



## SOCIAL AND LEGAL PROVISIONS RELATED TO LIVE-IN RELATIONSHIP IN INDIA: AN EVALUATION

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### AUTHOR'S CONTRIBUTION

The sole author designed, analysed, interpreted and prepared the manuscript.

**Received: 20 March 2021**

**Accepted: 24 May 2021**

**Published: 26 May 2021**

*Opinion Article*

### ABSTRACT

Live-in-relationship is not new for western countries but these days the concept is adjusting its roots in the east also. Live in relationship is an emerging concept of relationship in India. Live in relationship has become popular among youths but certain sections of the society discourage such practices and term it as immoral and unethical. Indian Judiciary has divergent view regarding the institution of Live in relationship. In India, Law related to Live-in relationship is not uniform. The need of the hour is that legislature must enact certain law for regulation of such relationship. This article is an attempt to discuss social status as well as legal provisions with respect to Live-in relationship in India.

**Keywords:** Cohabitation; marriage; live-in-relationship.

### 1. INTRODUCTION

Live-in relation i.e. cohabitation is an arrangement whereby two people decide to live together on a long-term or permanent basis in an emotionally and/or sexually intimate relationship. The term is most frequently applied to couples who are not married B [1]. Thus, Cohabitation has following main components

- i. It is an arrangement where two people are not married but live together.
- ii. They are often involved in a romantic or sexually intimate relationship on a long-term or permanent basis.
- iii. The couples engaged in live in relationship may be of same sex or opposite sex.

The rise in cohabitation is a part of major social changes such as higher divorce rate, older age at first

marriage and older age at childbearing. Factors such as increased participation of women in the labor force and changing views on sexuality have also been marked as contributing to these social changes. There has also been a change in modern sexual ethics with a focus on consent rather than marital status. In addition to this, some individuals may feel that marriage is unnecessary or outdated. These factors lead to couples not formalizing their relation.

People may live together for a number of reasons. These may include wanting to test compatibility or to establish financial security before marrying. Other reasons include living with someone before marriage in an effort to avoid divorce. Some individuals may also choose cohabitation because they see their relationships as being private and personal and not to be controlled by political, religious or patriarchal institutions [2].

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Inability to marry legally is also one of the important factors for rising cases of Cohabitation or Live-in-relationship. Marriage is an institution that is historically filled with restrictions. Some of these restrictions are as below:

- **Age restriction**-Most jurisdictions set a minimum age for marriage i.e. a person must attain a certain age to be legally allowed to marry.
- **Gender restriction**- Most sovereign states and other jurisdictions limit legally recognized marriage to opposite-sex couples.
- **Social restriction**- In many societies, marriage is performed among the same communities and marriage outside one's own community is considered to be immoral.
- **Monogamy**-Most of the legal systems prohibit polygamy. In many of them, polygamy is criminalized and a ground of divorce.
- **Extra marital relations**- Many of the world's major religions look with disfavor on sexual relations outside marriage. A married person's sexual relationship with someone other than his/her spouse is known as adultery. Almost all cultures that recognize marriage also recognize adultery as a violation of the terms of marriage. Adultery is considered in many jurisdictions to be a crime and grounds for divorce. In some parts of the world, women and girls accused of having sexual relations outside marriage are at risk of becoming victims of honor killings committed by their families.
- **Pre Marital relations**- Pre marital relations are considered a taboo among the various societies. There are non-secular states that sanction criminal penalties for sexual intercourse before marriage.
- **Prohibited marriage among close relatives**- To prohibit incest and eugenic reasons, marriage laws have set restrictions for relatives to marry. Direct blood relatives are usually prohibited to marry.

Thus couples who are not able to marriage due to these restrictions related to age, race, social status, consanguinity or gender prefer to be in Live in relationship.

