

The Legacy Outreach



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Glimpse of the Union Budget 2022 - 2023

The month of February 2023, was the most sought after, for a single reason, vis-a-vis, the announcement of the Union Budget 2022 - 23. Considering the fact that there were a lot of expectations from this budget on account of the same being the first after a proposed post-Covid world, the announcements on the various financial policies and decisions held up to the bargain. They made it an 'Amrit Kaal' one.

A few of the changes proposed by the Budget have been summarised below:



Within its 7 main priorities, the MoF expressed an intention to focus on introducing technology in the field of agriculture, promoting skill development, enhancing health as well as the infrastructure sector, promoting the development of sustainable cities, green hydrogen mission, green mobility, and artificial intelligence.

- Technology and Agriculture

Agriculture and Cooperation, a head included under the 'Inclusive Development' priority, included the government's intention to introduce digital public infrastructure (DPI) in agriculture.

The DPI has been defined to be an open source, open standard and interoperable 'public good' [1], which will provide farmer-centric solutions for issues like crop planning, estimation and health.

The establishment of an Agricultural Accelerator Fund was also announced as an incentive for encouraging the setting up of agricultural startups in India.

- Skill Development

Agendas on skill development were included within the priorities of 'Inclusive Development' as well as under 'Youth Power'.

Under the former head, the MoF announced an intention to enhance skills in the Health Sector by way of establishing 157 new nursing colleges, a mission to eliminate Sickle Cell Anaemia by 2047, increased accessibility to select ICMR labs and the introduction of dedicated multidisciplinary courses on different medical devices.

Another landmark announcement concerned the establishment of a National Digital Library for Children and adolescents, to effectively facilitate the availability of literature in various areas.

Under the latter priority, the MoF announced the launch of 'Pradhan Mantri Kaushal Vikas Yojana 4.0', whereby skill development for thousands of the youth population of the country, would be facilitated.

A further expansion of the Skill India Digital Platform and the establishment of the 'National Apprenticeship Promotion Scheme' was also included within the budget.

- Infrastructure and Development

The Union Budget 2022-23, sought to increase the capital investment outlay by 33%, in an attempt to increase employment, investments, and growth.

The provision for 50-year interest-free loans to state governments, for facilitating infrastructural investments and complementary policy actions was further continued for a second financial year.

In addition to this, the MoF specified that the recently established Infrastructure Finance Secretariat will be responsible for providing assistance to all stakeholders to enable increased private investment in the sector.

Other than this, a policy for encouraging States to undertake urban planning and establish 'sustainable cities for tomorrow', was also announced.

- Investment in Artificial Intelligence

Within its priority of enhancing infrastructure, the MoF expressed an intention of establishing three (3) centres of excellence in 'top-educational institutions'. These centres were proposed to be primarily responsible for undertaking partnerships with leading industry players and conducting interdisciplinary research and development in the field.

- Vivaad Se Vishwas I & II

In a bid to enhance the participation of MSMEs, in public procurement contracts, the Centre announced the reimbursement of 95% of the forfeited bid/performance security, in case of a failure in execution.

Under the Vivaad se Vishwas II, the MoF furthered the intention expressed by many central departments, wherein a settlement scheme, in case of a challenge to an arbitration award, was undertaken.

As per this scheme, a voluntary settlement scheme will be proposed to handle the cases where arbitration awards have been challenged before Courts.

This scheme was also previously adopted by the National Highways Authority of India, for settling matters where the award under challenge, exceeded Rs. 1000 crores.

- Green Growth and Green Hydrogen Mission

As per the budget, a total investment of Rs. 35,000 crores was announced for priority capital investments in attaining energy transition and net zero carbon emissions.

This aim was in lieu of the country's ambition to achieve a target of net zero carbon emissions by the year 2070. To further enable such achievement, an intention to notify a Green Credit Programme under the Environment (Protection) Act, 1986, was also announced.

- Establishment of New Portals

To facilitate an efficient flow of credit, and for the promotion of financial inclusion, the Government announced the setting up of a 'National Financial Information Registry which shall follow a new legislative framework designed in the constitution of the Reserve Bank of India.

