IN THE PURSUIT OF EMPLOYMENT JUSTICE: MAKING CLAIMS IN THE EMPLOYMENT CLAIMS TRIBUNAL

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I. Introduction

1 Employment disputes are unfortunately very commonplace in Singapore, with 9,397 employment claims and appeals lodged in 2023 alone.[2] Employment claims can be made for disputes regarding bonus payments, deduction from salary, medical benefits, pay for work on public holidays, and employees' entitlement to paid extended childcare leave under the Child Development Co-Savings Act, among others.[3]

2 In Singapore, the Employment Claims Tribunal ("**ECT**") hears and determines the outcome of employment dispute claims.[4] It was created to "facilitate the resolution of salary disputes without requiring employees to resort to costly litigation in regular courts."[5] The ECT is presided over by a tribunal magistrate, which can either be appointed by the President on the recommendation of the Chief Justice, or a District Judge designated by the Presiding Judge of the State Courts.[6]

3 While a claimant might immediately want recourse to the ECT, the process is not so straightforward. There are multiple steps before a claim can be filed with the ECT. For instance, potential claimants are recommended to first file a claim with the Tripartite Alliance for Dispute Management ("**TADM**"), which attempts to resolve disputes through mediation. If the TADM fails to resolve the disputes in question, they may issue claim referral certificates which can be used to file a claim with the ECT.[7]

4 This article will lay out the criteria and procedure for filing an employment claim (Part II), before discussing the methods of enforcing an employment claims order (Part III).

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[2] Ministry of Manpower & Tripartite Alliance for Dispute Management, "Employment Standards Report 2023" (2 August 2024) <https://www.mom.gov.sg/-/media/mom/documents/press-releases/2024/0802-annex-employment-standards-report-2023.pdf> (accessed 11 February 2025).

[3] See Employment Claims Act 2016 (2020 Rev Ed) First, Second & Third Schedule.

[4] Employment Claims Act 2016 (2020 Rev Ed) ss 12(1)-(7).

[5] *DFI Engineering Pte Ltd v Mo Mei Jen* [2018] 5 SLR 431 (SGHC) at [20].

[6] Employment Claims Act 2016 (2020 Rev Ed) ss 9(1) & 9(5).

[7] Tripartite Alliance for Dispute Management, "When will a Claim Referral Certificate (CRC) be issued?" (20 May 2024) <https://www.tal.sg/tadm/faqs/mediation/issue-crc-without-in-person-mediation> (accessed 11 February 2025).

II. Filing an Employment Claim

A. Preliminary considerations

5 It should first be noted that there are several groups of persons who cannot file a claim with the ECT:[8]

(a) Seafarers;

(b) Domestic workers;

(c) Public servants;

(d) Self-employed persons; and

(e) Persons whose claims exceed $20,000 before going through the Tripartite Mediation Framework or mediations which were assisted by unions recognised under the Industrial Relations Act. After utilising these avenues, the claim limit will be increased to $30,000.

6 Further, there are certain types of claims which the ECT does not hear. Some notable examples are:

(a) Claims relating to non-payment of Central Provident Fund ("**CPF**") contributions.[9] For CPF contribution problems, reports should be sent to the CPF Board directly. Attaching supporting documents such as pay slips and employment contracts to the reports would expedite the investigation process;[10]

(b) Payment-related disputes for self-employed people. Self-employed people can consider bringing claims which arise from contracts to the Small Claims Tribunals ("**SCT**") instead;[11] and

(c) Claims where the claimed value exceeds $20,000,[12] or $30,000 where there is a Memorandum of Consent signed by the relevant parties to the claim demonstrating their agreement for the claim to be heard in the SCT.

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[8] Singapore Courts, "Cases eligible for an employment claim" <https://www.judiciary.gov.sg/civil/cases-eligible-employment-claim> (accessed 11 February 2025) & Employment Claims Regulations 2017 ss 14(1)(*a*) & 14(1)(*c*) & Employment Act 1968 s 2(1).

[9] Singapore Courts, "Cases eligible for an employment claim" <https://www.judiciary.gov.sg/civil/cases-eligible-employment-claim> (accessed 11 February 2025).

[10] Central Provident Fund Board, "How can I lodge a report for non-payment or underpayment of CPF contributions?" <https://www.cpf.gov.sg/service/article/how-can-i-lodge-a-report-for-non-payment-or-underpayment-of-cpf-contributions> (accessed 11 February 2025).

