Ragless v Prospect City Council [1922] SASR 299 at

311 per Murray CJ:

I think the rules [as to the use of headings] may be stated thus:

If the language of the sections is clear, and is actually inconsistent with the headings, the headings must give way; If the language of the sections is clear, but, although more general, is not inconsistent with the headings, the sections must be read subject to the headings; If the language of the sections is doubtful or ambiguous, the meaning which is consistent with the headings must be adopted.

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