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Evolution of Principles Common to All Acts of Insolvency

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ABSTRACT

Insolvency laws have evolved in India with the Insolvency and Bankruptcy Code, 2016 being a consolidated law on the legal aspects of insolvency along with the Companies Act, 2013. Both these legislations have introduced innovation in business laws as well as various rights like class action suits, provision for registration of one person company, independent directors etc. However, the subject matter of insolvency and bankruptcy has seen a gradual shift in legal regime and jurisprudence. Scholarly work suggests that the principles of bankruptcy in US, UK and EU are necessarily the same. The article aims to come out with a comprehensive idea of the concept of insolvency under bankruptcy laws in US, UK and EU. It is an outcome of study of various principles which are the backbone of bankruptcy law interpretation in US, UK and EU. The study is useful as a primer to the understanding of insolvency and the underlying principles that are a linchpin of the legal framework concerning the same.

Keywords: *acts of insolvency, bankruptcy, corporate insolvency, liability, assets*

I. INTRODUCTION

As the global economy becomes more inter-connected, attorneys world-wide must have a better understanding of how different nations deal with personal insolvency issues. This research project will discuss the basic principles of bankruptcy laws in the United States, United Kingdom, and India. It will discuss, among other topics, the basic rules and principles dealing with insolvency law, management issues, buying and selling assets, the treatment of contracts and leases, and the resolution and payment of claims. All of which depend upon act of insolvency. [2]

Certain such common principles are namely:

- An act of insolvency is a creation of statute
- An act of insolvency is personal

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[2]Wee, Meng Seng. Singapore Journal of Legal Studies, 2006, pp. 228–30. JSTOR,http://www.jstor.org/stable/24869225. Accessed 8 Dec. 2023.

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- Act of insolvency cannot be purged
- An act of insolvency may be voluntary or involuntary
- Certain transfers are in themselves acts of insolvency
- Burden of proof[3]

It is pertinent at this juncture that we study the scheme and object of bankruptcy laws principles in these legislations. Understanding the reasoning and underlying principles, gives a gist of how to interpret these legislations. While legislations might differ, their underlying concept is the torch bearer for construction of these statutes, which is primordial objective to conduct a research on the aforementioned subject, relevant to insolvency, bankruptcy and principles of business laws.

II. OBJECTS OF INSOLVENCY LAWS

In sharp contrast with the antiquity of insolvency and its impact on society, economy and the law is its reputation, which has long been the subject of disdain by lawyers, lampoonery by authors and dread by the public. The infamy of insolvency is still evident in press reporting of the vicissitudes of people, although, as a subject of study and practice, it has gained ground. At the dawn of this century, as the financial crisis continues apace, it is difficult to imagine a practitioner whose practice will not touch on insolvency, whether of individuals or of companies. Insolvency is now the common currency of serious conversations and of casual table talk. In academic life, it is increasingly common to see insolvency academics and research units within faculties of law and/or business investigating the impact on law, society and the economy of this most singular of subject-matters. International conferences and colloquia abound as academics, practitioners and members of the judiciary proffer their views on the causes of the crisis and whether insolvency law and structures are sufficiently robust to withstand the pressures that are being placed on them, especially in the financial sector.

The principle of bankruptcy laws is to prevent persons craftily obtaining into their hands great substance of other men's goods, and at their own wills and pleasures consuming the substance obtained by credit of other men, and it is always to be remembered that it is the protection of persons who have so given credit which is the professed object of bankruptcy laws.[4]

It is a special law having for its object the distribution of an insolvent's assets equitably amongst

[3] *Ibid.*
[4] *Sutton* v *Weeley,* (1806) East 442. The law on the subject is contained in the Provincial Insolvency Act, 1920 and the Presidency-Towns Insolvency Act, 1909.

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his creditors and persons to whom he is under liability, and, upon this *cessio bonorum*, to release him under certain conditions from future liability in respect of his debts and obligations.[5]

Insolvency laws are designed to serve two basic purposes:

Firstly, they enable a person to get rid of the burden of debts which his assets are no longer in a position to pay so that when freed from his burden, he may have a fresh start in life.

Secondly, whatever has remained of his assets, they should be taken charge of by a third person and distributed equally among those who have claims against the insolvent.

