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## VERACITY OF LIVE IN RELATIONSHIP IN INDIA

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### I. ABSTRACT

As the Article 21 of the Indian Constitution says

*“No person shall be deprived of his life or personal liberty except according to procedure established by law.”<sup>1</sup>*

After the landmark judgement of Apex court in *Navtej Singh Johar vs Union Of India* case Article 21 also includes in its ambit the right to live with the partner of your choice. Starting to Study with the Historical Perspectives of marriages and live in relationships in India it can be concluded that despite of not having any specific legislations, the rulings of the Hon’ble Apex Court and The High<sup>2</sup> court stands as a milestone and ruling to protect and provide rights to live in relationship cohabiting couples. Furthermore the live in relationship is not only circumscribed in the definition of cohabitation of two hetero or homosexual persons being legally married but there can be many reasons for which this relationship starts. This can include examining compatibility, division of expenses, financial independence, checking the dispute resolution, emotional support and many more according to the needs before formalizing this relationship into a legal marriage. Central to this paper is the legal and constitutional frameworks ranging from rights, precedents to legislations for resolving the disputes arising with the passing time and increasing trend and protection of woman especially who are then neglected by society. The legislations include the Domestic Violence Act (2005), alimony, financial and property laws. Later on there comes speed breakers (challenges and concerns) that are need to be resolved. By drawing insights from worldwide and comparing the legislations of India with other countries like Brazil, France, USA, New York, Scandinavian countries valuable perspectives on alternative approaches to regulating and recognizing live-in relationships can be concluded.

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<sup>2</sup> Constitution of India,1950

*Keywords* : *Navtej Singh Johar vs Union Of India* , Article 21, Domestic Violence Act (2005), cohabitation, Indian Constitution

## II. INTRODUCTION

*“In the ancient tale of love whispered by wind, there were tale of god and goddesses, entwined in celestial live in bonds where the heavens themselves bore witness to their union”*

It reflects uncertainty for couples in such relationships by having no clear legal definition or framework surrounding and on the other side the rise in live-in relationships.

Live-in relationships is a form of cohabitation without formal marriage but akin to marriage where partners make intimate relationship. This trend is now been emerging as a significant social phenomenon in India. Despite increase in trend of this relationship and absence of specific legislative provisions governing live-in relationships, the legal status and recognition of live-in relationships remain ambiguous and contentious but in spite of this judiciary in India has played a important role in shaping the legal landscape surrounding this unconventional form of partnership .

Being the supreme law of the land, the Indian Constitution guarantees certain fundamental rights to all citizens, including the right to equality before the law (Article 14), the right to privacy, and the right to personal liberty (Article 21), by examining these fundamental rights we will delve into the research paper. These constitutional principles works as the milestone for safeguarding individual freedoms and autonomy in personal relationships. The judiciary, particularly the Supreme Court of India, has always played a important role in legal landscape surrounding this unconventional form of partnership and interpreting and upholding these rights in various landmark judgments.

In one such of the landmark judgement *Puttuswamy case* the supreme court gave judgement and guidelines about the autonomy of individuals to make choices regarding personal relationships and also the decision to cohabit with a partner without performing legal marriage.

This evolving jurisprudence time to time by various judgements has found implications for the legal recognition and protection of personal relationships, including live-in relationships and on the other hand also it reflects dynamic interpretation of constitutional provisions in response of changing society norms and realities.

### **III. RESEARCH OBJECTIVES**

1. To assess the legal framework and constitutional principles governing the live in relationships in India and analyze the stand of India in comparison to other countries.
2. To comprehensively study the historical aspects of live in relationship in India the contemporary prevalent types of relationships follows to challenges and concerns prevailing in the society.

### **IV. RESEARCH QUESTIONS**

1. What are the constitutional principles and current legal frameworks (evolved by the precedents) applying to the recognition and protection of live-in relationships in India?
2. What are the different types of live-in relationships prevalent in India?
3. What are the key challenges and concerns faced by the individuals in live in relationship?
4. What is the legal status of live in relationship in India in comparison to other jurisdictions, and lessons to implement the provisions?

### **V. RESEARCH HYPOTHESES**

1. Still the society hasn't fully accepted the form of live in relationship in India and in spite to changing world scenario it will take time to recognise the live in relationship as legal.
2. Despite of lack of legislative provisions, recognition this trend of live in relationship is constantly increasing in the younger generations which will soon lead to legalisation of live in relationship.

