
INTERPRETATION OF LAW- AN OVERVIEW

Santosh Kumar Jain

Advocate, Rajasthan High Court, Jaipur (Ex Vice Chairman, Bar Council of Rajasthan)

ABSTRACT

Interpretation of statutes is the correct understanding of the law. This process is commonly adopted by the courts for determining the exact intention of the legislature. Because the objective of the court is not only merely to read the law but is also to apply it in a meaningful manner to suit from case to case. It is also used for ascertaining the actual connotation of any Act or document with the actual intention of the legislature. There can be mischief in the statute which is required to be cured, and this can be done by applying various norms and theories of interpretation which might go against the literal meaning at times. The purpose behind interpretation is to clarify the meaning of the words used in the statutes which might not be that clear. It is the process of ascertaining the true meaning of the words used in a statute. The Court is not expected to interpret arbitrarily and therefore there have been certain principles which have evolved out of the continuous exercise by the Courts. These principles are sometimes called 'rules of interpretation'.

KEYWORDS: *Literal Meaning, Interpret Arbitrarily, Intention of the Legislature, Rules of Interpretation*

INTRODUCTION

Enacted laws, especially the modern acts and rules, are drafted by legal experts and it could be expected that the language used will leave little room for interpretation or construction. But the experience of all those who have to bear and share the task of application of the law has been different. It is not necessary that the words used in a statute are always clear, explicit and unambiguous and thus, in such cases it is very essential for courts to determine a clear and explicit meaning of the words or phrases used by the legislature and at the same time remove all the doubts if any. Hence, all the rules of interpretation mentioned in the article are important for providing justice.

MEANING AND DEFINITIONS

The expression Interpretation has been derived from the Latin term Interpretari which suggests to elucidate, expound and understand or to translate. Interpretation refers to interpret the legal provision for the aim of applying them during a proper and meaningful manner as the case may be. It's a process by which the court determines the appropriate meaning of the words employed within the statute. There are three organs of the state; Legislative, Executive and Judiciary. The concept of interpretation of statute carries with Judiciary. The Legislative body forms the acts and statutes and

therefore the purpose of executing those acts and statutes is completed by the Executive body. When a specific act or statute is formed the Judiciary body isn't present, hence while interpreting such act and statute the judiciary might encounter certain difficulties and thus a correct interpretation is required. The method involves an act of discovering the proper meaning of the language which has been utilized in the statute and therefore the words shall be free from ambiguity. Interpretation of a statute is therefore correct understanding of the law. The entire process of interpreting an act or statute is usually adopted by the courts to work out the precise intention of the Legislature. The target of the court isn't only merely to read the law but is additionally to use it during a meaningful manner to suit from the case to case. According to Salmond: "the process by which the courts seek to ascertain the meaning of the legislature through the medium of authoritative forms in which it is expressed."

BACKGROUND

Elaborate rules of interpretation were evolved even at a very early stage of Hindu civilization and culture. The rules given by 'Jaimini', the author of Mimasat Sutras, originally meant for srutis were employed for the interpretation of Smritis also. In the process of interpretation, several aids are used. They may be statutory or non –statutory. Statutory aids may be illustrated by the General Clauses Act, 1897 and by specific definitions contained in individuals Acts whereas non-statutory aids are illustrated by common law rules of interpretation and also by case laws relating to the interpretation of statutes.

Objective of the Study

To find out the techniques of interpreting words mentioned under the law.

To understand the true meaning of provisions mentioned in the law.

To explore the intention of the legislature behind framing the law.

Need of Interpretation

Interpretation of statutes is the correct understanding of the law. This process is commonly adopted by the courts for determining the exact intention of the legislature. Because the objective of the court is not only merely to read the law but is also to apply it in a meaningful manner to suit from case to case. Legislative language may be complicated for a layman, and hence may require interpretation and when the language of the statute is clear, there is no need for the rules of interpretation. But, in certain cases, more than one meaning may be derived from the same word or sentence. It is, therefore, necessary to interpret the statute to find out the real intention of the statute. Need of interpretation would arise only where the language of a statutory provision is ambiguous, not clear or where two views are possible or where the provision gives a different meaning defeating the object of the statute. In this regard, a Constitution Bench of five Judges of the Supreme Court in R.S. Nayak v A.R. Antulay, has held: "... If the words of the Statute are clear and unambiguous, it is the plainest duty of the Court to give effect to the natural meaning of the words

used in the provision. The question of construction arises only in the event of an ambiguity or the plain meaning of the words used in the Statute would be self-defeating.”

