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Doctor's Witness and Court Procedures in India

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Abstract

Law always need the help of medical expert in one way or other for justice as it has no such expertise. Sometimes, the doctor is the only material witness available. So, the court calls a doctor for help whenever it feels necessary. To attend a court is not less than a great ordeal for a doctor, as he is not well verse with the functioning of the court. This article is to introduce doctors to the court procedure so that he does not feel estrange whenever he had to face it.

Keyword: Summons; Medical Expert; Legal System; Court; Evidence; Witness; Conduct Money; Hostile Witness.

Introduction

The court has no medical expertise and not expected to have. It is dependent on a doctor for any opinion regarding the medical aspect of the fact at hand. Doctor can be of help as an expert in presenting the unbiased view of various events and in corroborating the facts presented by either party in a dispute. Sometimes, medical evidence is the only evidence available to the court when no eyewitness is available or come forward.

Giving testimony in the court of law is a responsible task. Most of the doctors try to avoid getting involved in it. There are various reasons behind it, but most importantly, time involvement and merciless cross-examination. This is mainly because doctors are not acquainted with the court and court procedure. This article is to provide some outline about how court usually interacts with a doctor as an expert witness and how a doctor should interacts with the court.

Summon

There are various processes to compel the appearance of an accused or any witness, expert or common, to give evidence in the court of law like Summons, Warrant of Arrest and Proclamation & Attachment.

Summon or Subpoena [1] (Latin, sub=under, poena=penalty) is a document compelling the attendance of a witness in a court of law under penalty, on a particular day, time and place, for the purpose of giving evidence.The court may also ask him to bring various books, documents or any other things under his control to produce on the court as evidence.

Section 311 of the Code of Criminal Procedure, 1973 deals with the power to summon material witness, or examine person present. Any Court may, at any stage of any inquiry, trial or other proceeding under this Code, summon any person as a witness, or examine any person in attendance, though not summoned as a witness, or recall and re- examine

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any person already examined; and the Court shall summon and examine or recall and re- examine any such person if his evidence appears to it to be essential to the just decision of the case.

Section 61 to 69 CrPC deals with summons. A summon is issued by the court in duplicate signed by the presiding officer and bears the seal of the court. It contains the name of the accused and defendant, FIR number, the various dealing IPCs, police station with which the FIR registered, date, time and place of hearing and brief account about the role of the witness in the particular case, including the relevant document name and number like postmortem report or /medico-legal report.

Subpoena/Summons are of Two Types [2]

- Subpoena ad testificandum: To attend and give evidence.
- Subpoena duces tecum: To attend, bring documents as specified and give evidence.

Serving of Summon [1,3,4]

Summon is served to the person by a police officer, officer of the court or any other government servant. The person keeps one copy giving receipt on the other copy. Summon can be served by the registered post. If the person to whom summon to be served is not found, summon can be served to any adult person of the family residing with him after taking receipt or can be fixed on the house where the person resides. If the person is in active government service, summon is usually sent in duplicate to the head of the office and such head will ensure delivery of summons to the particular person. When a Court issues summon to be served at any place outside its local jurisdiction, it usually sends such summons in duplicate to a Magistrate within whose jurisdiction where the person summoned, resides.

Under the code of civil procedure, a summon can be e-mailed or faxed by the court.

If a person refuses to accept summon, summon can be fixed on the house or workplace or court can issue arrest warrants to ensure his attendance.

Attending a Summon [1,4]

A summon must be obeyed and all the evidences must be submitted, as asked by the court. The person can be excused from attending the court if he has a valid reason but the reason for not attending the court should be intimated to the court in advance to avoid complications or penalty. The court generally accepts the genuine reasons like on health ground and allows to appear on the next date.

Whenever there are more than one summon at a particular time to attend, the witness should know that the criminal court has priority over civil court and he should attend the criminal court duly informing the civil court. In the same way, a higher court has priority over lower court. If summon is from the court of the same status, the witness should attend the court from which he got summonedearlier, duly informing the other court. The witness can attend the second court after finishing his evidence in the first court.