## VI. RESEARCH METHODOLOGY

The research methodology adopted in this paper is purely doctrinal in nature. Doctrinal research, also known as library-based research, is a distinctive method of conducting legal research that involves the study and analysis of existing legal provisions, case laws, and scholarly works. This methodology is well-suited for examining the theoretical and conceptual aspects of law and for providing a systematic exposition of legal doctrines and principles. The primary sources relied upon in doctrinal research include statutory materials, judicial precedents, and authoritative texts, while secondary sources such as commentaries, articles and legal digests are also consulted. The research process involves the identification, collection, and critical analysis of these sources to draw logical conclusions and offer insights into the legal issues under investigation. Through doctrinal research, this paper seeks to provide a comprehensive and coherent understanding of the legal framework governing the subject matter at hand.

## VII. LITERATURE REVIEW

The paper draws upon key provisions of the Constitution of India and Criminal Procedure Code specifically Article 14 and 21 and Section 125 respectively. The other provisions include Protection of Women from Domestic Violence Act, 2005, Hindu Marriage Act (1955), The Special Marriage Act (1954). It refers to constitutional law commentaries by renowned authors J.N. Pandey to explain the fundamental rights protecting the couples of live in relationship in India. The paper analyzes in depth several landmark Supreme Court judgments "*Khushboo vs Kanniammal*." (2010), "*D. Velusamy vs. D. Patchaiammal*", "*Indra Sarma vs V.K.V. Sarma*." , *Lata Singh v. State of U.P.* (2006) and others, that set out the law pronouncing live in relationship not an offence. The case laws provides rights to the cohabitating couples and protect the couples from disaffection of society. The literature reviewed in the paper provides a comprehensive legal framework governing the live in relationships. The paper seeks to analyze the future legal frameworks of the law on this subject by examining statutory provisions alongside authoritative judicial pronouncements.

## VIII. MEANING, DEFINITION & EXPLANATION.

A live-in relationship, also known as cohabitation, refers to an arrangement where two individuals who are romantically involved with each other live together without being married in religious or legal sense. The couple shares a common household and engages in a sexual relationship but chooses not to formalize their relationship through marriage and being independent for sharing household expenses, responsibilities, having the freedom to choose their lifestyle and activities without interference from others rather than being dependent in marriage.

In a live-in relationship, the couple may share financial resources, make joint decisions about their living arrangements, doing their works separately and may even raise children together. But the fact interestingly here is there are typically no legal rights or obligations regarding property ownership, inheritance, or spousal support in the event of separation or death as are given in marriage as both of them are not committed and has no responsibilities toward others.

Live-in relationships are increasingly common in many parts of the world and even in India, particularly among younger generations couples, who may choose to live together before getting married or as an alternative to marriage, where couple enjoys the benefits of living together without the legal obligations and formalities of marriage. It reflects changing social norms and attitudes towards marriage and cohabitation. There can be various reasons for which Couples may choose this arrangement, such as wanting to test compatibility before marriage, prioritizing personal freedom and independence, or simply not believing in the institution of marriage itself..

It is noting that live-in relationships are not legally recognized as a valid union under Indian law but the apex court held live-in to be not an offence thus couples in such relationships do not have the same legal rights as married couples. In other countries and regions may by common law or domestic partnership law afford certain rights and protection to cohabiting couples.

## IX. HISTORICAL BACKGROUND

The concept of live-in relationships has been prevalent in various parts of the country for centuries and hence is not new in India. However, the formal recognition of live-in relationships under Indian law is a relatively recent development and is in the process of development in present times.

In order of this in 2005, the Indian Parliament passed the Protection of Women from Domestic Violence Act, which provided legal protection to women who live with their partners in a relationship similar to marriage but not legally married and was passed when the need to protect women who face domestic violence in live-in relationships was recognized.

In the landmark judgement of "*Khushboo vs Kanniammal.*" (2010)<sup>3</sup> live-in relationships was first recognised in legal system and held that live-in relationships were not illegal or immoral, and the court also held that two adults having consent has the right to live together without getting married.

