WHERE DO SYRIAN CHRISTIAN WOMEN STAND IN THE INTERPLAY OF CUSTOM, KINSHIP AND THE LAW?

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Law and society have a symbiotic relationship. Law seems to be omnipresent, and an integral pillar of civilisation, whether it is religion or a nation-state; law is the axis and foundation. To answer the question, which is more influential- the present societal norms or law; is a Herculean task as definitions no longer remain within lines and transcend customary understanding. The juxtaposition of affect and effect often comes about when law aims to change established norms. The *Mary Roy* judgement brought to court the age-old position of the Syrian Christian daughter in her father's estate. The Syrian Christian community of Kerala, which imbibed Hindu traditions and kept its Christian faith, has made itself unique and distinct from other communities. Dowry has always been viewed as the norm, with the same entered in the Church registry at the beginning of the union; it is considered the daughter's share and after her husband's family receives the same, she no longer has any right in her father's property. The *Mary Roy* judgement pitted Syrian Christian norms against the understanding of the Indian Succession Act in an attempt to expand the boundaries of the daughter's rights. The capability of law to carry society to what is considered to be forward was tested in the events that followed the *Mary Roy* judgement. Equal rights are not just a matter of law and literacy as the discourse in society pointed out. The judgement shone light on the influence of law in the presence of a strong allegiance to prevailing custom and ideas of kinship.

A dowered daughter has no right in her father's estate, has been the tradition among the Syrian Christians of Kerala since time immemorial and an unassailable *Mary Roy* questioned the same. The judgement in itself is not the reason why it is important. It brought to light the reality of Syrian Christian women and kinship. Kerala being irreplaceable on the world map for its spices could explain why Christianity reached her shores not once but twice, the Syrian rite followed by the Latin rite much later. However, with the coming of the Portuguese and the Latin rite, the community was fragmented and reformed[i]. The community can be best described as

Christian by faith but Hindu by culture, imbibing various practices of the Hindu faith whose influence can be seen in the sacrament of marriage and even in the architecture of the Church.

The Syrian Christians, or Nasrani or Nasrani Mappilas believe to have received their faith from St Thomas, an apostle of Christ in A.D. 52. Some believe that he converted upper-caste Hindu families while others refute the same because it is only fabricated to gain respect and recognition in a society otherwise ingrained in caste[ii]. Ancient maritime traders had settled in Kerala to trade in spices and now there seems to be a consensus that they were the early converts with genealogy tests of Syrian Christians hinting at the same[iii]. Up until the 1960s the holy mass used to be conducted in Syriac, a dialect of Aramaic, the language of the apostle. Today it is held in Malayalam, however, Syriac continues to be prevalent in different denominations to varying extends[iv].

The Indian Christians of the princely State of Travancore now forming part of the State of Kerala were governed in matters of succession and inheritance by the Travancore Christian Succession Act 1916. Under the act, they included the following groups; Syrian Christians, Latin Christians of North Travancore (Kottayam), South Travancore Christians that is to say converts and descendants of converts of various castes that follow the Mitakshara law, Latin Christians of Central Travancore, Arasars, Bharathars, Caste Christians, Protestant Christians of Central Travancore and Marumakkathyam Christians[v].

Judges often showed their displeasure as there wasn't a statutory law to decide matters for these pupils and a Christian Committee was set up to examine the customs, usages and practices on succession and inheritance of the Christians in Travancore. It did not accept the plea for the adoption of the Indian Succession Act 1865, which was the predecessor to the 1925 Act under which the sons and daughters of a deceased person were entitled to an equal share of his property. As Syrian Christians and South Travancore Christians were agricultural communities, most owning only smallholdings, and if equal shares are given away with it will aggravate the fragmentation of those into smaller holdings and if the daughter's matrimonial home is away from the property it will be difficult to cultivate. Further, the Indian Succession Act 1865 was not suitable for Christians of Travancore as they more mostly joint families[vi].

Rules regarding intestate succession for the women were laid down in sections 16, 17, 21, 22, 24, 28 and 29 of the Act according to which a widow was only entitled to life interest which becomes terminable at death or remarriage and that the daughter will either be entitled to a

quarter of the value of the share or Rs 5,000/- whichever is less. This is not devoid of contingency and can only be claimed if *stridhanam* was not provided or promised to her by the intestate[vii].