In addition to this, the intention to set up a Central Data Processing Centre for enabling expedient responses to companies in relation to the filled forms under the Companies Act, 2013.

The establishment of an IT-based portal for facilitating investors in reclaiming unclaimed shares and dividends was also announced.

- Indirect and Direct Tax Proposals

To encourage green mobility, the excise duty on GST-paid compressed biogas was announced. Other than this, the duty was also removed from denatured ethyl alcohol, which is the primary ingredient for energy transmission.

Under the Direct Tax Proposal, the MoF sought to extend the benefit of presumptive taxation to MSMEs with a turnover of up to Rs. 2 Crores and further enhancement in the limits thereon.

To encourage the establishment of start-ups in the country, an extension in the date of incorporation for income tax benefits was announced.

- Conclusion

The fundamental objective of the Budget was to provide for a vision of 'Amritkaal', also known as the 'Golden Age' and thus, the various schemes and priorities were inclined towards the repositioning of the Indian economy in the aftermath of the pandemic-related losses.

This vision is efficiently visible in the various beneficial provisions, schemes and policies proposed by the MoF.

In fact, the Budget has also been able to be updated with the various technological, environmental and fiscal advancements, through its varying focus on these sectors. By establishing different repositories, and data banks, the Budget has definitely classified the need for being on point with the global economic changes and can thus be aptly signified as a strong entry into the age.

Note from the Editor:

Legacy Law Offices LLP takes pride in having provided services towards the implementation of the National Carbon Market, which seeks to facilitate the achievement of carbon emission targets.

We are happy to be associated with the mission and will keep doing our bit to reduce environmental damage.



Revisiting NIP 1991

About three decades ago, the Government of India enacted a New Industrial Policy (hereinafter referred to as 'NIP') to liberalize and balance public and private participation in the sector.

The Policy was planned and drafted in the year 1991 with an integrated approach to achieve the object of economic and social prosperity in the country. With a primary focus on the economic growth of the industrial sector, the policy was formulated to work on the weaker sector industries, to enable rehabilitation and reformation in their working conditions and to improve delivery efficiency within the sector.

While regulating the Monopolies and Restrictive Trade Practices (MRTP) Act, the new industrial policy works on controlling unfair trade practices by manufacturers or producers which may be monopolistic or restrictive in nature, so as to hinder the progress of the small and medium enterprises within the economy. The Policy also intends to employ measures for Industrial licensing, foreign investments, foreign technology agreements and public sector units.

The NIP focuses on two central factors, vis-a-vis, 'efficiency' and 'growth' in an attempt to improve India's industrial setup. Changes brought with NIP 1991 intended to remedy the drawbacks of obtaining prior approval from the government for various construction projects.

In the early 1990's, the obligation of providing clearances to the companies for initiating construction projects lay directly on the government, which in turn was a lengthy and cumbersome process. It also increased the input costs per unit of project output due to the fact that several contracts with political authorities had to be made to obtain the requisite clearance certificate.

NIP brought many changes to the existing industrial scenario of India by extending increased support from the private sector and the government to micro or small industries to improve their sectorial contribution by enhancing or adding to their human and material resources for efficient production. Thus, in the 1990s, India was witnessing several measures taken by the governmental authorities to adopt liberalization and privatization principles in the Indian Economy.

Draft New Industrial Policy

The New Industrial Policy 2022 aims to work on the larger economic objective of 'rapid industrial growth' which bears significant weightage in the realm of industrial development from the governmental point of view. Six fundamental objectives have been highlighted in the New Industrial Policy 2022.

These are competitiveness and capability; economic integration and moving up the global value chain; promoting India as an attractive investment destination; nurturing innovation and entrepreneurship; and achieving global scale, and standards.

NIP, 2022 is a useful package providing benefits and support to the small-sector or tiny-sector industries that are significantly less advantageously placed on an industrial sustenance scale in the Indian scenario.