Again in 2015, the Supreme Court of India made a landmark judgment in the case of "*D. Velusamy vs. D. Patchaiammal*"<sup>3</sup>, where long-term live-in relationship was considered a valid marriage under certain circumstances and women in live-in relationships are entitled to maintenance from their partners after separation. Subsequently, in 2015, in "*Indra Sarma vs V.K.V. Sarma.*"<sup>4</sup> the apex Court further expanded the rights of partners in live-in relationships even though not recognising live in relationships as a legal marriage in India, the women's in long-term live-in relationships were entitled to maintenance from their partners after separation.

There is no separate legal provisions for live in relationships in India but the legal recognition of live-in relationships in India has evolved over time, and while they are not considered a legally recognized union, couples in live-in relationships do have some legal protection under Indian law.

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<sup>3</sup> "*Khushboo vs Kanniammal.*" (2010) AIR 2010 SC 3196

<sup>3</sup> *D.Velusamy vs D.Patchaiammal* AIR 2011 SC 479

<sup>4</sup> *Indra Sarma vs V.K.V. Sarma* 2013 AIR SCW 6783

## X. CONSTITUTIONAL AND LEGAL FRAMEWORK

### A. Fundamental Rights

The fundamental rights are provided in the Indian Constitution and guarantees that may have implications for individuals in live-in relationships. This study in its ambit covers the provisions such as the right to life and personal liberty (Article 21), Right to Privacy, equality before law (Article 14)

- 1. Right to life and liberty:** As enshrined in constitutions worldwide and even in India it includes the freedom to choose one's living arrangements with partner of one's choice and relationships but being it not absolute the legal constraints often impede this freedom for individuals in live-in relationships, in matters such as inheritance rights, property rights, and access to social benefits. In the landmark judgement of *Navtej Singh Johar v. Union of India*<sup>4</sup>(2018)<sup>5</sup> which basically decriminalized homosexuality and further strengthen the argument for individual's freedom in choosing one's partner.
- 2. Right to Privacy:** Though not explicitly mentioned in constitutions, still Right to Privacy is a fundamental right Which covers in its ambit their choice of living arrangements, the freedom to live together without marital ties, the right to make intimate decisions about one's personal life, including the choice to enter into a live-in relationship. The Indian Supreme Court judgment in its landmark judgement of *K.S. Puttaswamy v. Union of India* (2017)<sup>6</sup> recognized privacy as a fundamental right, further bolstering the case for legal recognition of live-in relationships
- 3. Right to Equality and Non-Discrimination:** The Constitution guarantees equality before the law under Article 14 and prohibits discrimination based on marital status under Article 15. However there are many legal systems and societal norms that afford different treatment to unmarried cohabitants and even with married couples, thereby infringing upon the principle of equality. In its landmark judgement of *Indra Sarma v. V.K.V. Sarma* Supreme Court of India

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<sup>5</sup>Navtej Singh Johar v. Union of India (2018) 10 SCC 1

<sup>6</sup> K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1



affirmed that live-in relationships are entitled to the same rights and protections as married couples and held these relationships not be illegal. The Court gave importance to autonomy and choices of individuals in personal relationships, highlighting the need for legal clarity and protection for partners in live-in relationships.

## **B. Judicial Pronouncements**

Judiciary always and in every concept has played a pivotal role in solving the disputed societal legal issues, from them some of the landmark judgements are

*Lata Singh v. State of U.P. (2006)*<sup>7</sup> case was related to the honour killings. Lata Singh, a woman from Uttar Pradesh, married a man from a different caste against her family's wishes. Later on, her family filed a false case against her husband alleging abduction thus later on supreme court emphasised on right of one's right to choose partner or spouse.

In another case of *D. Veluswami v. D. Palanisam (2010)*<sup>8</sup> established that living together without marriage is not illegal.

Further in *Navtej Singh Johar v. Union of India (2018)* further strengthen its argument for individual autonomy in choosing relationships.

Apart from Supreme Court, High Court and Lower Court have also pronounced precedents in favour of legality of live in relationship in India. The conclusion can be taken from all these that although there are some societal norms that doesn't allow live in relationship to be merging in Indian culture but one of the pillar of the democracy, The Judiciary again and again gave precedents in favour of live in relationship.

In the case of *Payal Sharma v. Superintendent, Nari Niketan (2017)*<sup>9</sup>- Punjab and Haryana High Court the High Court held that live-in relationships between two consenting adults are not illegal or immoral. It emphasized that adults have the right

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<sup>7</sup> Lata Singh v. State of U.P. (2006) 5 SCC 475

<sup>8</sup>D.Velusamy vs D.Patchaiamma AIR 2011 SC 479

to choose their partners and live together without marriage, and society should respect their choices.