Rules of Interpretation

The Court is not expected to interpret arbitrarily and therefore there have been certain principles which have evolved out of the continuous exercise by the Courts. These principles are sometimes called ‘rules of interpretation’.

Primary Rules

Literal or Grammatical Rule–

Important aspects of this rule are to construe the provisions literally and grammatically giving the words their ordinary and natural meaning. There should be no additions or substitution of words in the construction of statutes and its interpretation. Only one meaning should be derived from the statute. It is the first rule of interpretation. According to this rule, the words used in this text are to be given or interpreted in their natural or ordinary meaning. After the interpretation, if the meaning is completely clear and unambiguous then the effect shall be given to a provision of a statute regardless of what may be the consequences. The basic rule is that whatever the intention legislature had while making any provision it has been expressed through words and thus, are to be interpreted according to the rules of grammar. It is the safest rule of interpretation of statutes because the intention of the legislature is deduced from the words and the language used. According to this rule, the only duty of the court is to give effect if the language of the statute is plain and has no business to look into the consequences which might arise. The only obligation of the court is to expound the law as it is and if any harsh consequences arise then the remedy for it shall be sought and looked out by the legislature.

CASE LAWS

Maqbool Hussain v. State of Bombay, in this case, the appellant, a citizen of India after arriving at the airport did not declare that he was carrying gold with him. During his search was carried on, gold was found in his possession as it was against the notification of the government and was confiscated under section 167(8) of Sea Customs Act. Later on, he was also charged under section 8 of the Foreign Exchange Regulations Act, 1947. The appellant challenged this trial to be violative under Article 20(2) of the Indian Constitution. According to this article, no person shall be punished or prosecuted more than once for the same offence. This is considered as double jeopardy. It was held by the court that the Seas Act neither a court nor any judicial tribunal. Thus, accordingly, he was not prosecuted earlier. Hence, his trial was held to be valid.

State of Kerala v. Mathai Verghese and others, 1987 AIR 33 SCR(1) 317, in this case a person was caught along with the counterfeit currency “dollars” and he was charged under section 120B, 498A, 498C and 420 read with section 511 and 34 of Indian Penal Code for possessing counterfeit currency. The accused contended before the court that a charge under section 498A and 498B of Indian Penal Code can only be levied in the case of counterfeiting of Indian currency notes and not

in the case of counterfeiting of foreign currency notes. The court held that the word currency notes or bank note cannot be prefixed. The person was held liable to be charge-sheeted.

The Mischief Rule/Purposive construction-

A rule of statutory interpretation that attempts to determine the legislator's intention – to determine the mischief and defect – to give ruling to implement the effective remedy. Mischief Rule was originated in Heydon's case in 1584. It is the rule of purposive construction because the purpose of this statute is most important while applying this rule. It is known as Heydon's rule because it was given by Lord Coke in Heydon's case in 1584. It is called as mischief rule because the focus is on curing the mischief.

In the Heydon's case, it was held that there are four things which have to be followed for true and sure interpretation of all the statutes in general, which are as follows-

1. What was the common law before the making of an act.
2. What was the mischief for which the present statute was enacted.
3. What remedy did the Parliament sought or had resolved and appointed to cure the disease of the commonwealth.
4. The true reason of the remedy.

The purpose of this rule is to suppress the mischief and advance the remedy.

CASE LAWS

Smith v. Huges, 1960 WLR 830, in this case around the 1960s, the prostitutes were soliciting in the streets of London and it was creating a huge problem in London. This was causing a great problem in maintaining law and order. To prevent this problem, Street Offences Act, 1959 was enacted. After the enactment of this act, the prostitutes started soliciting from windows and balconies. Further, the prostitutes who were carrying onto solicit from the streets and balconies were charged under section 1(1) of the said Act. But the prostitutes pleaded that they were not solicited from the streets. The court held that although they were not soliciting from the streets yet the mischief rule must be applied to prevent the soliciting by prostitutes and shall look into this issue. Thus, by applying this rule, the court held that the windows and balconies were taken to be an extension of the word street and charge sheet was held to be correct.