As per the Union Budget 2022 - 23, a significant proportion of allocation has been towards an industrial development scheme focused on micro, small and medium enterprises with funds to not only expand and upgrade existing industrial areas with common infrastructure but also develop new industrial areas.

Objectives of Draft NIP, 2022

- A Focus on competitiveness and capability;
- The Economic integration and enhancement of the global value chain;
- Promoting India as an attractive investment destination;
- Nurturing innovation and entrepreneurship; and
- Achieving global scale and standards.

Upon speculation of the old policy and the new draft industrial policy of India, it can be inferred that present measures aim towards crystallizing the make-in-India initiative of the government but with a worldwide perspective. The policy changes are to be followed by investments from the government in promoting large-scale domestic production of industrial goods. These Indian goods must not only be mass-produced but also possess qualities of internationally produced industrial goods insofar as they must match international standards depending upon the importing country.



सत्यमेव जयते

Department of Industrial Policy and Promotion
Ministry of Commerce and Industry
Government of India

Journey to Berlin

In March 2023, our Managing Partner, Mr Gagan Anand, and Principal Associate Advocate, Ankit Konwar attended the 8th Biennial Conference on Construction Projects from Conception to Completion” organized by the International Bar Association (IBA) in Berlin, Germany. Here are some of their memories:



Scope of Tribunal's Powers under Sections 33(1) and 33(4) of Arbitration and Conciliation Act, 1996 (As amended up to date)

Introduction

Though the arbitrators appointed by the parties try to resolve the disputes between the parties in the best possible manner, however, it is possible that, in some cases, errors may occur in the Arbitral Award. Some errors though minor in nature, may affect the meaning of an Arbitral Award substantially. Some examples of these errors are typographical and arithmetical errors. In order to deal with such a situation, the Arbitration and Conciliation Act, 1996 contains Section 33. Section 33 comprises of two crucial clauses, i.e., 33(1), which deals with the correction of computation, clerical, and typographical errors and section 33(4), which deals with the power of the Tribunal to pass additional award in respect of claims which although presented by the parties in the arbitral proceedings but omitted from the Arbitral Award. Though both clauses deal with somewhat similar issues but the scope of powers of the Tribunal differs significantly under these clauses. This article attempts to discuss and highlight the difference in the scope of the Tribunal's power in the abovementioned clauses.

Scope of the Tribunal's Power under Section 33 (1)

Section 33(1)(a) of the act allows the parties to the arbitration proceedings to approach the Arbitral Tribunal for correction of any computation errors, any clerical or typographical errors or any

other errors of a similar nature occurring in the award. [1] On the other hand, the resort is made to Section 33(1)(b) in case a party wishes to get a clearer interpretation of a specific point or part of the award.[2] For the sake of convenience Section 33(1) is reproduced below:

“Within thirty days from the receipt of the arbitral award, unless another period of time has been agreed upon by the parties –

(a) a party, with notice to the other party, may request the arbitral tribunal to correct any computation errors, any clerical or typographical errors or any other errors of a similar nature occurring in the award;

(b) if so agreed by the parties, a party, with notice to the other party, may request the arbitral tribunal to give an interpretation of a specific point or part of the award.”

It is evident from a bare reading of the aforementioned section that the scope of powers of the Arbitral Tribunal is very limited or minimal with regard to the correction of the award under the same. On the request of either party, the Tribunal may correct any minor error apparent on the face of the award without modifying the award substantially. Under the said provision, a party can seek certain/specific corrections in the computation of errors or clerical errors in case it occurs in the award, but the Arbitral Tribunal has no power to review it on merit.[3].

This provision is in pari materia with Section 152 of the Code of Civil Procedure, 1908. While interpreting Section 152, Hon'ble Supreme Court in Dwaraka Das v. State of M.P.[4] observed that "Section 152 CPC provides for correction of clerical or arithmetical mistakes in judgments, decrees or orders of errors arising therein from any accidental slip or omission. The exercise of this power contemplates the correction of mistakes by the Court of its ministerial actions and does not contemplate of passing of effective judicial orders after the judgment, decree or order."