In another case of *Madan Mohan Singh v. Rajni Kant (2010)*<sup>10</sup> the Delhi High Court held that if a legal age couple has been living together for a reasonable period they would be presumed married under the law and provided legal protection to woman in relationship.

In *Abhijit Bhikaseth Auti v. State of Maharashtra (2009)*<sup>11</sup> the Bombay High Court emphasised that two adults living together without marriage doesn't commit an offence and pronounced that society should accept the reality and change its mindset.

### C. Legislative Developments

As of developments are taking place in every field, it's also noting that the legal recognition and regulation of live-in relationships is also taking place and it can be said that the status and rights of couples in live-in relationships may continue to evolve through legislative changes and judicial interpretations.

#### 1. Protection of Women from Domestic Violence Act, 2005 (India):

This act provides legal protection and remedies to women in live-in relationships by defining her as a "toxic relationship" or "Domestic Relationship" and mostly include relationship in nature of marriage but after

Section 2(f) of the Domestic Violence Act, 2005 defines:

*"Domestic relationship means a relationship between two persons who live or have, at any point of time, lived together in a shared household, when they are related by consanguinity, marriage, or through a relationship in the nature of marriage, adoption or are family members living together as a joint family"*<sup>12</sup>

#### 2. Maintenance and Alimony Laws:

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<sup>9</sup>Payal Sharma v. Superintendent, Nari Niketan, AIR 2001 All. 254

<sup>10</sup>Madan Mohan Singh v. Rajni Kant (2010), AIR 2010 SC 2933

<sup>11</sup>Abhijit Bhikaseth Auti v. State of Maharashtra, AIR 2009 (NOC) 808

<sup>12</sup>Protection of Women from Domestic Violence Act 2005

Generally in marriages women are allowed to take maintenance under section 125 of Crpc but spouses in live in don't have automatic right to claim maintenance. As it is said there is a solution to every problem as in Section 125<sup>13</sup> of the Criminal Procedure Code allows either partner to claim maintenance if they can demonstrate:

- Long cohabitation resembling a marriage
- Financial dependence on the other partner
- Inability to maintain themselves

### 3. Inheritance Rights:

There are also rights for those children's born out of a live in relationship recognised in The Hindu Marriage Act (1955). They have inheritance right of self-acquired property of both parents. However, inheritance from ancestral property may be restricted. Partners themselves don't have automatic inheritance rights and provisions under any current laws. However, a well-drafted will can be used to grant inheritance rights to a live-in partner.

### 4. Marriage Laws:

If two legally valid opposite gender couples cohabit then there is no recognition of live-in relationships in The Special Marriage Act (1954), the Hindu Marriage Act (1955), etc. And are not able to enjoy the legal benefits and protections associated with marriage, such as automatic inheritance rights or spousal privilege in court.

## XI. TYPES OF LIVE IN RELATIONSHIP

The concept of live-in relationships in India has witnessed a notable shift in societal attitude as can be seen maximum number of individuals opting for live in arrangements in contemporary times. By gaining increasing recognition it encompass in its umbrella a wide spectrum of arrangements, ranging from pre-marital cohabitation to non-traditional partnerships

1. **Conventional Live-in Relationship:** In this type of relationship the reasons of cohabitation can be to test compatibility before marriage, financial

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<sup>12</sup> Code of Criminal Procedure, 1973

convenience, or personal choice so they choose to live together without performing formal marriage. They can share the living and other expenses and duties.

2. **Trial Marriage:** Couples live together only for a specific period of time as engaged to decide whether to formalize their relationship through marriage before long term commitment. It make sure to both about the term, viability, responsibility and duties of a marriage.
3. **Companionate Relationship:** this can be said as a kind of emotional connection and mutual support relationship in which there is no clear intent of formalizing the relationship legally. The reason can be for companionship, emotional support, intimacy, to forgetting past memories. This doesn't involve legal and societal norms.
4. **Cohabitation Agreement:** Couples draft a cohabitation agreement to clarify their rights and responsibilities regarding shared property, finances, and other aspects of cohabitation and it helps the couple to assure, understand, clarify their interest and assets on the point of breakup. It also includes the financial agreements like division of assets, expenditure and dispute resolution.
5. **Parenting Partnerships:** Those couples who choose to raise their children to provide a nurturing, healthy and stable environment for upbringing while maintaining a separate legal status. It may include the responsibilities toward the children, emotional, financial, legal support and cooperation
6. **Non-traditional Partnerships:** This type of relationship doesn't include the opposite gender or heterosexual relationships but it may include homosexual, polyamorous, unconventional family structures. It may also include multiple partners, non binary relationship, insensible commitments that challenge the past old traditional norms.