MULLA-

The chief aim of every system of bankruptcy law should be to combine and regulate two great objects. First, the distribution of the effects of the debtor in the most expeditious, the most equal and the most economical mode and secondly, the liberation of his person from the demands of his creditors when he has made a full surrender of his property.[6]

RINGWOOD-

Its two aims are to distribute the debtor's property among his creditors in the most expeditious and economical manner and to give the debtor a new start in life, free from the demands of his creditors, when he has not been guilty of certain serious offences.[7]

HENLEY-

There are two objects of insolvency law, namely-

(i) the equitable distribution of the effects of the debtor in an economical and expeditious manner; and

(ii) the liberation of his person from the demands of his creditors when he has made a full surrender of his property.[8]

BLACKSTONE-

The laws of bankruptcy are laws calculated for the benefit of trade and founded on principles of humanity as well as justice, and to that end they confer some privileges not only on the creditors but also on the insolvent debtor himself. On the creditors, by compelling the bankrupt to give up all his effects to their use, without any fraudulent concealment: On the debtor, by exempting him from the rigour of the general law, whereby his person might be confined at the

[5] *Levy, Re* (1881) 17 Ch D 746, CA.
[6] Mulla on the Law of Insolvency in India, (4th edn., 1997) p 1.
[7] *Ibid.*
[8] *Ibid.*

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discretion of his creditor, though in reality he has nothing to satisfy his debt: whereas the law of bankrupts, taking into consideration the sudden and unavoidable accidents to which men in trade are laible, has given them the liberty of their persons, and some pecuniary emoluments, upon condition they surrender up their whole estate to be divided among their creditors.[9]

To sum up, insolvency laws put all unsecured creditors on par. A secured creditor need not take part in bankruptcy. After his discharge an insolvent can have a fresh start in life.

III. CONCEPT AND MEANING OF THE TERM 'INSOLVENCY'

The term 'insolvency' under the Indian law is synonymous with the English law term 'bankruptcy'. Insolvency is a legal concept which exists for the purpose of administering, according to rules of law, the property of a person unable to pay his debts.[10]

The term 'insolvency' connotes a disabling non-domestic status of a privative nature. It is imposed by the state through its courts (if certain circumstances exist) by an order of adjudication and it attaches to the debtor until it is removed by that same court by an order of discharge.

Status is a person's legal condition in society, wither absolute or in a relation to another person which is imposed by the state and carries with it certain incidents (i.e. rights, duties, capacities, powers, disabilities or combinations of them). Such legal condition and its incidents are generally unchangeable at the mere will of the person subject to the status.

Insolvency involves a change of status and imposes certain civil disabilities on the debtor, for example *inter alia* , he cannot deal with his property, he cannot enter into contracts. He is disqualified from being appointed or acting as a magistrate, being elected to any office of any local authority where the appointment to such office is by election or holding or exercising any such office to which no salary is attached; and being elected or sitting or voting as a member of any local authority.[11]

The object of imposing the status of insolvent on a debtor is to protect the debtor himself, to safeguard the interest of his creditors and to preserve commercial morality.[12]

A debtor who has committed an act of insolvency may be adjudged an insolvent on his own petition or on the petition of his creditors. An administrator (official assignee or official

[9] *Ibid.*
[10] *Dasari Srihari Rao* v *Talluri Harinandha Babu*, (2002) 3 CLT 391 (DB) (AP).
[11] *Ibid.*
[12] Halsbury's Laws of England, para 201 in *T.T.V. Dhinakran* v *Dy Director, Enforcement Directorate*, AIR 2003 Mad 50 at pp. 67-68.

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receiver) is appointed to administer the property of the insolvent for the general benefit of all his creditors.

IV. GENERAL FRAMEWORK OF INSOLVENCY LAW IN INDIA

The need for an insolvency law in India was first articulated in the three Presidency-towns of Calcutta, Bombay and Madras. The earliest rudiments of insolvency legislation can be traced to sections 23 and 24 of the Government of India Act, 1800, which conferred insolvency jurisdiction on the Supreme Court at Fort William and Madras and the Recorder's Court at Bombay. These Courts were empowered to make rules and order for granting reliefs to insolvent debtors on the lines intended by the Act of the British Parliament called the Lord's Act passed in 1759.[13]

