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LANDED INTERESTS AND THE QUESTION OF LAND IN THE LEGISLATIVE FRAMEWORK OF PAKISTAN

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ABSTRACT

This paper analyzes to what extent the elected landed interests influenced the legislative process at the national level in Pakistan during the premiership of Zulfikar Ali Bhutto (1972-1977). Interestingly, in contrast to his promise of curtailing the power of the landed aristocracy, a large number of members of his party, Pakistan Peoples' Party (PPP), as well as National Assembly of Pakistan was landed aristocrats. An analysis of the debates of the National Assembly reveals that these aristocrats played a significant role in improving the plight of the poor people through legislation at the national level. Besides introducing land reforms to decrease the influence of the landed class, these legislations gave property rights to the people living in Katchi Abadis.

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1. INTRODUCTION

Landed aristocracy is a social group of the owners of great estates; this land is largely inherited, and the group dominates social, economic, and political life in rural areas (Aziz, 2001; Hussain, 1979; Javid, 2011; Thompson, 1963). (Landed aristocracy or landed interests or landed class means a group of landlords comprising mostly the larger aristocratic owners of great estates, whose lives are centered on inherited wealth and peerages in large, rural country house estates; and the group

dominates social, economic, and political life in rural areas. For them, the land is not only a source of income but also political power and social influence. Thus, these terminologies i.e. landed interests, landed aristocracy, and landed class, are used interchangeably in this research paper.)

Beyond their source of income, these large estates serve as an important instrument of socio-economic and political influence upon the local state institutions and society (Herring, 1983, p. 13; Nelson, 2011, p. 2; Rashid, 1985). It denotes patterns of stratification and authority; and through the exploitation of economic power, it supplies political leadership at the local level (Bertocchi, 2006; Nelson, 2011; Waseem, 1982). Thompson(1963) and Wash brook (1997) note over-accumulation of large tracts of land in the few hands is, nevertheless, associated with legislative, judicial, financial, and administrative problems. (For example, in nineteenth-century France, the aristocracy was responsible for tax collection and adjudication of local conflicts. However, in Russia, China, and Britain, besides tax collection, landlords provided private armies to control local unrest as well as soldiers in war.)

Several modern states have reformed their land ownership and land tenure systems to promote peace and prosperity. Particularly, five Asian countries have successfully transformed their agrarian structures into a system of individual peasant farming through two distinct patterns. While Japan, Taiwan, and South Korea rested on ‘land to the tiller’ strategy, ‘collective farming by expropriation of the land to the cultivators through radical reforms’ was the building principle of land reforms in China and Vietnam (Griffin et al., 2002). Conversely, land reforms in Pakistan were very limited in scope, and could not provide considerable dividends to the communities that were supposed to be the beneficiary of these reforms (Herring, 1980; Khan et al., 2001; Khan, 2006).

The history of the landed interests in Pakistan is connected with the colonial rule in India. The British created an aristocratic class, by awarding them land, and sustaining and strengthening their rule (Abbas et al., 2016; Ali, 1988; Hussain, 1976; Talbot, 2007). However, after the departure of the British in 1947, the landed class successfully wielded their powers and interests (Aziz, 2001; Baxter, 1974; Javid, 2015) by holding key positions in legislative, policy-making, and policy executing organs of the state. Moreover, by playing an important role in making and breaking governments (Rashid, 1985), they have been able to sustain their power (Alam, 1974). Though landed aristocrats have been studied extensively from political, historical and sociological angles (S. Ahmad, 1977; Alavi, 1976; Ansari, 2003; Martin, 2016; Nelson, 2011; Syed, 1992; Talbot, 2010). We still know less about their role in legislation through the legislative process.

This study is aimed at tracing ‘to what extent the elected landed interests influenced the legislative process at the national level in Pakistan during the premiership of Zulfikar Ali Bhutto (1972—1977)?’ An attempt is made to explore and analyse the role and influence of landed aristocrats in the legislative development related to ‘The Transfer of Evacuee Land (*Katchi Abadi*) Bill, 1972’, and ‘The Land Reforms Regulation, 1972’ at national level’. These regulations are related to land ownership or landed interests in one or the other way.