## 2. RESEARCH METHODOLOGY

The current study is descriptive and analytical study. The legal literature for the study has been collected from various resources. The current work depends heavily on the book reviews, articles of law journals and periodicals and judicial decisions. The researcher has also used various internet websites to collect the

information related to the subject of study. Secondary sources include magazines, newspapers and newsletters. To make the findings of the study to reach at the meaningful conclusion, attempt has been made to discuss, examine, evaluate and critically analyze different provisions of the enacted laws, national and international conventions.

## 3. ETHICS AND MORALITY IN LIVE IN RELATIONSHIP

Hinduism considers marriage as a sacred duty that entails both religious and social obligations. Hindu Marriage is a sacrament. It is one of the 16 sanskaras approved in the vedic traditions. It is eternal, permanent, indissoluble and holy union. The only purpose of Hindu Marriage is not to beget children and get them legitimized but it is also a holy union to perform religious duties. However, several restrictions such as Gender restriction, Social restriction, Prohibition of marriage among close relatives were recognized under traditional Hindu Law. Pre marital sex and extra marital sex were prohibited under traditional Hindu law.

In Muslim law [3], marriage is defined to be a contract, which has for its object the procreation and the legalizing of children. Marriage among Muslims though solemnized generally with recitations of certain verses from the Holy Qurran, yet the Muslim law does not positively prescribe any service peculiar to the occasion. However, Muslim marriage is both in the nature of ibadat, devotional act, as well as, muamalat, a dealing among men. It is not only a contract, but it is also a sacred covenant. Muslim marriage is prohibited on the ground of consanguinity, affinity, fosterage and plurality of husbands.

Marriage is an institution in which sexual relationships are acknowledged or sanctioned. In some cultures, marriage is recommended or considered to be compulsory before pursuing any sexual activity [4]. Marriage usually creates normative or legal obligations between the individuals involved and any offspring they may produce or adopt. As in the case of Live in relationship, sexual activities are permitted without going through the formal recognition of relationship as in the Case of marriage, it is often considered as unethical and immoral in both the major religion of India i.e. Hinduism and Islam.

## 4. PROVISIONS WITH REGARD TO LIVE-IN-RELATIONSHIPS

The European countries are worst affected by Live-in-relationship. In most places, it is legal for unmarried

people to live together. The law introduced in 1999 in France makes provisions for civil solidarity pacts allowing couples (even of same sex) to enter into a union and be entitled to the same rights as married couples in such areas as income tax, inheritance, housing and social welfare. Couples who want to enter into such a relationship may sign up before a court clerk and can revoke the contract unilaterally or by bilaterally with a simple declaration made in writing.

Article 147 of the Family Code of Philippines provides that when a man and a woman who are capacitated to marry each other live exclusively with each other as husband and wife without the benefit of marriage or under a void marriage, their wages and salaries shall be owned by them in equal shares and the property acquired by both of them through their work or industry shall be governed by the rules on co-ownership.

In Taylor vs. Fields [5] the facts were that the plaintiff Taylor had a relationship with a married man Leo. After Leo died, Taylor sued his widow alleging breach of an implied agreement to take care of Taylor financially and she claimed maintenance from the estate of Leo. The Court of Appeals in California held that the relationship alleged by Taylor was nothing more than that of a married man and his mistress. It was held that the alleged contract rested on meretricious consideration and hence was invalid and unenforceable. The Court of Appeals relied on the fact that Taylor did not live together with Leo but only occasionally spent weekends with him. There was no sign of a stable and significant cohabitation between the two.

In India, cohabitation has been a taboo since British rule. However, this is no longer true in big cities but is still often found in rural areas with more conservative values. Female live-in partners have economic rights under Protections of Women and Domestic Violence Act, 2005. The Maharashtra Government in October 2008 approved a proposal suggesting that a woman involved in a live-in relationship for a 'reasonable period' should get the status of a wife. Whether a period is a 'reasonable period' or not is determined by the facts and circumstances of each case.