Thus, it is clear from the above discussion that the intent behind Section 33(1) is not to empower the Tribunal to reconsider the award passed on its merits or to decide whether a better award could be passed. Similarly, it is not a chance with the parties to get the award modified anymore beyond the limited boundaries established by Section 33. In a very recent case, Hon'ble Supreme Court noted that under Section 33, the tribunal should not 'modify' the award once passed by the arbitrator, making it a landmark case[5]. The Court also highlighted the difference between Sections 34, 37 and 33 by enunciating that unlike section 33, which provides powers of limited nature, Sections 34 and 37 can manifestly change the nature of the award passed by the arbitrator[6].

Scope of the Tribunal's Power under Section 33 (4)

Either party to the arbitral proceeding may approach the Tribunal under Section 33(4) with the request to make an additional arbitral award as to claims presented in the arbitral proceedings but omitted from the Arbitral Award[7].

It is further clarified in subsection (5) that if the Arbitral Tribunal considers the request made under sub-section (4) to be justified, it shall make the additional arbitral award within sixty days from the receipt of such request[8].

The prerequisites for the proper application of this section were highlighted by the Hon'ble Supreme Court in Mcdermott International Inc. v. Burn Standard Co. Ltd.[9], which are mentioned below:

- *There is no contrary agreement between parties to the reference;*
- *A party to the reference, with notice to the other party to the reference, requests the arbitral tribunal to make the additional award;*
- *Such a request is made within 30 days from the receipt of the arbitral award;*
- *The arbitral tribunal considers the request so made justifies; and*
- *Additional arbitral award is made within sixty days from the receipt of such request by the arbitral tribunal*

The power of passing an additional award is provided to the Arbitral Tribunal under section 33(4) with regards to the claims presented by the party to the arbitral proceedings but which get missed out from the final award. However, it is to be noted that an additional award cannot be passed by the tribunal in respect of new claims which were not part of the original arbitral proceedings. Parties cannot resort to this provision with the ulterior motive of raising new claims. Another important point of consideration is that an additional award, once passed as per section 33(4), is a separate and distinct award from the original award, and hence it cannot be merged with the same.

Conclusion

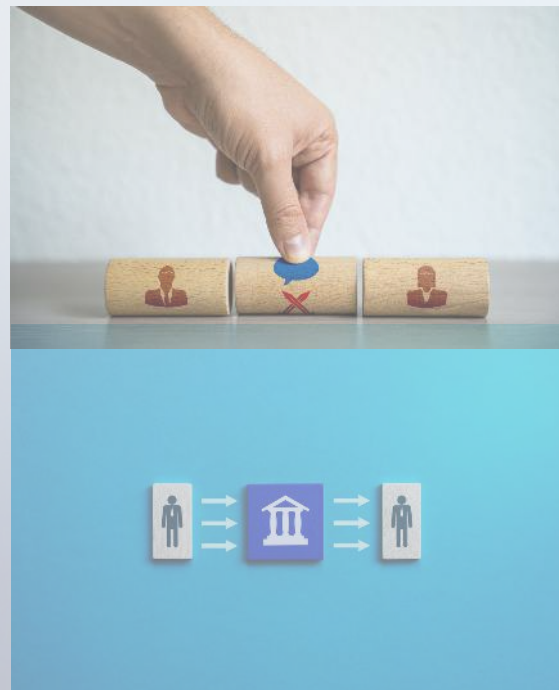
After such detailed scrutiny of section 33 and by the authority of landmark judicial pronouncements, it is now very much clear that the scope of powers provided to the Tribunal under Section 33 is not unfettered but is properly controlled with the help of the qualifications mentioned therein. And as far as the differences between sections 33(1) and 33(4) are concerned, there are two significant differences apart from what is already discussed above, i.e.,:-

Firstly, by virtue of Section 33(3), the tribunal is provided with the power of correcting the errors present in the award of the nature specified in section 33(1)(a) on its own motion, but no such power is provided to the tribunal under section 33(4). Therefore, the tribunal has no choice but to wait for an application to be filed by either of the party to pass an additional award, even if the tribunal became aware of such a defect.

