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# A REVIEW ON JUDICIAL AND LEGAL ASPECTS OF UNIFORM CIVIL CODE

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## I. ABSTRACT

*Policy Directives are delineated in Part IV of the Constitution of India. Although these principles lack legal enforceability, they are vital for the governance of the country. Article 44 of the Constitution mandates the state to implement a Uniform Civil Code as a guiding principle. The Supreme Court has issued several orders for its execution; nonetheless, the highly political environment of our nation has rendered it seemingly unattainable. Diverse religious communities in our nation are governed by various personal laws, as there is no singular legislation regulating personal matters such as marriage, divorce, and adoption. These laws legitimate gender discrimination in all its forms, deriving their authority from religious texts and practices, often exhibiting a bias favoring males over females. This article suggests delineating “essential religious practices” from “secular activities” as a means to reconcile the conflicting rights of religious freedom and equality. It is unequivocally evident that a Uniform Civil Code is urgently required. Nonetheless, it should be executed incrementally once the people, especially minorities, are educated about their stipulations and their entitlements.*

## II. KEYWORDS

Judicial, UCC, Landmark case, implementation, Global.

## III. INTRODUCTION

The civil law code serves as the theoretical basis for the concept of a unified civil code. It envisions individuals of many religions and geographical origins being controlled by uniform secular civil rules. This supersedes individuals' capacity to enforce unique personal rules based on their ethnicity or religion. A civil code often governs issues related to an individual's legal status, encompassing rights to acquire and manage

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property, as well as topics of marriage, divorce, and adoption. The prompt implementation of a Uniform Civil Code is essential to bridge the disparities created by the incremental integration of various personal laws into Indian legislation, stemming from the nation's significant religious and social diversity. This universal legislation will promote legal uniformity and provide justice for our varied society by eliminating accidental bias stemming from individual laws.

"The State shall endeavour to secure for the citizens a uniform civil code throughout the territory of India." (Article 44, Directive Principle of State Policy) This clause of the Indian Constitution ensures that all Indian citizens would be subject to the same legal system.

Cases involving paper protection do not provide sufficient grounds to approach the Court of Law, and the fact that it remains unimplemented is a result of its inclusion in Directive Principles, which are only suggestions rather than laws. While fundamental rights do not include the Uniform Civil Code, postmodern India has shown lightning-fast thinking that has paid off in the shape of a harmonized personal law system that is almost identical to the Uniform Civil Code. An integral component of the need for a unified civil code is the consolidation of India's many personal laws into a single body of secular legislation that all people, regardless of religious affiliation, would be required to follow. We don't yet know the specifics of how this unified code would be constructed, but it is likely that it will take the best features of all current personal laws and leave out the worst.

The Uniform Civil Code has been a contentious topic due to the religious freedom and secularism guaranteed by the Indian Constitution. The fact that India is a secular democratic republic, as stated in the constitution's preamble, implies that the government does not support any particular religion. A state that does not practice religious discrimination is considered secular. In other words, people's religious beliefs shouldn't dictate how they live their lives. Articles 14-18 of the Indian Constitution provide that no person should be subjected to discrimination because of his or her

gender. Nonetheless, there are a number of laws that seem to go counter to these ideals, and they persist, particularly in the personal laws of some communities that have provisions that are seen as significantly discriminatory against women. Gender equality is explicitly supported by the Indian Constitution. The goal of a Uniform Civil Code has not been realized, nevertheless, even though the Constitution has been in existence for fifty years. Regardless of their community affiliation, women—who constitute over half of India's population—persist in demanding a gender fair code so that they can experience equality and justice. In order to guarantee (a) legal parity between the sexes across communities and (b) legal parity within communities, the Uniform Civil Code is necessary.<sup>2</sup>

There is no pressure to do it quickly, and there is no set deadline. But Hindu extremists make it a militant demand that Hindu law should be the national family law. The Muslim minority is afraid that the Quran's hallowed family law would be rendered useless if this happens. It was considered a secular necessity to frame a unified civil code, and the Supreme Court frequently voiced its disapproval of the delay in doing so. With rare exceptions, the Muslim minority fiercely opposed any effort to implement a unified code, and a raging conflict ensued demanding its implementation. After gaining independence, there were intermittent attempts to establish a Uniform Civil Code. In multiple cases, the Supreme Court instructed the government to reform personal laws, particularly those pertaining to minorities, and to eliminate gender bias and laws that hurt women, in order to implement Article 44 of the Constitution. Avoiding insults and injuries to any minority is possible through value-based progressive adjustments, which maintain the distinct character of each religious community, even when a uniform civil code is not very high on the national agenda. It is possible that this is a first step towards establishing a common code. There will be less fundamentalist opposition nationwide if Muslim, Christian, and Parsi opinion is mobilized in this approach. Maybe, in order to start a conversation on a national level, non-governmental