PyareLal v. Ram Chandra, the accused in this case, was prosecuted for selling the sweeten supari which was sweetened with the help of an artificial sweetener. He was prosecuted under the Food Adulteration Act. It was contended by PyareLal that supari is not a food item. The court held that the dictionary meaning is not always the correct meaning, thereby, the mischief rule must be applicable, and the interpretation which advances the remedy shall be taken into consideration. Therefore, the court held that the word 'food' is consumable by mouth and orally. Thus, his prosecution was held to be valid.

Kanwar Singh v. Delhi Administration, AIR 1965 SC 871, Issues of the case were as follows- section 418 of Delhi Corporation Act, 1902 authorised the corporation to round up the cattle grazing on the government land. The MCD rounded up the cattle belonging to Kanwar Singh. The words used in the statute authorised the corporation to round up the abandoned cattle. It was contended by Kanwar Singh that the word abandoned means the loss of ownership and those cattle

which were round up belonged to him and hence, was not abandoned. The court held that the mischief rule had to be applied and the word abandoned must be interpreted to mean let loose or left unattended and even the temporary loss of ownership would be covered as abandoned.

Regional Provident Fund Commissioner v. Sri Krishna Manufacturing Company, AIR 1962 SC 1526, Issue, in this Case, was that the respondent concerned was running a factory where four units were for manufacturing. Out of these four units one was for paddy mill, other three consisted of flour mill, saw mill and copper sheet units. The number of employees there were more than 50. The RPFC applied the provisions of Employees Provident Fund Act, 1952 thereby directing the factory to give the benefits to the employees. The person concerned segregated the entire factory into four separate units wherein the number of employees had fallen below 50, and he argued that the provisions were not applicable to him because the number is more than 50 in each unit. It was held by the court that the mischief rule has to be applied and all the four units must be taken to be one industry, and therefore, the applicability of PFA was upheld.

The Golden Rule-

It is a form of statutory interpretation that allows a judge to depart from a word's normal meaning in order to avoid an absurd result. It is a compromise between the rule of interpretation and the rule of mischief. To be used in two ways-It is applied most frequently in a narrow sense where there is some ambiguity or absurdity in the words themselves. It is used in a wider sense to avoid a result that is obnoxious to the principles of public policy. It is known as the golden rule because it solves all the problems of interpretation. The rule says that to start with we shall go by the literal rule, however, if the interpretation given through the literal rule leads to some or any kind of ambiguity, injustice, inconvenience, hardship, inequity, then in all such events the literal meaning shall be discarded and interpretation shall be done in such a manner that the purpose of the legislation is fulfilled. The literal rule follows the concept of interpreting the natural meaning of the words used in the statute. But if interpreting natural meaning leads to any sought of repugnance, absurdity or hardship, then the court must modify the meaning to the extent of injustice or absurdity caused and no further to prevent the consequence. This rule suggests that the consequences and effects of interpretation deserve a lot more important because they are the clues of the true meaning of the words used by the legislature and its intention. At times, while applying this rule, the interpretation done may entirely be opposite of the literal rule, but it shall be justified because of the golden rule.

The presumption here is that the legislature does not intend certain objects. Thus, any such interpretation which leads to unintended objects shall be rejected. Important aspects of this rule are as follows:

The court must construe the contradictory provisions so as to harmonize them. The provision of one section cannot be used to defeat the provisions in another unless the Court, despite all its efforts, is unable to find a way to reconcile their differences. When it is impossible to reconcile the differences in contradictory provisions completely, the court must interpret them in such a way so as that effect is given to both the provisions as much as possible. It is not a harmonious construction if the interpretation reduces one provisions to be useless and not to destroy it or render it to loose.

CASE LAWS

Tirath Singh v. Bachittar Singh, AIR 1955 SC 850, in this case, there was an issue with regard to issuing of the notice under section 99 of Representation of People's Act, 1951, with regard to corrupt practices involved in the election. According to the rule, the notice shall be issued to all those persons who are a party to the election petition and at the same time to those who are not a party to it. Tirath Singh contended that no such notice was issued to him under the said provision. The notices were only issued to those who were non-parties to the election petition. This was challenged to be invalid on this particular ground. The court held that what is contemplated is giving of the information and the information even if it is given twice remains the same. The party to the petition is already having the notice regarding the petition, therefore, section 99 shall be so interpreted by applying the golden rule that notice is required against non-parties only.