Secondly, an additional award passed under section 33(4) is a distinct award altogether. This position is significantly different when there is a correction to the award under section 33(1), in which situation, the original award passed merges in the corrected award and hence limitation will necessarily start by applying the doctrine of merger from receiving the corrected copy of the corrected/amended award.[10]

End-Notes:

- [1] Section 33(1)(a), Arbitration and Conciliation Act, 1996
- [2] Section 33(1)(b), Arbitration and Conciliation Act, 1996
- [3] Para 27, NTPC Ltd. v. Marathon Electric Motors Ltd. (2012) 194 DLT 404 (DB)
- [4] (1999) 3 SCC 500
- [5] Gyan Prakash Arya v. Titan Industries 2021 SCC Online SC 1100
- [6] Snigdha Singh and Aniruddha Das, 'Can Arbitral Tribunals Modify Award Under Section 33 Of The Arbitration And Conciliation Act, 1996? - Supreme Court Clarifies'
- [7] Section 33(4), Arbitration and Conciliation Act, 1996
- [8] Section 33(5), Arbitration and Conciliation Act, 1996
- [9] 2006 (11) SCC (181)
- [10] M/s. Prakash Atlanta JVv. National Highways Authority of India, 2016 SCC OnLine Del 743.



The National Company Law Appellate Tribunal (NCLAT) recently while upholding the penalty of Rs. 1,337.76/- Crores, imposed on Google LLC and Google India Pvt. Ltd. (the Company), by the Competition Commission of India (CCI) vide its order passed on October 20 last year also considered the issue of side-loading which was addressed by the CCI earlier and by the NCLAT in the present case of Google LLC and Anr. Vs. Competition Commission of India and Ors. (Competition Appeal (AT) No.01 of 2023).

The CCI in its impugned order had found the company to have abused its dominant position which was challenged in an appeal on the ground that no inquiry or effect analysis under Section 4 was conducted before concluding that the dominant position has been abused in the present situation in addition to the argument submitted that the order of the CCI suffered from confirmation bias as it was based on an earlier European Commission ruling in relation to Google Android. The Supreme Court also refused interim relief to the company which had preferred a civil appeal against an order of the NCLAT directing deposit of 10% of the penalty amount while admitting the appeal.

In the original information filed with CCI under section 19(1)(a) of The Competition Act, 2002 the informants had highlighted App Stores for Android Mobile OS as one of the distinct relevant markets. One of the alleged anticompetitive practices in this context was a restriction of side-loading, which is an installation of an application on a mobile device without using the device's official application distribution method, and which by itself has gained major traction worldwide.

The European Union (EU), while addressing the issue sometime back, had enacted the Digital Markets Act (DMA) mandating gatekeepers, i.e., controllers of large online platforms, (such as Apple, Google, Microsoft, etc) to allow the installation of software applications from third-parties meaning that ultimate users can now side-load apps on their mobile phones.

In the present case, the Director General of CCI upon commencing inquiry had framed one of the issues as “Whether Google has abused its dominant position in Play Store by imposing unfair and discriminatory terms and conditions on App developers in violation of the provisions of Section 4 of the Act?” and the CCI had held the company to be dominant and to have abused its dominant position including in market for app stores for Android smart mobile OS in India. The CCI on the issue of side-loading directed that “Google shall not restrict the ability of app developers, in any manner, to distribute their apps through side-loading”.

The NCLAT judgment dealing with the issue of side-loading highlighted the relevant clause under Article 6, section 4 of DMA, reproduced below, which requires gatekeepers to allow users to choose whether they want to set the downloaded app or the app store as their default choice and also keeping in mind the overall interest of end users the DMA allowed gatekeepers to take “strictly necessary” and “proportionate measures” which are “justifiable” to ensure integrity and security of the hardware or operating system. Section 4 of Article 6 reads as follows:

4. The gatekeeper shall allow and technically enable the installation and effective use of third-party software applications or software application stores using, or interoperating with its

its operating system and allow those software applications or software application stores to be accessed by means other than the relevant core platform services of that gatekeeper. The gatekeeper shall, where applicable, not prevent the downloaded third-party software applications or software application stores from prompting end users to decide whether they want to set that downloaded software application or software application store as their default. The gatekeeper shall technically enable end users who decide to set that downloaded software application or software application store as their default to carry out that change easily.

