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Cohabitation and Constitutional Morality: A Socio-Legal Examination of Indian Live-in Partnerships

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ABSTRACT

The idea of live-in partnerships in India calls into question the traditional view of marriage as a sacramental and legally binding institution. This paper examines the constitutional dimensions of cohabitation within the framework of Indian marriage law, with an emphasis on the fundamental rights of those involved. It considers how constitutional values, particularly those found in Articles 14, 19, and 21, protect individual liberty, privacy, and the freedom to choose a partner. The paper analyses seminal rulings that have progressively shaped the judicial acceptance of cohabitation, including Lata Singh v. State of U.P., Indra Sarma v. V.K.V. Sarma, and S. Khushboo v. Kanniammal. It assesses the current legal standing of live-in partnerships under Indian law, paying particular attention to the legislative gaps arising from the absence of formal recognition, as well as to statutory frameworks such as the Protection of Women from Domestic Violence Act, 2005. The doctrinal analysis finds that, although judicial rulings have extended crucial protections to persons in live-in relationships, the lack of clear legislative acknowledgment leaves this group legally exposed. The study argues that Parliament should enact a comprehensive statute outlining the rights and responsibilities of cohabiting couples, including matters of support, property, and protection from domestic abuse, and highlights the need for public awareness measures to reduce social stigma and advance a fuller conception of individual autonomy. By filling the legal gaps and fostering social acceptance, India can ensure that persons in live-in relationships enjoy equality, security, and dignity in accordance with the constitutional ideals of justice and liberty.

Keywords: Live-in relationship, PWDVA, India, domestic violence, women.

I. INTRODUCTION

A live-in relationship refers to an arrangement in which two individuals choose to live together in a domestic partnership without entering into a formal marriage. In India, cohabitation outside

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marriage was traditionally viewed as immoral and contrary to cultural norms. Unlike several other jurisdictions, the concept of a live-in relationship has not been formally defined or legally recognised under Indian law. However, the Supreme Court of India has clarified that such relationships are neither illegal nor amount to a criminal offence. Although partners in a live-in relationship do not enjoy the same legal status or rights as married couples, certain legal protections have been extended to them under specific statutes and judicial interpretations. The absence of a clear statutory definition continues to create ambiguity regarding the rights, obligations, and legal status of individuals in such relationships.

Live-in relationships are increasingly prevalent in contemporary society, particularly among younger generations who may choose cohabitation either as a precursor to marriage or as an alternative to it. Although such relationships may not be legally recognised as a marital union in many jurisdictions, they offer couples the opportunity to assess compatibility, mutual understanding, and commitment before entering into a legally binding marriage. This arrangement allows partners to experience shared responsibilities and domestic life while retaining flexibility and autonomy, reflecting a shift in societal attitudes towards personal relationships and family structures.

A. Research objectives

This study pursues the following objectives. First, to examine the legal status and judicial evolution of live-in relationships in India and to analyse the extent of their recognition under Indian law. Second, to analyse the constitutional protection afforded to live-in relationships, particularly under Article 21, with reference to the rights to privacy, dignity, autonomy, and personal liberty. Third, to evaluate the role of the judiciary in balancing constitutional morality and societal morality while safeguarding the rights of consenting adults in non-marital relationships. Fourth, to assess the adequacy of the existing legal framework and to suggest reforms for ensuring greater protection, clarity, and justice for individuals in live-in relationships.

B. Methodology

This paper adopts a doctrinal approach, focusing on a comprehensive examination of the legal and constitutional dimensions of live-in relationships in India. The primary objective is to understand the concept and legal status of live-in relationships through an analysis of relevant statutes, judicial precedents, constitutional provisions, and academic literature. The study also explores the socio-legal dynamics and challenges faced by live-in partners. In light of these challenges, and considering the constitutional principles of equality, liberty, and the right to life

under Articles 14, 19, and 21 of the Constitution of India, this paper argues for the formulation of a distinct, secular, and gender-sensitive legal framework to recognise and protect the rights of individuals in live-in relationships.

II. MARRIAGE AND LIVE-IN RELATIONSHIPS

In India, marriage has traditionally been regarded as a sacred and enduring union since ancient Vedic times. Marriages are solemnised either in accordance with the customs and personal laws governing the respective religions of the parties or under the provisions of the Special Marriage Act, 1954.¹ Legally, marriage is understood as a social and civil contract between a man and a woman, wherein both parties consent to live together and provide mutual support and companionship.

Over time, the concept of marriage has evolved significantly. In contemporary society, it is recognised not merely as a religious or social institution but also as a fundamental civil right carrying important legal implications. Marriage confers a range of rights and obligations, including those related to inheritance, succession, maintenance, and property. Thus, it encompasses both traditional and legal dimensions, requiring adherence to established customs, legal formalities, and the consequences that flow from the marital relationship.

