

CHAPTER FOUR

HINDU CODE BILL

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In India there is a uniform code of laws covering almost every aspect of human relationship. In this context Ambedkar said in the constituent assembly "We have a uniform criminal code, law of transfer of property, Negotiable Instruments Act. This would prove that this country has practically a civil code, uniform in its content, and applicable to the whole of the country. The only province the civil law has not been able to invade so far as marriage and succession". He challenged the statement that Muslim personal law was immutable and uniform throughout the whole of India. He showed that "Shariat" law was not applicable to the North-West Frontier Province upto 1935. It followed Hindu Law in succession. In 1939 Shariat law was applied to it by Central Legislature. The legislature had to intervene in 1937 and to pass an enactment applying the Shariat law to the rest of India. In North Malabar, Muslims followed the matriarchal law. Ambedkar remarked,

... it would not be open to any Muslim to say that the framers of the civil code had done great violence to the sentiments of

the Muslim community. The fear is nullified. The Hindu code introduced only four new things in the present law. They were abolition of the doctrine of the rights by birth, absolute right over property to women share to daughter and provisions for divorce. These provisions were new as far as the present Hindu law was concerned. But there was nothing either anti-social or antireligious in them.

There was chaos in the law of adoption. There was no one system of Hindu law for the whole of India. Law of marriage was not uniform. Hindu law was not uniform for all Hindus and was not a system of law - such was the criticism often made by the critics of Hindu law. It may be asked at this stage as to what may be done to remove these anomalies, uncertainties and vagaries of law as were obtained in the Hindu law. The solution attempted upto now was the intervention of the legislature. Under these circumstances codification was the only solution. The great jurists favoured codification. Dr. P.V. Kane was also of the opinion that Hindu Law must be codified. The codification of Hindu Law was not merely a desideratum, but necessity. The code aimed at consolidating Hindu society and it would be applicable to all Hindus. The codification fulfilled the unambiguous pledge given by the Constitution of India that there would

be no discrimination between citizens of India on the grounds of sex and caste. Untouchability has been abolished by the constitution. All these pledges were sought to be fulfilled by the provisions of the code. Ambedkar contended that the enactments of the present code was a natural consequence of the adoption of the Constitution of India. The Hindu Code was consistent with the Smritis. It could be seen from the different Smritis that there was a periodic revision of Hindu Law. It could be safely asserted that the present Hindu Law was not divine. Another important thing was that the Hindu code was consistent with our constitution. Article 15 states, "The state shall not discriminate against any citizen on the ground of place of birth". It was the present system of Hindu law, that was inconsistent with the provisions of the fundamental right in our constitution and the code aimed at making it consistent with the constitution. The modern world is tending towards codification. Article 13 of the UN charters lays down, "Encouraging and progressive development of the international law and its codification".

In 1941 the Government of India appointed a Hindu Law Committee with Sir B.N. Rau as Chairman. The Rau Committee recommended the codification of Hindu Law in gradual stages. Its draft bill was introduced

in central legislature in 1943 and 1947, but it met with fierce opposition from orthodox Hindus. The codification of Hindu Law was a continuation of the work of framing our constitution. As such, Ambedkar, the Chairman of the Drafting Committee of the Constituent Assembly of India, took keen interest in the deliberations of this proposed codification. Dr. Ambedkar and 16 others were members of the Select Committee. The report of the Select Committee, to amend and codify certain branches of the Hindu Law was presented to the constituent Assembly of India (Legislature) on 12 August, 1948. The report contained nine parts, preliminary, Marriage and Divorce, Adoption, Minority and Guardianship, Joint Family Property, Women's property, succession, Maintenance and Miscellaneous.

A Government bill in exactly the same terms as the Draft Hindu Code prepared by the Hindu Law Committee was introduced in the Legislative Assembly on 11 April 1947. A motion for the continuance of the bill had also been adopted by this house on 17 November, 1947. Ambedkar remarked, "I am an orthodox, but the right to divorce must be given to women. But that right must not be used for bad purposes. Therefore, there are suggested curtailments in that right". This statement was self explanatory. And to curb the misuse of this right, he included in

