of written report from a licensed physician even though it was hearsay and the physician was not cross-examined. The report still served as substantial evidence supporting an adverse decision. Thus, the case emphasises that administrative tribunals have flexibility in evidentiary rules, unlike regular courts

France

The tribunal system owes its existence to France's *droit administratif* system. In France, the administrative matters fell exclusively within the domain of administrative tribunals rather than the courts. The French Legal system has a fully developed hierarchy of administrative courts. The modern France is the result of Revolution of 1789 (Bell). *Conseil d'État* was established by Napoleon on the lines of *Conseil du Roi* which acted as an advisory body to the monarch on legal and administrative issues however, it was abolished due to its arbitrary exercise of power (Messy, 2008). Once Napoleon assumed the role of First Consul, he implemented strict, almost military-style oversight over his administrators to ensure they operated within defined boundaries and to regain public confidence. To establish separate administrative courts to review the actions of the administration and with the Constitution of 1799, 'Conseil d' Etat' as 'Droit Administratif' was established in the French administration system (Messy, 2008). Thus, the disputes between individuals and administrators were decided by the administrative courts and were outside the jurisdiction of regular courts. *Conseil d'État* was the highest administrative court and

[5] R v. Medical Appeal Tribunal, [1957] 1 QB 574 (United Kingdom)
[6] R (Osborn) v. Parole Board, [2013] UKSC 61 (United Kingdom)
[7] Divya M & Gokulnath M, The Evolution of Administrative Tribunals: A Comparative Study of UK, USA, and India, IJLR, 781-789 (2025)

[8] Londoner v. City and County of Denver US Supreme Court 1908 (United States)
[9] Northern Pipeline Construction Co. v. Marathon Pipe Line Co US Supreme Court 1982 (United States)

[10] Richardson v. Perales ,US Supreme Court 1971 (United States)

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also served as an appellate body for decisions made by lower administrative tribunals. Over a period of time, a structured system of Three-Tier Tribunals was developed in France. The *Conseil d'État* transitioned from being an administrative body to functioning more as a judicial or quasi-judicial institution, as executive responsibilities were gradually delegated to various committees. The *Tribunal Administratif* which consisted of a president, four councillors, and a government commissioner served as the court of first instance for most administrative cases in France. The decisions made by this tribunals can be appealed to the *Conseil d'État.* The Conseil d'État is composed of a vice-president, five section presidents, and 59 councillors, all of whom are appointed through a cabinet decision based on a recommendation from the minister of justice. However, typically, appeals from the *Tribunal Administratif* are directed to the *Cour administrative d'appel*, although this appellate court does not handle appeals in all types of cases. The procedure followed by the tribunals are regulated by themselves.

In France, disputes involving the state and issues of administrative law are adjudicated by specialised administrative courts that function separately from the ordinary judicial system and apply their own distinct legal principles. When uncertainty arises regarding whether a matter falls within the jurisdiction of the administrative courts or the regular judiciary, the issue is resolved by the Tribunal des Conflits. The French administrative framework is notable for the substantial autonomy granted to these tribunals, reflecting a level of institutional independence that is uncommon elsewhere. Additionally, in contrast to many democratic systems such as those in India, the USA, and the UK, France does not employ a conventional mechanism of judicial review over administrative decisions, further distinguishing its model.

In *Blanco Case*[11] which is widely regarded as marking the emergence of modern administrative law in France. It affirmed the existence of a dual system of justice and clarified the division between administrative and judicial courts according to the character of the dispute—public or private. The central question was whether the State's liability should be determined under the same civil law principles that apply to private individuals or under a distinct body of public, administrative law.

The Tribunal concluded that responsibility arising from the operation of public services is not governed by the Civil Code but instead by specialised administrative rules that reflect the public interest and the nature of governmental functions. It further held that jurisdiction properly belonged to the Conseil d'État, acting through the administrative courts, rather than to the ordinary judicial courts. This ruling firmly separated civil and criminal courts from administrative tribunals and laid the institutional foundation for France's dual court structure, commonly described as the principle of *dualité de juridiction*.

In *Conseil de la Concurrence Case*[12], emphasising on the significance of doctrine of separation of power, it was held that punitive powers fell within the domain of judiciary and cannot be exercised by administrative authorities, Though administrative authorities can perform advisory and regulatory role but they cannot exercise punitive powers. The matter originated from a reference made to the French Constitutional Council concerning the validity of certain provisions in Ordinance No. 86-1243 of 1 December 1986, which restructured the framework of competition law in France. The ordinance conferred upon the Conseil de la Concurrence—an administrative body—the authority to impose fines and issue injunctions in response to anti-competitive conduct. This grant of power was contested on the basis that entrusting administrative authorities with sanctioning functions resembling judicial powers could violate the constitutional principles of separation of powers and the protection of individual liberties.