2. RESEARCH METHODOLOGY

For several reasons, the time period between 1972 and 1977 represents an interesting case study. First, as the President (1971-1973) and then as the Prime Minister (1973-1977), Zulfikar Ali Bhutto

tried to reduce the influence of the landed interests, notably through ‘Land Reforms Regulation’(Pakistan, 1972a; Rashid, 1985). (Although Zulfikar Ali Bhutto, then Chief (Civil) Martial Law Administrator, announced land reforms on March 1, 1972, during an address to the nation on television, however, being Chief Martial Law Administrator of the country, he formally launched land reforms programme by issuing ‘Martial Law Regulation No. 115’ on March 11, 1972.)

Second, the first general elections were held in 1970 (I. Ahmad, 1976); however, rather than reducing votes for the landed class, 35 percent of the Members of the National Assembly (MNAs) were landed aristocrats from West Pakistan (Abbas, 2015). Third, Bhutto, the founder of Pakistan Peoples’ Party (PPP), and then President and Prime Minister of Pakistan, was also a landed aristocrat from Larkana, Sindh (Jones, 2003; Wolpert, 1993). Fourth, after the fall of Bhutto’s government to the military dictatorship in 1977, General Zia Ul Haq in collaboration with religious clerics obtained a judgment from the Shariat Appellate Bench (SAB) of Supreme Court that land reforms were repugnant to Islamic injunctions. Thus, the process of land reforms, started by General Ayub Khan and advanced by Zulfikar Ali Bhutto, was not only stopped but reversed by General Zia Ul Haq (Kennedy, 1993; Rashid, 1985).

The role of landed interests in legislation during the legislative process would test whether the landed aristocrats resisted the legislation or supported it because these legislations were aimed at curtailing the power of landed interests. The scope of the study is limited to the legislative process only; the implementation of the legislated laws is beyond the scope of this paper.

A content analysis of the historical data is made to answer the question in this research study. The data mainly comes from debates in the National Assembly of Pakistan between 1972 and 1977. In addition, manifestos of PPP, land reforms regulations, speeches, and statements of Bhutto, white papers on the performance of Bhutto government by Zia’s government, Who is Who in the National Assembly of Pakistan, Acts, and Regulations of the provincial governments regarding *Katchi Abadis*, and files of Cabinet Division are also consulted. It is taken into account that the objectivity of some of these sources, such as white papers is questionable. White papers were published by Zia’s government. Zia was a military dictator who toppled Bhutto’s government in 1977. Moreover, facts regarding land reforms presented in the National Assembly Debates by the government representatives contradict with land reform reports presented by the peasants and other independent researchers including Anwar Hussain Syed, Ronald J. Herring, and Hamza Alavi. These scholars have already questioned the accuracy of the data. Taking a critical look at the authenticity of these data, and making use of a diversity of data, make this study quite interesting and important.

3. LANDED INTERESTS IN THE LEGISLATIVE FRAMEWORK IN PAKISTAN

Landed aristocrats consistently showed their overwhelming presence in all of the assemblies that came into being after 1947. Interestingly, an overwhelming majority of the members of the national assemblies of 1955, 1962, and 1965, which were not based on adult franchise, were landed aristocrats. (The general elections in Punjab (1951), Sindh (1953), and Northwest Frontier Province, now as Khyber Pakhtoonkhwa (1951) were based on direct elections (adult franchise). Landed aristocrats grabbed 80%, 90%, and more than 50% of the assembly seats, respectively. Moreover, 28

out of 40 members from West Pakistan, in the Second Constituent Assembly, were from the landed class.)

Rather, the Members of the National Assembly were, indirectly, elected by the Members of the Provincial Assemblies in 1955, and through the votes of Basic Democrats in 1962 and 1965. (Basic Democracies (BD) was a system of local government which was introduced by General Ayub Khan in 1960. Through this system, 80000 Basic Democrats (members of local government) were elected. In addition to running affairs of local government, the Basic Democrats also formed an electoral college to elect the Members of National Assemblies in 1962 and 1965.) As Table 1 shows, the representation from the landed class was high in the National Assemblies of Pakistan.

Table 1: Percentage of Landed Interests in the First Three National Assemblies of Pakistan.

Year	Total	West Pakistan	East Pakistan
1955	35	70	30
1962	45	74	26
1965	45	74	26

(Source: M. Ahmad, 1971; Baxter, 1971; Hussain, 1976).