section as in the original bill. The Bill as it now stands seeks to do away as far as possible with all customary laws. The portion relating to marriage has been revised and appears in a more elaborate form. Provision has been made for judicial separation, restoration and conjugal right and custody of children. In the Chapter of adoption, the adopted son is given the right to inherit one half of the estate inherited by the widow. A simple procedure for the re-distribution of adoption has been devised. The chapter on joint family property does away with the right to claim any interest in ancestral property arising by reason of birth in a family. Joint tenancy, as understood in Mitakshera Law is replaced by tenancy in common. It is understood that these provisions were found in the original Bill, but not in such elaborate forms. Similarly in the chapter on women's property it is definitely laid down that all property acquired after the code is adopted will be deemed to be separate property. The rules of succession have been simplified by recasting the chapter on succession. Elimination of what may be regarded as distant heirs has also been effected. An attempt has also been made to make the law of succession uniform for all Hindus. Provisions relating to maintenance found scattered in various parts of the original Bill have been grouped together and

a new provision has been added whereby the mother is put under obligation to maintain children if the father is unable to do so. It is stated by those who were closely connected with the Bill that it marks a great improvement over the previous one and ensures uniformity in law in all provinces. Dr. Ambedkar is believed to be keen on getting the Bill passed as early as possible, but the opinion in the House is so sharply divided that it is held rather doubtful whether it would be taken up during the present session. It is understood that as many as eleven members have recorded their minutes of dissent to the Bill and suggested postponement of legislation. Some of them feel that a bill of such controversial nature affecting the very roots of the present Hindu society should not be rushed through, but await further dispassionate consideration. Two reasons given for such postponement are firstly, the main object of the Bill to bring about uniformity in law cannot be achieved so long as agricultural land continues to be a provincial subject as at present, and secondly, those elected under a new constitution would be more representative of public opinion to tackle the problem" (The Times of India, Tuesday, dated 17.8.1948 pp. 1 and 7).²

The Prime Minister today impressed at a congress Parliamentary Party meeting that the passage of the

Hindu Code Bill could not be delayed, it is understood. The Government was committed to it and its enactment was desirable before the elections.

Dr. Ambedkar, who has all along been stout protagonist of the measure, is believed to have lent support to this appeal with the undertaking to compromise on differences of opinion as against matters of dispute such as the issue of monogamy and divorce.

While Mr. Rohini Kumar Chaudhari and Mr. Biswanath Das opposed the Bill, Mr. Munshi emphasised that much of it was concerned with codifying Hindu law which varied from State to State. As such there could be no objection to this aspect of the measure. The decision was also taken that controversial clauses should be discussed by the party outside the House so as to facilitate acceptance of compromise amendments. This follows the procedure adopted by the Congress Party during the Constituent Assembly debates. As already decided free voting will be allowed.³

A number of pamphlets were written condemning the Code. Attention was drawn to the qualifications and social origin of the Third Draft's virtual author. He being the accredited leader of the out-caste communities

(called Scheduled castes), felt that he could speak for a vast proportion of the population of India, and that, as it were by a card-vote he could fling a heavy weight against the flimsiest opponents of the Code. Unfortunately, he did avoid, in fact he rather courted the issue's becoming a caste issue, and the result of the controversy was almost certain from that movement. He was himself as a second Manu, but with the additional title, "breaker of the pride of the twice-born classes. This role could not avoid drawing upon him the mockery of the few competent to criticise the code in detail against the background of the classical Hindu law, and the obstinacy of his defence could not overcome the destiny of the attack. When the Third Draft came to be considered by the Constituent Assembly the atmosphere was charged with unhappy and, indeed, entirely inappropriate sentiments. A very large number of amendments were tabled, but the Law Minister battled on, and by September, 1951 the session ended with only four clauses passed. That the fourth clause came to be passed was itself no small achievement for the clause gave the Bill its over-riding effect. The principle of codification was thus admitted, without prejudice to the right to haggle over the individual clauses of the Code. The session ended, the Bill was virtually talked out, and it lapsed.

The Law Minister himself resigned in disgust at the tergiversation of many of his supposed allies, and many thought that the Hindu Code Bill's chances of success were gone forever. No one could tell whether the opposition had brought down the government's enthusiasm, or whether after all the Government was doubtful about the wisdom of the whole venture. A few saw that the opposition was entirely furious and that, under more propitious circumstances the project would get a more favourable hearing.⁴

DR. AMBEDKAR ROSE

MR. DEPUTY SPEAKER: The Honourable Minister might make his statement in the afternoon.