[11] Singapore Courts, "Cases eligible for an employment claim" <https://www.judiciary.gov.sg/civil/cases-eligible-employment-claim> (accessed 11 February 2025).

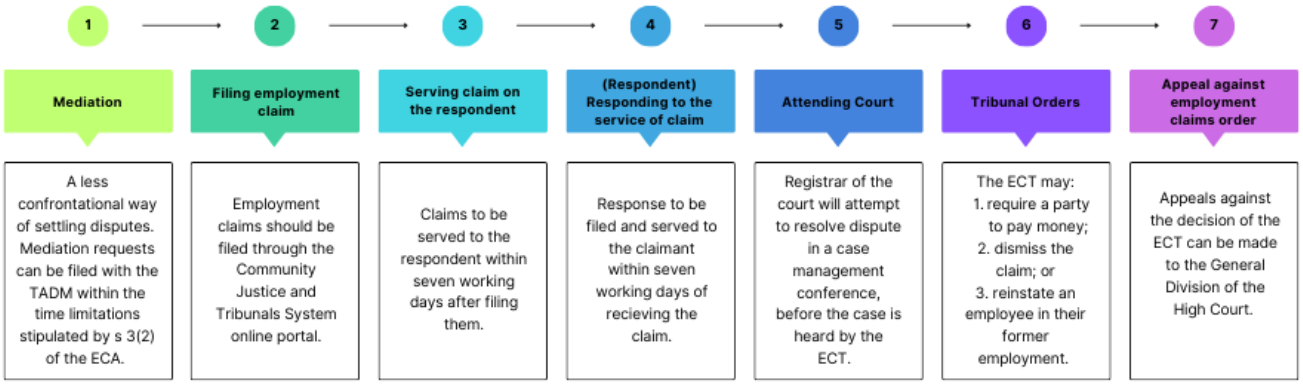
[12] Small Claims Tribunals Act 1984 (2020 Rev Ed) ss 2(1) & 5(3).

7 For claims which fall within the ECT's jurisdiction, there are at least two preliminary requirements which must be fulfilled:[13]

(a) First, the dispute remains unresolved even after mediation at the TADM; and

(b) Second, a claim referral certificate was issued by the TADM mediator.

8 The following flowchart outlines the process surrounding a claim with the ECT:



B. Step 1: Mediation

9 Mediation generally involves discussing the dispute with the other party in a less confrontational way. A neutral third party known as a mediator will help to facilitate the discussion between the parties. There are several benefits of mediation as compared to commencing a lawsuit, including lower costs and less time expended to resolve the dispute. Furthermore, conversations during a mediation cannot be used as evidence against the parties in future trials,[14] and confidentiality of the discussions is likely to be preserved as mediation communications cannot be disclosed to any third party to the mediation other than in limited circumstances (such as by order of the court) For example, mediation communication may be disclosed if this is required by an order of court.[15]

10 Mediation requests can be made through the TADM website, which also provides more details on how mediation requests can be filed.[16] Some important points on the mediation process are discussed below.

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[13] Singapore Courts, "Cases eligible for an employment claim" <https://www.judiciary.gov.sg/civil/cases-eligible-employment-claim> (accessed 11 February 2025) & Singapore Courts, "How to file and serve an employment claim" <https://www.judiciary.gov.sg/civil/how-to-file-serve-employment-claim> (accessed 11 February 2025).
[14] Singapore Courts, "Mediation" <https://www.judiciary.gov.sg/alternatives-to-trial/mediation/what-is-mediation> (accessed 11 February 2025) & Mediation Act 2017 (2020 Rev Ed) ss 10 & 11.
[15] Mediation Act 2017 (2020 Rev Ed) s 9(2)(*g*).
[16] Tripartite Alliance for Dispute Management, "Mediation guide" <https://www.tal.sg/tadm/mediation-guide-3> (accessed 11 February 2025).

(a) Time bar for mediation requests and claims

11 Mediation requests should be made as soon as practicable once the employment-related issue arises. This is because s 3(2) of the Employment Claims Act ("**ECA**") prescribes time limitations for mediation requests, which vary according to the type of dispute in question. For example, mediation requests for wrongful dismissal disputes under s 14(2) of the Employment Act must be submitted not later than one month after the date of dismissal of that employee.[17]

12 Further, in the event that the dispute is referred to the courts by the mediator, the Limitation Act may restrict the scope of actionable claims in formal court proceedings.[18] For instance, claims which are based on contract or torts (e.g., negligence or harassment) may not be actionable if 6 years have elapsed since the date on which the cause of action happened.[19]

(b) Who can act for the parties to the mediation

13 Mediation in the context of filing a claim with the ECT must adhere to several requirements.[20] Individuals and groups are subject to different rules. Individual parties in a mediation:[21]

(a) must act in person;

(b) cannot be represented by an advocate and solicitor; and

(c) cannot be represented by an agent (whether paid or unpaid).