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<sup>2</sup> F. Agnes, "Hindu Men Monogamy and Uniform Civil Code" XXX (50) Economic and Political Weekly 32 (1995); B. Karat, "Uniformity v. Equality" Frontline 17 Nov 1995.

organizations may create a common code that minority can choose to adopt or reject. In 1947, during the Constituent Assembly, the idea of a Uniform Civil Code was first proposed.

The subcommittee on Fundamental Rights later included it as one of the state policy directive principles, and clause 39 of the draft stated that the state would strive to obtain a Uniform Civil Code for its citizens. It was argued that India's advancement was hindered by varied personal laws of religious sects, and that a Uniform Civil Code should be implemented as quickly as possible to help the newly independent nation progress. The framers of the United States Constitution reached a middle ground on the contentious subject of a uniform civil code by enshrining it as a policy direction in Article 44.

#### **A. Research Questions**

1. What is the constitutional position of the Uniform Civil Code under Article 44 of the Indian Constitution?
2. How have Indian courts interpreted and applied the idea of a Uniform Civil Code over time?
3. In what ways do existing personal laws in India result in gender-based discrimination?
4. How does the conflict between religious freedom and the right to equality affect the implementation of UCC?
5. What lessons can India draw from the implementation of Uniform Civil Codes in other jurisdictions?
6. Can judicial interventions act as an effective substitute for legislative implementation of UCC?

**B. Research Objectives**

1. To examine the constitutional basis and intent behind Article 44 of the Indian Constitution.
2. To analyse landmark judicial decisions relating to the Uniform Civil Code in India.
3. To study the impact of personal laws on gender equality across different religious communities.
4. To evaluate the tension between religious autonomy and constitutional morality in the context of UCC.
5. To undertake a comparative analysis of Uniform Civil Code models adopted in selected foreign jurisdictions.
6. To assess whether gradual and reform-based approaches can lead towards an effective Uniform Civil Code in India.

**C. Research Methodology**

This research adopts a doctrinal and analytical legal research methodology. The study is primarily based on secondary sources of data. These include constitutional provisions, statutes, judicial pronouncements of the Supreme Court and High Courts, Law Commission reports, and international legal instruments. Authoritative textbooks, peer-reviewed journal articles, commentaries, and reputed electronic legal databases have been relied upon for academic analysis.

A case law analysis has been undertaken to understand the evolving judicial approach towards the Uniform Civil Code, particularly in matters relating to gender justice and personal laws. Further, a comparative method is used to examine the implementation of civil codes in other countries such as France, Germany, Turkey, and the United States, with the aim of drawing relevant insights for the Indian context.

The research is qualitative in nature and focuses on constitutional interpretation, judicial reasoning, and policy evaluation. No empirical or field-based data has been used. The methodology is suited to assess normative legal questions surrounding secularism, equality, and personal law reform in India

#### **IV. LEGAL VALIDITY ON UCC**

The political, cultural, and historical backdrop of India greatly influences the discussion of the Uniform Civil Code (UCC). To understand the intricacy of this continuing debate, one must be familiar with its historical development. Personal rules in medieval and ancient India were based on community-specific religious books and customs, such the Hindu Manusmriti and the Muslim Quran and Hadith. The British colonial rulers of India established a diverse legal system through personal law reforms and a “non-interference” policy that gave various religious groups the authority to decide on their own personal affairs. The Hindu Code Bill, introduced in the mid-1950s by Prime Minister Jawaharlal Nehru and intended to revise and codify Hindu personal rules in face of heavy resistance, was a watershed moment in the UCC discussion. Importantly, after gaining independence from Portugal in 1961, the state of Goa adopted a UCC, showing that such a system might work on a smaller scale. The 1985 Shah Bano case, in which the Supreme Court ruled in favor of a Muslim woman’s maintenance, caused a nationwide controversy and brought attention to the need for gender equity and personal law consistency. The Vishwa Hindu Parishad’s (VHP) ascent and the controversial destruction of the Babri Masjid in the late 1980s and early 1990s heightened religious tensions and had an impact on the UCC discussion. To promote social justice and gender equality, the Law Commission of India has reviewed the UCC on a regular basis and suggested changes to personal laws.

