PATENTING OF MEDICINES IN INDIA

CONTENTS

The Indian pharmaceutical industry has been witnessing an exponential growth from past few years and as per the report of Brand Equity Foundation, India's market share is poised to reach the mark of $55 billion by 2020. This, in terms of growth rate, India would see itself as one among top three pharmaceutical markets, whereas, globally it's set to gain sixth position in absolute size.

UNDERSTANDING 'INTELLECTUAL PROPERTY RIGHTS' & 'PATENTS':

- Intellectual Property refers to assets that are intangible and have been created by the intellect, that is, the mind, and covers inventions, literary & artistic creations, etc.
- Intellectual Property Rights (IPRs) are very similar to other property rights as they empower the individual or company with exclusive rights by awarding patent or trademark or copyright, etc. It stands as a key policy for innovations and inventions.
- Patent is an exclusive right provided for a limited period, by the govt to an inventor for his invention or innovation. This right safeguard's the patentee's invention from being misused by others and would be termed illegal if it's done without the due permission of the authorized person or company.

IMPACT OF TRIPS (Trade Related Aspects of Intellectual Property Rights) ON INDIAN PHARMACEUTICAL INDUSTRY:

India became a member of WTO in 1995 and by signing TRIPS agreed to bring about changes in parameters as required by International agreements. The required changes were of immense

consequence on the pharmaceutical industry as till then the 'process' was being patented by them; now the rules mandated the 'product' that is, the drug, was to be patented. Till then, the generic pharmaceutical industry flourished and catered high quality, generic medicines at reasonable prices, world over. Shift of such mammoth proportions naturally witnessed lots of apprehensions.

 # Reasons for Negative Emotions

- Will hamper the growth rate
- Will be deleterious to industry's health
- Skeptical of competition from MNCs
- Will lead to monopolistic control by the patentee
- Price escalation will be inevitable
- Small and medium scale industries will face survival issues

While many apprehensions were shared by industry insiders at the same time, an equal number of people saw the brighter side that this inevitable change would usher in.

 # Reasons of Positive Emotions

- India will become an integral part of global research industry
- More stress will be laid on basic research
- India would emerge as an intellectual hub protected by national Intellectual Property laws
- India will gain immensely from outsourcing of R&D
- Will open up more lucrative avenues in the future

The biggest barrier on the way to achieving, adapting and adopting new requirements was the lack of Intellectual Property Rights Cell in the companies. A study taken up in 2005, regarding this issue, throws light on the reasons for not establishing Intellectual Property Rights Cell: Lack of basic infrastructure

- Procedural hurdles
- Incapability of financial nature
- Did not deem it necessary or beneficial

The biggest hurdle for the companies was lack of competent people who could undertake the responsibility to acquire, defend and challenge patents.

PATENTING OF MEDICINES IN INDIA

Patenting is the most dominant of Intellectual Property Rights (IPRs) used in the Indian pharmaceutical industry.

A BRIEF HISTORY OF THE PATENTS ACT, REGULATED BY IPRs, INDIA

The Patents Act of India 1970, came into effect in 1972 after it replaced the Indian Patents and Designs Act, 1911. This Act mandated the pharmaceutical industry to patent the 'process' of manufacturing drugs and these patents carried the validity of seven years. But things changed drastically with India becoming a member of World Trade Organization (WTO) from 1 January, 1995 and consequently, signing TRIPS (Trade Related Aspects of Intellectual Property Rights) agreement & few other international agreements like European Patent Convention (EPT).

Why did the need to become a member of WTO and other dominant international arrangements was felt by India?

- The primary rationale was to make a recognizable place in the modern world as it did not want to be left behind.
- The intention was also to boost its patent law by strengthening it on the international parameters.

AMENDMENTS TO PATENTS ACT TRIGGERED BY TRIPS

India was bound by contractual obligation to make amendments in its Patents Act, 1970, after signing TRIPS. TRIPS does not enforce a uniform international law but instead it enumerates minimum standards of patent protection to be fulfilled by each member country of the WTO.

The pharmaceutical industry was hugely impacted by the new regulations because now they would be required to seek 'product patent' instead of the 'process patent'. Keeping in mind, India's status as a developing nation, the WTO agreement conceded a transition period to switch from process patent to product patent. Thus, a ten-year transition period was awarded to India, from 1995-2005. This heralded a spate of amendments in the existing Patent Act.

