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PRICE FIXING CARTEL AND ROLE OF CCI TO PREVENT ANTI-COMPETITIVE PRACTICE: AN ANALYSIS

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ABSTRACT

One of the key elements that affects a product's consumability in a competitive market is price. Both consumers and the industry benefit from a symbiotic relationship in an ideal competitive society. However, it has been held that in a perfect scenario.

Since industries are driven by profit, which may be attained through increased sales, businesses strive to succeed in their specialised fields in order to offer high-quality goods at reasonable rates in a competitive market caused by the abundance of similar products.

However, it has been discovered that industries use unfair trade tactics to increase their profits.

In order to control these unfair business activities, the Indian Parliament created the Competition Act in 2002. This law's main goals are to encourage fair competition in the market and to punish businesspeople who engage in anti-competitive trade activities. The creation of cartels is one such tactic. A cartel is considered to be created when two or more businessmen get into a formal or informal agreement to further their own interests and obstruct fair competition in the market. Cartels can stifle free competition by setting prices for goods and services or by influencing non-price elements like manufacturing. In order to maintain market competition and provide customers with as many options as possible at lower prices, the present article focuses on the examination of price cartels and the role that competition law plays in regulating these cartels.

Keywords: *Cartels, India, U.S.A, C.C.I., D.O.J,*

INTRODUCTION

The cost of various things on the market is a crucial component of public policy. Our legislators have a responsibility to advance fair competition and safeguard consumers' interests in the marketplace. In addition to allowing fair entry into the market, competition law also assures healthy market competition so that the interests of consumers are well-served. "Cartelization" is one of the numerous restraints or unfair trade practises that the law names as impeding competition in an economy. It is a tool employed by businessmen to control the market to their advantage.

Under this scenario, the industrialists engaged in similar types of products or services typically form a group, either formally or informally, and agree to either set a fixed price for the products or to control the production of specific products. They may also agree to divide the market, either geographically or by product, among themselves in order to maintain control over the market and prevent new competitors from entering it. These agreements are made in order to give a select few industries a monopoly. A cartel can typically form at any step of production, including the manufacturer, distributor, wholesaler, and retailer. These agreements are also known as anti-competitive agreements because they limit market competition. The Competition Act of 2002 states:

"Cartel is defined includes an association of producers, sellers, distributors, traders or service providers who, by agreement amongst themselves, limit, control or attempt to control the production, distribution, sale or price of, or, trade in goods or provision of services"

The Supreme Court has defined the word cartel saying that:

"cartel, therefore is an association of producers who by agreement among themselves attempt to control production, sale and price of the product to obtain a monopoly in any particular industry or commodity. It may be any combination the object of which is to limit or control trade or production, distribution, sale or price of the goods or services."

Cartels' Origins:

Any economy must contend with cartel formation, which is not a new issue. The "Arthashastra" of Kautilya contains the earliest indications of cartels. In his book, he advocated for stiff penalties to be imposed on cartel agreements in order to prevent their formation. Distinct nations have different antitrust laws, but "Cartelization" is one concept that all antitrust laws have in common. Monopoly is the antidote to healthy competition, and creating cartels is one strategy that is seen to be harmful to it. Eight decades after the United States approved the

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first modern antitrust law, the Indian Parliament passed its own antitrust law for the first time after independence in 1969, known as the Monopolistic Restrictive Trade Practices (MRTP) Act. However, due to the licencing Raj, which severely constrained and regulated Indian economy, these efforts did not yield any fruitful results until 1991. India's economy first experienced economic liberalisation in 1991. Following the implementation of the New Economic Policy, a number of market restrictions were lifted, including those relating to product price, production, and diversification restrictions. It might be claimed that after 1991, our formerly closed economy became accessible to the rest of the globe. Additionally, the licence regulations were relaxed.

Many new businesses entered the market at this time, and the economy began to transition from a socialist to a capitalist structure. MRTP commission ruled on seven cartel instances between 1991 and 1978, according to data. However, due to a lack of funding for thorough investigations, the commission was forced to reject the majority of the complaints. As a result, the MRTP Act utterly fails to expose and punish India's cartels. The Competition Act of 2002 was passed as a result of the MRTP Act's failure to exert control. The act creates the Competition Commission of India (CCI), which is given more authority and better resources to look into and prosecute cartels.