MR. AMBEDKAR: After this Bill? (Industries development)

MR. DEPUTY SPEAKER: At about six O'clock.

MR. AMBEDKAR: It was first arranged between you and me and the Prime Minister that I should make a statement on the 6th. As certain part of the business was not finished on the 6th, it was definitely agreed that you would be pleased to suspend the rule about the transaction of business and allow me to make the statement on the 11th. So this is in the time when I should make the statement.

MR. DEPUTY SPEAKER: It is true that I said to the honourable Law Minister that I will suspend the rule. Normally under rule 128, immediately after the question hour is over, any honourable Minister, who has resigned can make, with the permission of the Speaker, a statement in explanation of his resignation. Today I have to suspend the rule for that purpose, and I am going to do it. I am only suggesting that it may be put off till six O'Clock. That is all.

MR. AMBEDKAR: Why now now?

MR. DEPUTY SPEAKER: At six O'clock I will hear the honourable Minister.

MR. AMBEDKAR: I do not quite understand why any statement should be postponed to six O'clock.

MR. DEPUTY SPEAKER: Under the rules, Speaker must give his consent before any honourable Minister can make a statement. I would like to know what statement the honourable Minister is going to make. Of course it involves my consent. I am not disclosing anything to the House which is not provided for. I would request the honourable Minister to give me a copy of the statement that I will allow him to read the statement after this afternoon.

DR. AMBEDKAR: If that was so, you could have already told me when I saw you that I should hand over my statement to you before you give the permission. You did

not do so.

MR. DEPUTY SPEAKER: There is no harm.

DR. AMBEDKAR: I came and subsequently wrote a letter but so far as I am concerned you did not say that I should furnish you with a copy of my statement before you come to the conclusion that you would permit me to make a statement and so far as I read rule 128, I do not see that there is any provision therein which requires that a statement should be submitted to the Speaker before he gives consent. The Prime Minister had asked me for a copy of my statement and I have given him a copy of my statement. If you had also given me an order that I should submit a copy of my statement to you before you come to the conclusion whether I should make it or not. I should have been very glad to do so but you gave me no such indication when I came to you. I felt the difficulty was that under the rules the statement should be made immediately after the question hour and the Prime Minister was very keen that I should finish certain business which it may not be possible for other Member to undertake because it involves certain difficult matters. I agreed to this and then I came to you and said, "Will you kindly suspend the rules so that I may help the Prime Minister in getting the business through?" You never said that you wanted to see a copy of my statement

before permitting me and I see that now you have raised this point for the first time.

PANDIT KUNZUR: May I know whether the Chair can claim some sort of censorship as stated by you?

MR. DEPUTY SPEAKER: Yes. The kind of censorship which the Chair can always exercise is to avoid the matter which ought not to be placed before the House, which is libellous, slanderous, irrelevant and so on and so forth. (Interruption). Order! order! I am only answering the question which was put. I can certainly do so. I am not going to allow observations of an irrelevant nature and improper statements. I will confine myself strictly to rule 128 and if an honourable Minister goes on making a statement on the floor of the House, I am entitled to call him order, if I find that the statement is lacking in decency or decorum or I otherwise regard it as irrelevant. I have always got the power. Otherwise, this rule would be meaningless.

So far as giving the permission to the honourable Minister is concerned, I agree he came to me. Possibly his memory is short, but he did not suggest to me that I, under the rule, can suspend the standing orders. I wanted to accommodate him and said I would allow him to make a statement at any time that he liked and I

brought to his notice that I can suspend the order. He agreed. Even now during the course of his statement if I do not agree and if I feel that a particular statement ought not to be made I can certainly ask that portion to be erased from the proceedings of the House. In order to avoid this, I would like to know what exactly the statement is. It is not going beyond the rules and the scope of my powers. I am prepared to allow him to make a statement suspending the rule, that immediately after the question hour the statement may be made. It still stands. I am not going behind that position and as it is open to me while the honourable Minister is making a statement, to see that this kind of matter ought not to be stated on the floor of the house. I only asked him, now that there is time to give me a copy of the statement. I learn that he has given a copy to the Prime Minister, the Leader of the House. But to the hands of the Speaker the entire privilege of the House, the honour, the decorum and everything is entrusted. Therefore, there ought to be no difference so far as the Speaker is concerned in this matter. I am not going out of the way. I am trying to exercise my powers without prejudice either to the dignity of the House or of the honourable members with regard to the freedom of making statement. I will allow the honourable minister to make the statement at six O'clock.