Non-Compliance of the Summon

When a witness fails to attend the court on the date of summon, the court doesn't straight forward issue notice/warrant to the witness. The court will ask the 'proof of service' i.e. the return receipt of certified mail, signature of the person receiving summon or the person who served summon swears that summon was served. In the absence of 'proof of service' the court cannot issue notice/warrant because you were not duly served. A telephone call or a faxed/emailed summon will not constitute 'proof of service' but if he appears to the 'electronic summon' it will be taken as 'proof of service'.

If the witness fails to attend the court intentionally without any valid reason, then he will be liable to pay damages in civil cases. In criminal cases, the court may issue notice (Sec 350 CrPC) and after hearing the witness, if the court finds out that the person neglected summon without any valid reason, may sentence fine on him or imprisonment or may issue bailable/non-bailable warrant to secure the attendance of the witness. Generally the court issues a bailable warrant, followed by non-bailable warrant. On rare occasion, the court may penalize the person by making him stand 'till the rising of the court'. Sometimes the court can bind the witness for the next appearance with his consent in the court itself without the need for issuing next summon. Then, he is bound to appear on the next date.

Nonattendance of the court in response to a court order without any valid reason may cause imprisonment up to six months or fine upto 1000 rupees or both (Sec 174 IPC).

Expenses to Attend the Court [1,5,6,7]

In civil cases, a fee is paid to the witness at the time of serving summons to cover the expenses of attending the court known as conduct money.

Conduct money is legally defined as 'money paid to a witness who has been subpoenaed on a trial, sufficient to defray the reasonable expenses of going to, staying at, and returning from the place of trial'. If the witness thinks that the fee is not sufficient, he can bring this fact to the notice of the court before giving the evidence.

In criminal cases, no fee is paid to the witness at the time of serving the summons. But the witness should attend the court and give evidence in the interest of the state. Conveyance charges and daily allowance can be claimed by the witness, according to the government rule. Nowadays, in all cases in which an officer of Government is summoned to give evidence, the Court gives him a certificate in the prescribed form, specifying the dates on which the officer attended the court and the amount, if any, paid to him by the Court. This certificate can be used by the officer concerned for claiming the travelling allowance from his employer, if he was not paid by the court. The certificate of attendance is provided in both civil and criminal cases.

Legal Procedures in India [1,4]

The witness is defined as 'a person who can give evidence regarding facts and/or the inferences that can be drawn therefrom' [1,4] (Sec 118-134 IEA). Legally,a witness is a person whose declaration under oath (or affirmation) is received as evidence for any purpose, whether such declaration is made on oral examination or by deposition or affidavit [16].

Witnesses are of two types: common witness and expert witness.

Common Witness is witness of fact who can give evidence about the facts observed or perceived by him.

Expert Witness (Sec 45 IEA) is a person who is trained, skilled or has education, knowledge or experience in a technical or scientific subject and capable of drawing inferences/ opinion from the facts observed by him or by others, as doctors, firearm experts, fingerprint experts, handwriting experts, etc.

An expert may give an opinion upon facts which are either admitted, or proved by him or other witnesses at the trial; on matters of common knowledge; and on hypothetical questions based on assumptions. The main obligation of a doctor is to bring professional facts. A doctor's testimony is considered evidence only when he can prove that his inferences are based on reasonable medical certainty (more probable than not) that a fact is true or not. Conclusions must be based on facts.

Experts are of two types: [11]

• Non-testifying Expert:

– Hired by a contesting party to evaluate the facts of the case. The expert helps the attorney to prepare a case, without testifying in the court

• Testifying Expert

– The expert appears in the court to testify before the judge, under oath

A witness who is supposed to have some motive or interest in concealing part of the truth or giving false evidence is declared as a hostile witness by the court on the suggestion of the lawyer of the summoned party. Hostile witness or adverse witness is defined as a witness who gives negative evidence against the party who called them as a witness [9].

In a significant order in the sensational Naga Vaishnavi murder case, the Andhra Pradesh high court stated that no expert witness could be treated as hostile by the prosecution. The HC bench headed by Justice Raja Elangovan said that the forensic expert was only an expert from outside the prosecution and their witness could not be considered as prosecution witness. He, however, said that the prosecution could cross-examine the forensic expert if they wanted to without treating him as hostile [12].