The present personal laws of India tend to favor men since they are based on long-established traditions. The protection of families from colonial interference was the original intent of these laws, but they have since contributed to gender inequality. There is a long tradition of sexism in Hindu personal law. Men fought against efforts to

outlaw polygamy until 1955. At first, daughters were not allowed to inherit family property under the Hindu Succession Act (1956). Inconsistencies are also caused by regional variations. Sikhs, for instance, are exempt from the ban on carrying ceremonial daggers. Also, Hindu women have limited rights when it comes to adoption. Similarly, women are disadvantaged by Muslim personal laws. The right to polygamy is just one more way in which men have always been considered superior. The “Triple Talaq” system leaves women defenseless since it permits husbands to divorce immediately. There is a time restriction on maintenance payments for Muslim women following a divorce. These inequities have driven aspirations for a Uniform Civil Code (UCC) in India. The All India Women’s Conference and other women’s rights organizations regard the UCC as a solution to the problems with current personal laws and a path toward gender equality.

Our Constitution’s Third Amendment provides robust protections for the rights guaranteed to all people, regardless of their religion, faith, race, gender, national origin, or place of birth. This prevents the government from passing any legislation that may lead to discrimination based on any of those listed above. Secularism in India is based on the principle that the state should treat all religions equally. This has also granted religious groups the autonomy to establish their own legal codes, which are not subject to court review. The conflicting goals of religious liberty and the establishment of a consistent body of law for individual cases are addressed in the Indian Constitution. A Uniform Civil Code (UCC) should supersede personal laws based on religion, according to Article 44 of the Directive Principles. The goal is to advance social justice and equality by creating uniform regulations for marriage, inheritance, and other parts of people’s lives. However, Article 25 provides freedom of religion, possibly conflicting with a UCC’s uniformity. Additionally, Article 26 provides religious bodies autonomy in handling their business. Striking a balance is key.

The debate on the Uniform Civil Code (UCC) in India has been considerably affected by many major judgments and court declarations. One of the first and most famous



instances was the *Shah Bano case* (1985)<sup>3</sup>, when the Supreme Court decided in favor of Shah Bano, a Muslim lady seeking alimony from her husband following divorce. The ruling prompted a national discussion about changing Muslim personal law and brought attention to the need for a consistent legal framework to guarantee gender equality. In another landmark decision, *Sarla Mudgal v. Union of India* (1995)<sup>4</sup>, the Supreme Court highlighted the necessity of a UCC to settle disputes stemming from religious conversion for marital purposes. The court emphasized once again that a UCC is crucial for advancing national unity and gender equality. To ensure that Muslim women receive equitable maintenance, the Supreme Court confirmed the Shah Bano ruling in the 2001 case of *Daniel Latifi v. Union of India*<sup>5</sup>, thus supporting the argument for a UCC. Equal protection under the law is necessary regardless of a person's religious beliefs; for example, in *ABC v. The State (NCT of Delhi)* (2015)<sup>6</sup>, the Supreme Court upheld a Christian mother's right to be a child's only guardian even though she was never married. Taken together, these instances highlight the judiciary's push for a UCC to guarantee justice, equity, and consistency in personal laws across India's many faith sects.

## V. GLOBAL IMPLEMENTATION OF UCC

Many nations have introduced a Uniform Civil Code (UCC), but the consequences vary depending on their cultural, historical, and social settings. Comparing the UCC in other nations to India helps identify its pros and cons.

Many Western nations use UCCs in their legal systems. France and Germany have civil codes that encompass family, contract, and property law. These nations have long maintained secular governments where state law trumps religious law in civil concerns. The Napoleonic Code, or French Civil Code, was founded in 1804 and has inspired many other nations. It promotes secularism, church-state separation, and civil

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<sup>3</sup> 1985 AIR 945

<sup>4</sup> 1995 AIR 1531

<sup>5</sup> AIR 2001 SUPREME COURT 395

<sup>6</sup> (2015) 10 SCC 1

conformity. Germany's Bürgerliches Gesetzbuch (BGB), created in 1900, offers a precise legal foundation for all people, regardless of religion. The homogeneity of their people and an agreement on religion-state separation have helped these regimes succeed.