The gatekeeper shall not be prevented from taking to the extent that they are strictly necessary and proportionate, measures to ensure that third-party software applications or software application stores do not endanger the integrity of the hardware or operating system provided by the gatekeeper, provided that such measures are duly justified by the gatekeeper.

Furthermore, the gatekeeper shall not be prevented from applying, to the extent that they are strictly necessary and proportionate, measures and settings other than default settings, enabling end users to effectively protect security in relation to third-party software applications or software application stores, provided that such measures and settings other than default settings are duly justified by the gatekeeper.

While largely upholding the CCI order, which by itself is a significant milestone, the NCLAT by way of relief to the company has set aside certain directions of the CCI in

relation to allowing side-loaded apps, allowing users to uninstall the preloaded apps, sharing of APIs and allowing of third party app stores in Play Store. On the face of it the relief may seem to be minor as compared to the penalty but a careful examination will reveal the enormity given the business economics of such a mechanism contributing a sizeable portion of the overall revenue of the company in terms of annual fee, in some cases, for hosting apps as well as a commission for transactions, which reportedly in the case of Apple Inc, a competitor of Google, is 30% commission from every single transaction that was made through the App Store.

It is relevant to note that the EU legislation comes on the heels of the much-publicized decision of the US District Court for the Northern District of California in the case of Epic Games Vs. Apple, a competitor of Google, on the issue of Apple's alleged monopoly in the control of the iOS App Store which was argued to be anti-competitive, an argument which was finally not agreed with. Interestingly, Epic Games sought intervention in the present matter and argued that "in side-loading, there are warnings issued by Google, which are deterrent and result in an inability to download". Further, while highlighting statistics showing that Google Play Store is on 98.4% mobile devices it was argued by Epic that Google's policy of exclusion of third parties Apps is without any basis. In India while the fight on side-loading remains to be fought another day it is but only a matter of time for the issue to come to the forefront.

A Read Down of How Netflix Banned Password Sharing

Netflix password sharing is a common practice in India. It has also gained sentimental value overtime where password sharing is understood as a medium to connect with your loved ones. With the outstanding statistics concerning millions of users sharing passwords within other millions of people in India, the sudden announcement of Netflix placing a ban on password sharing outside single household has been a shock to many. Netflix will therefore, announce extra charges for providing password sharing services on a system that is not identical to the primary IP address similar to that of multiple screen sharing packages/options available presently.

The pandemic surge in viewership was believed to have masked the initial password sharing issue, enabling Netflix to put off the problem for long. Later, it was recorded that more than 100 million Netflix users only use password sharing on streaming, thereby robbing Netflix off of subscribers. Consequently, Netflix was forced to pursue arrangement crackdown widely, which will prove to be a challenge equally for both the platform, viewers as well as the goodwill earned over years.

Netflix made a stern announcement highlighting the implementation of above policy on password sharing in the third quarter of 2022, but no further development upon the same was understood as just a means of threatening the users. Earlier this year, Netflix stated that they are serious about implementing such policy gradually all over the world so as to enhance their user base thereby accepting the adverse consequences and reaction upon the same.

The objective of the sudden policy change by Netflix is not to impose a ban but to obtain financial benefits and enhance the user base, thereby pushing users towards payment of an extra penny for extended benefits. Such impeding practice is also seen as a way to recover from the sudden and extreme financial loss of the user base witnessed by Netflix in the last fiscal. Prominent rehabilitation of the present platform/user policy of Netflix is impliedly gaslighted since Netflix's April shareholder meeting that analyzed the loss of substantial subscribers, especially for the first time since the notably long period of ten years.