The central constitutional question was whether an administrative authority could legitimately be empowered to impose sanctions affecting personal rights and freedoms, or whether such coercive authority must remain exclusively within the domain of the judiciary. The Constitutional Council held that certain essential powers—particularly those involving restrictions on personal liberty—must be reserved solely for the judicial authority under Article 66 of the Constitution. It reaffirmed that only courts within the judicial branch may deprive individuals of liberty or impose penalties of a criminal nature. Although administrative bodies may perform regulatory or advisory roles, they cannot exercise punitive functions that interfere with fundamental freedoms. Consequently, the Council declared the relevant provisions of the ordinance unconstitutional to the extent that they authorised the Competition Council to impose such sanctions.

In *Cadot*[13] The Conseil d'État affirmed its authority to function as both the initial and ultimate appellate body in administrative disputes, thereby eliminating the earlier ministerial screening process that had restricted direct appeals. Through this decision, the Conseil abandoned the outdated requirement that an aggrieved citizen must first submit a complaint to the relevant minister before seeking judicial redress.

India

The evolution of tribunals in India can broadly be classified into the Pre-Independence and Post-Independence period. In the pre-independence period, tribunals were largely created by the British colonial authorities to reduce the workload of ordinary courts and to ensure the swift adjudication of specific disputes, particularly those concerning revenue, tenancy, and military affairs. In India, the evolution of Tribunals is usually traced to the 42nd Amendment which inserted Articles 323A and 323B in the Constitution but rather they were inserted in the Indian Constitution to encourage the tribunal system (Jain, 2007) and to provide constitutional power for legislation (Basu, Commentary on Constitution of India, 2011). But however, the tribunals were in existence even before the independence, when the Income Tax Appellate Tribunal was established in 1941 to decide the disputes regarding over income tax assessments. But, the factors that led to the development of tribunals in Pre-Independence era were very different from the factors in Post-Independent era. Special adjudication powers were granted to specific administrative authorities, resulting in the creation of the contemporary administrative adjudication. However, the object of these adjudicatory bodies was not to do justice but rather protect the interests of the ruler. Thus, these bodies failed to earn the trust and faith of the people. To address growing public dissatisfaction and to build confidence in administrative justice, the British authorities introduced the concept of judicialization within the administrative system. Over time, these judicialised administrative tribunals gained public acceptance, encouraging their continued expansion. Consequently, by 1947, a significant number of such administrative adjudicatory bodies had been established. After the adoption of the constitution, the administrative adjudicatory bodies have grown immensely since the police state gave way to welfare state. Further, the complexity of society also contributed to the growth of tribunals. It was realised that the courts were not competent to provide quick, efficient and effective justice, this paved the way for the development of tribunals. The Law Commission's numerous reports and Committee Reports are also credited with helping tribunals in India develop which time and again emphasized the need to have a system of adjudication that will supplement and compliment the role of courts. For instance, Eleventh Law Commission investigated cases that are still undecided in the High Courts. and suggested establishment of tribunals to clear the backlog, In the Fifteenth Law Commission Report the Commission recommended the changes necessitated to be made in the tribunals to ensure the independence of tribunals. As a result, the 42nd Amendment introduced tribunals into the Constitution. With this there was proliferation growth of tribunals across the country. There were numerous legislations passed which made provisions for the creation of tribunals to provide speedier and expert adjudication of disputes. However, as the number of tribunals grew, the difficulty of a absence of uniformity in terms

[11] Blanco case (Tribunal des Confits Feb 8, 1873). (France)

[12] Conseil de la Concurrence (Conseil Constitutionnel July 10, 2001) (France)

[13] Cadot , Conseil d'État December 13, 1889 (France)

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of appointment of tribunal members, their service conditions, and the procedure for deciding disputes was also faced. To address these issues, the Finance Act, 2017 was passed, to streamline working of tribunal across country. The Act granted Central Government authority to formulate rules concerning tribunal members. The Rules were contested before the Supreme Court and the Supreme Court directed the Central Government to revise and reframe them. In 2020, the Central Government re-framed the Rules, which were again challenged before the Supreme Court. Subsequently Tribunal Reform Act, 2021 was passed, which is also challenged before the Supreme Court. The judiciary has played a pivotal role in shaping the development of tribunals in India by upholding the principles of independence, fairness, and accountability in quasi-judicial bodies. Through landmark judgments such as *L. Chandra Kumar v. Union of India*[14], the Supreme Court emphasized that tribunals cannot replace High Courts and must remain subject to judicial review, thereby ensuring their decisions are constitutionally accountable. The tribunal system has grown tremendously in India as it has been realized that tribunals are need of a democratic society. Through its various significant rulings, the judiciary has time and again stressed the significance of preserving the independence of tribunals in order to ensure administration of justice by tribunals effectively. The Indian tribunal system has been shaped by significant rulings rendered by the Supreme Court and High Courts of India. The courts have developed certain principles aimed at bringing objectivity and impartiality to adjudicatory processes.

Neither the Constitution nor any other law defines the word "tribunal." The definition of the term tribunal has been greatly influenced by the courts. In *Durga Shankar Mehta v Raghuraj Sin*gh[15] , the Supreme Court defined “tribunal” in the following words:

“Article 136's use of the term "tribunel" does not indicate "court," but rather encompasses all adjudicating bodies as long as they are established by the state and have judicial authority as opposed to administrative or executive duties.”

