



Growth and Evolution of ADR Mechanisms in India: An Analysis from Legal and Socio-Economic Dimensions.

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ABSTRACT

Alternative Dispute Resolution is now one of the most important tools for resolving disputes outside the court. Alternative Dispute Resolution (ADR) is a dispute redressal mechanism and alternate to the settlement of disputes outside the courtrooms. You must remember that ADR was a dispute resolution from the start! But, it has been evolving as a real pillar of the judiciary in recent time. Although it is not a new concept but its recent acceleration in past two years indicates it to be a new concept. This article assesses recent legislative and policy developments, such as the institutional arbitration movement and online dispute resolution. The study takes a socio legal view of ADR and explores its potential to resolve commercial, matrimonial and community-based disputes. The Study ends with suggestions to the India ADR framework for making it more accessible, credible and enforceable.

Key words: Alternative Dispute Resolution (ADR), Arbitration, Mediation, Justice, Legal, Socio-Economic Dimensions.

1. Introduction

India's judicial system has been burdened with a growing docket since pendency numbers are in the millions across subordinate courts, High Courts and the Supreme Court of India. This systemic congestion does not only subvert the constitutional pledge of "access to justice" in Articles 14 and 21 of the Constitution of India, but also compromises the effectiveness of rule of law by unduly delaying adjudication. [Judicial delay has long been perceived as a denial of justice in terms of an old maxim saying that justice delayed is justice denied (Cappelletti & Garth, 1978). Anecdotal evidence from sources such as Law Commission of India and National Judicial Data Grid highlights that structural inefficiency, procedural complexity, skewed judge-to-population ratio and frequent adjournments aggravate this crisis (Law Commission of India, 2014; NJDG, 2023).

In this environment, despite the doctrinal soundness and procedural codification of the more formal adjudicatory framework in laws like the Code of Civil Procedure, 1908 and the Code of Criminal Procedure, 1973, it is often beyond reach; out of bounds for a common litigant. <https://indianexpress.com/article/cities/mumbai/querulous-or-pedantic-free-legal-service-and-the-civil-litigation-battle-8591831> Both the prohibitive cost of litigation, technicalities and long timelines act as deterrents to justice delivery. This has led to a growing jurisprudential and policy-oriented sway towards Alternative Dispute Resolution (ADR) mechanisms as viable adjuncts of the conventional judiciary.

In India, ADR has several institutional design and statutory processes like arbitration, mediation, conciliation and Lok Adalat's. The Arbitration and Conciliation Act, 1996 lays



down the statutory framework for arbitration and conciliation, bringing the principles of UNCITRAL Model Law into play to effectively heralding compliance of Indian jurisprudence on arbitration with international best practices (Redfern & Hunter, 2015). The legislative recognition of mediation in our country through Section 89 of the Code of Civil Procedure, 1908, should also be mentioned here. Also, mediation becomes structured and enforceable process by the enactment of Mediation Act, 2023 by filling gap and which is another achievement for India where this particular method become a form of institutionalize within country.

Lok Adalat's are an indigenous ADR mechanism under the Legal Services Authorities Act, 1987 anchored in Gandhian Precepts of Conciliation and participatory justice. These forums are intended to be held by the listener in seeking compromise and settling, while ensuring speedy disposal of cases, especially those concerning public utility services and compoundable offences. The awards of Lok Adalat's are treated as the decrees of civil courts, which are considered to be final and binding on the parties with no provision for appeal thus ensuring finality and minimizing litigation burdens (Jain, 2016).

Landmark judgements like *Afcons Infrastructure Ltd. v. Cherian Varkey Construction Co. (P) Ltd.* (2010) by the Supreme Court of India emphasised on the necessity and usage of ADR, as courts are mandated to encourage parties to settle disputes using alternative measures so that judgment backlog could be reduced and settled amicably amongst themselves. In similar vein, in *Salem Advocate Bar Association v. Union of India* (2005), the Court stressed how mere insertion of Section 89 CPC would not suffice but its operationalisation is necessary and thus on institutionalising ADR within the precincts of judiciary.