In contrast, civilian laws, particularly family laws, vary widely in the US due to its federal government. The U.S. does not have a UCC like other European nations, but the constitutional separation of church and state prevents religious legislation from superseding state or federal laws. Despite geographical differences, this provides a similar civic approach across religions. The judiciary routinely overturns legislation that violate constitutional equality and non-discrimination, focusing on individual rights and liberties.

However, religiously and culturally diverse nations have encountered various obstacles. Mustafa Kemal Atatürk's early 20th-century secular reforms in Turkey relied on a UCC. The Swiss Civil Code was enacted in 1926 to modernize the country and eliminate religious influence in public life. Despite resistance, this top-down secularism-based nation-building and modernization strategy established a consistent legal framework.

Comparing these worldwide models to India reveals distinct issues and concerns. India's religious variety is unmatched, with each community following its own rules. Hindu, Muslim, Christian, and other religious laws control marriage, divorce, and inheritance. The Indian Constitution balances community rights with equality and secularism in its multicultural legal system. A UCC is envisioned under Article 44 of the Indian Constitution, but its implementation has been controversial due to concerns about religious liberties and cultural identities.

The historical and social setting distinguishes India from UCC-implemented nations. In India, a UCC might be seen as a majority imposition on minority groups, notably Muslims, who have historically been sensitive to religious intrusion. Unlike Europe's homogenous demographics or Turkey and the US's strong secular traditions.

Indian politics adds another element of intricacy. The UCC is highly political and often utilized for electoral reasons. Different political parties have different views, making a code implementation difficult. The political agreement on secularism and the rule of law has helped civil codes in France and Germany run smoothly.

Another distinction is legal reform strategy. Legal changes were typically part of modernization initiatives and featured official action to lessen religious dominance in many nations. Though slow, legislative reforms in India have sought to accommodate religious pluralism rather than overturn it. The 1950s Hindu Code Bills changed Hindu personal laws but not other communities, showing Indian policymakers' caution.

In addition, judicial influence has shaped Indian personal laws. The judiciary has championed gender fairness and personal law consistency in landmark instances like *Shah Bano* (1985) and *Shayara Bano* (2017). Due to India's diversity and pluralism, turning court opinions into substantial legislative reforms is difficult.

In conclusion, UCCs have worked in other nations, but India's cultural, religious, and political backdrop poses unique problems. France, Germany, Turkey, and the US demonstrate the challenges of establishing a UCC in a varied and multicultural nation like India. Indian authorities struggle to balance equality, secularism, and religious and cultural identity.

## VI. JUDICIAL LANDMARK CASES

In matters involving the Uniform Civil Code, the Judiciary has consistently, through its numerous rulings, maintained gender fairness.

"It is also a matter of regret that Article 44 of our Constitution has remained a dead letter," the Supreme Court stated in the *Mohammad Ahmed Khan v. Shah Bano Begum*<sup>7</sup>, more often known as the *Shah Bano* case. Gender justice necessitated this ruling, which was deemed liberal in interpretation of the law, despite harsh criticism from Muslim

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<sup>7</sup> (1985) 2 SCC 556

fundamentalists. Eventually, in 1986, the federal government caved to pressure from Muslim fundamentalists and enacted the Muslim Women's (Protection of rights on Divorce) Act, which outlawed Muslim women's entitlement to maintenance under section 125 Cr.P.C. It "was doubtless a retrograde step," as the activist properly condemned. That further demonstrated that not even the secular Indian state places a high value on women's rights. As a result, religious autonomy took precedence over women's rights.

In *Sarla Mudgal (Smt.), President, Kalyani and others v. Union of India and Others* <sup>8</sup> the Supreme Court mandated the Government to execute the directive of Article 44 and to submit an affidavit detailing the actions taken. The Court observed that "Successive governments have been wholly remiss in their duty of implementing the Constitutional mandate under Article 44." Consequently, the Supreme Court urged the Government of India, through the Prime Minister, to reassess Article 44 of the Constitution and strive to establish a uniform civil code across India.

There was a public interest litigation (PIL) contesting gender discriminatory laws in Hindu, Muslim, and Christian statutory and non-statutory law in the case of *Ahmadabad Women's Action Group (AWAG) v. Union of India*<sup>9</sup>. The Supreme Court seemed rather reticent in this case, ruling that matters pertaining to state policies are beyond its usual purview, such as the elimination of gender discrimination in personal legislation.