Although in essence *stridhanam* is dowry, the community uses defects in the Dowry Prohibition law like its uninformed definition, which allows for the transfer of gifts and thereby allow for the continuation of the practice of dowry even if it does not go by the term of *stridhanam*. Currently, *orapeeru* is a ritual for announcing the union of the couple, which will be formed, with the sacrament of marriage to family and friends but before it also a ritual for the witnessing of the dowry the same would be recorded in the church registry as proof of the transaction[viii]. This has become an institutionalised practice over the years with a portion of the *stridhanam* given to the church as *passaram* or tithe[ix]. This is not a Biblical commandment but rather an order from the church[x]. Children who joined the convent or the seminary were given also given a share; the girl share would be given to the convent, as they will handle all her expenses. The son's share would be given to either him or his seminary[xi].

As the public announcement of dowry cannot be made after the coming of the Dowry Prohibition Act dowry was transferred in private[xii], this left women defenceless and at the mercy of the patriarch. She "cannot legally claim what is transmitted on their behalf illegally"[xiii]. Before dowry was a safeguard for women as if the marriage ended in a divorce, or upon the death of her husband the dowry was to be returned to her[xiv]. If she died without bearing a child the dowry will be returned to her family, these rules have been undisputed in the community for generations so much that not returning a deceased woman's dowry speaks ill of that family and the community, as a whole will ostracize such a person. Even decades after such an incident the community still remembers the man who killed himself because of the debt he hoped to pay off with the dowry of his deceased sister he was supposed to receive from his sister's in-laws[xv].

Background of the *Mary Roy v. State of Kerala*[xvi] a landmark judgement for Syrian Christian women is as follows; the petitioner had married outside her community- Bengali Brahmin and didn't receive any *stridhanam*. She separated from her husband and settled in her father's cottage in Ooty, along with her kids. After her father died intestate, her brother without any sympathy for her circumstances asked her to leave the cottage in furtherance of his business interests[xvii]. She returned to Kerala and started a school in Kottayam which is now considered

to be one of the finest schools in Kerala but the Kerala High Court decided in line with the ratio in the case of *Kurian Augusty vs Devassy Alley*[xviii], where it was held that the Indian Succession Act can't be applied and should not interfere with the customary laws of Syrian Christians which have been codified in the Act[xix].

Defying societal norms, she continued her claim over her father's property organising opposition with women's groups however they were not successful in gaining support within the community and the law ministry insisted on the same because after all, it was a personal law[xx]. She appealed to Supreme Court along with two unmarried Syrian Christian women Aleykutty and Mariakutty. The story of the other two litigants was on similar lines, Aleykutty was a 60-year-old retired nurse, eldest among her siblings out of which- two sisters were nuns, one sister had polio, one sister and her son were deserted by her husband, and one brother- Pappachan. Their mother Aley Chacko was entitled to the dowry she brought and his married sister was promised dowry. His mother and siblings had rights and interests according to the customary law but he ignored the same and evicted them from the ancestral property. Mariakutty was a 65-year-old retired teacher who continued to live in her ancestral home contributing to the family income until 1982 when her brother attempted to bribe her with Rs 5,000 (the amount an unmarried woman was entitled to under the Travancore Act) and evict her from the property[xxi].

They challenged the discriminatory sections in a writ petition under Article 32 as a violation of Article 14 of the Indian Constitution and the applicability of the act since the coming of the Part B States (Laws) Act 1951[xxii]. The applicability of this Act was first challenged in the case of *Kurian Augusty vs Devassy Alley* the Travancore-Cochin High court decided that it is a part of the Indian Succession Act and did not come under part V of the same, nor was it intended to encroach upon the already existing laws of the communities. Therefore, it was still applicable. However, in the judgement given by Justice M.M. Ismail of the Madras High Court in *Solomon And Ors. vs Muthiah And Ors.*, disagreed and stated,

> *"In other words, so long as any other law for the time being in force has not provided for the exclusion of the applicability of Part V, Part V will apply. If the intention of the Legislature was to save the custom or any other law relating to intestacy, the language of Section 29 (2) would have been entirely different"*[xxiii].

Where section 29 of the Indian Succession Act reads as follows,

> *Application of part. —*
>
> *(1) This Part shall not apply to any intestacy occurring before the first day of January, 1866, or to the property of any Hindu, Muhammadan, Buddhist, Sikh or Jaina.*
>
> *(2) Save as provided in sub-section (1) or by any other law for the time being in force, the provisions of this Part shall constitute the law of 1[India] in all cases of intestacy*[xxiv].