Jurisprudentially, ADR mechanisms are a manifestation of party autonomy, procedural adaptability, confidentiality and economic efficiency. Whereas adversarial litigation is premised on rights-based claims litigated antagonistically, ADR moves towards a consensual and interests-based model that aims to retain the parties' relationships through restorative justice. Furthermore, ADR not only reduces the burden on already loaded courts but also makes them work more efficiently and helps in timely delivery of justice that is essential to make constitutional goals enforceable in India witnessed a journey: from nothing to everything and it has become an inevitable process of dispute resolution as for the parties where settlements ease out smartly rather than progressing through traditional forms of litigation. Though concerns over enforceability, awareness and institutional capacity remain, ADR undoubtedly forms a crucial part of the contemporary legal architecture in India.

2. Historical background

The origins of Alternative Dispute Resolution (ADR) date back to ancient times when communities used their own means to resolve disputes. In those primordial societies, conflicts were frequently resolved within the tribe or community, with elders or revered individuals intervening to mediate through informal dialogue and consensus-building. These methods — though never formalized — helped preserve social harmony. Consider ancient Greece and Rome, where we find early examples of arbitration. Citizens often turned to trusted individuals who would assist them with disputes, particularly with respect to business dealings. Similarly,



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in Islamic law, also used methods such as Tahkim from Tahaqaqa in order to solve conflicts with each other about trade and property. In such preliminary modes, ADR was not only a mechanism for conflict resolution; it had also become a mechanism of social integration that promoted options to avoid violence and maintained order in society. India's flourishing scholarship on judicial delays and Alternative Dispute Resolution (ADR) resonates in its continued grappling with the functional failings of the mainstream legal system and the gradual rise of consensual dispute settlement mechanism to mitigate these limitations. The chronic backlog of cases before the Supreme Court of India and subordinate courts has received considerable scrutiny in legal and socio-economic literature, with scholarly diagnoses attributing such delays to a combination of institutional bottleneck, procedural rigidity, and inadequate judicial infrastructure. It means that it is not enough for a legal system to provide remedies as such, but rather, the access must also work in practice (Cappelletti and Garth 1978). In the Indian context, this observation holds profound seriousness, as pointed out by the Law Commission of India (2014), which understands that judicial backlog is a known bottleneck for timely justice delivery and on measures must be taken to introduce systemic amendments including incorporation of ADR mechanisms.

Literature also highlights that the traditional litigation model, which is based on procedural laws, does not change to suit a heterogeneous and populous society. As Jain (2016) reminds us, the adversary system of litigation as well as the increasingly expensive and lengthy nature of lawsuits have estranged many factions from access to justice. The National Judicial Data Grid (2023) empirically reinforces this critique, compelling the significance of alternative frameworks for dispute resolution in recognition of outstanding cases in India. For tackling these challenges, ADR emerged as the most practical and effective mechanism providing flexible, cost-effective and quick results for parties.

The evolving landscape of Alternative Dispute Resolution (ADR) in India has led to a focus on arbitration as one of its main pillars, attracting significant academic interest owing to its legislative endorsement through the Arbitration and Conciliation Act, 1996. The Act is the first major convergence of Indian arbitration law with global standards, incorporating aspects of the UNCITRAL Model Law and promoting party autonomy (Redfern & Hunter 2015) In the years since then, further amendments to the Act have enhanced and solidified the arbitration framework by streamlining procedures and restricting judicial intervention. While some modern scholars point towards delay and judicial interference in arbitral proceedings as a continuing concern which compromise the credibility of Indian arbitration (Srikrishna, 2017), others suggest that arbitration's full potential remains unrealized.

Another essential type of ADR, mediation has been a prominent topic in modern legal dialogue as a means to facilitate amicable settlements and maintain relationships. They have also interpreted Section 89 of the Code of Civil Procedure, 1908, as a legislative motto to promote mediation which embedded in it powers empowering courts to refer disputes for out-of-the-court resolution. This institutionalization has been further solidified by the enactment of Mediation Act, 2023 which provides a comprehensive legal framework for the conduct and



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enforcement of mediation. That makes mediation's focus on confidentiality, voluntariness and mutual consent make it different than the oppositional nature of litigation and a better approach to resolving commercial, family and community disputes (Menkel-Meadow, 2016). However, the literature identifies still challenges related to awareness, trained mediators and institutional capacity.