14 There are exceptions to the rule outlined above.[22] For instance, parents or guardians can represent parties who are below 18 years of age.[23]

15 As for parties other than individuals, s 5(2) of the ECA lists the people who may represent them. For instance, unincorporated associations may be represented by a member of their governing body.[24]

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[17] Employment Claims Act 2016 (2020 Rev Ed) s 3(2)(*d*) & Employment Act 1968 (2020 Rev Ed) s 14(2).
[18] Limitation Act 1959 (2020 Rev Ed) s 2(1).
[19] Limitation Act 1959 (2020 Rev Ed) s 6(1).
[20] Employment Claims Act 2016 (2020 Rev Ed) s 5.
[21] Employment Claims Act 2016 (2020 Rev Ed) s 5(1).
[22] Employment Claims Act 2016 (2020 Rev Ed) s 5(3) & s 34.
[23] Employment Claims Regulations 2017 s 12 & First Schedule, read with Employment Claims Act 2016 (2020 Rev Ed) s 5(3). The First Schedule of the Employment Claims Regulations has a comprehensive list of the parties who may be represented by other individuals.
[24] Employment Claims Act 2016 (2020 Rev Ed) s 5(2)(*d*).

(c) When and how claim referral certificate may be issued

16 The TADM mediator has to issue a claim referral certificate before the claim can be filed with the ECT. The mediator must issue a claim referral certificate when:[25]

(a) The respondent (generally the employer) of the mediation request does not attend the mediation for that particular dispute, even after being given reasonable notice of the mediation;

(b) No settlement is reached at the end of the mediation in relation to one or more of the employment disputes which were specified in the mediation request; or

(c) The approved mediator is satisfied that the specified employment dispute has no reasonable prospect of being settled through mediation.

17 The claimants must also play their part in the mediation by attending the mediation sessions. If they fail to do so, the approved mediator may either discontinue the mediation, or refuse to issue the claim referral certificate.[26] This may negatively affect the claimant's chances of bringing the claim up to the ECT.

(d) What happens when the dispute is resolved by mediation

18 If parties successfully settle their employment disputes through mediation, they first must enter into a settlement agreement using a form prescribed by the Rules of Court,[27] which must be signed by or on behalf of each party.[28] This form can be found on the Ministry of Manpower website.[29] The form is a legally binding contract, which contains terms that both parties must comply with to resolve existing or potential disputes peacefully.[30]

(e) What happens if the settlement agreement is breached

19 If a party breaches the terms of the settlement agreement (for example, by failing to pay any instalment), action can be taken against the defaulting party. This can be done either by way of enforcement (if the settlement agreement is registered with the District Court) or by suing on the settlement agreement itself.

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[25] Employment Claims Act 2016 (2020 Rev Ed) s 6.
[26] Employment Claims Act 2016 (2020 Rev Ed) s 6(3).
[27] Employment Claims Act 2016 (2020 Rev Ed) s 7(1)(*a*) & s 33.
[28] Employment Claims Act 2016 (2020 Rev Ed) s 7(1)(*d*).
[29] Tripartite Alliance for Dispute Management, "Settlement Agreement (Physical Copy)" <https://www.mom.gov.sg/-/media/mom/documents/employment-practices/tadm/employment-claims-settlement-agreement.pdf> (accessed 11 February 2025).
[30] Singapore Courts, "Register a settlement agreement" <https://www.judiciary.gov.sg/civil/register-settlement-agreement> (accessed 11 February 2025).

20 Either party to the agreement may register it with the District Court,[31] which makes it enforceable as a District Court Order.[32] Thus, enforcement action can be taken against a party which does not fulfil their obligations under a registered settlement agreement.[33] Conversely, if the settlement agreement is not registered with the District Court, the party must first start a civil claim against the defaulting party, and enforcement action can only be taken against the defaulter if the claimant obtains a court order in their favour.[34]

21 Nevertheless, even if the settlement agreement is registered in a District court, any party to the agreement can apply to a District Court to have it set aside at the court's discretion.[35] This application must be made within seven days of the applicant receiving notice of the settlement agreement's registration in a District Court.[36] The District Court is likely to set aside the registration where the settlement agreement:[37]

(a) is void or voidable due to fraud, coercion, mistake;
(b) contains subject matter that does not relate to a specified employment dispute; or
(c) is contrary to public policy.