## **XII. CHALLENGES AND CONCERNS**

Despite of various developments took place in the last few years in socio economic, religious, technical and cultural fields the legal framework surrounding live-in relationships till seems to be complex, and number of challenges are to be faced when the question of live in relationship arise. Even after pronouncing the live in relationship as not illegal the society hasn't accepted this in real sense and means. Some of the key challenges and concerns is been written below to study more about the future implications of live in relationship which will need a legal comprehensive research for clear understanding

### **1. Lack of specific Legal Definition:**

There isn't any clear legal description of specific definition of live in relationship in any of the laws of India. Marriages, which are specified in separate laws according to castes but there is no legal definition in any of the laws. This lack of clarity about the Unlike marriage, which is legally recognized and governed by specific laws, there is no specific legislation that addresses live-in relationships. This lack of clarity poses a big challenge and ambiguity regarding the rights, responsibilities and obligations of partners leading to issues of maintenance, inheritance and child custody and in understanding the legal framework.

### **2. Social Stigma and Cultural Barriers:**

Inspite of much developments in technology mindset of the people still hasn't been changed about the marriages, live in and other relationships. Live-in relationships continue to face social stigma, disapproval and cultural barriers in Indian society. Traditional and conservative mindsets still continues to view these relationships as morally objectionable or against societal norms and hence are not accepted. Such attitudes can hinder research and judicial efforts, as individuals may feel often reluctant to openly discuss their experiences and problems when viewed with a suspicious eye.

### **3. Variations in Judicial Interpretations:**

While Supreme Court judgments like *Navtej Singh Johar v. Union of India* (2018) recognize the right to choose relationships and partner freely, lower court precedents may differ. However, The Indian judiciary has dealt with live-in relationships on a case-to-case basis, but sometimes it leads to variations in judicial interpretations across different courts as was in previous case and this creates uncertainty and challenge for couples in many cases like protection . This inconsistency creates uncertainty for couples seeking legal protection.

#### **4. Limited Inheritance Rights:**

In present time, the children's born out of such relationships can inherit the self acquired property of both of the parents but not the ancestral property but the same isn't true in the case of partners cohabiting in live in relationship and is unclear and thus don't have the automatic inheritance rights property. Wills can be a legal solution, but awareness and utilization about this is still limited.

#### **5. Custody and Guardianship Disputes:**

After the solution of inheritance rights the question of custody and guardianship arises especially when paternity isn't established. Due to Lack of clear legal guidelines the problems and ambiguities arises for both the parents and the children. It also creates a puzzling situation for the judiciary also to decide in whose favour the custody of the child should be given and this impact the upbringing and mental, social health badly.

### **XIII. COMPARATIVE ANALYSIS**

*"Everyone has to face mirror in order for its constant advancement"*. While judiciary has granted certain rights and protection to individuals but still these aren't mentioned explicitly recognized under Indian law. However, The Supreme Court and High Courts have recognized live-in partners as equal to married couples in consideration of maintenance, inheritance, and domestic violence protection. There are other countries also which has given full or some of the legal recognition to the live in relationship in India.

As is in the case of United States the live in has evolved over time and has become common specially among younger generations. The legal recognition and legislatures regarding live in varies state by state and in most of the scenario are treated as legally married entitling them to the same rights and obligations as formally married couples. Gender dynamics may vary depending on factors such as socioeconomic status, education, and cultural background.

Another consideration of Scandinavian countries also have a dynamic and progressive legal that not only recognize but also protect the cohabiting couples. Thus it can be said that it is widely accepted as there is no stigma associated with live in couples and couples can enjoy the same legal rights, benefits, duties and responsibilities as those of married couples. The registration is called "sambo" (cohabitants) and enjoys the legal recognition and protection. There are laws governing cohabitation, property rights, inheritance, and parental rights for unmarried couples and thus also assure gender equality

In Sweden, live-in relationships are referred to as "samboende." Here also couples does not have a specific legal framework for live-in relationships, but are legally recognized and enjoy certain legal rights such as regarding property acquired during the relationship, financial support, and inheritance but are restricted as comparison is given to married couples.