Indian Lok Adalat's [1] are established under the Legal Services Authorities Act, 1987 and has been subjected to significant examination as an Indian model of ADR. According to Jain (2016) and other scholars, Lok Adalat's incorporate tenets of participatory justice and social equity by offering an accessible mechanism for dispute resolution for especially marginalized segments of society. Lok Adalat awards are binding in nature and do not provide for any appellate procedure, which ensures finality and expediency. Nonetheless, some have criticized the voluntariness of settlements, and cautioned against instances where coercion could occur in certain contexts, advocating for protections that preserve procedural fairness.

The judicial pronouncements, also play a crucial role in deciding the narrative of ADR in India. Notably, in *Afcons Infrastructure Ltd. v. Cherian Varkey Construction Co. (P) Ltd.*, (2010) the judiciary laid down guidelines for reference of cases to alternative dispute resolution mechanisms with emphasis on their significance in alleviating court congestion. Likewise, in *Salem Advocate Bar Association v. Union of India* (2005), the Court highlighted the need for successful execution of Section 89 CPC to foster alternative dispute resolution. Such rulings demonstrate a judicial recognition of the role of ADR as part and parcel of the justice delivery system, rather than being merely an alternative.

The literature situates ADR within wider frameworks of restorative justice and participatory governance from a theoretical perspective. According to Menkel-Meadow (2016), ADR processes promote negotiation based on interests of the parties involved rather than legal rights, which alleviates the shortcomings of adjudication through legal rights. The relevance of this approach vis-a-vis the socio-legal context in India is obvious — disputes here not only trigger conflict on an interpersonal level but also have implications at more micro-community levels. Additionally, ADR is viewed as promoting the democratization of justice because it enables parties to assume an active role in resolving the conflict.

In spite of advantages few hurdles are also identified by the literature in regard to implementation of ADR in India. These challenges include ignorance of litigants, reluctance of the legal professionals who are ingrained in conventional litigation process, and establishment of infrastructure for effective ADR institutions. Moreover, issues of enforceability have arisen as another area of concern for many legal systems, requiring ongoing legal and institutional reforms to better promote effective mediation and arbitration in conflict resolution. South-African arbitration scholar Srikrishna (2017) has argued that we need to emphasize a balanced approach, one which strengthens ADR mechanisms as well but does not compromise on accountability and its conformity with principles of natural justice.

There is a lot of consensus in the literature regarding the increased need and utility for ADR to solve problem endemic in the Indian judiciary. Although the formal legal structure is vital for resolving complicated and landmark cases, ADR provides an alternative that strengthens access



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to justice, minimizes wait times, and encourages cordial settlements. The changing legal architecture with legislative enactments and judicial pronouncements denotes the progressive institutionalization of ADR in India. But appropriate activities to practice and inculcate system thinking are still not come up to scale, inclusive public awareness is far out of the entire society and great institutional capacities are always in need.

The Evolution of ADR as We Know It (19th Century)

The concept of Alternative Dispute Resolution (ADR) was first solidified during the 19th century with increase in industrialization and boom in International trade. The number of disputes also rose, especially in business, trade and shipping — factors that created a great demand for faster and more effective methods to settle differences. Arbitration thus developed as an efficient, effective and common means of settling commercial disputes. International commercial arbitration marked an important turning point for ADR, providing a systematic method for resolving disputes between companies of various nationalities. One of the most important laws was the United States Arbitration Act of 1925, commonly known as the Federal Arbitration Act helped lay down a legal framework for arbitration agreements and awards in the USA. As the 19th century turned into the 20th, arbitration became much more formalized via bodies like American Arbitration Association (AAA) and International Chamber of Commerce (ICC). Such structures, rules and procedures were established by these institutions which helped to improve the credibility and acknowledgment of arbitration nationally and internationally.

The Stage of Post-War Expansion of ADR (1940s-1970s)

Alternative Dispute Resolution ADR also emerged as a concern in the post World War II world. With the rising complexity of global commerce, there was added necessity for swift resolution of disputes making ADR practices mainstream across the globe. Arbitration developed over this period along with more formal structures, including a number of international arbitration organizations such as the International Centre for Settlement of Investment Disputes (ICSID) and UNCITRAL (United Nations Commission on International Trade Law). At the same time, there was an increased need for remedies to help with industrial disputes, labour relations issues and conflicts within families which led to the emergence of mediation and conciliation techniques. Mediation where a neutral third party facilitating mutual voluntary agreement between the disputing parties, emerged as a more collaborative and less contentious approach than arbitration or litigation. Mediation emerged as a dominant approach in the 1960s and 1970s, particularly in connection with labour disputes and family law cases, where interest extended beyond simple conflict resolution to maintaining productive relationships. This change marked ADR's transformation into a mechanism for preventing disputes and managing relationships as opposed to only recourse for dispute resolution after it has reached an escalation point.