Hostile witnesses can be charged with perjury, which means giving wilful false or fabricated evidence (Sec 191 IPC) and may be prosecuted with imprisonment up to seven years (Sec 193 IPC).

Doctor as a Witness

A doctor can be both a common and expertwitness. When he describes injuries present over the body, he is a common witness and when he draws inferences and opinion about the inflicting weapon and the manner of infliction, etc., he is an expert witness.

As per Section 45 of Indian Evidence Act, the opinion of an expert is admissible, as opinion on a scientific fact by a person skilled in that subject is a relevant fact. However, the opinion of an expert is not binding on the court, as the expert is not a witness of facts and his evidence is of an advisory nature. He needs to put all the material facts before the court and the reasons on which he concludes the opinion, so that the court can make his own judgement.

Medical evidence is only corroborative evidence. It is of little value when there is a conflict of opinion between experts. In that case, Courts usually accept the opinion which is not in conflict with the direct evidence. But if direct evidence is not trustworthy, conviction may rely on medical evidence, if it is

trustworthy.

Recording of Evidence [1,4]

When the doctor appears before the court, the court will generally record their evidence promptly and as far as possible, they will not be required to attend the court at any adjourn hearing. The court will provide a tentative hour when the evidence is likely to be recorded. There is a standing order by Delhi High Court that the doctors should be summoned after 2 pm, so that it does not affect their patient care.

Evidence is recorded after taking oath. There are three main steps in recording evidence: Examination-in-chief by the counsel for the party who called him/her, Cross-examination by the opposing counsel and Re-examination by the prosecution counsel. Judge can ask any question at any stage to clear any doubt.

Examination-in-Chief

It is the first examination of the witness. Examination-in-chief is done by the lawyer for the party who called the witness. In a criminal case,the state is the party and the doctor is first examined by the prosecution lawyer.The object of this examination is to elicit principle salient facts bearing on the case, all relevant, medical facts and the conclusion that has been drawn from the facts. At this stage no leading question allowed except when the presiding officer is satisfied that the witness has turned hostile.

The Doctor should help the prosecutor in framing proper questions in proper sequence, so that each and every essential fact can be elicited.

Cross-Examination

In this the witness is examined by the lawyer of opposite party i.e. defence lawyer. The main objective of this examination is to elicit facts which are favourable to his case, to test the accuracy of the statement given by the witness during chief examination and sometimes to discredit the witness. Competency and credibility of the witness are also questioned.

The doctor should keep in mind that the facts favourable to the defence side should be given as promptly as on chief examination. Any omission should be accepted as the entire test given in a treatise for a single diagnosis need not to be done, which can be explained to the court. The doctor should not be dogmatic about his opinion.

Cross-examination helps to test the reliability of the evidence given. The object of cross-examination is to weaken, qualify or destroy the case of opponent. When the defence starts humiliating or embarrassing the witness, he may become tense, frightened, angry, aggressive or hostile. He should face the cross-examination coolly and intelligently, and should on no account lose his temper. Any self-incriminating statement given during cross-examination doesn't make him liable for arrest or prosecution afterward.Leading questions are allowed during cross-examination. It has no time limit.

Re-Examination

This is conducted by the first lawyer. The object is to correct, clarify or add any details to the statement the witness had made during cross-examination.It is allowed only when the presiding officer allows thinking it proper, but still leading question is not allowed.

Question by Judge

The judge may ask any question, in any form, about any fact, irrelevant or relevant, at any stage of examination to clear any doubts which arise. The court has the power to examine the witness even in the absence of public prosecutor, so that the person behind the scene doesn't suffer [13].

The deposition of the doctor is written and handed over to him. The witness should go through all the papers and sign all the papers. The witness should leave the court only after due permission of the court. The court can recall and re-examine any witness who is already examined if the court think it essential to examine the witness again.

In Witness Box

Some rules which can help a doctor in the witness box in avoiding unnecessary embarrassment are as follows:

A doctor should attend the court in time with all the required documents as asked and well prepared, and if necessary study the literature on the subject. He should appear professional and should not talk loosely about the case to anyone. As per Bouardel: if the law had made a physician a witness, he should remain a man of science; he has no victim to avenge, no guilty person to convict and no innocent person to save.