In France, "PACS" (Pacte civil de solidarité) established in 1999 is a framework for live-in relationships and is available to both same-sex and opposite-sex couples which allows couples as a formalized union. It also provides legal recognition and certain rights and obligations to partners, including inheritance rights, social security benefits, and tax benefits.

In Brazil, live-in relationships are commonly known as "*união estável*" and provides are legal recognition and similar rights and obligations to those of married couples some of them are as property rights, inheritance rights, and financial support. Not only rights but they have legal protection and can seek legal remedies in case of disputes or dissolution of the relationship.

In New Zealand and Germany also there are some of the rights granted to the cohabiting couples, including cohabitation agreements, division of property upon separation, and inheritance rights. Thus it can be clearly said that in India it will take time to live in relationships as recognising the legal relationships.

#### **XIV. CONCLUSION, SUGGESTIONS & RECOMMENDATIONS**

In conclusion after studying all the perspectives, the veracity of live-in relationships in India emerges as a complex issue and it doesn't recognize the live in relationship as legal as marriage. It is shaped by a multifaceted interplay of Historical Background, constitutional principles, judicial precedents, Rights of couples, types and comparative legal frameworks.

The historical background reveals marriage is primary and sacred institution for formation of family units is a basic part of society. The emergence and increasing trend of live in relationship in contemporary times marks a significant shift in societal norms but is still little as compared to other countries. However, patriarchal structures continue to pose challenges and problems for women in live-in relationships

Basically The article 21 of the Indian constitution has played a significant role in recognizing the autonomy and personal choices of individuals in their relationships, including live-in relationships and protecting the rights of individuals in live-in relationships. Article 14 and 19 also provides the rights to equality and freedom of choice of spouse. Moreover, the Apex Court and High Court has also played a major role in providing and protecting rights of the couples.

After that considering the analysis of different types of live-in relationships illustrates the diversity and complexity of contemporary partnerships in India, if it be pre-marital cohabitation or it be non-traditional arrangements. Each one has unique motivations, problems, dynamics, reasons and concerns.

There are not only types but also challenges as of include legal ambiguities, societal stigma, economic disparities, custodial and child upbringing and gender inequalities. Last but not the least Comparative analysis with other countries, such



as the United States and Scandinavian nations, offers valuable insights into alternative approaches to regulating and recognizing live-in relationships and speaks about the situation in comparison to other countries.

Thus for addressing the veracity of live-in relationships in India, it requires a legal and societal approach which include constitutional , historical , typological insights and perspectives . By fostering legal reforms, promoting gender equality, and societal acceptance, and by other such positive changes India can strive towards advancement and more development.

## **XV. REFERENCES**

### **A. Books / Commentaries / Journals Referred**

1. Constitutional Law Of India by J.N. Pandey

### **B. Online Articles / Sources Referred**

1. [PriyaV1C2.pdf](#)
2. [2631831820974585.pdf](#)
3. [1501666740\\_Kalpana\\_Deokar\\_10.pdf](#)

### **C. Cases Referred**

1. "Khushboo vs Kanniammal." (2010) AIR 2010 SC 3196
2. D.Velusamy vs D.Patchaiammal AIR 2011 SC 479
3. Indra Sarma vs V.K.V. Sarma 2013 AIR SCW 6783
4. Navtej Singh Johar v. Union of India (2018) 10 SCC 1
5. K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1
6. Lata Singh v. State of U.P. (2006) 5 SCC 475
7. D.Velusamy vs D.Patchaiamma AIR 2011 SC 479
8. Payal Sharma v. Superintendent, Nari Niketan, AIR 2001 All. 254
9. Madan Mohan Singh & Ors. v. Rajni Kant & Anr., AIR 2010 SC 2933

10. *Abhijit Bhikaseth Auti v. State of Maharashtra* (2009) 3 Cri.LJ, 889, 892(Bom.2009)

#### **D. Statutes Referred**

1. The Constitution of India, 1950
2. Code Of Criminal Procedure, 1973
3. Protection of Women from Domestic Violence Act, 2005
4. Hindu Marriage Act (1955)
5. The Special Marriage Act (1954)