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1.	John Kay, “The Rationale of Taxation” 2(2) Oxford Review of Economic Policy 1-6 (1986)
2.	Tyler A. LeFevre, “Justice in Taxation” 41(4) Vermont Law Review 763-798 (2017)
3.	T.N. Pandey, “Evolution and Development of Direct Tax Laws” FIFTY YEARS OF THE SUPREME COURT OF INDIA (OXFORD UNIVERSITY PRESS, 2013)
4.	Laura Biron, “Taxing or Taking? Property Rhetoric and the Justice of Taxation” Taxation: Philosophical Perspectives EDITED BY Martin O’Neill and Shepley Orr (Oxford University Press) 2018 pp. 81-97
5.	Constituent Assembly Debates Volume 5 Thursday, the 21st August, 1947 Volume 9 Friday, the 9th September, 1949
6.	Aseem Chawla, “India” 5 The Tax Disputes and Litigation Review (2017)
7.	Pratik Datta, Shefali Malhotra & Shivangi Tyagi, “Judicial Review and Money Bills” 10 NUJS L. REV (2017)
8.	Harish Salve, “Retrospective Taxation- the Indian Experience” Retrieved from: https://www.biicl.org/files/6722_panel_two_harish_salve.pdf
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3.	Sarbapriya Ray, “A Close Look into Double Taxation Avoidance Agreements with India: Some Relevant Issues in International Taxation” 2 International Affairs and Global Strategy 1-18 (2011)
4.	Saurabh Bagaria, “The Nature and Purposes of Double Taxation Agreements and the Issues which the Interpretation of such Agreements may give rise” 59 PL (March 2014)
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2.	<p>India – Country Practices: Transfer Pricing Practices and Challenges in India United Nations Practical Manual on Transfer Pricing (2021) pp. 585 – 607</p>
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