To meet with the international requirements, on 26 March, 1999, the first amendment of the Patents Act came into being, but it was enforced retrospectively, from 1 January, 1995. The relevant amendments were:

I. **Introduction of Section 5(2)-** This Section introduced the provision of filing applications for acquiring patent for drugs and medicines & agro-chemicals.
II. **Provision of Exclusive Marketing Rights (EMR)-** This was included to ensure safeguarding the manufacturers who had applied for patents.
III. **Omission of Section 39-** This chapter was omitted in order to empower and permit Indians to apply for patents in India as well as out of India, simultaneously.

IV. **Insertion of Chapter II (A)-** This was included in the Indian Patents Rules to help in dealing with International Applications as mandated under Patent Cooperation Treaty (PCT).

The second amendment of the Patents Act took place in 2002, but came into effect from 20 May, 2003. The salient features of this amendment were as follows:

I. **Extension of Tenure of Patent-** The term of patent was increased to 20 years from the date of completion of filing specifications. The distinction in the term of a food or drug & others was also eliminated.
II. **Broadening of the Scope of term 'Invention'-** 'Invention' was redefined to include the concept of inventive step, keeping the TRIPS agreement in mind.
III. **Introduction of Deferred Examination System**
IV. **Provision of publishing of applications-** Bringing things at par with other countries, the new provision was introduced that would publish the applications 18 months after the filing.
V. **Microorganism were included in the list of patentable items**- on one hand Microorganism could be patented and on the other traditional knowledge was no more patentable.
VI. **Unity of invention conceptualized-** In keeping conformity with European Patent Convention (EPT) as well as the Patent Cooperation Treaty this was done.
VII. **Reintroduction of Section 39**- This restrained Indians from applying abroad without filing first in India or without prior permission.
VIII. **Insertion of Section 116-** This section provided an Appellate Board with its headquarter in Chennai.
IX. **Provision of Section 117-** This Section brought in Bolar provision or exemption as a special concession to the pharmaceutical and agrochemical industries.

The third and final amendment to the Patents Act, 1970 was done in 2006 but was effective from retrospective effect from 1 January, 2005. After this amendment India finally fulfilled the obligations mandated by TRIPS and finally ended the transitional arrangements. The most notable factors of this amendment were-

I. **Deletion of Section 5, ushering in a new era of 'product patent regime' in India**
II. **Exclusive Marketing Right (EMR) was abolished.**

CONCESSIONS GIVEN TO PHARMA COMPANIES:

Although the amendment of The Act illegalized reverse engineering and put a full stop to copycat drugs, yet two types of generic drugs were allowed in the Indian market:

I. Patent-expired &
II. Non-patented

COMPULSORY LICENSING:

The provision of Compulsory Licensing was introduced as an effective provision under which the govt can permit a company to produce a patent drug or a patented process legally, without

the consent of the patentee. An application to acquire Compulsory License can be made to the Controller as specified under Section 84(1) of the Amendment Act. The Section lays that such an application can be made by anyone after lapsation of three years of granting of patent.

The rationale behind such a provision is a humanitarian one; as these licenses will be given for export to countries that are backward & poor and hence, lack infrastructure support in manufacturing them. This is to ensure that the underprivileged masses get medicines at reasonable prices. It is important to note that the clause specifies that the patented invention is not made available in the territory of India.

To safeguard this very human cause from being misused, Section 146 (2) of the Patents Act, 1970 along with Rule 131 of the Patent Rule, 2003, mandates an annual disclosure to prove their commercial reach and satisfaction of reasonable requirement of the public. Any violation shall result in the license being pronounced void.

NATCO: THE GAINER OF FIRST COMPULSORY LICENSE:

In 9 March, 2012, the first ever Compulsory License was granted to NATCO for Bayer's Nexavar, which is a drug to treat patients facing advanced stage of liver and kidney cancer. This judgement made waves not only in the pharmaceutical industry, nationally and internationally, but also triggered a debate on Intellectual Property Right.

After securing the compulsory license NATCO is legally entitled to manufacture as well as sell the generic version of the drug- Nexavar. This decision was taken based on the facts that Bayer failed to fulfill the requirements mentioned under Section 84 of the Patents Act, 1970. The drug was sold at exorbitant price amounting to breach of affordable price as specified in the Act; a month's doze costing Rs. 2.8 lakh and thus catering to only 2% of the total number of kidney and liver cancer patients.