Again, the question was examined in *D. Chelliah Nadar And Anr. vs G. Lalitha Bai And Anr.* A decade before the Supreme Court decision in the infamous *Mary Roy* judgement. It was held that,

> "*The Indian Succession Act by itself excludes its operation to the Indian Christians in the Travancore State. There could, therefore, be no repeal of any enactment not covered by the Indian Succession Act. In this view we are unable to accept the conclusion arrived by the learned Judge, that being a corresponding law, Travancore Christian Succession Act stood repealed"*[xxv].

Then Chief Justice P.N Bhagawati heard the matter and without indulging in the constitutionality of the sections. Referring to Section 6 of the Part B States (Laws) Act, 1951 which reads as follows,

> "*If immediately before the appointed day, there is in force in any Part B State any law corresponding to any of the Acts or Ordinances now extended to that State, that law shall, save as otherwise expressly provided in this Act stand repealed*[xxvi]"

Through section 3 of part States (Laws) Act, 1925 the Indian Succession Act, 1925 was extended to the state of Travancore-Cochin, the Travancore Christian Succession Act, 1092 stood unambiguously repealed by through Section 6 of the latter and Chapter II of part V of the Indian Succession Act shall apply for intestate succession for Indian Christians residing in the former State of Travancore. The Cochin Christian Inheritance Act 1921 for the then State of Cochin which was is in *pari materia* with the Travancore Act, was also repealed by this decision.[xxvii].

The retrospective effect of the judgement was implied, as it stood repealed from 1951 when the Indian Succession Act was extended and it became the most controversial aspect of the judgement. Men in the household had taken possession of the entire property and given it as

collateral or they had been sold off. Financial institutions now required no-objection certificates from female members. Joint Christian Action Council's Annie Thayyil argued that they would not be able to recover advances worth Rs. 500 crore due to the judgement's retrospective application[xxviii]. The extent of litigants, which was to come about, was exaggerated, and the men tried to lobby to do away with its retrospective effect. The state government for obvious political reasons did not want to distress one of the most influential communities; a Bill was drafted to invalidate the retrospective effect, the Travancore Cochin Christian Succession (Revival and Validation) Bill of 1995[xxix].

Concerns were raised regarding the position of the Christian debtors. The state government was headed by K. Karunakaran who was backed by a powerful domination of the Indian National Congress within which a large proportion were Syrian Christian men, with the importance one gives to their family name there is also this sentiment that the ancestral property should continue to stay in the family. An exception to this general rule is when there are no sons in the family and the youngest sister will continue to stay with her parents and her husband will move to her ancestral home this is called *dathunikukha*, the property would then be under the husband's family name[xxx].

The Revival Bill was not passed into an Act; agitated women's groups could be a possible factor. These groups also included nuns who are considered to be married to the church and to have denounced material wealth, a strong lobby came about and sent their memorandum to the then President, who assured that he will not support the revival bill[xxxi]. As it is the leaders of the community were divided over the issue. "Any dilution of the law of equality is unjustified. The Christian men are going back on the rights of women. They should be ashamed that they themselves did not take up to the issue after 1952" was M.M. Thomas's remarks; he was the former governor of Nagaland and well-known theologian raised in the Mar Thoma Syrian church[xxxii]. The then Syrian Catholic Archbishop of Trivandrum Mar Gregorious supported the judgement and stated: "The time and conditions when the law was made have changed. I am happy that women have been given equal rights, and the church will not stand in the way"[xxxiii] The Synod (an assembly) of Syrian Christian Churches started to aid families in writing wills and buying property in the name of their sons so that the family wealth does not go outside the family[xxxiv].

Unequal division of the estate among the males and females was condemned in Decree XX of the Synod (an assembly) in 1599, this was however ignored[xxxv]. Even though Christian puritanism bathed in Hindu Orthodoxy, a similar family structure was not introduced. Matrilineal groups were present among the Hindu and a few Muslim groups however among Christians an aggressive patrilineal and patrilocal system prevailed, interestingly the latter community did exceptionally well in terms of education and Syrian Christian women went on to become the first women to head a department in India (Travancore Medical Department in the 1920s)[xxxvi] and in various other fields, Mahatma Gandhi hailed the heroic acts of Accamma Cherian – an exemplary woman who inspired many in Travancore during India's freedom struggle. Yet when it came to their share in the property, they conceded with the existing patriarchal stand.