Different kinds of cartels:
According to research by Cuts International, there are four different types of cartels:

a) Price-fixing cartels: These are groups of industrialists who have agreed to control the price of a product.

Market sharing

(b) Cartels: These are the cartels in which the existing industrialists divide the geographical or product market in order to lessen competition.

c) Cartels that regulate the outputs: These are cartels in which merchants restrict the production of commodities to artificially deplete the market and maximise profits by limiting the flow of goods or services.

d) Bid rigging: "Bid-rigging" is defined as an agreement among parties engaged in the trade of comparable products or services where they band together to exclude a rival bidder or attempt to manipulate the bid.

Price Cartel:
Increasing market competition is one of the main goals of competition legislation. It made colluding among rivals to manipulate the price of products or services illegal. Due to the fact that this hinders healthy competition and limits the options available to end consumers. Price When rivals get together and agree on a price for goods or services, a cartel is formed. Typically, they come to an unofficial accord and fix things together. Due to collusion among the rivals, this agreement essentially decreases the level of market competition. The following are the basic characteristics of price cartels:

It is an association of independent enterprises, it is a horizontal trade disruptive element developed between competitors in the same industry, and it causes the industries to control prices as a result of lessening competition through these agreements.

d) The consumers are impacted since the price of the goods is unfairly increased to increase profit.

e) When there is an inelastic demand for the items, cartel formation is simple.

How does market cartelization impact consumers?
Cartel is a disruptive and extremely risky trade practise. In a constrained economy, the likelihood of cartel formation increases. as oligopoly predominates in the closed market. Cartel formation lessens producer competition, which has a long-term impact on the overall health of the economy. In nations where cartels hold a dominant position, consumer welfare suffers significantly as well. In accordance with OECD reports, cartels that are successful will actually drive up the cost of items on the market and prevent consumers from purchasing them at a price that is competitive. In the end, the consumer has two options: either refuse to pay and avoid purchasing the product altogether, or give the cartel operator his hard-earned cash. Second, the cartel protects its members from the effects of the market, which has increased prices and reduced spending on innovation. The demand-supply equation does not hold true in a cartel-dominated market. According to competition law specialist Bruce Wardhaugh, cartels "may extract a bigger social cost than even monopolies." He does so in the following way:

"*given that innovation would require the expenditure of research and development costs (which would be unnecessary due to a cartel-wide agreed 'stand-still' on innovation), such investment would not be undertaken.*

Since the monopolist, unlike the cartelist, must be concerned with other firms developing goods which may be less expensive substitutes for its goods, the monopolist may have greater incentive for research and development expenditure. Thus, these social costs of reduced product innovation may be greater with cartels."

The only method to control cartels, according to an OECD policy brief, is through severe penalties because money is also a factor in their formation.

Presence of a Cartel: A Classification of Evidence

A cartel's existence may be proven through direct confirmation, erroneous (fortunate) proof, or a combination of the two. Direct evidence includes written agreements between cartel members, an explanation from a cartel member who attended a meeting and reached an understanding with competitors, a reminder written inside an organization to report a meeting with competitors where an understanding was reached, records of phone conversations with competitors, or an announcement from a man who was persuaded to join the cartel.

However, cogent evidence is rarely produced since members of cartels frequently disagree verbally rather than in writing. Direct confirmation might be supported by backhanded (conditional) proof. Without anybody else's help, it might also show that a cartel exists, hence it's important to exercise caution when interpreting ambiguous evidence " Fortuitous proof is a different type of confirmation. Henry David Thoreau, an American academic, said that serendipitous confirmation can persuade, like when you find a trout in the milk. He suggested that the only explanation for this occurrence is that someone accidentally mixed trout and milk. When there is only one and only one explanation for an event, conditional confirmation is at its most useful. It is possible to use this principle when studying cartels. Only in cases when there is a cartel should one look for behavior that is encouraging. For instance, it would be suspicious behavior if all of the competitors in a certain industry announced at the same time that their prices would increase by the same amount. It makes one think that they all approved of the expense increase. However, there are other possible explanations as well, such as a data cost build that affected all of them similarly, a sudden shift in the demand for their product, or a quick rise in the price of a substitute item. The other potential explanations might be eliminated with more investigation. The straggling remnants, as the fabled English detective Sherlock Holmes put it, "must be reality" when the unimaginable has been eliminated. The only constant explanation for the abrupt identical price increase announcements, if all other intelligent explanations are eliminated, is that the competitors all discussed and agreed upon the price increases. That would be conditional approval of a cartel agreement in a deceptive manner ". In this vein, the various procurements under the Competition Act are shown. The MRTP Act's issues are examined to determine whether the Act resolves them. On the basis of two nation papers arranged by advisers working on this project, references are made to the experiences of two other large economies, the US and Brazil, as often as possible for correlation and in order to draw the necessary conclusions. The study concludes with a few recommendations regarding the CCI's strategy and operational issues as it relates to executing its mandate under the Competition.