In 1970 direct general elections, 51 out of 313 seats of the National Assembly were won by the landed aristocrats (Out of 313 seats, 13 were reserved for women.). In case of the West Pakistan, (present-day Pakistan), a considerable proportion of these members (up to 35%), were landlords from Sindh and Punjab (Pakistan, 1973e; Syed, 1992). (There is no denying the fact that the percentage of the landed interests in the National Assembly of Pakistan, as a result of the 1970 elections, decreased considerably (as compared to the previous assemblies). The reason could be that the members were elected through direct elections on the basis of adult franchise unlike the previous assemblies, whose members were indirectly elected either through the Members of the Provincial Assemblies or through the members of the local government. Secondly, the Green Revolution of Ayub followed by social rhetoric of PPP for land reforms and redistribution of resources also caused in decreasing the representation of landed aristocrats in the assembly.)

The contested legitimacy of these elections and the post-election conflict of constituting a government led to a brief civil war, which ended up in the creation of Bangladesh (East Pakistan) on December 20, 1971 (Abbas, 2015). Subsequently, members elected from West Pakistan made up the National Assembly of Pakistan.

3.1 THE TRANSFER OF EVACUEE LAND (KATCHI ABADI) BILL, 1972

Industrialization, which provided for excellent economic opportunities and better health and educational facilities pulled villagers to migrate to the cities. As a result, evacuee lands, in the form of *Katchi Abadis*, were inhabited by the locals as well as by immigrants. (Evacuee land—either ownership of a private person or the government (central or provincial)—was the land that was basically owned by the non-Muslims at the time of partition of colonial India in 1947. However, those non-Muslims migrated from Pakistan to India after the partition by leaving their properties. Although this land was allotted, transferred, or disposed of to either private persons or government—provincial or central, but was still lying vacant. The term *Katchi Abadis* literally means unplanned and impermanent settlements. *Katchi Abadis* were areas in the cities where poor and landless people had illegally built their houses with mud and bricks or huts on the evacuee land without purchasing this land.)

A large number of *Katchi Abadis* were found in cities mainly Lahore, Lyallpur (now Faisalabad), Multan, Karachi, Hyderabad, Peshawar, and Quetta (Esposito, 1974). To deliver on its electoral promise of 'roti, kapra aur makan' (bread, cloth, and shelter), Bhutto's PPP introduced a bill 'Transfer of Evacuee Land (Katchi Abadi) Bill, 1972' that was aimed at transfer of the evacuee lands to the illegal but poor occupants. The proposed bill envisaged placing the key power of distribution of the land in the Land Settlement Commissioner. However, Jamat-i-Islami (JI), a rightist religio-political party, was against such an arrangement. For example, JI-affiliated Professor Abdul Ghafoor maintained that since, according to his perceptions, the bill contains the seed of socialism and the High Court should be vested with the powers of the appeal against the decisions of the Land Commissioner. Such interference in the original bill was further supported by other religio-political parties who were not directly affected by the land settlement process. Moreover, some landed aristocrats including Sahibzada Ahmad Raza Khan Qasuri supported Ghaffor's proposed amendment and argued that the Chief Settlement Commissioner could not be empowered to have the last say in this process. Aggrieved people should be given the right to go to the courts to challenge the decision of the Chief Settlement Commissioner (Pakistan, 1975a).

Despite appreciating the Bill, other landed aristocrats opposed the amendment on two grounds: their first objection was related to the poor people's financial viability in pursuing their cases in the courts, and secondly they were concerned about the lengthy processes of arriving at the decisions of the appeals in the courts. (Those landed aristocrats who opposed the amendment include Haji Ali Ahmad Khan Talpur, Hakim Ali Zardari, and Abdul Hafeez Pirzada (from Sindh), and Sardar Shaukat Hayat Khan, Syed Abbas Hussain Gardezi, Chaudhary Ghulam Rasul Tarar, Malik Baboo Karam Bakhsh Awan, and Rai Hafeezullah Khan Kharal (from Punjab).)

They argued that if this amendment was passed, influential landowners would access the courts to linger on and affect this settlement process. The judiciary and the law enforcement agencies, including police and revenue department, would side with the influential landed interests as it had been happening for years. Ultimately, the homeless people of *Katchi Abadis* would be ejected forcefully. Likewise, Abdul Hafeez Pirzada objected that this Bill was rather a continuation of the two previous acts which neither required interference of the judiciary nor is not required now (Pakistan, 1972c). ('Displaced Persons Land Settlement Act, 1958' and 'Displaced Persons Compensation and Rehabilitation Act, 1958' were introduced by the General Ayub Khan led military government in order to not only resettle the immigrants from India, as a result of partition of the British India in 1947, but also to compensate for their property losses.)