Stand taken by the UK IPO

Subsequently, even though Netflix is not planning on suing people involved in password sharing, the practice of curbing password sharing has attracted enough heat from users. There have been continuous discussions on the legal standpoint of implementing such a policy in the present times. The discussion is not limited to the Indian legal landscape but is being widely discussed in many other legislations. Henceforth, the UK Intellectual Property Office has expressed a strong perspective on the frequent practice of password sharing.

The UK Government Agency, the Intellectual Property Office (IPO) has suggested that the practice of password sharing against the company guidelines may attract civil and/or criminal liability within the UK legislation. IPO is affirmative regarding its stand on the practice of password sharing as being illegal.

The Authority through careful examination of the pertinent legal policies in the UK has concluded that the ban imposed by Netflix is justified and legal in the eyes of law. The IPO Authority of the UK has explored the legal waters concerning the prominent practice of password sharing against the company policies, holding that such practice falls within the act of copyright infringement and can attract both penal and financial liability upon commitment.

The Authority upheld the practice of password sharing as being against the terms of user agreements in light of issued IPO Guidelines. "There is a range of provisions in criminal and civil law which may be applicable in the case of password sharing where the intent is to allow a user to access copyright-protected works without payment," stated the IPO spokesperson expressing their bias towards counting the practice as being bad in eyes of law.

A Discussion on the Possibility of a Similar Policy in India

The announcement of streaming giant, Netflix has triggered a debate over the legal landscape of password sharing in India. Even though legal experts believe that it is unlikely as well as illogical for Netflix to sue millions of people for sharing passwords around the world, they do believe that it may become punishable by different civil and criminal laws in India if dragged to court. The legal experts believe that such practice of password sharing, against the company policy of Netflix, can become punishable and can attract civil and/or criminal liability within the Indian legal regime

as similar to that of the Intellectual Property Office (IPO).

Despite IPO's tough stand on the issue, the practice of password sharing with family and friends has no way attracted the title of being illegal or fraudulent by OTT platforms. However, in order to compensate for the loss of business due to the practice of password sharing, various OTT platforms have come up with revamped organizational policies to impede increasing unauthorized access to copyright content without receiving benefits for such services.

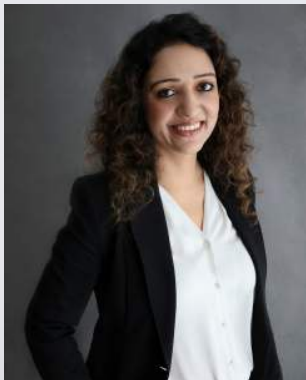


Reminiscing on the Last Quarter

The last quarter has been extremely fruitful and eventful for the Legacy Family for quite a few reasons. From new rankings under our umbrella to new achievements, to new additions to the team, to attending international conferences, our Lawyers have been increasingly active and present within the legal spectrum.

Hence, we are proud to present a few highlights of Legacy's journey within the last quarter.

Welcoming Ms Shikha Sharma



We are elated to announce the joining of Ms Shikha Sharma as an Immigration Law Partner to the Firm.

Ms Sharma is an ardent and meticulous legal professional with an avid experience of over 18 years in different sectors. Additionally, she is well-adept in handling immigration-related issues in India as well as Canada.

At Legacy, she will be diligently working towards providing legal consultancy, advisory and other related services in the Immigration sector, to the Clients.

Rankings & Awards

We are excited to announce the recognition of our Managing Partner Mr Gagan Anand, in the **Global 2023 Rankings of Chambers & Partners** in the Projects Energy and Infrastructure practice area.

This announcement comes as an addition to his recognition in the **Asia-Pacific 2023 rankings**.



Furthermore, Mr Anand, Ms Shalini Munjal, our Co-Managing Partner, and Ms Eshjyot Walia, our Principal Associate Advocate, have attained recognition as **Recommended Lawyers** in the **Legal 500 2023 Asia - Pacific** rankings.



We wish to express gratitude towards our valued clients, for making these new achievements possible.

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