C. Step 2: Filing employment claim

22 After obtaining the claim referral certificate, the claim should be filed through the Community Justice and Tribunals System ("**CJTS**").[38]

D. Step 3: Serving the claim on the respondent

23 The claim must be served to the respondent within seven working days after the claim has been filed.[39] This can be done through several ways, such as by delivering the hard copy of the documents personally to the respondent or by sending registered posts to the last known residential address in an envelope addressed to the individual. If it is a business entity, hard copies of the documents can be sent to the respondent's Accounting and Corporate Regulatory Authority ("**ACRA**") address in an envelope addressed to them.[40]

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[31] Employment Claims rules 2017 s 39(1).
[32] Employment Claims Act 2016 (2020 Rev Ed) s 7(3).
[33] Singapore Courts, "Register a settlement agreement" <https://www.judiciary.gov.sg/civil/register-settlement-agreement> (accessed 11 February 2025) & Rules of Court 2021 Order 22 s 1 & s 2.
[34] Singapore Courts, "Register a settlement agreement" <https://www.judiciary.gov.sg/civil/register-settlement-agreement> (accessed 11 February 2025).
[35] Employment Claims Act 2016 (2020 Rev Ed) s 7(4).
[36] Employment Claims Rules 2017 s 41(1).
[37] Employment Claims Act 2016 (2020 Rev Ed) s 7(6).
[38] Singapore Courts, "How to file and serve an employment claim" <https://www.judiciary.gov.sg/civil/how-to-file-serve-employment-claim> (accessed 11 February 2025).
[39] Employment Claims Rules 2017 s 9(1) & s 48(2)(*c*).
[40] Employment Claims Rules 2017 s 47 & Singapore Courts, "How to file and serve an employment claim" <https://www.judiciary.gov.sg/civil/how-to-file-serve-employment-claim> (accessed 11 February 2025).

The claimant must also pay $30 for claims which are within $10,000, or $60 for those which exceed this amount.[41]

24 After the above step has been completed, the claimant must also file a declaration of service in the CJTS on a date which is: (a) within 4 weeks after the date on which the claim was filed, *and* (b) regardless of whether the 4 weeks has elapsed, before the first case management conference.[42] If the claim is not filed on time, it will be deemed to be discontinued.[43]

E. Step 4: (Respondent) Responding to the service of claim

(a) Filing a response

25 Respondents who do not agree with the claim must file a response within seven working days after being served with the claim,[44] and file a declaration of service in the CJTS within 4 weeks after the date on which the response was filed, or before the next case management conference, whichever is earlier.[45] The procedure with respect to service of the response is similar to that as stated at paragraph 23 above.

(b) Filing a counterclaim

26 Respondents can also file counterclaims against the claimant. The procedure is similar to that of filing a claim as mentioned in paragraphs 23-24, with the necessary adjustments such as amending the wording to suit the context of a counterclaim.[46] Notably, regardless of whether the original claim is "granted, stayed, discontinued, withdrawn, dismissed or settled", the counterclaim can still proceed.[47]

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[41] Employment Claims Rules 2017 s 8(2) & First Schedule.
[42] Employment Claims Rules 2017 s 9(2) & Singapore Courts, "How to file and serve an employment claim" <https://www.judiciary.gov.sg/civil/how-to-file-serve-employment-claim> (accessed 11 February 2025).
[43] Employment Claims Rules 2017 s 15(5).
[44] Employment Claims Rules 2017 s 10 & s 48(2)(*c*).
[45] Employment Claims Rules 2017 s 10(3).
[46] Employment Claims Rules 2017 s 11.
[47] Employment Claims Rules 2017 s 11(6).