Women who decided to get their share of the property were very few. When Mariakutty sat for a meeting with her brothers in the presence of a retired judge to resolve her matter and to get her dividend of the property she was lectured by the judge and it was patriarchal in every sense asking her to sacrifice some property for her brothers[xxxvii], as women have to bear the burden of higher moral obligations. However, she did not give in to the same and the judge remarked, "some women are stronger than men"[xxxviii].

In conversation with Thushara James[xxxix] whose father is a Knanaya Catholic and mother is a Roman Syrian Catholic and brought up in a very close-knit Knanaya family setting in Trivandrum and the heart of Syrian Christendom- Kottayam, when asked why women haven't asked for partition? Her answer could be captured in two crucial words – "domestic peace". The Bible which is an extremely patriarchal text asks a wife to leave her kin and join her husband and become one with his family and under such circumstances, it is impossible to imagine the girl child getting an equal share. The judgement was decided based on its technical aspects but not on the ground of whether it was unconstitutional as to whether it discriminates against women. Interestingly the judgement did not take into account the family structure and kinship in the community, which is extremely close-knit and to be partitioned with every generation is against the sentiments of the families even women. She agrees that the judgement was ground-breaking as far as gender inequality and the 1980s backdrop is concerned. However, if such a judgement were to come out today it would only be seen as one arising out of a need and not as a luxury as it was seen before.

The common link between Mrs Roy, Mariakutty and Aleykutty was the ruptured kinship among them. The women they inspired also faced a similar experience[xl]. Accounts of two Syrian Christian women described in Amali Philip's article clearly shows the two aspects there is to kinship and property. Leelamma was asked to transfer a share of the family property she received from her father for development prospects, initially she did not agree but eventually agreed. She felt that there was nothing to gain from a ruptured family. A young widow returned her share of the family property to her siblings since she already received a delayed dowry in cash because she was confident that her siblings would continue to support her in the absence of her husband and father. Even women who were upset with the practice of dowry found themselves in a debatable position between the interests of their natal family, its economic position and the interests of their male siblings[xli].

Women are conflicted between their duties as daughters and legal rights, resorting to the latter when there are no bonds left to save within the family. The *Mary Roy* judgement brought to light the subtle but strong patriarchal undertones in the community, which was all along hidden under the claim of high literacy among its women. The judgement, which created waves in the Syrian Christian society, has barely been taken advantage of in court. Just like how Christianity came to the shores of Kerala twice, a newfound wave of self-assurance and independence will have to strike this community once again otherwise this judgement, will always remain on paper.

BIBLIOGRAPHY

1. Amali Philips, *Stridhanam: Rethinking dowry, inheritance and women's resistance among the Syrian christians of Kerala*, 45 ANTHROPOLOGICA 245–263 (2003), https://www.jstor.org/stable/25606144 (last visited May 15, 2020).
2. Annie Thayyil, *Making Things Harder for Women*, The Indian Express, Sep. 13, 1993 (as cited in Thomas John, *Succession Law in India and Obstacles in the Road to Gender Equality: The Experience of "Mary Roy v. State of Kerala"*, 18 STUDENT BAR REVIEW 38 - 58 (2006), https://www.jstor.org/stable/44306654 (last visited May 12, 2020).
3. *D. Chelliah Nadar And Anr. vs G. Lalitha Bai And Anr.*, (1977) 1 MLJ 454
4. Indian Succession Act 1925, Acts of Parliament, 1925 (India).