Several elected landed aristocrats supported the bill mentioned above in the National Assembly. (Those landed aristocrats who supported the bill include Abdul Hafeez Pirzada, Hakim Ali Zardari, Haji Ali Ahmad Khan Talpur, Sardar Shaukat Hayat Khan, Syed Abbas Hussain Gardezi, Chaudhary Ghulam Rasul Tarar, Malik Baboo Karam Bakhsh Awan, and Rai Hafeezullah Khan Kharal.)

Besides favoring the immediate transfer of rights of the ownership of the lands to the poor inhabitants, they criticised those landlords who had illegally occupied large tracts of land and were obstructing the passage of the bill by raising undue questions, debates, and amendments. Further, these members proposed amendments to improve upon the civic amenities, including sanitation, streets, and provision of water and gas in *Katchi Abadis* to improve the living standard of the inhabitants. Through active lobbying, they blocked amendments, for example, clause 10, during the

passage of the Bill in the Assembly. Eventually, the said Bill was passed on September 6, 1972, and was subsequently enforced in Punjab, Sindh, the NWFP, and Federal Capital Territory and Federal Capital Territory (Pakistan, 1972c).

Some commentators argue that PPP adopted the legislation to please its political constituency—inhabitants of *Katchi Abadis* (Pakistan, 1972c); and others argue that such a legislation was not possible without the assistance of the United Nations Development Programme, which financed the Master Plan for Karachi (1968), and the World Bank, which funded Lahore's Urban Development (1976). (For example, General Ayub Khan's government in 1963 planned to relocate and shift *Katchi Abadi* of Lyari in Karachi far away from the city. The residents of *Katchi Abadi* of Lyari were not willing to move far away from the city and protested against the government. Zulfikar Ali Bhutto sided with the residents and lobbied successfully within the government for their regularization at the existing place. Subsequently, Bhutto successfully won the support of the residents of *Katchi Abadi* of Lyari. Later on, he contested and won the first general election of Pakistan from Lyari's constituency. In the 1970s, after coming to power, Bhutto issued land titles to Lyari's residents. From 1970s, Lyari has been a strong constituency for Bhutto's PPP.) However, PPP-affiliated aristocrats could not be discredited for granting land ownership rights, in the form of three and five marla schemes, to the poor inhabitants. Later on, military dictator General Zia Ul Haq also introduced five and seven marla schemes (Gazdar & Mallah, 2011). (1 marla = 25.29 square meters). Later on, provincial governments introduced their regularization schemes. It is estimated that under 'The Sindh *Katchi Abadis* Act, 1987' 539 *Katchi Abadis* were identified till 2005; out of which 483 qualified for regularization (Qadeer, 1996).

3.2 THE LAND REFORMS REGULATION, 1972

To realize his promises of 'roti kapra aur makan' (Gazdar & Mallah, 2011), Bhutto, announced land reforms on March 1, 1972, during his address to the nation on television (Panhwar, 2009, pp. 98-106). Later on, he issued 'Land Reforms Regulation, 1972', on March 11, 1972 (Pakistan, 1972d). Bhutto envisioned land reforms through 'Martial Law Regulation No. 115'. However, this proposal was put up to the National Assembly in the form of 'The Land Reforms Regulation, 1972' by Abdul Hafeez Pirzada on August 6, 1973. He requested to refer the Bill to the Standing Committee on Law and Parliamentary Affairs (Pakistan, 1972a). The committee, headed by Abdul Hafeez Pirzada, proposed the transfer of executive powers of the Land Reforms Commission from President to the Federal Government, and the Federal Land Commission (Pakistan, 1973a).

Mir Ghous Bazanjo from Balochistan, and Sardar Maula Bakhsh Soomro, Abdul Hameed Jatui, and Haji Ali Ahmad Khan Talpur from Sindh opposed the above said amendments. They argued that agricultural land reforms were a provincial subject rather than the central one. They stated that they were not against the land reforms, but they were against the amendment, which would affect both the provincial autonomy and agriculture (Pakistan, 1973b). (It is important to know that the provincial government had the authority to implement these land reforms. However, the provincial government, dominated by land interests, could not implement the land reforms in letter and spirit as should have been. By considering this development, it could be extracted that the advocates of provincial autonomy were basically trying to avert the legislation on land reforms.)