PATENT OFFICES IN INDIA:

The Head Patent Office is located in Kolkata, with branches spread in Delhi, Mumbai and Chennai. Each office enjoys its independent territorial jurisdiction and receives applications for patency and has the power to deal with all sections of the Patent Act. The overall in charge of it is the Controller General of Patents, Designs, Trademarks and Geographical Indications.

CRITERIA OF PATENTABILITY:

The conditions laid by the Patents Act of India can be ascertained by the definition provided by it which says that to achieve patent an invention shall be "a new product or process involving an inventive step and capable of industrial application".

Hence, the basic requirements of patent can be described as:

- Novel or original to fall in the category of 'new':
- Involve technical furtherance or headway to fulfill the criteria of 'inventive step':

- Suitability and appropriateness of use to justify 'industrial applicability':

Under the Act 'New' is defined under section 2(1)(l) of the Patents Act

'New' means any invention or technology which has not been anticipated by publication in any document or used in the country or elsewhere in the world before the date of filing of patent application with complete specification, i.e., the subject matter has not fallen in public domain or that it does not form part of the state of the art.

Under Section 2 (1) (ja) of the Act we can find the definition of 'inventive step' which carries a broader connotation in the Act after amendment. It states:

'Inventive step' means a feature of an invention that involves technical advance as compare to the existing knowledge or having economic significance or both and that makes the invention not obvious to a person skilled in the art."

Furthermore 'industrial application' is specified in connection to the new invention by fulfilling three conditions:

I. can be produced/made,
II. can be put to effective use in at least one field of activity,
III. can be reproduced with the same characteristics.

TYPES OF PATENTS IN INDIAN PHARMACEUTICAL FIELD:

The pharmaceutical industry is one sector which is not only growing but also extremely competitive. Based wholly on knowledge and intellect, as they look for inventions, new formulations, etc. the use of IPR is extensive in this field. Life sciences researches and studies are highly expensive affairs as they need best of infrastructure and may stretch to years before anything worthwhile is achieved. The need for patent protection arises to protect the invention from being used by others, which would lead to catastrophic losses. Patents are classified into following categories based on Indian Patents law-

#1. Drug Compound Patents: Compound patent or product patent is the most effective in providing foolproof protection to a newly invented drug. Patents under this category are claimed based on chemical structure of a drug and are usually cited as Markush type claims which covers more than one structure.

In short, compound patent provides iron shield to the inventions as it keeps the competitors at arm's length and they cannot replicate the drug through any route for full 20 years.

For example, under Indian Patent number 202989, the chemical structure of a newly invented drug that claims to be useful in controlling of parasites was patented.

#2. Formulation Patents: For this patent the pharmaceutical companies use well known compounds and restructure a chemical molecule or simply combine it with other ingredients in fixed quantities, to give a new formulation, while retaining its core benefits. This is a tactic to give new life to aging drugs that are still popular and in demand.

For example, under Indian Patent number 203986 (9), an ayurvedic composition for treatment of AIDS was claimed and it gives away the specific quantities of each ingredient used in its formulation.

#3. Synergistic Combination Patents: Under this provision, two or more drugs interact with each other and this combination results in drug synergy. The union of these drugs amplifies the effect of one or more than one drug, then such products are eligible for patent.

For example, under Indian Patent number 206328 (10) claims of a synergistic combination of roflumilast and salmeterol.

#4. Technology Patents: Under this category lies patenting of techniques which are used to deal with technical problems that are specific in nature like taste masking, stabilizers, etc.

For example, under Indian Patent number 227933 (11) claims of a formulation of a taste mask has been made.

#5. Polymorph Patents: Polymorphs are crystal structures or in other words, varied physical forms of already known compound and are majorly used either to increase stability or minimize impurities of the compounds.

For example, under Indian Patent number 237261 claims of certain crystalline for resulting in greater purity has been stated.

Relevance of Section 3(d) in Polymorph Patenting:

It is Section 3 (d) of the Patents Act, 1970, that rules the granting or rejecting of patents to Polymorphs. The Patents (Amendment) Act, 2005, made substantial amendments in this Section.

The Section 13 of the Act states that simply discovering a new form of a known substance will not make it eligible for patenting until and unless it differs notably and is more advantageous.