Price fixing is an agreement (written, verbal, or derived from direct) between rivals that increases, decreases, or resolves costs or aggressive terms. The majority of the time, antitrust rules mandate that each organization establish prices and other terms alone, without consulting a rival. When consumers make choices regarding the goods and services they will buy, they anticipate that the price will have been determined purely on the basis of supply and demand, not by collusion among rivals. When rivals agree to restrict competition, the result is typically greater costs. Price regulation is unavoidably a significant concern for government antitrust regulation.

Whether expenses are agreed upon at the very least, at the most, or within a range, a simple agreement among competitors to adjust costs is frequently illegal. When two or more rivals agree to produce actions that have the effect of increasing, decreasing, or balancing out the cost of any good or service without a legitimate interest, this is known as illegal price-fixing. Price fixing schemes are frequently developed in secrecy and can be challenging to disclose, yet an agreement can be discovered via "fortunate" proof. For instance, illegal price settling may be the cause if related competitors have a case of unexplained same contract terms or price behaviour combined with various features (such as the absence of legitimate business clarity). Concerns can also be raised by offers to organise prices, such as when a competitor declares openly that it is willing to terminate a price war provided its rival is also willing to do so, and the conditions are so explicit that rivals can interpret this as an offer to fix prices jointly.

Not every price similitude or price change that takes place in the interim is a result of a price settlement. Actually, they frequently result from common economic circumstances. For instance, prices for commodities like wheat are typically the same since the commodity is essentially equal, and the prices that ranchers charge

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all rise and decrease together without communication. Each and every affected rancher will pay more if a dry season results in a decline in the availability of wheat. An increase in consumer demand can also result in continually high prices for a limited-supply good.

Price fixing concerns both costs and various terms that affect costs to customers, such as shipping fees, guarantees, markdown initiatives, or financing rates.

Price cartel regulation under THE MONOPOLIES AND RESTRICTIVE TRADE PRACTICES ACT (MRTP) of 1969:

The MRTP Act is legally the first law in India that tries to prevent the exploitation of monopolistic corporate practises. Prior to this, an illegal agreement was addressed by the Indian Contract Act of 1872. Sec. 27 of the Contract Act states that "subject to the specific exception provided therein, every agreement by which any person is restrained from exercising a lawful profession, trade, or business of any kind, is to that extent void." Sec. 23 of the Contract Act states that "the consideration or object of an agreement is unlawful if the court regards it to be contrary to public policy and is void."

The need for competition law was really mandated by the Indian constitution. The Directive Principle of State Policy, which places an unique obligation on the future government to further the welfare of the people, is found in Part IV of the Indian Constitution. The primary goals and objectives of our first competition law are thus:

"to encourage fair play and fair deal in the market besides promoting healthy competition. They seek to afford protection and support consuming public by reducing Monopolistic, Restrictive and Unfair Trade Practices from the market."

Prior to 1991, the MRTP Act was a crucial piece of legislation that guaranteed Indian industries' independence while also advancing social justice. However, since the introduction of New Economic Policies in 1991, the emphasis of our economy has shifted from policing monopolies to encouraging competition. The MRTP Act is rendered ineffective by this change in the object.

The MRTP Act does not include a specific definition of cartels with regard to its requirements. The Act impliedly applied to cartels. The Act's ambiguity on the matter makes it difficult to prevent the creation of cartels.

MRTP Commission, in contrast to CCI, lacked extraterritorial jurisdiction.

Therefore, it could not apply to global cartels. The MRTP Commission was a more reforming organisation. Even though it could conduct investigations on its own, awards "can only be given on an application by the central government, state government, or a party suffering the loss or damage once the type and extent of loss or damage have been determined through an inquiry."