The passing of Statute 9 in 1828 (Geo. IV. c. 73), can be said to be the beginning of the special insolvency legislation in India. Under this Act, the first insolvency courts for relief of insolvent debtors were established in the Presidency-towns. Although the insolvency Court was presided over by a judge of the Supreme Court, it had a distinct and separate existence. The Insolvency Court was to sit and dispose of insolvency matters as often as was necessary. But the Court at Calcutta was to sit at least once a month. The Act of 1828 was originally intended to remain in force for a period of four years, but subsequent legislation extended its duration up to 1843 and also made certain amendments therein.[14]

A further step in the development of Insolvency Law was taken when the law in 1848 (11 & 12 Viet.c.21) was passed. The Act presumed the distinction between traders and non-traders in certain respects on the lines of the corresponding Bankruptcy statutes, then in force in England. It continued the Courts for the relief of insolvent debtors established by the Act of 1828 in the Presidency towns and in their place the present High Courts were set up. The insolvency jurisdiction in the Presidency towns was thus transferred from the Supreme Court to the High Court.[15]

The Provisions of the Indian Insolvency Act, 1848, were, however, found to be inadequate to meet the changing conditions. In the eighteen seventies Sir James Fitzjames Stephen proposed an Insolvency Bill for the whole of India modeled on the Bankruptcy Law then in force in England. But this proposal was dropped, as the conditions in India in general were not

[13] I.D.C. Ramsay, "Models of Consumer Bankruptcy: Implications for Research and Policy" (1997) 20 *Journal of Consumer Policy* 269.
[14] See Mulla Law of Insolvency in India(1997), P.16
[15] A. Walters, "Bankruptcy and hybrid claims" (2005) 121 L.Q.R. 46; Insolvency Service, "Bankruptcy: revised guidance on motor vehicles as exempt property" (2006) 1 Q.A. 23

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favourable for a compulsive legislation on the subject. The Act of 1848 continued in force in the Presidency-towns until the enactment in 1909 of the present Presidency-towns Insolvency Act, 1909.

While there was special insolvency legislation for the Presidency-towns, there was no insolvency law in the rural areas. The main reason for this difference was the absence of any flourishing trade and commerce therein. In the rural areas for a considerable period the ordinary principle of distributing the sale proceeds pronotes among decree-holders after satisfaction in full of the amount due to the attaching decree holder seems to have prevailed. The first attempt to introduce insolvency law in the rural areas was made in 1877. Some rules were incorporated in Chapter 20 of the Code of Civil Procedure, 1877, which conferred jurisdiction on the district Courts to entertain insolvency petitions and grant orders of discharge, these rules were re-enacted with certain modifications in Chapter 20 of the Code of Civil Procedure, 1882.

The Provisions in the Civil Procedure Code of 1859 were described as the "germ and nothing more than a germ of an insolvency law." The provisions were limited to cases in which legal proceedings were instituted and judgment obtained. Creditors of a debtor were not entitled to file an insolvency petition. These defects were removed by the provincial Insolvency Act, 1907. This Act created a special Insolvency Jurisdiction laying down the conditions under which a debtor could be adjudicated on his own petition or on a petition by a creditor. The Act of 1907 was repealed by the provincial Insolvency Act, 1920 which is the Act now in force in the areas other than the Presidency towns.

CENTRAL AND STATE LEGISLATIONS:

On January 26, 1950 the Constitution of India came into force. The Laws/Acts enacted after its adoption are called the Central Laws/Acts. For Example the Companies Act, 1956, Limited Liability Partnership Act, 2008 (LLP) etc, (this contains the detailed process for the winding up of the corporate entities). These are called the Central Acts, wherein the Companies/LLPs are required to get themselves registered with the Central Registry known as the Registrar of Companies /LLP in order to become corporate entities.

However, before the adoption of the Constitution of India, many laws/Acts governing the insolvency procedures were in operation like the Provisional Insolvency Act, 1920, and the Presidency Towns Insolvency Act, 1908. Government of India saved these Acts so that they do not get repealed and allowed for State Amendments wherein the entities provided for under those Acts are regulated by different States and the States were given the authority to modify or make provisions in these Acts. Since, the personal insolvency is a subject matter of State List

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over which laws can be made by the State Legislation. Hence any amendment in these Acts will require acceptance or assent, from all the States or the States can individually amend these laws/Acts.