They further added that these land reforms were to take revenge from the opposition and alleged that a large number of big landed aristocrats were part of the ruling party that is why their lands were

not affected under these land reforms (Pakistan, 1973b). Moreover, they attached the land reform legislation with that of industry and trading, and also socialism. They demanded that the government should either introduce reforms in other sectors just like agrarian reforms or should abort the agrarian reforms as well (Pakistan, 1973c). Abdul Hafeez Pirzada replied that their argument was illogical and false because land reform was a subject of the concurrent list, and National Assembly had the power to legislate on this subject. He argued that their sole purpose was to stop the process of land reforms (Pakistan, 1973c).

Rao Khursheed Ali Khan, Rana Muhammad Hanif Khan, Mir Darya Khan Khoso, Ali Hassan Mangi, and Hakim Ali Zardari supported these reforms by arguing that they would eliminate landlordism on the one hand, and improve agriculture, on the other hand. The supporters of land reforms maintained that the landowner, rather than the peasant, would provide seeds, fertilizers, and pesticides along with bearing the land revenue, water, and local taxes. If a landowner wanted to sell his land, the farmer or peasant had the first right to purchase it, and landowners would not get any compensation for the acquired, in excess of the ceilings, land (Pakistan, 1973b).

Interestingly, on the issue of land reforms, some of the religio-political parties and the PPP were on the same page. The representatives of these parties, based upon their interpretations of Islam, demanded further lowering of the ceilings. (However, later on, Federal Shariat Court ruled against land reforms by declaring them repugnant to Islamic injunctions.). Contrary to this, some landlords criticised that the ceilings were lower and should have been high. They even criticized the acquisition of land, in excess of 100 acres, from the civil servants. They further argued that if such ceilings or restrictions were not imposed on the businesses, why they were being imposed on agricultural land (Pakistan, 1973c). Some other landed aristocrats opposed land reforms diplomatically. They argued that they knew that there is no concept of peasantry and sharecropping in Islam, and landlordism is forbidden. However, the same Islam ensures the welfare and egalitarian society. So if the government wanted to develop an Islamic society—welfare and egalitarian, they would support the cause of land reforms (Pakistan, 1972b). Still, others opposed land reform by alleging that was no practical implementation of land reforms because the land commission was being bribed to get favors (Pakistan, 1973d).

Bhutto introduced another land reform project initially through a Prime Ministerial Ordinance that was later passed through the National Assembly in the name of 'Land Reforms Bill, 1977'. The purpose of the Ordinance was to accord the benefits of the reforms to the maximum people and as immediately as possible, rather than through legislation (Pakistan, 1975b). Critics of Bhutto allege that Bhutto promulgated these land reforms suddenly through Ordinance rather than legislation in the Assembly because elections were due in few months. Thus, it was a cunning move to win more seats in the coming elections. Before the land reforms could be implemented, Bhutto's government was toppled by Dictator Zia Ul Haq, a military general, on July 5, 1977.

According to Ronald J. Herring (1980; 1977), one of the strong critics of Bhutto's era claimed that some PPP-affiliated landed aristocrats' support for the reforms stemmed from their presumption that these reforms would not affect their patterns of land ownership and position. It could be verified from the assembly debates that some of the landlords skipped from the debates to remain silent, partly from the wrath of Bhutto, to safeguard their interests, and partly they were sure that land reforms would not affect their properties and would not bring any change. However, their silence consented to

the legislation of land reforms. To add, they voted to pass the land reforms bill. A substantial number of members were representing the landed interests in the assembly. They could have resisted the legislation on land reforms, but they did not do it. Legislature did its job. (Making law is far difficult than implementing the legislated law. Whatever the reason might be behind this legislation on land reforms, legislators, mainly coming from the landed families, could not be discredited simply on the basis of assumptions or doubts. Now it was the duty of the executive to implement the legislated laws. The military dictator, who ousted Bhutto from power, could have implemented those laws. However, instead of implementing the laws, he declared Bhutto government's legislation on land reforms repugnant to Islamic injunctions. Even the governments after Zia Ul Haq did not take any substantial step to curtail the power of the landed interests.)