MRTP was therefore unable to stem the threat of cartels. International cartels were also a worry, particularly after 1991 when our economy became more globalised, but the Act lacked extraterritorial authority.

Provision under Competition Act 2002 to regulate price cartel:

For the first time, the term "global cartels" was specifically defined in the Competition Act because it recognises the shortcomings of the MRTP Act, 1969.

The Competition Act of 2002 was created with the following as its primary goal:

"An Act to provide, keeping in view of the economic development of the country, for the establishment of a Commission to prevent practices having adverse effect on competition, to promote and sustain competition in markets, to protect the interests of consumers and to ensure freedom of trade carried on by other participants in markets, in India, and for matters connected therewith or incidental thereto."

Under the Competition Act, cartels are viewed as anti-competitive practises. The board can issue a ruling against a foreign entity if it engages in any activity that has an appreciable adverse effect on competition (AAEC) in India, in addition to acting in cases of domestic cartels. The Act establishes the Director General (DG), COMPAT, and CCI as the three main enforcement agencies. CCI and its investigative wing, DG, have the authority to conduct investigations. The CCI may initiate an investigation into a cartel either suo moto, based on information or knowledge already in its possession, or upon receiving information or a referral from the government or a statutory entity. According to the Act, the Commission shall direct the DG to conduct an investigation if it appears to the Commission that there is a prima facie case of an anti-competitive agreement (cartels being one of them). The DG must do the tasks outlined in Chapter V of the Act while looking into the

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case. The commission must receive the DG investigation's report following completion. Based on this study, if the commission determines that a cartel has been formed, anybody who is expressly or implicitly a part of this agreement will face severe punishment. Section 27(proviso)'s states that:

"Provided that in case any agreement referred to in section 3 has been entered into by a cartel, the Commission may impose upon each producer, seller, distributor, trader or service provider included in that cartel, a penalty of up to three times of its profit for each year of the continuance of such agreement or ten percent. of its turnover for each year of the continuance of such agreement, whichever is higher".

As far as cartels are concern the Act provided a very stringent provision when compared to penalties provided for other anti-competitive agreement. Appeal from CCI would lie in COMPAT.

Provision under Competition Act 2002 to regulate price cartel:

The MRTP Act, 1969's problems are noted in the Competition Act, which makes it the first time that the Act itself clearly defines global cartels. The Competition Act of 2002 was created with the following stated as its primary goal: "An Act to provide, in consideration of the economic development of the country, for the establishment of a Commission to promote and sustain competition in markets, to protect the interests of consumers, and to ensure freedom of trade carried on by other participants in markets, in India, and for matters connected therewith."

Under the Competition Act, cartels are viewed as anti-competitive practices. The board can issue a ruling against a foreign entity if it engages in any activity that has an appreciable adverse effect on competition (AAEC) in India, in addition to acting in cases of domestic cartels. The Act establishes the Director General (DG), COMPAT, and CCI as the three main enforcement agencies. CCI and its investigative wing, DG, have the authority to conduct investigations. The CCI may initiate an investigation into a cartel either on its own initiative, in reliance on knowledge or information already in its possession, or in response to information received or upon receiving a referral from the government or a statutory authority. According to the Act, the Commission shall direct the DG to conduct an investigation if it appears to the Commission that there is a prima facie case of an anti-competitive agreement (cartels being one of them). The DG must do the tasks outlined in Chapter V of the Act while looking into the case. The commission must receive the DG investigation's report following completion. Based on this findings, if the commission determines that a cartel has been formed, anyone who is a part of it whether directly or implicitly will face severe punishment. Section 27(proviso)'s reads as follows: "Provided that, in the event that any agreement referred to in Section 3 has been entered into by a cartel, the Commission may impose upon each producer, seller, distributor, trader, or service provider included in such cartel, a penalty of up to three times such producer's profit for each year of the continuance of such agreement or ten percent of such producer's turnover for each year of the continuance of such agreement, When compared to the penalties established for other anti-competitive agreements, the Act provided a fairly strict provision against cartels. CCI's appeal would be heard under COMPAT.