State of Madhya Pradesh v. Azad Bharat Financial Company, AIR 1967 SC 276, In this case a transporting company was carrying a parcel of apples was challenged and charge-sheeted. The truck of the transporting company was impounded as the parcel contained opium along with the apples. At the same time, the invoice shown for the transport consisted of apples only. Section 11 of the opium act 1878, all the vehicles which transport the contraband articles shall be impounded and articles shall be confiscated. It was contended by the transport company that they were unaware of the fact that opium was loaded along with the apples in the truck. The court held that although the words contained in section 11 of the said act provided that the vehicle shall be confiscated but by applying the literal rule of interpretation for this provision it is leading to injustice and inequity and therefore, this interpretation shall be avoided. The words 'shall be confiscated' should be interpreted as 'may be confiscated'.

State of Punjab v. Quiser Jehan Begum, AIR 1963 SC 1604, a period of limitation was prescribed for, under section 18 of land acquisition act, 1844, that an appeal shall be filed for the announcement of the award within 6 months of the announcement of the compensation. Award was passed in the name of Quiser Jehan. It was intimated to her after the period of six months about this by her counsel. The appeal was filed beyond the period of six months. The appeal was rejected by the lower courts.

It was held by the court that the period of six months shall be counted from the time when Quiser Jehan had the knowledge because the interpretation was leading to absurdity. The court by applying the golden rule allowed the appeal.

Harmonious Construction-

When there is a conflict between two or more statutes or two or more parts of a statute then this rule is to be adopted. If it is not possible to harmonize the two statutes, then the court is to decide the same and it shall prevail. There should be consistency. According to this rule of interpretation, when two or more provisions of the same statute are repugnant to each other, then in such a situation the court, if possible, will try to construe the provisions in such a manner as to give effect to both the provisions by maintaining harmony between the two. The question that the two provisions of the same statute are overlapping or mutually exclusive may be difficult to determine. The legislature clarifies its intention through the words used in the provision of the statute. So, here the basic principle of harmonious construction is that the legislature could not have tried to contradict itself. In the cases of interpretation of the Constitution, the rule of harmonious

construction is applied many times. It can be assumed that if the legislature has intended to give something by one, it would not intend to take it away with the other hand as both the provisions have been framed by the legislature and absorbed the equal force of law. One provision of the same act cannot make the other provision useless. Thus, in no circumstances, the legislature can be expected to contradict itself.

CASE LAWS

IshwariKhaitan Sugar Mills v. State of Uttar Pradesh, in this case, the State Government proposed to acquire sugar industries under U.P Sugar Undertakings (Acquisition) Act, 1971. This was challenged on the ground that these sugar industries were declared to be a controlled one by the union under Industries (Development and Regulation) Act, 1951. And accordingly, the state did not have the power of acquisition of requisition of property which was under the control of the union. The Supreme Court held that the power of acquisition was not occupied by Industries (Development and Regulation) Act, 1951. The state had a separate power under Entry 42 List III.

M.S.M Sharma v. Krishna Sinha, AIR 1959 SC 395.Facts of the case are as follows- Article 19(1)(a) of the Constitution provides for freedom of speech and expression. Article 194(3) provides to the Parliament for punishing for its contempt and it is known as the Parliamentary Privilege. In this case, an editor of a newspaper published the word -for- word record of the proceedings of the Parliament including those portions which were expunged from the record. He was called for the breach of parliamentary privilege. He contended that he had a fundamental right to speech and expression. It was held by the court that article 19(1)(a) itself talks about reasonable freedom and therefore freedom of speech and expression shall pertain only to those portions which have not been expunged on the record but not beyond that.

Rule of Reasonable Construction-

This rule stresses upon the intention of the legislature to bring up the statute and sensible and not the prima facie meaning of the statute. This helps to clear the error caused due to the faulty draftsman ship.

Rule of Beneficial Construction-

Beneficial construction is a tendency and not a rule. This principle is based on human tendency to be fair, accommodating and just. In one case the Tribunal awarded more number of paid leaves to the workers than stated in section 79(1) of the Factories Act. This has been challenged. The Supreme Court held that the enactment being welfare legislation for the workers had to be beneficially constructed in favour of the workers.