Currently, the Insolvency and Bankruptcy Code, 2016 deals with insolvency laws in India along with the Companies Act,2013. Earlier, the stream of insolvency laws can be segregated chiefly under two heads: Personal Insolvency, which deals with individuals and partnership firms governed by Provisional Insolvency Act, 1920 and Presidency Towns Insolvency Act, 1908 and Corporate Insolvency, whose consequence is winding up of the company under the Companies Act, 1956.

V. PRINCIPLES COMMON TO ALL ACTS OF INSOLVENCY

In order to invoke the jurisdiction of an insolvency court to have a person adjudged an insolvent it is essential that such a person is a debtor within the meaning of insolvency lw and has committed an act of insolvency. Both these form the very basis of the insolvency jurisdiction of courts.[16]

The term "act of insolvency" is purely the creation of statute. Therefore, it covers only those and those acts which alone which are prescribed or declared as *indicia of insolvency* by the statute. [17]This term has not been defined by both the Presidency Towns Insolvency Act and the Provincial Insolvency Act, but seven acts are enumerated therein. Accordingly, a debtor commits an act of insolvency in each of the following cases, namely:-

1. ***Transfer of property***- if in India or elsewhere he makes-

   i. A transfer of all or substantially all his property to a third person for the benefit of his creditors generally;

   ii. A transfer of his property or any part thereof with intent to defeat or delay his creditors;

   iii. Any transfer of his property or any part thereof, which would, under this or any other enactment for the time being in force, be void as a fraudulent preference if he were adjudged an insolvent;

[16] S.A. Riesenfeld, "The Evolution of Modern Bankruptcy Law: A Comparison of the Recent Bankruptcy Acts of Italy and the United States" (1947) 31 Minn. L.Rev. 401.

[17] I.P.H. Duffy, "English Bankrupts, 1571-1861" (1980) 24 Amer. J. Legal Hist. 283; R.H. Helmholz, "Bankruptcy and Probate jurisdiction before 1571" (1983) 48 *Missouri Law Review* 415; R. Weisberg, "Commercial Morality, the Merchant Character, and the History of the Voidable Preference" (1986) 39 *Stanford Law Review* 1; M.S. Servian, "The influence on, and the influence of a Law Reformer: Basil Montagu, a Founding Father of the Modern Law of Insolvency" [1986] I.L. & P. 45; M.S. Servian, "On the demise of acts of bankruptcy" [1988] I.L. & P. 117; D. Graham, "'Shakespeare in Debt?' English and International Insolvency in Tudor England: Part 1" (2000) 13 *Insolvency Intelligence* 36.

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2. ***Avoidance of creditors***- if with intent to defeat or delay his creditors-

i. He departs or remains out of India i.e. the territories to which the Act extends;

ii. He departs from his dwelling house or usual place of business or otherwise absents himself;

iii. He secludes himself so as to deprive his creditors of the means of communicating with him;

3. ***Sale or attachment in execution of a money decree***- if any of his property has been sold or attached for a period not less than twenty-one days in execution of the decree of any court for the payment of money (the words "or attached for a period of not less than twenty-one days" do not occur in the P.I.A., therefore in cases governed by the P.I.A. only a sale in execution of a money decree can operate as an act of insolvency);

4. ***Debtor's petition***- if the debtor petitions, to be adjudged an insolvent;

5. ***Notice of suspension of payment of his debts***- if he gives notice to any of his creditors that he has suspended, or that he is about to suspend the payment of his debts;

6. ***Imprisonment in execution of a money decree***- if he is imprisoned in execution of the decree of any court for the payment of money;[18]

7. ***Non-complaince with insolvency notice***- if, after a creditor has served an insolvency notice on him in respect of a decree or an order for the payment of any amount due to such creditor, (the execution of which is not stayed), he does not, within the period specified in the notice (which shall not be less than one month), comply with the requirements of the notice.[19]

However, the debtor shall not be deemed to have committed an act of insolvency for non-compliance with the insolvency notice, if he has a counter-claim or set-off which equals or exceeds the amount ordered to be paid, and which he could not lawfully set up in the suit or proceeding in which the decree or order was made against him.[20]

Explanation- the act of an agent may be the act of the principal, even though the agent may have no specific authority to commit the act.[21] (The words "even though the agent may have no specific authority to commit the act" do not occur in the PIA., but this does not make any difference as such authority can flow from the agent's general position.)