A doctor should be impartial. Any fact or opinion which is favourable to the defence should be given as promptly as to the prosecution. His evidence should be within the limit and scope of science and

his field of expertise. He should avoid speaking on a subject in which he has little or no practical experience. Irrelevant questions can be brought to the notice of public prosecutor/court.

The most important thing is how the doctor clarifies the facts and opinions to the court. He should speak coolly and calmly with full confidence, should use simple words and avoid technical terms. Under any circumstances, he should not lose temper. An angry witness is often a poor witness, and the effectiveness of his testimony is diminished or destroyed.

He should answer briefly and directly to the question asked by the counsel or the court, but if any question requires an explanation, the doctor should resists to give simple answer and explain it. If the question is not understood, he can politely ask to clarify or rephrase it. If any question is not known to him or beyond his expertise, he should admit it without any hesitation. A doctor has no professional privilege, and therefore he must answer any question, but only if the court directs to do so.

A doctor can volunteer things to the court, if he thinks necessary to avoid any confusion or misleading which may lead to miscarriage of justice. But, information should not be volunteered beyond that asked for in the question as it is often not well prepared, and is liable to cross-examination.

There are Some Guidelines Proposed by the General Medical Council, UK, for Medical Witnesses [10]:

1. The role of an expert witness is to assist the court on some special or technical matters which are within their expertise. His duty to the court overrides any obligationto the party who is paying him. So, the expert has to be independent and not influenced by the party calling him.
2. He must understand the question asked before giving any answer. He should not give any answer/opinion until he understands the exact question.
3. He must restrict his view/opinion/statement to the area he has relevant and direct experience. He must be aware of the standard of various procedures at the time of the incidence.
4. If any issue/question falls outside his expertise, he should make it clear to the court. If the court still ordered to answer, he must answer with his best of abilities, making it clear that the issue is outside of his competency.
5. His opinion must be balanced and he must clear the facts or assumption on which the opinion is based on.
6. All the reports written or evidence given should be accurate and must not be misleading.
7. If he is asked to give advice or opinion about any person without consultation he must express the limitation.
8. His language and terminology should be readily understood by the non-doctor. He must explain any medical terminology or abbreviation used.
9. If at any stage the medical witness changes his view on any material/matter, he must convey the fact to the calling party, opposite party and to the court. Usually, the expert informs the calling party counsel and he ensures to inform the opposite counsel and the court.
10. The most important thing is to be honest, trustworthy, objective and impartial. He should not be influenced by the facts and individuals related to the proceedings.
11. He must keep upto date in his field. He must understand the law of the land related to his work. He also should know how to prepare a court-compliant report and how to give oral evidence.
12. If proper consent has not been obtained for disclosure of the information from the concerned party, he should inform the court. He should not disclose the confidential information other than to the party to the proceedings, unless the subject consents or obliged by law to do so or ordered by a court or tribunal to do so.
13. If there is any potential conflict of interest of the expert or personal interest, he must remain impartial. He may continue as an expert witness only when the court allows.

Statute of the Expert Witness in Indian Senario [14]

Scientific evidences are accepted by the court under Sec 45 IEA as there is no specific rule or law related to this as opposed to various rules prevalent in American law, e.g. 'The Frye Test', 'The Federal Rule of Evidence' and ' The Daubert Guidelines'.

According to the section 45 IEA 'When the court has to form an opinion upon a point of foreign law, or science or art, or as to the identity of handwriting (or finger impressions), the opinions upon that point of persons specially skilled in such foreign law, science or art, (or in questions as to the identity of handwriting or finger impressions) are the relevant facts.

According to the courts, medical evidence is only

an opinion and it is hardly decisive. But the opinion of the autopsy surgeon and of the forensic science laboratory is reliable. The Supreme Court has stated that unless there is something inherently defective in the medical report, the Court cannot substitute its own opinion for that of the doctor. The court is unlikely to understand the various principles and methods of the procedure, so the opinion of experts is taken by the court solely on trust and faith.