Rule of Exceptional Construction-

It stands for the elimination of statutes and words in a statute which defeats the real objective of the statute or makes no sense. 'and' 'or', 'may', 'shall', 'must'.

Secondary Rules –**Noscitur a Sociis –**

It can be used wherever a statutory provision contains a word or phrase that is capable of bearing more than one meaning. Noscere means to know and sociis means association. Thus, Noscitur a Sociis means knowing from association. The meaning of an unclear word or phrase should be determined by the words immediately surrounding it. In other words, the meaning of a word is to be judged by the company it keeps. The questionable meaning of a doubtful word can be derived from its association with other words. This rule is explained in Maxwell on the interpretation of statutes (12th edition) in following words – When two or more words susceptible of analogous meaning are coupled together, they are understood to be used in their cognate sense. The words take their colour from and are quantified by each other, the meaning of the general words being restricted to a sense analogous to that of the less general. When a word is ambiguous, its meaning may be determined by reference to the rest of the statute. Thus, under the doctrine of “noscitur a sociis” the questionable meaning of a word or doubtful words can be derived from its association with other words within the context of the phrase. Relying on the above, The apex court in Pradeep Agarbatti with reference to the Punjab Sales Tax Act held that the word, “perfumery” means such articles as used in cosmetics and toilet goods viz, sprays, etc but does not include ‘Dhoop’ and ‘Agarbatti’. This is because in Schedule ‘A’ Entry 16 of Punjab Sales Tax Act reads as “cosmetics, perfumery & toilet goods excluding toothpaste, tooth powder kumkum & soap.”

Delhi Tribunal in the case of, Parsons Brinckerhoff India (P.) Ltd. vs. Asstt. DIT (Int. Tax) applying the rule of Noscitur a Sociis held that, the words ‘model’ and ‘design’ cannot fall under definition of ‘royalty’ under Explanation 2 to section 9 (I) (VI) of the Income Tax Act. They have to take colour from the other words surrounding them, such as, patent, invention, secret formula or process or trade mark, which are all species of intellectual property.

Noscitur a sociis cannot prevail in case where it is clear that the wider words have been deliberately used in order to make the scope of the defined word correspondingly wider. It can also be applied where the meaning of the words of wider meaning import is doubtful; but, where the object of the Legislature in using wider words is clear and free from ambiguity, the rule of construction cannot be applied. This doctrine is broader than the doctrine of ejusdem generis because this rule puts the words in context of the whole phrase and not just in relation to the nearby words. The language of the phrase can be used as a guide to arrive at the true meaning of the word.

This rule is illustrated in *Foster v DiphwysCasson* (1887) 18 QBD 428, involving a statute which stated that explosives taken into a mine must be in a “case or canister”. Here the defendant used a cloth bag. The courts had to consider whether a cloth bag was within the definition. Under Noscitur a sociis, it was held that the bag could not have been within the statutory definition, because parliament’s intention was referring to a case or container of the same strength as a canister.

Further, this rule can only be used when the associated words have analogous meaning. It cannot be used when the words have disjoint meanings. For example, in the case of *Lokmat Newspapers vs Shankar prasad* AIR 1999, it was held that the words “discharge” and “dismissal” do not have the same analogous meaning and so this rule cannot be applied.

Ejusdem Generis –

When a list of two or more specific descriptors are followed by more general descriptors, the otherwise wide meaning of the general descriptors must be restricted to the same class, if any, of the specific words that precede them e.g. vehicles in “cars, motorbikes, motor powered vehicles” would be interpreted in a limited sense and therefore cannot be interpreted as including air planes. The ejusdem generis, or ‘of the same genus’ rule, is similar though narrower than the more general rule of *noscitur a sociis*. According to this rule, when particular words pertaining to a class or a genus are followed by general words, the general words are construed as limited to the things of the same kind as those specified by the class or the genus. The meaning of an expression with wider meaning is limited to the meaning of the preceding specific expressions. However, for this rule to apply, the preceding words must form a specific class or genus. Further, this rule cannot be applied in the words with a wider meaning appear before the words with specific or narrow meaning.