5. Interview with L. Kuriakose I.R.S (retd), "Syrian Christians of Kerala" (May 20, 2020).
6. Interview with Thushara James, "What stops Syrian Christian Women" (May 16, 2020).
7. *Kurian Augusty vs Devassy Alley*, A.I.R. 1957 Travancore Cochin 1.
8. *Mrs Mary Roy Etc. Etc vs State Of Kerala & Ors*, 1986 AIR 1011.
9. Paul Zacharia, THE SURPRISINGLY EARLY HISTORY OF CHRISTIANITY IN INDIA SMITHSONIAN.COM (2016), https://www.smithsonianmag.com/travel/how-christianity-came-to-india-kerala-180958117/ (last visited May 8, 2020).
10. PT Thufail, 'Bishop Demolishes The Biggest Conversion Myth Of Kerala' (https://www.outlookindia.com/, 2020) <https://www.outlookindia.com/website/story/bishop-demolishes-the-biggest-conversion-myth-of-kerala/310974> accessed 3 May 2020.
11. Report of the Christian Committee 5 (1912) (as cited in Alice Jacob, *Equal Inheritance Rights to Indian Christian Women of Kerala*, 28 JOURNAL OF THE INDIAN LAW INSTITUTE 242 (1986), https://www.jstor.org/stable/43951007 (last visited May 7, 2020).
12. Robin Jeffrey, *Legacies of Matriliny: The Place of Women and the "Kerala Model"*, 77 PACIFIC AFFAIRS 647–664 (2004), https://www.jstor.org/stable/40023536 (last visited May 29, 2020).
13. *Solomon And Ors. vs Muthiah And Ors*, [1974] 1 Madras Law Journal 53.
14. Sreedhar Pillai, KERALA CHRISTIAN WOMAN WINS BATTLE ALLOWING HER TO CLAIM EQUAL SHARE IN ANCESTRAL PROPERTY INDIA TODAY (2014), https://www.indiatoday.in/magazine/religion/story/19860331-kerala-christian-woman-wins-battle-allowing-her-to-claim-equal-share-in-ancestral-property-800744-1986-03-31 (last visited Jun 9, 2020).
15. Surekha Yadav, WHERE DO SYRIAN CHRISTIANS COME FROM? DNA TESTING PROVIDES SOME INTERESTING ANSWERS. KOCHIPOST (2013), https://kochipost.com/2013/05/23/where-do-syrian-christians-come-from-dna-testing-provides-some-interesting-answers/ (last visited Jun 12, 2020).

16. Susan Thomas, *Church and Community Formation Among the Syrian Christians of Kerala*, 73 PROCEEDINGS OF THE INDIAN HISTORY CONGRESS 1016–1024 (2012), https://www.jstor.org/stable/44156302.
17. Susan Vellapally & Markos Vellapally, *Repeal of the Travancore Christian Succession Act, 1916 and its Aftermath*, 22 INDIA INTERNATIONAL CENTRE QUARTERLY 181 - 190, https://www.jstor.org/stable/23003945 (last visited May 20, 2020).
18. The Part B States (Laws) Act, 1951, Acts of Parliament, 1951 (India).
19. Travancore Christian Succession Act 1916, Acts of Parliament, 1916 (India).

ENDNOTES

[i] Susan Thomas, *Church and Community Formation Among the Syrian Christians of Kerala*, 73 PROCEEDINGS OF THE INDIAN HISTORY CONGRESS 1016 (2012), https://www.jstor.org/stable/44156302.

[ii] PT Thufail, 'Bishop Demolishes The Biggest Conversion Myth Of Kerala' (https://www.outlookindia.com/, 2020) <https://www.outlookindia.com/website/story/bishop-demolishes-the-biggest-conversion-myth-of-kerala/310974> accessed 3 May 2020.

[iii] Surekha Yadav, WHERE DO SYRIAN CHRISTIANS COME FROM? DNA TESTING PROVIDES SOME INTERESTING ANSWERS. KOCHIPOST (2013), https://kochipost.com/2013/05/23/where-do-syrian-christians-come-from-dna-testing-provides-some-interesting-answers/ (last visited Jun 12, 2020).

[iv] Paul Zacharia, THE SURPRISINGLY EARLY HISTORY OF CHRISTIANITY IN INDIA SMITHSONIAN.COM (2016), https://www.smithsonianmag.com/travel/how-christianity-came-to-india-kerala-180958117/ (last visited May 8, 2020).

[v] Travancore Christian Succession Act 1916, Acts of Parliament, 1916 (India).

[vi] Report of the Christian Committee 5 (1912) (as cited in Alice Jacob, *Equal Inheritance Rights to Indian Christian Women of Kerala*, 28 JOURNAL OF THE INDIAN LAW INSTITUTE 242 (1986), https://www.jstor.org/stable/43951007 (last visited May 7, 2020).

[vii] Susan Thomas, *supra* note 1.

[viii] Amali Philips, *Stridhanam: Rethinking dowry, inheritance and women's resistance among the Syrian christians of Kerala*, 45 ANTHROPOLOGICA 245, 251 (2003), https://www.jstor.org/stable/25606144 (last visited May 15, 2020).