[18] M. Radin, "The Nature of Bankruptcy" (1940) 89 *University of Pennsylvania Law Review* 1
[19] G. Glenn, "Essentials of Bankruptcy: Prevention of Fraud, and Control of Debtor" (1937) 23 *Virginia Law Review* 373.
[20] I. Treiman, "Acts of bankruptcy: a medieval concept in modern bankruptcy law" (1938) 52 Harv. L.Rev 187
[21] *Ibid.*

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FUNDAMENTAL PRINCIPLES COMMON TO ALL ACTS OF INSOLVENCY:

According to Mulla, there are ten fundamental principles common to all "acts of insolvency". These are briefly discussed below.

1. *An act of insolvency is the foundation of jurisdiction-*

It is the act of insolvency, and not the insolvency petition, which gives jurisdiction to the insolvency court.[22]

2. *Act of insolvency is a creation of statute-*

The acts or omissions declared by a statute to constitute an act of insolvency alone when committed by a debtor render him liable to be adjudicated an insolvent, consequently there is no common law of an act of insolvency, not even if the consequences of the act are precisely identical to an act of insolvency.[23]

3. *Act of insolvency must be committed in India-*

Unless the statute otherwise provides, insolvency laws have territorial operation only. The PTIA 1909 and PIA 1920 provide that the three classes of transfers enumerated therein as acts of insolvency constitute an act of insolvency, whether such transfer is made in India or elsewhere.[24]

4. *An act of insolvency is personal-*

Under the English Law, an act of bankruptcy must be the personal act or default of the debtor. Thus a firm as such cannot commit an act of bankruptcy by a particular act of his agent which he has not authorized and of which he has no cognizance.[25]

Under the Indian law also, the act of insolvency is personal in nature, but it may, in certain circumstances, be committed by an agent. A firm as such may also be adjudicated an insolvent, although a firm cannot strictly speaking commit any act of insolvency.[26]

5. *Act of insolvency cannot be purged-*

If an act of insolvency is once committed, no subsequent circumstances can purge or condone it. Thus, if a debtor presents an insolvency petition, he commits an act of insolvency. If the petition is subsequently dismissed, it does not, and cannot, purge the act of insolvency. Even where all creditors consent, the act of insolvency cannot be condoned. Any creditor may present

[22] *Ex. P. Crispin* (1873) 8 Ch. App. 374.
[23] Per Lord Halsbury in *Cooke* v *Charles A. Vogler Co.* (1901) A.C. 102.
[24] *Ibid.*
[25] *Ex. P. Blain* (1879) 12 Ch. D 522.
[26] *Re. Mukund Lal Firm* [A. (1968) S.C. 1182].

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an insolvency petition against the debtor founded on that act of insolvency.[27]

6. ***An act of insolvency may be voluntary or involuntary-***

If it is voluntary, it dates from the time when it is begun. In case it is involuntary, it dates from the time when it is completed.[28]

According to Hidayatulla J.: (as he then was), involuntary acts of insolvency are of a kind which a creditor is able to compel a debtor to disclose his insolvent condition, even if the insolvent is careful enough not to commit a voluntary act of insolvency. E.g. imprisonment in execution of a money decree.[29]

The acts of insolvency which are voluntary are: Debtor's petition, notice of suspension of payment, certain transfers of property, avoidance of creditors with intent to defeat or delay. On the other hand, insolvency notice, sale or attachment of property in execution fo a money decree, imprisonment of the judgment debtor in execution of a money decree constitute involuntary acts of insolvency.[30]

7. ***Act of insolvency must have been committed within three months before presentation of a creditor's petition-***

The insolvency petition should have been presented within three months of the ac of insolvency on which it is founded.

8. ***Transfers which are in themselves acts of insolvency-***

Irrespective of whether they are made in India or elsewhere, the following three types of transfers are declared by the Acts to constitute an act of insolvency. These are:

i. A transfer by a debtor for the benefit of his creditors generally.

ii. A transfer with intent to defeat or delay creditors.

iii. A transfer which would be void by way of fraudulent preference.