Sardar Sherbaz Mazari (1983), an MNA from a landed family of South Punjab, claims that lands of the members of the ruling party, including Ghulam Mustafa Jatoi, and Bhutto were not affected. Mazari pointed out that the land of all those people, including him, who were in opposition to Bhutto were affected by the land reforms. Contrary to this, the White Paper of General Zia Ul Haq's regime claimed that Bhutto and his family also surrendered land under the land reforms. However, their lands were not affected up to the level as should have been (Mazari, 1999).

Military Government of General Zia Ul Haq rejected the complete success of the land reforms as were projected by Bhutto and his PPP. As claimed in Zia's White Papers, the implementation of the land reforms largely failed due to the landed aristocrats of the ruling party in the Assembly. While the White Paper claims that the government had only resumed 1,250,000 acres of land, the government claimed that it had resumed 2,800,000 acres of land. (Interestingly, the figures claimed by Zia in these White Papers are based on the studies of leading economists such as Ronald J. Herring and Ghaffar Chaudhary and his own constituted inquiry committee. The procedure adopted by the committee and documents consulted is unknown. Importantly, the figures claimed in these White Papers contradict with the peasant reports and other academic studies. As already discussed above, the authenticity of the land records and government documents was questionable.)

Nevertheless, independent commentators observe that the area resumed under 1972 reforms was 1,747,617 acres (Pakistan, 1979a). Additionally, a large number of people did not file their declarations and concealed their land holdings with the help of corrupt revenue officials (Pakistan, 1979b; Syed, 1992). Even the family of Prime Minister Bhutto concealed holding of 389 acres of land through unequal exchanges, misclassification of soil and unlawful sales (Nelson, 2011). Through these, Zia tried to prove that there were several irregularities in land reform implementations.

Interestingly, instead of correcting those irregularities during his dictatorial regime, Zia tried not only to undo land reforms but also to reverse the process of land reforms under the guise of Islam. He was successful in getting a religious decree from the Islamic scholars and judgment from the court that land reforms were against the injunctions of Islam. Thus, the process of land reforms, started by General Ayub Khan and advanced by Zulfikar Ali Bhutto, was not only stopped but reversed by General Zia Ul Haq (Pakistan, 1979a; Rashid, 1985). Despite his animosity towards Bhutto, Zia could figure out that there were discrepancies or irregularities in the implementation of land reforms. He, in his White Papers, did not mention or figure out problems in the legislation of land reforms (Kennedy, 1993).

4. CONCLUSION

This paper showed that landed aristocrats had considerable representation in the legislative framework. Drawing powers from the land, and under the auspices of political parties and military regimes, they trained themselves in the fields of exercise of power which they manifested during the legislative processes at both the national and provincial levels. They achieved the desired goal, not to let the power transfer to the grass-root level. Bhutto, through popular vote, got an opportunity to change the trajectory in Pakistan.

An analysis of the assembly debates established that landed aristocrats, despite being one of the most dominant elite groups in the governing circles of Pakistan, played a notable role in the legislation. Analyzing records and debates of the National Assembly, it may be noted that the PPP government led by Bhutto, who himself was not only a landed aristocrat from Sindh but also filled the major cadre of his party with the aristocrats, unexpectedly brought about some major reforms. His notable contributions include but not limited to, giving property rights to the people living in *Kachi Abadis* and introducing land reforms to decrease the influence of landowners. Unfortunately, Bhutto could not properly implement the 'The Land Reforms Regulation, 1972' due to corrupt revenue officials and bureaucracy and landlords themselves, and premature end of his political government by a military dictator. Thus, the attempt of land reforms to curtail the undue influence of landed aristocrats could do only a little. However, these land reforms created consciousness among the peasants who were now, at least, talking of the law and Bhutto's statement 'land belongs to the tiller'. There is no denying the fact that truly radical land reform was politically impossible mainly due to landlords' dominance in the legislative assembly. However, the PPP government led by Bhutto laid down the foundation for larger reforms. Unfortunately, Zia, after toppling Bhutto's government, closed the doors for further land reforms with the help of religious clerics and judges of courts.

5. DATA AND MATERIAL AVAILABILITY

This study already includes all the information about this study.

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