The 1980s and 1990s: The Rise of ADR

The 1980s and 1990s saw a dramatic change with the rise of Alternative Dispute Resolution (ADR), entering into more mainstream legal systems. The merits of ADR were recognized, and the need for court-annexed ADR programs were established. These programs encouraged —



and at times mandated — parties to consider resolution through ADR prior to engaging in full-blown litigation. Particularly significant was the passing of the Civil Justice Reform Act in 1990 in the United States, which set a new standard for how Alternative Dispute Resolution (ADR) could function as part of civil justice system and offer alternative mechanisms alongside traditional court trial (H. Beadnell, K. E. Kelly); By the mid-1990s, many states had passed laws requiring mediation or arbitration for certain types of disputes, particularly in family law and commercial cases. It is this movement toward court-mandated ADR that helped in alleviating the burden of courts and providing parties with a far superior method for a quick and non-adversarial solution to their disputes. It was also during this period that negotiation emerged as a more formalized aspect of the ADR field. This informal but effective method of resolving disputes through direct discussions between parties was recognized. It took hold especially in corporate law, where companies preferred the swiftness and secrecy of direct negotiation over the long and public process of litigation. In addition, with the increasing globalization of commerce and the internet, Online Dispute Resolution (ODR) was born. In 2020, an array of ODR platforms surfaced that allowed individuals and businesses to resolve their disputes without meetings in person, allowing for an efficient process to tackle disagreements such as e-commerce transactions, intellectual property matters and consumer protection.

3. ADR institutionalization and global Reach.

By the early 2000s, Alternative Dispute Resolution(ADR) was a well-established part of modern legal systems not only in the United States but throughout the world. Many countries have embedded ADR frameworks in their national laws, often requiring parties to be aware of, and attempt these options before going to court. In several European countries, for instance, mandatory mediation is the routine first step in civil cases, Australia also embraces ADR as an integral feature of the family law landscape.

4. International ADR: a global phenomenon

International arbitration has grown increasingly dominant as the preferred means of resolving cross-border commercial and investment disputes. One of the best-known forms of international ADR is investor-state arbitration, in which disputes between foreign investors and states involving a partner are settled by means of arbitration. The ICSID Convention, created in 1966, provided the foundation for this type of ADR and it has since developed into an indispensable tool under international law to protect investments. Moreover, following the development of international ADR institutions such as ICC International Court of Arbitration, London Court of International Arbitration (LCIA) and Singapore International Arbitration Centre (SIAC), ADR has become more available with higher degree of trust around the world. They have created standardized procedures and rules that the parties can rely on, enabling ADR to remain a fair and predictable means of dispute resolution.

5. Legal and Socio-Economic Dimensions

The theoretical founding of Alternative Dispute Resolution (ADR) in the Indian context cannot be divorced from the wider discussion on access to justice, legal pluralism and socio-economic efficiency. Thus, the evolution of ADR mechanisms marks not just a procedural reform but a



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paradigm shift in its philosophical underpinnings. The Indian legal system, which is paradigmatically grounded in adversarial litigation and structured through institutions like the Supreme Court of India, has historically championed formal adjudication, compliance with procedures in a strict sense and judicial determination of rights. But the growing volume of cases and the inherent inefficiencies in such a system have led to warrant alternative systems that come into closer alignment with the needs of an increasingly diverse and populous society. Access to justice is a theoretical framework, which acts as the theoretical base for Alternative Dispute Resolution (ADR). As such, access to justice cannot be divorced from its many legal and economic implications (Cappelletti & Garth, 1978). ADR processes present for the Indian landscape, where socio-economic differences make considerable difference to accessibility of individuals in the legal system, an accessible and egalitarian forum to resolve disputes. ADR focuses on cost-cutting, simplifying and expediting the procedures to affirm the constitutional command of equality before law and equal protection of laws.