SHRI KAMATH: It is not a fact that under the rules a Minister or a member may be called to order on the ground of irrelevance or otherwise but that statement should not be pre-censored.

MR. DEPUTY SPEAKER: This is not so. I think under the rules I am entitled to see what is the statement that the honourable Minister is going to make now.

DR. AMBEDKAR: I take it that you do not wish me to make a statement; that is how I interpret your ruling. I am no longer a Minister. I am going out. I am not going to submit myself to this dictation.

PANDIT KUNZRU: May I know when Shri Syama Prasad Mookerjee resigned if he was asked by the Speaker to be supplied with a copy of the statement before he made it in the House?

MR. DEPUTY SPEAKER: He had a talk with the honourable Speaker and he told him what he intended to state on the floor of the House.

All that was discussed in the House. The House will now proceed with the next business.

PANDIT KUNZUR: A copy of the speech was not supplied to him.

MR. DEPUTY SPEAKER: That was not necessary.



SHRI KAMATH: We have been deprived of the statement anyway.

MR. DEPUTY SPEAKER: It was left to him. Honourable members are now told that he is not going to make a statement.

*(The Parliamentary Debates, Vol. 16, Part 2,
Pages 4642-45, dated 11.10.1951)*

DR. AMBEDKAR'S LETTER OF RESIGNATION

MR. DEPUTY SPEAKER: I said that at six O'clock Dr. Ambedkar may make the statement if he likes. I do not find him in his seat. Under the rules, immediately after the question hour is over, any honourable Minister who has resigned can, with the consent of the Speaker, be allowed to make a statement. Today the question hour was over this morning after the short notice question and Ambedkar piloted the Delimitation of Constituencies Motions and that is why it could not be done immediately when he wanted to make a statement. Thereafter, I thought, in keeping with the practice, either he may do it immediately after the question hour or at the close of the day at six O'clock. Therefore, I fixed six O'clock. I would be only too glad to give him an opportunity now but he is not here.

As regards the copy of his statement, it is true when he wanted to make an oral statement, at the

time he approached me in the Chamber, I could not anticipate and ask him to put the thing in writing and give it to me. It was not right. Therefore, I allow him to make a statement and even said that I would suspend the rules, if he could not make the statement immediately after the question hour. But this morning I found that what he wanted to make by way of a statement he had put it in writing and had given a copy to the Prime Minister, who is also the leader of the House. Naturally, I sent word through the Secretary, sufficiently in advance or long before he rose to make his statement, to send me copy of the statement. I am sorry to say that he would not furnish me with a copy. I do not know why. I have to regulate the debate; not that I wanted to interfere with the statement at all. When any statement is read before the House usually the person gives me a copy. I do not know the reasons why he declined to do so.

When he wanted to make a statement I said that he may make a statement without any reserve at 6 O'clock but he did not choose to do so. I am, therefore, sorry that he did not avail himself of that opportunity. I wanted to clear a misunderstanding. I had also asked him before he stood on his legs to furnish me with a copy, which unfortunately he could not furnish. At

6 O'clock whether he furnished me with a copy of the statement or not I would have allowed him to make a statement orally in this House. He has not chosen to do so.

SHRI JNANI RAM (Bihar): The statement has already appeared in the Press.

MR. DEPUTY SPEAKER: I do now know. The House will not take any notice of it.

THE PRIME MINISTER (Shri Jawaharlal Nehru): May I say a few words in this connection? It is a matter of regret to me, if for no other reason, for the fact that an old colleague should part company in the way that he has done today. I do not wish to go into the various matters that have arisen to which you have referred. I got a copy of that statement at 9.30 A.M. as I was sitting in my place here, about 45 minutes before he actually rose to make it. I read it with some surprise because it was not the kind of statement that I had expected from a Minister resigning. However, there it was and it was my intention when he made that statement to say a few words, because it was not desirable nor permissible under the rules to have a debate on such a matter. I should like, with your permission, to read out the letter of resignation sent to me and a few other

letters exchanged before and after.

The first letter which I received from him ...