According to The Supreme Court Of India 'A medical witness called in as an expert and the evidence given by the medical officer is really of an advisory character based on the symptoms found on examination. The expert witness is expected to put before the court all materials inclusive of the date which induced him to come the conclusion and enlighten the Court on the technical aspects of the case by explaining the terms of science, so that the Court, although not an expert, may form its own judgement on these materials after giving due regard to the expert's opinion because once the expert's opinion is accepted it is not the opinion of the medical officer but that of the Court.

Witness Protection [15]

In current scenario, India does not have any specific law or act to protect important witness as in USA, where there is the Federal Witness Protection Program and in Canada, Witness Protection Act which provides protection to its witnesses. But, there are guidelines/orders issued by various courts for the protection of important witnesses and their relatives.

Delhi High Court has provided some guidelines for the protection of witnesses. The Court has also made it compulsory for the investigating officer of a case to inform the witness about the new guidelines. The Court has appointed the Member Secretary of the Delhi Legal Services Authority to decide whether a witness requires police protection or not. The competent authority shall take into account the nature of security risk to him/her from the accused, while granting permission to protect the witness. Once the permission is granted, it shall be the duty of the Commissioner of Police to give protection to the witness.

Besides this, Mumbai police has formulated four-point plan to protect the vital witnesses in the bomb blast and other sensitive cases. The plan is based on the following guidelines:

1. Transferring the witness from his city of residence to another city.
2. The government will provide the witness with a job similar to the one he is/was doing.
3. The witness shall be given a new name, identification, ration card; and a new passport.
4. The government will accept the responsibility of the witness's entire family and provide it with security cover.

Under present circumstances, the Indian Government is evaluating the American laws pertaining to witness protection, where gang men after turning approver are given a new name and identity and relocated to a new place.

Recording via Video Conference [16]

Indian statutes do not have specific provisions for recording of evidence via video conference, though courts through various landmarked decisions laid down various parameters and framework for the use of video conference and internet conference.

This has been consolidated in the landmark decision of the State of Maharashtra v Dr Praful B Desai in 2003. In the case Supreme Court upheld video conferencing as a vital tool for recording of evidence, particularly for the witnesses residing abroad.

Firstly, it was used in civil proceedings in cases where the witness is residing abroad or cannot attend the court for various reasons. Courts observed that it saves time and expenses and also helps in rapid disposal of cases.

The courtalso has used the technology on several other occasions depending upon the facts and circumstances, mainlyan examination of sexually exploited victims.

In the case of Dr Kumar Saha v Dr Sukumar Mukherjee in 2011, the Supreme Court allowed recording of testimonies and cross-examination through internet conferencing.

Guidelines for Video Conferencing

Certain guidelines are laid down by the judiciary for proper identification of the witness and accuracy of the equipment. They can be summarised as follows:

1. All the expenses and arrangements for video conferencing have to be borne by the applicant, who wants to avail the facility.
2. An officer will be deputed, from India or from the consulate/embassy inthe country where the evidence is being recorded, who will have some important responsibility. He would remain

present during the process and willensure that there is no other person in the room while the evidenceis being recorded. He will fix the time for recording evidence.

3. The evidence will be recorded during working hours of Indian courts. No plea of anyinconvenience will be accepted on account of the time difference between India and the concerned country where the witness is.
4. If the witness doesn't attend at fixed time, without any sufficientcause, then the Magistrate may disallow recording of evidence by video conferencing or may take action asprovided by law, to compel attendance.
5. In case of non-Party witnesses, all the relevant and disclosed documents will be sent to the witness for theiracquaintance and an acknowledgement will be filed.
6. The visual will be recorded at both ends.
7. The witness would have to filean affidavit/ undertaking duly verified before a judge/ magistrate/notary that the person shown asa witness is the same person as who is going to depose with a copy of such affidavit to the otherside, before the process of evidence recording starts.After identification process, oath would be administered as per the Oaths Act 1969 of India, by an officer duly authorised for that.
8. The person who wishes to examine such witness would have to file anaffidavit/undertaking.
9. The officer deputed will ensure that the witness is not coached/tutored/prompted. He will ensure that the witness, their counsel and one assistant are allowed in the studio during the process. He will also ensure that the witness is notany way prevented from bringing into the studio any papers/documents which may be required. The witness alone can be present at thetime of the process of evidence recording.
10. Magistrate and notary are to certify to this effect.
11. The officer deputed will ensure that the whole process proceeds without any interruption and without any adjournments.
12. The officer will take memo if the witness doesn't reply to any answer and this will be taken into consideration while the evidence is being read in the court.
13. The court/commissioner must record any remark regarding the demur ofthe witness while on the screen and shall note the objections raised during the recording of thewitness either manually or mechanically.
14. To become part of the record of the proceedings, the depositions of the witnesswill have to be signed by the witness as early as possible before a magistrate or notary public. The digital signature can be adopted in thisprocess and will be obtained immediately after day's deposition.