Section 3(d) works majorly in keeping out frivolous claims of companies by what is known as ‘evergreening of patents’; a strategy adopted by companies to safeguard their economic and financial interests. Under this tactic, the companies make negligible changes to the existing product without any significant alteration in its effect.

Patents are awarded in the said category only if the potential enhancement in its value occurs, thus weeding out claims made for insignificant and minor changes

Case of Novartis A. G. v. Union of India[1]:

The landmark judgement pronounced on 1 April, 2013, by a bench of two-judges of the Supreme Court of India (SC), is hailed as the best example of relevance of provisions under Section 3(d) of the Patents Act (Amendment) Act, 2005. The pharma giant had applied to patent an anticancer drug Gleevec, which was rejected by the Madras Patent Office in 2006 on the basis of the said Section. Next, Novartis approached Intellectual Property Appellate Board which also turned down their request for patent on the same grounds. As a last option, the company filed a Special Leave Petition in the SC against the order. SC also rejected the petition and contented that the it had failed to fulfill the requirements under Section 3(d). The court pointed out that the product was a new form of the substance but not the whole substance, which is not patentable unless it enhances its 'known efficacy'; which Novartis failed to prove beyond doubt.

#6. Biotechnology Patents: The Biotechnology Patents cover a whole gamut of products ranging from immunological to therapeutic to diagnostic. It deals with living organisms and biological materials that are used for preparation of pharma products.

The first ever Biotechnology Patent, after the implementation of the product patent regime in 2005, was awarded to F. Hoffmann – La Roche Ltd. of Switzerland, through the patent number 234072 for a procedure to synthesize L-lactone.

#7. Process Patents: Process Patent does not in any way protect a product but is awarded only to a novel or inventive process that can be used to procure a product.

For example, under Indian Patent number 206678 a process of synthesizing L-lactone has been claimed.

PROCEDURE OF SECURING A PATENT IN INDIA:

A detailed documentation of the entire requirement and process of patent finds a mention in the Act; here we shall go through the various relevant steps in brief.

#1. ELIGIBILITY TO FILE A PATENT: An application for securing a patent of an invention can be made by alone or jointly with any other person-

I. any person who is the true or first inventor; or

II. any person or persons who is his assignee; or

[1] SC Civil Appeal No. 2706-2761 of 2013.

III. any person who is the legal representative of the deceased inventor.

#2. FOREIGN FILING LICENSE: Indian residents are barred from filing for patent outside the country unless;

an application for patent has been filed not less than six weeks before it is to be applied in the other country;

- No secrecy direction under Section 35 (1) has been issued or all such directions have been revoked.
- If eligible, foreign filing can be done on the prescribed form.

#3. PUBLICATION OF APPLICATION: Applications shall be published after the expiry of 18 months from the date of filing.

#4. PROVISIONAL PROTECTION: From the date of publication of the application till the grant of the patent, the applicant will enjoy the rights and privileges of patentee except for the infringement rights that shall be bestowed only after patent is awarded.

The exception to this is applications given under Section 5 (2) of the Act, that is concerned with pharmaceutical and agrochemical industry; who shall enjoy this protection only after the patent has been granted.

#5. REQUEST FOR EXAMINATION: Within 48 months of applying or priority, whichever is earlier, a request for examination shall be filed on the prescribed form and submission of prescribed fee. In case, one fails to apply for examination, then the application shall be considered as withdrawn.

#6. PATENT PROCEDURE: On the receipt of a request for examination the Controller forwards the said application to the Examiner. The later submits the report to the Controller within a specified period. Once all procedures are done and all requirements met satisfactorily, the grant shall be notified in the official weekly journal of the Patent Office.

#7. OPPOSITION PROCEEDINGS: The Act gives provision of two opposition proceedings- one before and the other after the grant of patent. There are specified grounds for both of them.

#8. TERMS OF PATENT: The term of every patent granted under the Act is for twenty years from the date of filing. To restore the patent, one shall apply 18 months prior to the time of lapse. To keep the patent in force an annual fee shall be paid by the patentee.

#9. APPEAL PROCEDURE: Section 117 (A) of the Patents Act, 2005, describes in detail the provisions of making an appeal to the Appellate Board.