Many experts believe that preventing cartel activity is the most important function of an opposition office. They believe that since cartels harm customers the most, finding and proving these claims should be one of the main priorities for competition authorities. As cartels are envisioned and carried out in secrecy, arresting them may be the most difficult task given to rival governments. Administrators of cartels refrain from actively collaborating with competition authorities during investigations since they are aware that their behavior is illegal. As a result, obtaining evidence to show the existence of cartel understandings involves specialized investigative tools and skills. The following list illustrates the various types of evidence that can be used to identify cartels

CCI decisions on price cartel cases:

The MRTP Commission, created by the MRTP Act of 1969, has been succeeded by CCI. To make sure that no unfair practises have been used in the market, this commission has been given greater authority and resources. According to the Supreme Court, the CCI was authorised to take notice of agreements made before May 20, 2009. According to certain sources, CCI did extraordinary work in addressing the cartel issue. According to data from the CCI up until 2018, 63% of all cases that were looked into involved cartelization. The commission has assessed fines in five cartel proceedings since April 1, 2019.

Several current instances: Case of ACC Cement: Since it began operating in 2008, the Competition Commission of India has fined 11 significant cement makers a total of Rs 6,307 crore for cartelization, which is the largest penalty the agency has ever levied.

Modi Alkali and Chemicals Limited versus DG: There has been a criticism that some of the biggest businesses in northern India have banded together to increase the cost of their goods. In 1992, the cost of chlorine gas and

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hydrochloric acid rose by 277% and 200%, respectively, during the course of six and four months. As a result, the parties came to an agreement to feign a scarcity in order to raise the price of their goods. Since the cost of power and sodium chloride as raw materials remained essentially unchanged, this would be a made-up crisis intended to manipulate the market and drive up the cost of their goods.

Flashlight Case The court, in this case, held that "there was no violation of Section 3 of the act even when the information had been exchanged between the competitors. The commission in this case noted that as there is no fixation of prices in their agreement, thus, the presumption of appreciable adverse effect on competition (AAEC) did not apply". Rajasthan Cylinders case: The Supreme Court in this case held that "despite the identical fixation of prices by the bidders and a trade association meeting, the court found out that there was no involvement of any collusive bidding. The parallel pricing fixation is the nature of the market and not the collusion". Madhya Pradesh Chemists and Distributors Federation V. Madhya Pradesh Chemists and drug association : The court, in this case, held that " any agreement which causes an adverse effect on competition but is not actually covered under section 3 of the Competition Act, 2002. However, in such concerning cases, the onus to prove the guilty side of the cartel is on Commission". Jeetender Gupta V. Competition Commission of India: In this case, the Appellate tribunal stated that "the legal machinery under the Competition Commission Act, 2020 cannot certainly be moved by a person who actually has no interest in whatsoever the subject matter of the information is."

In the matter of Rajasthan Cylinders, the Supreme Court reached the conclusion that there was no involvement of any collusive bidding, despite the fact that the bidders had fixed their pricing identically and that there had been a meeting of a trade group. The parallel pricing fixing is not the result of cooperation but rather the inherent nature of the market.

Chemists and Distributors Federation of Madhya Pradesh vs. Madhya Pradesh Chemists and Drug Association: Regarding this particular instance, the court came to the conclusion that "any arrangement which creates a detrimental effect on competition but is not genuinely included under section 3 of the Competition Act, 2002." In spite of this, the burden of proving which side of the cartel was responsible lies with the Commission in situations of such concern.

The Competition Commission of India v. Jeetender Gupta: In this particular instance, the Appellate tribunal made the following statement: "the legal machinery under the Competition Commission Act, 2020 cannot absolutely be moved by a person who truly has no interest in whatever the subject matter of the information is."

CONCLUSION:

Price cartels are an extremely risky business phenomenon. The wellbeing of the populace is put at risk when cartels are formed, although this is difficult to identify. The Competition Act of 2002 contains strict regulations that will prevent cartel formation. Data from the last ten years indicate that businesses are still participating in cartel formation. But at the same time, CCI's strict actions give us hope that the law will prevent the creation of this anti-competitive pact. enabling the market to operate freely.

Additionally, this would guarantee the buyer greater options and a better price, attaining the goal of citizen welfare set down in Part IV of the Indian Constitution.