In *Harinagar Sugar Mills Ltd v. Shyam Sundar Jhunjhunwala*[16], Justice Hidayatulla has tried to differentiate between the courts and tribunals. It was examined by Justice *“that all courts can be called tribunals but all tribunals cannot be called the court. However, the courts and the tribunals both exercise the judicial power of the State, but still, tribunals can’t be called courts due to which the Legislature has expressly mentioned the word ‘tribunals’ under Art 136 and 227 of the Constitution of India”.*

In *S.P. Sampath Kumar v Union of India*[17] The Supreme Court even considered Tribunals as an effective alternative mechanisms to High Court when Section 28 of Administrative Tribunal Act, 1985 removed the High Court's judicial review power and the Supreme Court upheld such provision.

However, the dissatisfaction of the Supreme Court with regard to functioning and effectiveness of Administrative Tribunals was expressed in the case of *R.K.Jain v. Union of India*[18] where the Court opined that these Tribunals could not be effective substitutes of High Courts under Articles 226 and 227.

The Supreme court overruled its decision of *S.P. Sampath Kumar case* in *L. Chandra Kumar v Union of India*[19] wherein the Court held that judicial review constitutes the part of basic structure doctrine. It affirms that while tribunals can perform a supplemental role and are competent to test the constitutional validity of statutory provisions and rules (with the exception of their parent statute), all their decisions will be subject to the scrutiny of a Division Bench of the respective High Courts.

In *Union of India v R. Gandhi*[20] *,* the Court observed that when legislature transfers judicial functions from courts to the tribunals it must ensure that independence of judiciary and principles of Rule of Law and Separation of Power are maintained. In the tribunals which are established to provide speedy justice and which does not involve technical matters, the presence of non-judicial members would result in dilution of independence of judiciary and rule of law and thus unconstitutional. The judiciary has been instrumental in reforming the tribunal system in India by ensuring that these quasi-judicial bodies adhere to constitutional principles, particularly judicial independence, fairness, and the rule of law. Through a series of landmark judgments, the Supreme Court has actively shaped the structure, functioning, and oversight of tribunals.

Conclusion

Tribunals are set up in various countries, each governed by its own legal framework that outlines their powers and procedures. It is the primary duty of every State to uphold law and justice in society, and to achieve this, countries around the world have developed systems for delivering justice. Tribunals play a vital role in these justice systems in many nations. Both the United States and England include tribunals as part of their regular judicial systems. However, the way these tribunals’ function differs between the two countries due to differences in their legal structures. In England, the legal system is based on parliamentary supremacy, meaning that all government branches are considered part of Parliament. This limits the scope of judicial review because there is no separation of powers. Consequently, higher courts in England often apply the literal rule of interpretation during judicial review. In contrast, the American legal system firmly upholds the principle of separation of powers, placing judicial review at the core of its legal structure. This ensures that the judiciary operates independently, without interference from other branches of government, with judicial independence being a fundamental aspect of the American system. American courts have the authority to interpret laws and statutes, making them a crucial element of the legal system. The concept of administrative tribunals in the United States has evolved significantly over time. Early developments can be traced back to the establishment of specialized courts and agencies intended to handle specific types of cases more efficiently than traditional courts. According to the United States Constitution, administrative organisations that are not courts cannot receive judicial power. Administrative tribunals do not have "judicial" power; they merely have "quasi-judicial" power. In the United States, administrative tribunals have restricted authority to carry out quasi-judicial tasks linked to administrative matters. They are permitted to make decisions only on issues that do not fall under the category of purely judicial functions. This limitation exists because the U.S. Constitution forbids granting judicial powers to anybody that is not a formal court. As a result, administrative tribunals do not have the authority to function as courts. Their decisions can still be examined by courts with the appropriate jurisdiction. The tribunal system we know today has its origins in France's *droit administratif* system. France was the first country to develop a structured and comprehensive system in which administrative matters were entirely removed from the jurisdiction of ordinary courts. Instead, these issues fall exclusively under the authority of administrative courts. The French system operates through a fully established hierarchy of administrative courts, which function as separate and independent institutions. A structured system of Three-Tier Tribunals was developed in France with *Conseil d’État, Tribunal Administratif* and *Cour administrative d'appel.* In India, the tribunals were in existence even before the Independence. But during that time, they were established to protect the British power rather than administering justice. While, in post-Independence era they were established to provide speedy and effective adjudication. The various Law Commission and Committee reports and also the judiciary has been instrumental in development of tribunals in India.

[14] L. Chandra Kumar v. Union of India AIR 1997 SC 1125 (India)
[15] Durga Shankar Mehta v Raghuraj Singh AIR 1954 SC 520 (India)
[16] Harinagar Sugar Mills Ltd v. Shyam Sundar Jhunjhunwala AIR 1961 SC 1669 (India)
[17] S.P. Sampath Kumar v Union of India AIR 1987 SC 386 (India)
[18] R.K.Jain v. Union of India AIR 1993 SC 1769 (India)
[19] L. Chandra Kumar v Union of India AIR 1997 SC 1125 (India)
[20] Union of India v R. Gandhi AIR 2010 SC 2221 (India)