F. Step 5: Attending court

(a) Case management conference

27 After the claim has been filed, a deputy or assistant registrar ("**Registrar**") will attempt to resolve the dispute in a case management conference ("**CMC**").[48] A CMC is a meeting before the court hearing. The Registrar will give parties an opportunity to resolve their dispute, and if parties are able to reach a settlement to resolve the dispute, this will be recorded by the Registrar as a consent order to reflect the agreement.[49]

28 The Registrar may issue directions which they think are necessary for the "just, expeditious and economical disposal" of the matter.[50] This may involve ordering the parties to the claim to attend mediation or counselling again.[51] Failure to comply with the Registrar's directions may result in the Registrar striking out the response, or even ordering that the defaulting parties undergo committal proceedings to determine the penalties they should face.[52]

(b) Hearing before the ECT

29 Once the Registrar decides that the parties are unable to resolve their dispute without a hearing before a tribunal, the Registrar will fix the case for hearing.[53]

30 One of the important benefits of an ECT hearing is that all proceedings before a tribunal are generally conducted in private.[54] This allows for greater confidentiality as compared to open court hearings (which are open to the public),[55] although the tribunal still has the power to permit specific individuals to observe the hearings.[56]

31 It must be stressed that parties to ECT proceedings must act in person and cannot be represented by an advocate and solicitor.[57] The judge-led proceedings are conducted in an

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[48] Singapore Courts, "Before going to court for an employment claim" <https://www.judiciary.gov.sg/civil/before-going-to-court-employment-claim> (accessed 11 February 2025) & Employment Claims Rules 2017 s 17.
[49] Singapore Courts, "At your employment claims case management conference" <https://www.judiciary.gov.sg/civil/at-employment-claims-CMC> (accessed 11 February 2025).
[50] Employment Claims Rules 2017 s 17(1).
[51] Employment Claims Rules 2017 s 17(2)(*a*).
[52] Employment Claims Rules 2017 s 17(4) & Singapore Courts, "Committal proceedings" <https://www.judiciary.gov.sg/civil/committal-proceedings> (accessed 11 February 2025).
[53] Employment Claims Rules 2017 s 18.
[54] Employment Claims Act 2016 (2020 Rev Ed) s 18.
[55] See Rules of Court 2021 (2020 Rev Ed) Order 15 Rule 1 & Singapore Courts, "Guide to attending court" <https://www.judiciary.gov.sg/attending-court/guide-to-attending-court> (accessed 11 February 2025).
[56] Employment Claims Act 2016 (2020 Rev Ed) s 18(4).
[57] Employment Claims Act 2016 (2020 Rev Ed) s 19(1).

informal manner,[58] where the tribunal may on its own initiative summon any person to give evidence and produce relevant documents.[59] Additionally, the evidence presented to a tribunal do not need to be given on oath or affirmation, and the ECT is also able to make investigations into particular matters as they deem fit, regardless of whether they have been raised by the parties.[60]

G. Step 6: Tribunal orders

32 After considering the details of the claim, the ECT may decide its outcome by issuing an order which:[61]

(a) requires a party to pay money or costs to another party;

(b) dismisses a part of or the entirety of the claim; or

(c) requires an employer to reinstate an employee in the employee's former employment.

33 When determining whether to make these orders, the ECT may also consider whether the claim was frivolous or vexatious, which roughly means that the cases are initiated by parties who merely wish to annoy their opponents without a serious purpose.[62] Additionally, the ECT considers whether the parties failed to attend mediation without a reasonable excuse.[63]

H. Step 7: Appeal against employment claims order

34 The respondent may not be satisfied with the outcome of the trial. In these circumstances, they may want to file an appeal against the decision of a tribunal to the General Division of the High Court.[64] An application for leave (i.e., permission) to do so must first be filed with the District Court.[65] Once the District Court gives or refuses permission to appeal, this decision is final and cannot be further appealed against.[66]

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[58] Employment Claims Act 2016 (2020 Rev Ed) s 20(3).
[59] Employment Claims Act 2016 (2020 Rev Ed) s 20.
[60] Employment Claims Act 2016 (2020 Rev Ed) s 20(3) & s 20(5).
[61] Employment Claims Act 2016 (2020 Rev Ed) s 22(1).
[62] *Parti Liyani v Public Prosecutor* [2021] 5 SLR 860 at [65] (citing *Arun Kaliamurthy v Public Prosecutor* [2014] 3 SLR 1023 at [31]-[33]).
[63] Employment Claims Act 2016 (2020 Rev Ed) s 22(2).
[64] Employment Claims Act 2016 (2020 Rev Ed) s 23(1) & Singapore Courts, "Appeal against an employment claims order made by a tribunal" <https://www.judiciary.gov.sg/civil/appeal-employment-claims-order-tribunal> (accessed 11 February 2025).
[65] Employment Claims Act 2016 (2020 Rev Ed) s 23(2).
[66] Employment Claims Act 2016 (2020 Rev Ed) s 23(4).