Some felt the highest court in India had abandoned its duty to uphold gender equality in personal law cases involving different cultures in India because of this ruling.<sup>10</sup>

It is difficult to cast doubt on the merits of a Uniform Civil Code, according to the Supreme Court's decision in *Lily Thomas etc. v. Union of India and others* <sup>11</sup>. But it can only come to fruition when society as a whole constructs an appropriate social

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<sup>8</sup> AIR 1995 SC 1531,

<sup>9</sup> AIR 1997 SC 3614

<sup>10</sup> Rajeev Dhawan, "The Apex Court and Personal Law" *The Hindu*, 14 March 1997

<sup>11</sup> AIR 2000 SC 1650

atmosphere, with leaders serving as statesmen who, rather than seeking personal benefit, rally the masses to embrace change for the greater good of the country.

Christians in India faced a unique set of personal law considerations. The courts appeared to be more progressive and daring in their treatment of their case, particularly with regard to gender equality. For example, the Calcutta High Court was of the opinion that sections 10 and 17 of the Indian Divorce Act, 1869 should be deemed invalid in the case of *Swapana Ghosh v. Sadananda Ghosh*<sup>12</sup>. However, this decision was not implemented until 1995. In two separate cases, the Bombay High Court in *Pragati Verghese v. Cyrill George Verghese* AIR 1997 Bom. 349 and the Kerala High Court in *Ammuni E.J. v. Union of India*<sup>13</sup> both firmly invalidated section 10 of the Indian Divorce Act, 1869, on the grounds that it violated gender equality.

The Indian Supreme Court firmly said in the case of *Naveen Kohli v. Neelu Kohli*<sup>14</sup> that the Hindu Marriage Act should be amended to make the irretrievable breakdown of a marriage a viable basis for divorce, even though the couple in question had been married for thirty years. The court found that many other countries use irretrievable breakdown of marriage as a basis for divorce, so it suggested that the Union of India think long and hard about amending the Hindu Marriage Act, 1955 to include this provision. The court has directed that a copy of the decision be sent to the Secretary, Ministry of Law and Justice, Department of Legal Affairs, Government of India. This will allow them to take the necessary actions and address the requests that were raised in this case.

A recent case, *Ramesh Jangid v. Sunita*<sup>15</sup> involved a wife's desire for her husband to live apart from his parents. Given that the woman had been living apart from the husband for thirteen years and denied any physical contact, the court found that her demand was unreasonable and granted the divorce. The court made the observation that the

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<sup>12</sup> AIR 1989 Cal. 1

<sup>13</sup> AIR 1995 Ker.252

<sup>14</sup> 2006 (4) SCC 558

<sup>15</sup> 2008 (1) HLR 8 (Raj.),

parties cannot afford to ignore the growing gulf that has developed between them over the past decade. The parties and the court both agree that a divorce is the best course of action when a marriage has clearly broken down irretrievably.

Despite being legally married in 1955, the spouses in *Prabhakar v. Shanti Bai* <sup>16</sup> did not live together for the last half-century. Due to the irreparable damage done to the marriage and the futility of continuing it, the court issued a judgment of divorce.

## VII. CONCLUSION

To conclusion, we must recognize the urgency of enacting a consistent civil code. The moment has come to strictly review all personal laws of all religions and reject those that contravene the Constitution. Personal laws in all faiths discriminate against women in marriage, divorce, and inheritance. An essential need exists to establish reasonable and equitable laws across all religions, create a gender-based civil code, uphold equality in our Constitution, and eliminate discriminatory and prejudiced regulations. The Hindu law is not universally applicable to all religions. However, triple talaq, polygamy, and the benefits of Hindu undivided families in property and inheritance would need to be eliminated.

Personal laws of our nation impact the lives and rights of many women across all groups, leaving them in a disadvantaged situation. Despite efforts to promote gender equality through international instruments, national law reforms, judicial trends, and recommendations from Law Commissions, women still face discrimination in family law, particularly in marriage, divorce, maintenance, and inheritance cases. For long, these circumstances require a gender-just code. A Uniform Civil Code is crucial for protecting oppressed women, removing discrimination, and aligning national laws with international law, including conventions and human rights instruments ratified by India. Now is the moment to promote a Uniform Civil Code. To conclude, a single code is essential for promoting national unity, solidarity, and integration, regardless of faith.

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<sup>16</sup> 2008) HLR 250 (Nagpur)

Compromises are not acceptable. Religions must unite and adopt unifying ideas in the spirit of secularism. India needs a single-family law code that encompasses all its faiths. Time alone may determine if it is the endeavor of the State, the mandate of the court, or the will of the people.

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