#10. PATENT RIGHTS: The Act provides statutory rights to the patentees for their inventions and based on these they shall be able to stop unauthorized use of their patents or any infringement of it.

THE BIG DEBATE: PATENTING MEDICINES- A BOON OR A BANE?

This topic of Intellectual Properties Rights in connection to patenting rights of medicines, carries vast connotations in the perspective of modern world; thus, there arises the need to assess its pros and cons in different contexts.

#1. PATENTING OF MEDICINES AND PHARMACEUTICAL INDUSTRY:

The Indian Patents Law, 1970, has undergone a sea change to meet the basic requirements laid by international organizations. In its present form there are supporters as well as critics of this widely debated topic.

Benefits of Patents For The Pharma Companies:

1) **Recovery of investment gone into inventing**: Patentees are given an exclusive right in lieu of their outstanding brilliance i.e. invention, in way of patent. Patent gives them the monopolizing rights for 20 years in which financial gains are reaped; recovering much more than the investment.

2) **Helps in attracting investors and funds:** Patenting gives value to the product & company, and hence, it becomes easy to attract investors and flow of funds. The economic health of the patentee is boosted, giving opportunity to expand further.

3) **Incentive and encouragement for Companies to invest in R&D:** By striving to secure patents, the companies get motivated and inspired not only to increase percentage of investment in R&D but also work towards providing a more positive environment.

4) **Awards prestige and improves the credentials**: Securing a patent enhances the prestige of the patentee company manifolds. Its improved credentials and results in better prospects for the future.

5) **Limits competition:** The most blissful impact of patent is that it makes the patentee the market ruler and competitors are left far behind.

6) **Better prospects for employees:** All benefits of patent result in the better and improved conditions for all employees.

Disadvantages of Patents For The Pharma Companies:

1) **Time consuming, expensive and complex process:** The process of applying to secure a patent is cumbersome and expensive task. Experts of IPR need to look into the intricacies and pursue it.

2) **Kills healthy competition:** The patentee invariably monopolizes the market by the right to patent and there is barely any competition for it.

3) **Expensive to obtain and maintain the patent:** Not only securing but also maintaining the patent is an expensive affair.

4) **Economically burdens small and medium companies:** A financial burden is caused, mainly on small businesses, in way of extensive infrastructure needed to maintain R&D, IPR cell, etc.

5) **In case of infringement, defend your patent:** In case of any misuse, the patent needs to be legally defended by the patentee; a process which demands lots of time, money and patience. This increases the liability of the patentee a lot.

#2. PATENTING OF MEDICINES AND THE MASSES:

The advocates of Intellectual Rights vociferously and emphatically emphasize on the need of Patents as they believe it to be the stimulant for innovation and invention. This justification is even more applicable on pharmaceutical industries as the investments on R&D is immense and the results in the form of new findings and products is comparatively few resulting in high costs. Hence, a patented product, which enjoys an enviable monopoly for 20 years, eliminates all competition and rules the market. The companies that own the patents, wanting a quick recovery of their hefty investment, increase the prices.

IMPACT OF PATENTING ON MASSES:

The World Health Organization (WHO) proposes in its Constitution that highest possible standard of health should be the fundamental right of every human being. Contrary to this is the factual data of the world! A world divided into developed, developing and under-developed countries we can witness immense disparity.

Those residing in countries like Switzerland, Luxembourg and Singapore, where the respective govts. provide universal health care, every citizen is entitled to good health. In contrast to this, the statistical data of underdeveloped countries like Sierra Leone, Nigeria & Congo, etc. gives a grim picture as almost 80% of their population is deprived of basic health care.

In such a scenario, patenting adds to the agony of citizens of developing and under-developed countries as most of the patents are acquired by big, multinational companies, with their base in developed countries. Huge investments lead to massive profiteering by them after getting the patenting rights for a medicine, thus an escalation in prices. An article in the Annals of the New York Academy of Sciences confirms the correlation between poverty and healthcare as it discloses that 90% of world's diseases is borne by underdeveloped and developing countries but

alarmingly only 12% of health expenditure comes from these countries. An appalling situation for modern world where we are looking to a more equitable and just universal system!

Universal patenting of drugs lacks humanitarian justification because in a world where billions of people are affected & dying from diseases like malaria, tuberculosis, dengue, diarrhea, cancer, HIV/AIDS, etc. there should be some rationale in the form of concessions on life-saving drugs for those who cannot afford it. The poor and backward countries lack infrastructure and means to provide public healthcare to its citizens leaving them to fend for themselves.