Each of the above transfers in itself constitutes an act of insolvency and is void as against the Official Assignee or Receiver, if insolvency supervenes within three months from the date of the transfer. But where no insolvency supervenes within the prescribed time, the transfer cannot be impeached as an act of insolvency. In cases where the transfer is also fraudulent under the Transfer of Property Act, 1882, it is void as against the O.A/O.R., even after the expiry of three

[27] Jacob Ziegel, *Consumer Insolvencies: A Neglected Area of Study in English Insolvency Law* (unpublished) a paper delivered at the 2003 Oxford Society of Legal Scholars conference.
[28] *Ex. P. Villars* (1874) 9 Ch. App. 432.
[29] *Re Y .M. Dora* [A. (1966) S.C.), 918].
[30] *Ibid.*

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months, if the debtor is adjudged an insolvent on a petition founded on a subsequent act of insolvency. The O.A. or O.R. as representing the general body of creditors, is entitled to impeach such transfers by making an application to the insolvency court by a suit in the Civil Court, provided he takes action within the period prescribed by the Law of Limitation to impeach such transfer.

Exception- a transfer to a *bona fide* purchaser for value without notice is a protected transaction, and cannot be impeached as an act of insolvency.[31]

9. ***Any creditor can file a petition on any act of insolvency-***

A Petitioning creditor can rely upon any act of insolvency committed by the debtor. But where the alleged act of insolvency is the execution of a deed of transfer or assignment for the benefit of creditors generally, a creditor who has in any way been a party or privy to it or has acquiesced in it or has assented, recognized or approved it, cannot afterwards allege that the execution of such deed constitutes an act of insolvency.[32]

10. ***Burden of proof-***

The burden of proving that an act of insolvency has been committed by a debtor is upon the person who alleges it, and that burden must be strictly discharged. It is essential that the alleged act of insolvency must be strictly proved, as it gives jurisdiction to the insolvency court to pass an order of adjudication against the debtor. [33]This order has serious and drastic consequences of attaching various disqualifications and altering the status of the debtor.

VI. CONCLUSION

The object of insolvency law is to make all the property of the insolvent divisible among all the creditors. The Act provides the machinery by which the insolvent can be given relief and also the machinery by which the creditors, who are not secured in the payment of these debts, are to be satisfied. The Insolvency Act provides for the particular protection of the insolvent and general protection of creditors and the trading public. It is an administrative or adjective law. The policy and object underlying it is to secure the distribution of a debtors estate among his creditors and to prevent the more active creditors from getting an undue advantage over those who may be less active. Section 6of the Act deals with acts of insolvency. The insolvency jurisdiction of the courts can be exercised for adjudging a person as insolvent only if he is a

[31] P.T.I.A, S. 57; P.I.A., S. 55.

[32] John Tribe, "Personal Insolvency Law: Debtor Education, Debtor Advice and the Credit Environment (Part 1)" (2007) 20 *Insolvency Intelligence* 23.

[33] *Ibid.*

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debtor under the Act and has committed any one of the acts of insolvency as enumerated in Section 6.[34]

The starting point or foundation of insolvency jurisdiction is an act of insolvency on the part of the debtor.[35]

Although the law relating to personal insolvency has not evolved much in the U.S., U.K. or India, the basic tenets of insolvency has shifted from punishing the debtor, to rather protect him. The insolvency laws are created with an object to secure the debtor as well as the creditors. There are nine fundamental principles which run like a string among all the insolvency legislations for personal insolvency issues.

These principles are primal to an act of insolvency which is rather a creation of statute. This is the most important beginning point of all the other principles which are then common to all the acts of insolvency, especially in India.

These principles have been appreciated by the judges in each and every case depending on the facts and circumstances of each case. These principles act like a guiding light for the judges to apply the insolvency laws and not vitiate the basic spirit of these legislations.

As a scholarly suggestion, it can be noted that even more fundamentally we need to ensure that appropriate forums exist for scholarly discussion of personal insolvency law, practice and policy. The most important of these forums is obviously the journals.[36]

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[34] *Sulthan Pillai* v *Govt of Karnataka*, AIR 1999 Kant 74.

[35] John Tribe, "Personal Insolvency Law: Debtor Education, Debtor Advice and the Credit Environment (Part 1)" (2007) 20 *Insolvency Intelligence* 23.

[36] *Nortel Networks SA, Re* [2009] EWHC 206 (Ch) (February 11, 2009), judgment available from the BAILII website at *http://www.bailii.org/ew/cases/EWHC/Ch/2009/206.html*.

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