A presumption for couples living together without getting legally married started at the time of British Rule in India. In *Andrahennedige Dinohamy v. Wijetunge Liyanapatabendige Blahamy* [6] the Privy Council took a stand that, "where a man and a woman are proved to have lived respectively as spouse, the law will presume, unless the opposite be obviously demonstrated that they were living respectively in result of a legitimate marriage, and not

in a condition of concubinage". This same view was also taken in *Mohabbat Ali Khan v. Md. Ibrahim Khan* [7] wherein the court held the marriage to be legitimate as both the partners have lived together as spouse.

The Allahabad High Court recognised the concept of live-in relationship in *Payal Sharma v. Nari Niketan* [8] wherein the Bench consisting of Justice M. Katju and Justice R.B. Misra observed that, "In our opinion, a man and a woman, even without getting married, can live together if they wish to. This may be regarded as immoral by society, but it is not illegal. There is a difference between law and morality."

In *Ramdev Food Products (P) Ltd. v. Arvindbhai Rambhai Patel* [9] the Court observed that two people who are in a live-in relationship without a formal marriage are not criminal offenders. In *Madan Mohan Singh v. Rajni Kant* [10] the Court held that, the live-in relationship if continued for long time, cannot be termed as a "walk-in and walk-out" relationship and that there is a presumption of marriage between the parties. By this approach of the Court it can be clearly inferred that the Court is in favour of treating long-term living relationships as marriage rather than giving making it a new concept like live-in relationship.

In *S. Khushboo v. Kanniammal & Anr.*, [11] the apex court said there was no law which prohibits live-in relationship or pre-marital sex. The Supreme Court held that a living relationship comes within the ambit of right to life under Article 21 of the Constitution of India. The Court further held that live-in relationships are permissible and the act of two major living together cannot be considered illegal or unlawful. A three judge bench of Chief Justice K G Balakrishnan, Deepak Verma and B S Chauhan observed

*"When two adult people want to live together, what is the offence? Does it amount to an offence? Living together is not an offence. It cannot be an offence."*

In 2010 the Delhi High Court decided *Alok Kumar v. State* [12] which was related to live-in relationships. The complainant was in a live-in relationship with the petitioner, who had not even divorced his previous wife and had a child of his own. The complainant also had a child of her own. The Delhi High Court, therefore, tagged the nature of such relationship as a walk-in and walk-out relationship with no legal strings attached. It is a contract of living together which is renewed every day by the parties and can be terminated by either of the parties without consent of the other party. Those who do not want to enter into such relationships enter into a

relationship of marriage which creates a legal bond that cannot be broken by either party at will. Thus, people who choose to have live-in relationships cannot later complain of infidelity or immorality.

In *Chanmuniya v. Chanmuniya Kumar Singh Kushwaha* [13] where High Court declared that appellant wife is not entitled to maintenance on the ground that only legally married woman can claim maintenance under Section 125 Criminal Procedure Code. But the Supreme Court turned down the judgment delivered by the High Court and awarded maintenance to the wife (appellant) saying that provisions of Section 125 Criminal Procedure Code must be considered in the light of Section 26 of the Protection of domestic violence against women act, 2005. The Supreme Court held that women in live-in relationships are equally entitled to all the claims and reliefs which are available to a legally wedded wife [14].

A relationship like marriage under the 2005 Act must consent to some basic criteria. It provides that the couple must be of legal age to marry or should be qualified to enter into a legal marriage. It was also stated that the couple must have voluntarily cohabited and held themselves out to the world as being akin to spouses for a significant period of time. Every kind of live-in relationships should not be covered under the Act of 2005. Simply spending a week together or a one night stand would not make it a household relationship. It additionally held that if a man has a keep whom he maintains financially and uses principally for sexual reasons or potentially as a slave then it would not be considered, as a relationship in the nature of marriage [15].