In *UP State Electricity Board vs Harishankar*, AIR 1979, SC held that the following conditions must exist for the application of this rule –

1. The statute contains an enumeration of specific words
2. The subject of the enumeration constitute a class or a category
3. The class or category is not exhausted by the enumeration
4. A general term is present at the end of the enumeration
5. There is no indication of a different legislative intent

Justice Hidayatullah explained the principles of this rule through the following example – In the expression, “books, pamphlets, newspapers, and other documents”, private letters may not be held included if “other documents” be interpreted ejusdem generis with what goes before. But in a provision which reads, “newspapers or other documents likely to convey secrets to the enemy”, the words “other documents” would include documents of any kind and would not take their meaning from newspaper.

This was also illustrated in the case of *Ishwar Singh Baggav* State of Rajasthan 1987, where the words “other person”, in the expression “any police officer authorized in this behalf or any other person authorized in this behalf by the State government” in Section 129 of Motor Vehicles Act, were held not to be interpreted ejusdem generis because the mention of a single species of “police officers” does not constitute a genus.

It can be seen that this rule is an exception to the rule of construction that general words should be given their full and natural meaning. It is a canon of construction like many other rules that are used to understand the intention of the legislature. This rule also covers the rank principle, which goes as follows – Where a string of items of a certain rank or level is followed by general residuary words, it is presumed that the residuary words are not intended to include items of a higher rank than those specified. By specifying only items of lower rank the impression is created that higher ranks are not intended to be covered. If they were, then their mention would be expected a fortiori. For example, the phrase “tradesman, artificer, workman, labourer, or other person whatsoever” was held not to include persons above the artisan class. Similarly, the phrase “copper, brass, pewter, and tin, and all other metals” in a local Act of 1825 was held not to include precious metals such as gold and silver.

Reddendo Singula Singulis –

When a list of words has a modifying phrase at the end, the phrase refers only to the last word, e.g., firemen, policemen, and doctors in a hospital. Here, “in a hospital” only applies to doctors and not to firemen or policemen. The reddendosingulasingulis principle concerns the use of words distributively. Where a complex sentence has more than one subject, and more than one object, it may be the right construction to render each to each, by reading the provision distributively and applying each object to its appropriate subject. A similar principle applies to verbs and their subjects, and to other parts of speech. A typical application of this principle is where a testator says ‘I devise and bequeath all my real and personal property to B’. The term devise is appropriate only to real property. The term bequeath is appropriate only to personal property. Accordingly, by the application of the principle reddendo singular singulis, the testamentary disposition is read as if it were worded ‘I devise all my real property, and bequeath all my personal property, to B’. This rule has been applied in the case of KoteswarVittalKamatvs K RangappaBaliga, AIR 1969, in the construction of the Proviso to Article 304 of the Constitution which reads, “Provided that no bill or amendment for the purpose of clause (b), shall be introduced or moved in the legislature of a state without the previous sanction of the President”. It was held that the word introduced applies to bill and moved applies to amendment.

SUGGESTIONS OF THE STUDY

Some important points to be taken care of in the context of interpreting Statutes:

- The intention of the legislature.
- The Statute must be read as a whole in its context.
- The Statute should be construed so as to make it Effective and Workable- if a statutory provision is ambiguous and capable of various constructions, then that construction must be adopted which will give meaning and effect to the other provision of the enactment rather than that which will give none.
- If a meaning is plain, the effect must be given to it irrespective of consequences.
- The process of construction combines both literal and purposive approaches. The purposive of construction rule highlights that you should shift from literal construction when it leads to absurdity.

CONCLUSION

Every nation has its own judicial system, the purpose of which to grant justice to all. The court aims to interpret the law in such a manner that every citizen is ensured justice to all. To ensure justice to all the concept of canons of interpretation was expounded. These are the rules which are evolved for determining the real intention of the legislature.

It is not necessary that the words used in a statute are always clear, explicit and unambiguous and thus, in such cases it is very essential for courts to determine a clear and explicit meaning of the words or phrases used by the legislature and at the same time remove all the doubts if any. Hence, all the rules mentioned in the article are important for providing justice

On the basis of the above description of the rules of interpretation, it can rightly be concluded that the above rules of interpretation are like the tools of carpenter or sculptor. To a great extent their value depends on the fact that with what care or skill they are used. Actually, it depends upon the wisdom and care which the judges take in interpreting the statutes by applying the above rules of interpretation.

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