A similar theory is the idea of legal pluralism, which describes the existence of more than one system of law and conflict resolution in a society. This pluralistic tradition is reflected in India's historical dependence on community-based institutions like panchayats. For example, the statute-based recognition of ADR through legislation such as the Legal Services Authorities Act, 1987 was a form of reuniting these homegrown modalities into the otherwise formal legal apparatus. Lok Adalat's set up under this Act missive the concept of participatory justice and social concord, thus serving as a bridge between statutory law and societal norms. Leaders of the economic analysis of law movement, also use ADR to help justify their theoretical schemes. Through this lens, legal processes are assessed based on their efficiency, cost-effectiveness, and ability to allocate resources in the most effective manner. Traditional litigation can be characterized by high transaction costs, lengthy delays, uncertain outcomes, and other inefficiencies that may hinder economic activity and discourage investment. Conversely, alternative dispute resolution (ADR) mechanisms such as arbitration—which are governed by the Arbitration and Conciliation Act of 1996—ensure a simple and predictable process that is particularly well-suited for disputes relating to commercial transactions. Arbitration improves economic efficiency and provides a favourable business environment by minimizing delays, ensuring that awards are enforceable.

Restorative justice: This theoretical approach highlights the significance of repair, conversation, and relationship restoration over punitive laying down of adjudication. In contrast to adversarial litigation, which often escalates conflict, ADR processes such as mediation and conciliation promote mutual understanding and collaborative problem solving. However, the Mediation Act, 2023 is a progressive step towards further entrenching restorative principles into the Indian legal system. Because mediation upholds principles of voluntariness, confidentiality and party autonomy, it is ideally suited to the restorative justice framework and evidence suggests it is one of the most effective means for resolving family, community and commercial disputes. Judicial activism has also propelled the development of adjudication-based jurisprudence in India concerning ADR. The judiciary has from time to time promoted the use of ADR to reduce pendency and improve access to justice. The landmark judgments



including Afcons Infrastructure Ltd. v. Cherian Varkey Construction Co. (P) Ltd(2010), Salem Advocate Bar Association v Union of India (2005) made it mandate for the courts to promote ADR and define the structure within which mediation will take place. These rulings highlight the recognition of the judiciary of ADR as an integral part of justice delivery system.

ADR has a key socio-economic role in democratizing access to justice. A bureaucratic legal system, with its complexity of procedures and costs often gets inaccessible for large poor banishing middle classes. By contrast, ADR mechanisms are – for the most part – accessible, informal and user-friendly: They allow wider participation. Lok Adalat's and mediation centre's, in particular, have demonstrated success in addressing the needs of vulnerable sections of society and promoting social justice and inclusion. ADR enhances economic development through the same function of helping to do business efficiently by resolving disputes, particularly for the private sector business. A welter of ADR framework boosts investors confidence, mitigates litigation risks and renders an atmosphere of better ease of doing business. The rising alignment of India's arbitration laws to global standards only adds to its appeal as a prospective investment and trade destination in an increasingly internationalized economy.

But the theoretical promise of ADR does not come without obstacles. Problems of awareness, institutional infrastructure and resistance from the legal professions are still hindering its widespread adoption. Also mitigations on enforcement aspect of mediated settlements and, award quality of the arbitral awards require continuous reform and capacity-building initiatives. Given these challenges, a balanced approach that recognizes the importance of integrating ADR with the formal judicial system alongside adherence to principles of fairness and justice is necessary. Even so, ultimately, if we dissect the theoretical analysis of ADR in India it would need to bind down space that allowed room for the legal, economic and social perspectives into a multidimensional framework. ADR is not just a substitute to litigation it is complimentary mechanism which facilitate the justice delivery system to be more efficient, accessible and inclusive. It will need legislative backing and accompaniment from the judiciary along with popular acceptance for its survival, so that justice remains a way of life and not confined to books or ideas.

6. Current trends in ADR

Now, ADR continues to evolve with the changing needs of society and faster changes within technology. These are some important trends to watch:

- **Technology Integration** — Online Dispute Resolution (ODR) is fast becoming the preferred way for parties to resolve conflicts as it allows them to resolve in real time regardless of location. This is especially relevant for consumer disputes and e-commerce transactions.
- **Corporate Use of ADR:** Large organizations have emerged in recent years and many companies are now forming their own outside ADR departments to handle internal disputes or issues with suppliers and customers. These teams are employing various methods of ADR to settle their disputes without destroying business relationships.