On 26-11-2013 a two-Judge Bench of the Supreme Court constituting of K.S.P. Radhakrishnan and Pinaki Chandra Ghose, JJ. in *Indra Sarma v. V.K.V. Sarma* [16] held that when the woman, who is aware of the fact that the man with whom she is in a live-in relationship already has a legally wedded wife and two children, is not entitled to various reliefs available to a legally wedded wife. But in this case, the Supreme Court felt that denial of any protection would amount to a great injustice to victims of illegal relationships. Therefore, the Supreme Court emphasized that there is a great need to extend Section 2(f) which defines "domestic relationships" in Protection of domestic violence against women act, 2005 so as to include victims of illegal relationships who are poor, illiterate along with their children who are born out of such relationships and who do not have any source of income. Further, Supreme Court requested Parliament to enact a new legislation based on certain guidelines given by it so that the victims

can be given protection from any societal wrong caused from such relationships.

The National Commission for Women recommended to the Ministry of Women and Child Development on 30th June, 2008 that the definition of 'wife' as described in section 125 of Cr.P.C, must include women involved in a live-in relationship. The aim of the recommendation was to harmonize the provisions of law dealing with protection of women from domestic violence and also to put a live-in couple's relationship at par with that of a legally married couple.

There was a Committee set up by the Supreme Court for this purpose called the Justice Malimath Committee, which observed that "if a man and a woman are living together as husband and wife for a reasonable long period, the man shall be deemed to have married the woman." The Malimath Committee had also suggested that the word 'wife' under Cr.P.C. be amended to include a 'woman living with the man like his wife' so that even a woman having a live-in relationship with a man would also be entitled to alimony.

The Supreme Court in *Abhijit Bhikaseth Auti v. State of Maharashtra and Others* [17] observed that it is not necessary for a woman to strictly establish the marriage to claim maintenance under section 125 of Cr.P.C. A woman in a live-in relationship may also claim maintenance under section 125 Cr.P.C. The Supreme Court observed that a man and woman, if involved in a live-in relationship for a long period, they will be treated as a married couple and their child would be considered as legitimate.

In *Payal Katara v. Superintendent Nari Niketan Kandri Vihar Agra and Others* [18], the Allahabad High Court ruled out that a lady of about 21 years of age being a major has the right to live with a man even without getting married, if both so wish .

In *D. Velusamy v. D. Patchaiammal* [19] reflecting upon live-in relationships becoming frequent in India, the Court has pointed out that no legal entitlements occur by such relationship. The Supreme Court was dealing with the claim of maintenance by a woman claiming to be a wife in view of a live-in relationship for some year. The Court ruled that the concept of alimony which applied to such relationships was not recognized in India and even though the Domestic Violence Act recognized live-in relationships to some degree, not all such relationships were entitled for maintenance unless they satisfied the conditions stipulated by the Court.

In the case of *Madhu Bala v. State of Uttarakhand* [20] and others, the Uttarakhand High Court stated that consensual cohabitation between two adults of the same-sex is legal.

## 5. DEBATES FOR PROS AND CONS OF LIVE-IN RELATIONSHIPS

The Supreme Court's controversial observation regarding live-in relationships and pre-marital sex has generated fierce debate across the country. The historic observation has made many orthodox groups upset fearing that it would destroy the sanctity of marriage. A fragment of the society including noted social activists and prominent dignitaries have stepped ahead and shared their precious views on this.

Social scientists have already identified grave social problems like young age pregnancy of adolescent girls, drug abuse, violence and juvenile delinquencies and in the wake of the controversial ruling, the erstwhile objectionable social behaviour gets legalized, many felt. This way, the new generation will be more spoilt. They will prefer live-in relationships to marriages arranged by their parents. There is no guarantee that the male in such relationships will turn out to be a loyal partner in the long run or would not leave the woman with their issues and run away without prior notice.

On the other hand, the section advocating freedom of choosing live-in relationships has hailed it as a pragmatic move. The recent observations, as they see, should be welcomed because it lays down emphasis on individual freedom. It opens frontiers to understand the personality traits of their partner as well. Since there are no legal complications in a live-in relationship, walking out of such a relationship would be much easier than walking out of a marriage. Metro life that throws floodgates of challenges also supports this kind of an arrangement. The individuals should be free to live as they think best, subject only to the limitation that their actions and choices should not cause harm to others. It is a very radical attitude. Some people are of the view that women should be given the liberty to choose their life partners and should not be forced into marriages if they are not ready.