REFERENCE

1. Cartelization is one of the horizontal agreements that shall be presumed to have appreciable adverse effect on competition under Section 3 of the Act.
2. James Chen, "Cartel", Investopedia, https://www.investopedia.com/terms/c/cartel.asp (Visited on November, 2022)
3. Competition Act, 2002, (12 OF 2003)S.2(c)
4. Union of India vs. Hindustan Development Corporation, SC 1994 AIR 988
5. Vijay Kumar, "Cartels in the Kautiliya Arthasastra", 6 Czech Economic Review 59 (2012)
6. The Sherman Act of 1890 and the Clayton Act of 1914
7. Aditya Bhatacharya and Ondrila De, Cartels and the Competition Commission, 47 EPW 14 (Sept.2012)
8. (https://cutsccier.org/pdf/Study_of_Cartel_Case_Laws_in_Select_Jurisdictions-Learnings_for_the_CCI.pdf)
9. Competition Act, 2002 (12 of 2003) S.3(3)(c)

10. Supra
11. Competition Act, 2002 (12 of 2003) S.3(3)(d)
12. The explanation to sub-section (3) of Section 3 of the Act
13. Australian Competition and Consumer Commission, Price fixing, https://www.accc.gov.au/business/anti-competitive-behaviour/cartels/price-fixing , (visited on November 5, 2022)
14. UNCTAD, Measuring the Economic Effects of Cartels in Developing Countries, https://unctad.org/Topic/Competition-and-Consumer-Protection/Research-Partnership/Platform/Economic-Effects-of-Cartels (visited on November, 5 2022)
15. OECD, Hard Core Cartels- Harm and Effective Sanction, https://www.oecd.org/competition/cartels/21552797.pdf (visited on November 5, 2022)
16. Supra
17. Udit Mishra, Explain Speaking why cartels can be even worse than monopolies, Indian Express, September 28, 2022 https://indianexpress.com/article/explained/why-cartels-can-be-even-worse-than-monopolies-7536426/
18. Craig W. Conrath, "Practical Handbook of Antimonopoly Law Enforcement for Economies in Transition or Development", Department of Justice (2003)
19. T. "Ramappa, Competition Law in India (Oxford University Press, New Delhi, 2nd edn., 2009)"
20. Constitution of India, art. 38 and art. 39
21. Notes on Competition Law SRCC https://www.srcc.edu/sites/default/files/B.com%20H_sem%20vi_Consumer%20affairs%20and%20Customer%20Care_Ms.%20Kavita%20Kamboj.pdf
22. Supra
23. Competition Act, 2002 (12 of 2003) S.33(1)(g)
24. Competition Act, 2002 (12 of 2003) S. 12B
25. Competition Act, 2002 (12 of 2003) S.1
26. Competition Act, 2002 (12 of 2003) S. 2(c)
27. https://www.cci.gov.in/sites/default/files/cci_pdf/competitionact2012.pdf
28. Competition Act, 2002 (12 of 2003)S. 3
29. Competition Act, 2002 (12 of 2003) S. 32
30. Competition Act, 2002 (12 of 2003) S. 19(1)
31. Competition Act, 2002 (12 of 2003) S. 53A
32. Competition Act, 2002 (12 of 2003) S. 2(c)
33. https://www.cci.gov.in/sites/default/files/cci_pdf/competitionact2012.pdf
34. Competition Act, 2002 (12 of 2003) S. 3
35. Competition Act, 2002 (12 of 2003) S. 32
36. Competition Act, 2002 (12 of 2003) S. 19(1)
37. Competition Act, 2002 (12 of 2003) S. 41
38. Competition Act, 2002 (12 of 2003) S. 2(l)
39. Competition Act, 2002 (12 of 2003) S. 53A
40. Excel Crop Care v Competition Commission of India (Civil Appeal 2480/2014)
41. Vivek Aggarwal, India: Cartels Comparative Guide, Mondaq, https://www.mondaq.com/india/antitrustcompetition-law/900272/cartels-comparative-guide, (visited November 5 2022)

42. Case No. 29 of 2010 (CCI)
43. 2002, CTJ 459 (MRTP)
44. Suo Motu Case 01/2017
45. Civil Appeal 3546/2014
46. Case 64/2014 40 Appeal 30/2014
47. Appeal 30/2014
48. Civil Appeal 3546/2014
49. Case 64/2014
50. Appeal 30/2014