References

1. Reddy, K S N. The Essentials of Forensic Medicine and Toxicology. 31st ed. Hyderabad: K Saguna Devi. 2012; Pg 7.
2. Seth, Sumit. Review of Forensic Medicine. 4th ed (international). Delhi: Peepee Publishers and Distributors Pvt Ltd. 2011; Pg 247.
3. Know your law: Summons. Ourlarnataka.com [internet] [cited 2013 Jan 25]. Available from:http:// www.ourkarnataka.com/Articles/law/summons. htm
4. Vij, Krishan. Text Book of Forensic Medicine and Toxicology Principles and Practice. 5th ed. Chennai: Reed Elsevier India Pvt Ltd. 2011; Pg 10-11.
5. Conduct money. The Law Dictionary [internet] [cited 2013 Jan 25]. Available from:http:// thelawdictionary.org/conduct-money/.
6. Rules for payment of fees to expert witnesses summoned in Criminal Courts [internet] [cited 2013 Mar 14]. Available at:http://punjabrevenue.nic.in/ csr1pII(4).htm.
7. Rules made by the Punjab Government under the powers conferred by Section 544 of the Code of Criminal Procedure, 1898, [See Section 312 of new Code] regulating the payment of subsistence and travelling allowance to witnesses attending trials etc., in Subordinate Courts. [internet] [cited 2013 Mar 13]. Available at:http://delhihighcourt.nic.in/ writereaddata/upload/courtrules/courtrulefile_ du93z1t5.pdf.
8. Witness. The Law Dictionary [internet] [cited 2013 Jan 25]. Available from:http://thelawdictionary. org/witness-n/.
9. Adverse Witness. The Law Dictionary [internet] [cited 2013 Jan 25]. Available from:http:// thelawdictionary.org/adverse-witness/.
10. Acting as an expert witness - guidance for doctors. General Medical Council [internet] [cited 2013 Mar 10]. Available from:http://www.gmc-uk.org/ guidance/expert_witness_guidance.asp.
11. Vahia, Vihag N et al. Psychiatrist as witness. Paper presented at: 5th National Workshop, Forensic Psychiatry; 2008; Aug 28-29; Jaipur, India.
12. Don't treat expert witness as hostile: AP high court. Times of India. 2012 Oct 8: Hyderabad. [internet]

[cited 2013 Mar 10]. Available from:http://articles.timesofindia.indiatimes.com/2012-10-08/hyderabad/34322039_1_forensic-expert-expert-witness-prosecution.

13. Rao, Y S. Examination of Witness by the Court in the Absence of Prosecutor. [internet] [Published on 2012 May 22; cited on 2013 Mar 13]. Available from:http://articlesonlaw.wordpress.com.
14. Kantak, M P et al. Utility of Daubert guidelines in India. JIAFM. 2004; 26(3): 110-112.
15. Desai, Dhruv. Treatment and Protection of Witnesses in India. [internet] [cited on 2013 Mar 13]. Available from:http://www.legalserviceindia.com/articles/witnesses.htm.
16. Mangaldas, Amarchand. Video conferencing in India [internet] [updated 2012 Oct 09; cited 2013 Mar 12]. Available from:http://www.inhouselawyer.co.uk/index.php/india/9950-video-conferencing-in-india.

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