



# INTERNATIONAL JOURNAL OF CREATIVE RESEARCH THOUGHTS | ISSN: 2320 - 2882

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**Reforming India's Civil Justice System Through Mandatory ADR:  
Comparative Insights from the United States, United Kingdom and  
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Volume 14 Issue 1 January 2026 , Date of Publication: 08-January-2026

UGC Approved Journal No: 49023 (18)

PAPER ID : IJCRT2601154

Registration ID : 300020

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