[ix] Susan Vellapally & Markos Vellapally, *Repeal of the Travancore Christian Succession Act, 1916 and its Aftermath*, 22 INDIA INTERNATIONAL CENTRE QUARTERLY 181, 182, https://www.jstor.org/stable/23003945 (last visited May 20, 2020).

[x] Interview with L. Kuriakose I.R.S (retd), "Syrian Christians of Kerala" (May 20 2020). He was the Chief Commissioner of Income Tax, Kerala and currently a legal counsel for the Syro-Malabar Church in an ongoing Taxation dispute in the Supreme Court. He was brought up in a pious Syrian Catholic Family in Pala, Kerala.
[xi] *Id.*
[xii] Amali Philips, *supra* note 8 at 251.
[xiii] *Id.* at 252.
[xiv] *Id.* at 251.
[xv] L. Kuriakose, *supra* note 10.
[xvi] *Mrs Mary Roy Etc. Etc vs State Of Kerala & Ors*, 1986 AIR 1011.
[xvii] Susan Vellapally & Markos Vellapally, *supra* note 9 at 184.
[xviii] Amali Philips, *supra* note 8 at 253.
[xix] *Kurian Augusty vs Devassy Alley*, A.I.R. 1957 Travancore Cochin 1.
[xx] Susan Vellapally & Markos Vellapally, *supra* note 9 at 185.
[xxi] Amali Philips, *supra* note 8 at 253.
[xxii] L. Kuriakose, *supra* note 10.
[xxiii] *Solomon And Ors. vs Muthiah And Ors*, [1974] 1 Madras Law Journal 53.
[xxiv] Indian Succession Act 1925, Acts of Parliament, 1925 (India).
[xxv] *D. Chelliah Nadar And Anr. vs G. Lalitha Bai And Anr.*, (1977) 1 MLJ 454.
[xxvi] The Part B States (Laws) Act, 1951, Acts of Parliament, 1951 (India).
[xxvii] L. Kuriakose, *supra* note 10.

[xxviii] Annie Thayyil, *Making Things Harder for Women*, The Indian Express, Sep. 13, 1993 (as cited in Thomas John, *Succession Law in India and Obstacles in the Road to Gender Equality: The Experience of "Mary Roy v. State of Kerala"*, 18 STUDENT BAR REVIEW 48 (2006), https://www.jstor.org/stable/44306654 (last visited May 12, 2020).

[xxix] Susan Vellapally & Markos Vellapally, *supra* note 9 at 189.
[xxx] L. Kuriakose, *supra* note 10.
[xxxi] Susan Vellapally & Markos Vellapally, *supra* note 9 at 189.
[xxxii] *Id.* at 190.

[xxxiii] Sreedhar Pillai, KERALA CHRISTIAN WOMAN WINS BATTLE ALLOWING HER TO CLAIM EQUAL SHARE IN ANCESTRAL PROPERTY INDIA TODAY (2014), https://www.indiatoday.in/magazine/religion/story/19860331-kerala-christian-woman-wins-battle-allowing-her-to-claim-equal-share-in-ancestral-property-800744-1986-03-31 (last visited Jun 9, 2020).

[xxxiv] Amali Philips, *supra* note 8 at 256.
[xxxv] L. Kuriakose, *supra* note 10.

[xxxvi] Robin Jeffrey, *Legacies of Matriliny: The Place of Women and the "Kerala Model"*, 77 PACIFIC AFFAIRS 647, 656 (2004), https://www.jstor.org/stable/40023536 (last visited May 29, 2020).

[xxxvii] I Mariakutty Thomman, Femina, August September 1987 (as cited in Amali Philips, *supra* note 8 at 254).
[xxxviii] *Id.*
[xxxix] Interview with Thushara James, "What stops Syrian Christian Women" (May 16, 2020). She is the daughter of James Joseph, former Director of Higher Secondary Education to the Government of Kerala and Smt. (Dr.) Jancy James, The Vice-Chancellor, Central University of Kerala. Currently practising as a government pleader at the Kerala High Court she was awarded the Best Student Advocate of India, The Best Lady Student Advocate of India, The Best Orator and The Best Individual Participant in The Philip. C. Jessup International Law Moot National Rounds 1997 and was a student at the time of the drafting of the Revival Bill.
[xl] Amali Philips, *supra* note 8 at 256.
[xli] *Id.* at 255.