Patents indirectly have come down to a show of money power as a hefty investment is needed for research infrastructure. Being based in developed countries, the companies cater more to the health problems of them and the diseases impacting the poor countries is ignored. Therefore, in recent past more and more research is going on in lifestyle diseases like heart diseases, diabetes, etc. whereas a blind eye has been turned to diseases like malaria, tuberculosis, etc. that are major causes of deaths in poor countries.

"Inventors and innovators of medicines, all have the fundamental aspiration to contribute towards betterment of humanity; patenting should not undermine their pious intentions and deprive humanity of these inventions and innovations for any reason; more so due to lack of money!"

- Surbhi Aggarwal
(Founder & CEO, School of Legal Education)

#3. IMPACT OF PATENTING IN INDIA:

Indira Gandhi echoed the sentiments of millions of people when she stated these words at the World Health Assembly in 1982, "The idea of a better ordered world is one in which medical discoveries will be free of patents and there will be no profiteering from life and death".

By becoming a member of WTO, India exhibited its eagerness to compete with the developed countries in the modern world. The most critical side-effect of it was that a nation, which ruled the world through manufacturing and supply of generic medicines, had to do away with it. This was a massive blow for the poor and needy world over as this would mean getting medicines at much higher rates. The 'drug patent regime' saw the end of cheap generic drugs and a domination of multinationals came into effect.

India, comprehending the structure of the society was acutely aware of the repercussion of drastic changes that would usher in with the pricing of medicines after signing the TRIPS agreement. Creating a balance between safeguarding the need of the poor and at the same time not left behind other progressing countries, was the most challenging job for the govt. During the

transition period, that is, from 1995-2005, it mulled on the various ways to work for a middle path.

India, along with other developing and underdeveloped countries wanted a rationalization in the TRIPS agreement. As a result, in the 2001, WTO Ministerial Conference in Doha (which is commonly known as the Doha Declaration) WTO declared that its Members shall not be prevented from taking steps to safeguard public health. This resulted in some laudable provisions being made like Compulsory License, Parallel Importation.

During the final drafting of the Patents Act (Amendment) 2005, the govt. saw to it that a balance was created and its citizens health was not undermined due to lack of affordability. The Compulsory License gave a tool to keep a tap on unjustified profiteering by the patentees. The first ever Compulsory License was granted to NATCO on 9 March, 2012, by Mr. P. H. Kurian, the then Controller of Patents. The justification for this was purely on humanitarian grounds as the drug in question was Bayer's Nexavar, a drug used to treat patients of liver and kidney cancer. Bayer was not able to convince the reach of the medicine to mere 2% of the patients and more damning was the cost which was Rs. 2.8 for a month's dose.

Another aspect of the Act that protects India's commitment towards public health was Section 3 (d) that counters the sham strategies like 'evergreening of patents' to keep reaping the profits of a product. In a landmark judgement, the Supreme Court of India refused to grant patent to Novartis for its anti-cancer drug Gleevec on the grounds that it had failed to prove the enhancement of efficacy and at the same time could not justify its 'newness' conclusively.

India's Patent Act, 2005, is hailed by many countries and international NGOs as a positive way of taking a stand to look after public health.

OPINION:

As a citizen of the world, which is striving to unify and bring equality among all, the unconditionality of patents by Intellectual Property Rights is a step that is dividing the classes and the masses. We need to develop an empathy towards the deprived and the needy all over the world. There should be no law that undermines the very value of 'life'. Patents are asking us to sacrifice our core values, as life-saving drugs are also kept in its ambit. A world where 80% of the population is deprived of basic health and the mortality rate is way above expectations, the least we can do is to ensure access of medicines to all suffering.

The cost, time and intellect that goes into an innovation, should be looked after, but without compromising on the basic human values. The greatness of human lies in realizing the fact that nothing is more rewarding than contributing towards humanity. 'Health for all' should be the motto of the countries, instead of 'health for us'.

"The assertion that without patents inventions and innovations would cease, is completely fallacious; otherwise how can we justify all the inventions of pre-patent era that we have been enjoying for ages!"

- Surbhi Aggarwal
(Founder & CEO, School of Legal Education)
Thankyou