(a) An example of a successful appeal

35 In *Hossain Rakib v Ideal Design & Build Pte Ltd*,[67] the employee was a construction worker who claimed that his employer should have paid him over 700 hours' worth of overtime pay, which his employer refused to pay for the most part.[68] The ECT held that the employee could not claim for more than 72 hours of overtime pay per month,[69] as the "employee may not work for more than 72 hours' overtime per month even if he/she wanted to" based on their interpretation of s 38(5) of the Employment Act.[70] In an attempt to claim additional overtime pay, the employee appealed to the General Division of the High Court. His argument relied on another interpretation of s 38(5).[71]

36 Judicial Commissioner Goh Yihan (as he then was) allowed the appeal. He held that the employee's interpretation of s 38(5) was better aligned with its legislative purpose.[72] JC Goh held that the provision is "protective" in nature,[73] in that it protects the employee from being required to work more than 72 overtime hours in a month,[74] but it *does not prohibit* an employee from claiming overtime pay (in excess of 72 overtime hours) if the employee had been compelled by his or her employer to perform such overtime work.[75] The case was then remitted back to the ECT to compute the additional amount which the employer was to pay to the employee.[76]

III. Enforcing an employment claim order

37 If one party does not fulfil their obligations under an ECT order, the aggrieved party may enforce the order against the aforementioned party,[77] by filing an enforcement application (Form 38, from Appendix A2 of the State Courts Practice Directions 2021).[78]

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[67] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC).
[68] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [1].
[69] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [1].
[70] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [7] – [8] (citing *Hossain Rakib v Ideal Design & Build Pte Ltd* [2022] SGECT 109).
[71] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [15].
[72] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [41].
[73] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [49] & Cherlyn Suet Yean Lee, Shjoneman Tan, "Reflections on Statutory Interpretation of the Employment Act and Extra-contractual Claims to Overtime Pay *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] SGHC 166" [2023] SAL Prac 26 at [3].
[74] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [53].
[75] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [55].
[76] *Hossain Rakib v Ideal Design & Build Pte Ltd* [2023] 5 SLR 1529 (SGHC) at [62].
[77] Singapore Courts, "Enforce an employment claims order" <https://www.judiciary.gov.sg/civil/enforce-employment-claims-order> (accessed 11 February 2025).
[78] Singapore Courts, "Enforce an employment claims order" <https://www.judiciary.gov.sg/civil/enforce-employment-claims-order> (accessed 11 February 2025) & Singapore Courts, "State Courts Practice Directions 2021" <https://epd2021-statecourts.judiciary.gov.sg/appendices> (accessed 11 February 2025).

38 The enforcement order authorises the Sheriff (a bailiff of the Supreme or State Courts)[79] to do one or more of the following:[80]

(a) Seize and sell all property belonging to the enforcement respondent;

(b) Seize and deliver or give possession of property in possession or control of the enforcement respondent;

(c) Attach a debt which is due to the enforcement respondent from any non-party; or

(d) Anything else specified in the Court order.

39 The enforcement order ceases to be valid once the enforcement applicant makes a written notice to the Sheriff not to take further action, or when the Court orders for its satisfaction to be recorded.[81] The latter can occur after a person who has satisfied a judgement debt applies to the Court for its satisfaction to be recorded.[82]

IV. Conclusion

40 A claim with the ECT can alleviate many of the troubles which employees face, such as unpaid bonuses and wrongful dismissal, and hence it may be a worthwhile venture. In practice, it is an effective way for employees to bring claims, and sometimes it may be the only way to "force" an employer to enter into a settlement. This is because employers often wish to settle, especially if the claim sum from the employee is not large.

41 However, it should be noted that filing a claim with the ECT remains a potentially lengthy and tedious procedure, as explained above. Ultimately, each claimant should carefully consider whether to proceed with a claim.

[79] Rules of Court 2021 (2020 Rev Ed) Order 1 Rule 3.
[80] Rules of Court 2021 (2020 Rev Ed) Order 22 Rule 2.
[81] Rules of Court 2021 (2020 Rev Ed) Order 22 Rule 2(8).
[82] Rules of Court 2021 (2020 Rev Ed) Order 22 Rule 3.