- Increased use of alternate dispute resolution (ADR) in family law and employment: ADR, especially mediation and conciliation, has become more common to resolve disputes related to divorce and child custody matters as well as workplace-related issues.
- Sustainable and Environmental Disputes: With increased focus on environmental issues, mediation techniques are being used in the resolution of disputes between companies and governments as well as conservationist organizations concerning natural resource management or climate change.

7. Conclusion

From its informal, community-based roots, ADR has grown into serious business. Well-established and professional dispute resolution mechanism in a range of areas. Its evolution from arbitration to mediation, and its adoption of tech-savvy solutions only demonstrate its flexibility and global reach. Today, ADR is part of the legal landscape in countries across the world and offers an agile, efficient and cost-effective solution for resolving disputes and maintaining relationships. By further using technology and types of legal structures, ADR can be an even more important mechanism for the future. Herein is a compilation of recommendations through which Alternative Dispute Resolution (ADR) in India can be strengthened and the existing legal, structural, and awareness-related gaps can be addressed. Legal and institutions reforms by introducing the institutional arbitration and mediation centres. Capacity building and training by introducing systematic accreditation and licensing of arbitrators, mediators. Encouraging businesses on tech-enabled platform to resolve low-value civil, consumer and e-commerce disputes. Enacting public-private partnerships to build secure, scalable ODR systems Enhancing public awareness and access. Initiating public education campaigns particularly at the district and village levels to educate citizens about ADR possibilities Ensuring that free legal aid includes access to such ADR services, particularly for disadvantaged groups.

Promoting the selection of ADR before the courts, they are in turn used in cases such as those involving land contracts. Simply put, enhancing ADR in India is hardly a procedural reform- it is also argumentation towards justice system that is more accessible, affordable and participatory in nature. By institutionalising ADR, investing in adequately trained professionals, using technology and designing a trust-based framework for the common man in dealing with legal matters, India may help mitigate the burden of litigation while ensuring that every citizen's right to timely justice is preserved. This is a negotiation that engaging in mediation will put forward to all parties involved to fully utilise the power of dispute resolution through ADR.



References

1. Afcons Infrastructure Ltd. v. Cherian Varkey Construction Co. (P) Ltd., (2010) 8 SCC 24.
2. Baxi, U. (1982). *The Crisis of the Indian Legal System*. New Delhi: Vikas Publishing.
3. Cappelletti, M., & Garth, B. (1978). *Access to Justice: The Worldwide Movement to Make Rights Effective*.
4. Chandrachud, D. Y. (2020). *Justice, Judiciary and Democracy in India*.
5. Galanter, M. (1984). *Competing Equalities: Law and the Backward Classes in India*.
6. Jain, M. P. (2016). *Indian Legal System*.
7. Law Commission of India. (2014). Report No. 245: *Arrears and Backlog: Creating Additional Judicial Capacity*.
8. Menkel-Meadow, C. (2016). *Dispute Resolution: Beyond the Adversarial Model*.
9. National Judicial Data Grid. (2023). *Pendency of Cases Report*.
10. Nolan-Haley, J. (2013). *Alternative Dispute Resolution in a Nutshell*.
11. Owen, M. (2019). *The Role of Mediation in Modern Legal Systems*.
12. Rao, P. C. (2004). *Alternative Dispute Resolution: What it is and How it Works*.
13. Redfern, A., & Hunter, M. (2015). *Law and Practice of International Commercial Arbitration*.
14. Salem Advocate Bar Association v. Union of India, (2005) 6 SCC 344.
15. Sander, F. E. A. (1976). *Varieties of Dispute Processing*. Harvard Law Review.
16. Srikrishna, B. N. (2017). *Report of the High-Level Committee to Review the Institutionalisation of Arbitration Mechanism in India*.
17. State of Punjab v. Jalour Singh, (2008) 2 SCC 660.
18. Arbitration and Conciliation Act, 1996.
19. Legal Services Authorities Act, 1987.
20. Mediation Act, 2023.