DR. DESHMUKH (Madhya Pradesh); On a point of order, if it was the desire of the Chair to give Dr. Ambedkar another opportunity then I think instead of the Prime Minister making any statement on this issue just now, it would be better to wait to see if Dr. Ambedkar is prepared to avail himself of the opportunity.

KHWAJA INAIT ULLAH (Bihar): We have already got a copy at our hands ...

DR. DESHMUKH: If an opportunity is proposed to be given ...

MR. DEPUTY SPEAKER: I do not know whether any honourable Member can speak on behalf of another has any authority from Dr. Ambedkar. ...

DR. DESHMUKH: Not at all.

MR. DEPUTY SPEAKER: Though he might have resigned as a Minister he is still a member of the House. We expect in fairness that when he asked the Deputy Speaker to waive notice and the Deputy Speaker had agreed to waive notice and fixed 6 O'clock for the statement, we expected him to be here and make his representation. It was open to him to make the statement or not, but he is not in his seat at all. The Prime Minister wants to make a

statement. ...

SHRI JAWAHARLAL NEHRU: I wish to read out to the House his letter of resignation, because normally a statement by a Minister is related to his letter of resignation.

DR. DESHMUKH: How does it arise since the statement is not there?

MR. DEPUTY SPEAKER: It arises this way. We have ministers introduced to the House when a Minister is appointed under the direction or on the advice of the Prime Minister. It is open to the Prime Minister to read the letter of resignation to the House.

DR. DESHMUKH: It is the privilege of a Member to make a statement. If that is lacking I do not know under what rules you are proposing to act and how the necessity for any other statement arises.

MR. DEPUTY SPEAKER: It is always open to the Chair to allow any statement to be made on behalf of the Government.

DR. DESHMUKH: I do not object to that. I want to point out how it arises out of the situation that arose this morning.

MR. DEPUTY SPEAKER: The Government wants to make an explanation regarding a particular matter and whether all persons are interested an opportunity should be given.

SHRI JAWAHARLAL NEHRU: As you know, Sir, so far as I am concerned I was expecting him to make his statement and if I may say so with all respect, I did not know that the statement would not be made then or that you would fix another time for it. I did not expect the developments as they occurred. But since this happened and the statement has been published in the press or is going to be. I think the House would be interested greatly in the letter exchanged. I am not referring to the statement in the least, but I am referring to the letters exchanged between Dr. Ambedkar and myself.

The first letter he wrote to me does not refer to his resignation and is dated 10th August 1951. It reads⁶ -

DR. AMBEDKAR RESIGNS

Expected Changes in Cabinet

New Delhi, September 25, 1951.

The Law Minister Dr. B.R. Ambedkar has submitted his resignation from the Cabinet to the Prime Minister, it was reliably learnt here tonight.

A Cabinet reshuffle seems inevitable at the end of the current sessions of Parliament as, apart from Dr. Ambedkar, Mr. C. Rajagopalachari, the Home

Minister, also intends to retire. The Communications Ministry continues to be without a Minister since the resignation of Mr. Rafi Ahmed Kidwai in July.

In his letter of resignation to the Prime Minister, Dr. Ambedkar is believed to have mentioned his ill-health as the main reason for his decision. But it is considered obvious in lobby circles that the resignation was hastened by the disappointingly fluctuating fortunes of the Hindu Code Bill.

The Law Minister is expected to laydown the resignation of his office on or about October 6, 1951, when the current session of Parliament is most likely to come to an end.

Any reshuffle, which the Prime Minister may embark upon, will be designed to form what may be truly called a "care-taker" government on the eve of the coming elections.

CONFLICTING REPORTS

Conflicting reports are current about the prospective Home Minister. In some Parliamentary Circles it is suggested that Mr N. Gopalaswami Ayyangar will be asked to look after the Home portfolio and that the responsibility of the Railway administration will be

entrusted entirely to Mr. K. Santhanam, Minister of State for Transport and Railways. There is also a report current that Mr. Rafi Ahmed Kidwai, former Communication Minister, will succeed Mr. C. Rajgopalachari. Yet a third report suggests that Mr. N.V. Gadgil might be entrusted with the Home and Law Ministries.