This is not the first time; the live-in relationship is in the midst of debates and discussions. There has been a long-standing controversy whether a relationship between a man and a woman living together without marriage can be recognized by law. With changing social hypothesis entering society, in most places, it is legal for unmarried people to live together. Now even in a country like India bounded by innumerable

cultural ethics and rites, the law finds legally nothing wrong in live-in relationships.

This, however, cannot be construed that law promotes such relationships. Law traditionally has been biased in favour of marriage. It reserves many rights and privileges to married persons to preserve and encourage the institution of marriage. Such stands, in particular cases of live-in relationship, it appears that, by and large, is based on the assumption that they are not between equals and therefore women must be protected by the courts from the patriarchal power that defines marriage, which covers these relationships too.

## 6. LEGAL IMPLICATIONS OF LIVE IN RELATIONSHIP

### 6.1 Legitimacy of the Child Born Out of a Live-in Relationship

The first time when the Supreme Court held the legitimacy of children born out of live-in relationship was in *S.P.S. Balasubramanyam v. Suruttayan* [21] the Supreme Court had said, "If a man and woman are living under the same roof and cohabiting for some years, there will be a presumption under Section 114 of the Evidence Act that they live as husband and wife and the children born to them will not be illegitimate." Further, the court interpreted the status and legislation to an extent that it shows conformity from Article 39(f) of the Constitution of India which sets out the obligation of the State to give the children adequate opportunity so that they develop in proper manner and further safeguard their interest.

Dealing with the recent case on the legitimacy of children of such relationships, Supreme Court in *Tulsa v. Durghatiya* [22] has held that a child born out of such relationship will no longer be considered as an illegitimate child. The important precondition for the same should be that the parents must have lived under one roof and cohabited for a significantly long time for the society to recognize them as husband and wife and it should not be a "walk-in and walk-out" relationship.

The Supreme Court while deciding a case involving the legitimacy of a child born out of wedlock has ruled that if a man and a woman are involved in a live-in relationship for a long period, they will be treated as a married couple and their child would be legitimate [23]. The recent changes introduced in law through the Domestic Violence Act, 2005 gives protection to women involved in such relationships for a 'reasonable long period' and promises them the status of wives. A Supreme Court Bench headed by

Justice Arijit Pasayat declared that children born out of such a relationship will no more be called illegitimate. “Law inclines in the interest of legitimacy and thumbs down ‘whoreson’ or ‘fruit of adultery’.

In August 2010, the Supreme Court held that a live-in relationship that has existed for a long time will be considered a marriage and that the children born to such a couple will not be illegitimate. Justice P Sathasivam and Justice BS Chauhan of the Supreme Court passed this judgment and it will have strong legal implications on disputes related to the legitimacy of children who are born to live-in partners [24].

On 31-3-2011 a Special Bench of the Supreme Court of India consisting of G.S. Singhvi, Asok Kumar Ganguly in *Revanasiddappa v. Mallikarjun* [25] remarked that irrespective of the relationship between parents, birth of a child out of such relationship has to be viewed independently of the relationship of the parents. It is as plain and clear as sunshine that a child born out of such relationship is innocent and is entitled to all the rights and privileges available to children born out of valid marriages. This is the crux of Section 16(3) of the amended Hindu Marriage Act, 1955.