The names of Pandit Govind Ballabh Pant, Messrs T.T. Krishnamachari, Kailash Nath Katju and Asaf Ali are among those mentioned for inclusion in the caretaker Cabinet"

*(The Times of India, Wednesday, 26.9.1951, p. 1)*⁷

DR. AMBEDKAR'S RESIGNATION

Effective from Oct. 6

New Delhi, September 28, 1951.

Mr. Nehru has accepted the resignation of the New Minister, Dr. B.R. Ambedkar, from the Cabinet and has agreed to relieve him at the end of the current sessions of Parliament which is expected to conclude on October 6, 1951.

Dr. Ambedkar intends to remain in Delhi after laying down the reins of ministerial office and help the Scheduled Castes Federation of which he is the friend, guide and philosopher in fighting the elections.

The Executive Council of the Federation will meet at Delhi on October 6, 1951, to consider the election manifesto and selection of candidates for the reserved constituencies both in Parliament and in State Legislatures.

"C.R.S." PLANS

P.T.I. adds: "The Home Minister, Mr. C. Rajagopalachari, will relinquish his office by the end of October, it was reliably learnt today.

According to informed quarters, there will be no new appointments to the Cabinet. But the Prime Minister is expected to redistribute the Home and Law portfolios among the existing members of the Cabinet. The present indication is that the Food Minister, Mr. K.M. Munshi, has also announced that he will have additional charge of the Law Ministry."

(Times of India 39.9.51)⁸

Dr. Ambedkar's resignation from the Cabinet does not surprise those, aware of his eager anxiety to get the Hindu Code Bill placed on the statute book by the present Parliament. That Dr. Ambedkar should have looked upon his association with the Bill as being of greater importance than his work in framing the Constitution is also understandable. Being the robust realist

that he is, he must realise that he under-rated the opposition to this measure and slurred over the constitutional impropriety of attempting to force it through without an electoral mandate it is to be hoped that these considerations have also impressed themselves upon the Government of India.

Bereft of the crown of Manu Dr. Ambedkar nonetheless leaves the Government with a considerable record of achievement behind him. The Cabinet is not over-burdened with talent, and the departure of this discerning scholar and industrious student of public affairs cannot but dim its limited lustre. If the Congress was wise in including him in the Ministry Dr. Ambedkar's decision to enter the Party tabernacle was equally far-sighted. For nearly a quarter of a century he has fought for special political rights for his depressed community and many momentous years were spent in acrimonious conflicts with the Congress. Political memories, it is true, are short, but in sheeding old prejudices Dr. Ambedkar showed himself capable of raising to the height of new responsibilities and occasions. The Congress also emerges creditably from the episode.

India can ill-afford to lose the services of this able politician and it would be little short of

a tragedy, personal and national, if Dr. Ambedkar were to relinquish the national stage and relapse into communal politics. That is perhaps a danger more remote than some fear. Addressing a public meeting in Bombay some twenty months ago the Scheduled Castes leader adjured his followers to place the country above community in order to avoid "our independence being put into jeopardy a second time and being lost for ever". Dr. Ambedkar's practice should follow precept. Even if a long war has to be waged before Hindu society is rid of the curse of untouchability. From the point of view of their own welfare as also in the wider interest of the country, the Harijans cannot live in cloistered isolation and fight their battles single-handed. Economics cuts across social and political divisions and the prime need of the hour is a broad-based party sponsoring progressive socio-economic programme. It is to the evolution of such a national democratic front that Dr. Ambedkar should not dedicate his massive talent and energy and alliance between him and the Congress is incongruous in the context of recent events. A formidable ally, Dr. Ambedkar is also a foeman worthy of one's steel. The last few years have seen him harnessing his outstanding ability to constructive purpose, and both the country and his community stand to gain if he continues in that path.

(The Times of India, Monday 1.10.1951, p. 4)⁹

NOTES AND REFERENCES

- 1 W.N. Kuber, Dr. Ambedkar, A Critical Study, New Delhi, 1973, pp. 64-67.
- 2 Changdev Bhavanrao Khairmode, Dr. Ambedkar Ani Hindu Code Bill (Marathi), Pune, 1987, pp. 8-9.
- 3 Ibid., p. 10.
- 4 Ibid., pp. 15-16.
- 5 Ibid., pp. 20-23.
- 6 Ibid., pp. 24-27.
- 7 Ibid., pp. 32-33.
- 8 Ibid., pp. 33-34.
- 9 Ibid., pp. 34-36.