## 6.2 Inheritance Rights

In *Bharatha Matha & Anr. v. R.Vijaya Renganathan & Ors* [26], The Supreme Court held that a child born out of a live-in relationship is not entitled to claim inheritance in Hindu ancestral coparcenary property (in the case of an undivided joint Hindu family) and can only claim a share in the parents’ self-acquired property. The Bench set aside a Madras High Court judgment, which held that children born out of live-in relationships were entitled to a share in ancestral property as there was a presumption of marriage in view of the long relationship. Reiterating an earlier ruling, a Vacation Bench of Justices B.S. Chauhan and Swatanter Kumar said, “In view of the legal fiction contained in Section 16 of the Hindu Marriage Act, 1955 (legitimacy of children of void and voidable marriages), the illegitimate children, for all practical purposes, including succession to the properties of their parents, have to be treated as legitimate. They cannot, however, succeed to the properties of any other relation on the basis of this rule, which in its operation, is limited to the properties of the parents.”

A child can only make a claim on the person's self acquired property, in case the child is illegitimate. It can also be interpreted in a way in which a child could lay a claim on the share of a parents’ ancestral property as they can ask for that parents’ share in such

property, as Section 16 permits a share in the parents’ property. Hence, it could be argued that the person is not only entitled to self acquired property but also a share in the ancestral property.

The Apex Court also stated that while the marriage exists, a spouse cannot claim the live-in relationship with some other person and seek inheritance for the children from the property of that other person. Court observed that the relationship with some other person, while the husband is living is not ‘live-in relationship’ but ‘adultery’. It is further clarified that ‘live in relationship’ is permissible in unmarried heterosexuals (in case, one of the said persons is married, the man may be guilty of adultery and it would amount to an offence under Section 497 of the Indian Penal Code).

## 6.3 Domestic Violence Act applicable to Live-in Relationships

Different court judgments have discussed on different disputes pertaining to live-in relationships. Live-in relationships are now considered with marriage under a new Indian law pertaining to domestic violence. The provisions of the Domestic Violence Act, 2005 are now extended to those who are in live-in relationships as well. The amendments intend to protect the victims of domestic abuse in live-in relationships. Section 2 (g) of the aforementioned Act provides that a relationship between two individuals who live together or have lived together in the past is considered as a domestic relationship. A woman who is in a live-in relationship can seek legal relief against her partner in case of abuse and harassment. Further, the new law also protects Indian women who are trapped in fraudulent or invalid marriages. A woman who is subject to any form of violence in a live-in relationship as well as a marital relationship can file a complaint under section 498 A, IPC. She can also seek relief through protection orders, compensation and interim orders citing sections 18 to 23 of the Domestic Violence Act.

Live-in relationships are now very popular in India. The law does not prescribe how we should live; it is ethics and social norms which explain the essence of living in a welfare model. The Court itself notices that what law sees as no crime may still be immoral.

In *Lata Singh v. State of U.P. and Anr* [27], the court held that two consenting adults engaging in sex is not an offence in law “even though it may be perceived as immoral. Of course, such protective sanctions may potentially lead to complications that could otherwise be avoided. But simply raising the hammer may not be the best route to taming the bold and the brave. Awareness has to be created in these young minds not

just from the point of the emotional and societal pressures that such a relationship may create, but also the fact that it could give rise to various legal hassles on issues like division of property, violence, cases of desertion by death of a partner and handling of custody and other issues when it comes to children resulting from such relationships.

While the Supreme Court's opinion might not have the undesirable effect on more and more couples preferring live-in relationships rather than opting to wed, it could certainly embolden more young men and women as they would now be convinced that there is no breach of law in the live-in relationship. One can only weigh the pros and cons and take into account the impact of their decision on their family and most importantly on themselves.

## 7. CONCLUSIONS

In India, cohabitation has been a taboo since British rule. It has become an acceptable form of relationship in big cities, but it is still prohibited and discouraged in rural areas with more conservative values. As of now, there is no legislation or statute that specifically governs matters related to succession, maintenance, guardianship in regards to live-in relationships. It is the duty of the legislature to ensure that law is to be accommodated with the changing scenario of the society. The need of the hour is that there must be a separate statute dealing with live in relationship. Such a step would protect the rights of living partners, children born out of such relationships and all those people who are likely to get affected by such relationship.

## COMPETING INTERESTS

Author has declared that no competing interests exist.

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