In contrast, the concept of live-in relationships is not entirely foreign to Indian society and has existed, in varying forms, across different regions in contemporary times. However, its legal recognition is a relatively recent development within Indian jurisprudence. The first statutory acknowledgment of such relationships emerged through the Protection of Women from Domestic Violence Act, 2005 (PWDVA).² This Act was enacted with the primary objective of safeguarding women from domestic violence and ensuring their right to reside in a shared household.

Section 2(f) of the Act defines a domestic relationship as a relationship between two persons who live or have lived together in a shared household and are related by marriage, consanguinity, a relationship in the nature of marriage, adoption, or as members of a joint family.³ By including the phrase “relationship in the nature of marriage,” the legislature implicitly brought live-in relationships within the ambit of legal protection under the Act. Consequently, the PWDVA, 2005 marked the first step towards statutory recognition of live-in relationships in India. This recognition has since been reinforced and elaborated through judicial

¹ The Special Marriage Act, 1954, No. 43, Acts of Parliament, 1954 (India).

² The Protection of Women from Domestic Violence Act, 2005, No. 43, Acts of Parliament, 2005 (India).

³ The Protection of Women from Domestic Violence Act, 2005, No. 43, Acts of Parliament, 2005, § 2(f) (India).

interpretations, wherein courts have extended legal safeguards and clarified the conditions under which a live-in relationship may be considered akin to marriage.

III. LEGAL STATUS OF LIVE-IN RELATIONSHIPS IN INDIA

In the landmark case of *Dinohamy v. W.L. Balahamy*,⁴ the Privy Council addressed the issue of the presumption of marriage arising from prolonged cohabitation. In this case, the parties had lived together for an extended period as husband and wife, and the question before the court was whether such a relationship could be presumed to constitute a valid marriage in the absence of formal proof of a ceremonial union. The Privy Council held that where a man and woman have cohabited continuously and openly as husband and wife, the law will presume, in the absence of contrary evidence, that they were living together in a lawful marriage. This presumption is based on the principle that long-term cohabitation and social recognition of the relationship as marital give rise to a legitimate inference of marriage. The decision in *Dinohamy* thus laid the foundation for later judicial approaches in India that recognise the validity and legitimacy of long-term cohabitation resembling marriage, thereby influencing subsequent interpretations relating to live-in relationships.

IV. EVOLUTION OF LIVE-IN RELATIONSHIPS IN INDIA

Historically, cohabitation outside marriage was not socially accepted in India and was generally regarded as illegitimate and immoral. Indian society, deeply influenced by religious and cultural traditions, has long emphasised the sanctity and permanence of marriage as a sacred institution. Consequently, domestic and sexual relationships outside the framework of a legally and socially recognised marriage were traditionally discouraged. However, historical evidence from the Vedic period, including references found in ancient epics and customs such as *Gandharva Vivaha* (a form of marriage based on the mutual consent of the partners), suggests that informal unions did exist and, in certain circumstances, enjoyed a degree of social acceptance.

In contemporary India, live-in relationships are more prevalent in urban areas than in rural regions, reflecting changing social attitudes, increased individual autonomy, and the influence of modernisation. Recognising the growing prevalence of such relationships, the National Commission for Women, on 30 June 2008, recommended to the Ministry of Women and Child Development that the definition of “wife” under Section 125 of the Code of Criminal Procedure, 1973 (now Section 144 of the Bharatiya Nagarik Suraksha Sanhita, 2023) be expanded to include women involved in live-in relationships, thereby extending legal protection and

⁴ *Andrahennedige Dinohamy v. Wijetunge Liyanapatabendige Balahamy*, AIR 1927 PC 185.

maintenance rights to them.⁵ This perspective was also supported by the Malimath Committee on Reforms of the Criminal Justice System, which observed that if a man and a woman live together for a reasonably long period, the law should presume them to be married. The Committee emphasised the need to protect women in long-term cohabiting relationships from social and economic vulnerability by affording them rights similar to those available to legally married spouses.

These developments signify a gradual shift in India's legal and social approach towards live-in relationships, reflecting an effort to balance traditional family values with the realities of changing relationship patterns in contemporary society.

V. CONSTITUTIONAL DIMENSIONS

A. Right to privacy, dignity, and protection under Article 21

A significant shift in judicial attitudes towards live-in relationships has been driven by the expansive interpretation of Article 21 of the Constitution of India, which guarantees the right to life and personal liberty. Over time, the judiciary has transformed Article 21 from a mere procedural safeguard into a comprehensive source of substantive rights, including the rights to privacy, dignity, autonomy, and personal choice. These developments have provided a strong constitutional foundation for recognising live-in relationships as lawful and protected forms of companionship.

Article 21 states that "No person shall be deprived of his life or personal liberty except according to procedure established by law."⁶ Through progressive judicial interpretation, the scope of this provision has been broadened to encompass the right to live with dignity, bodily integrity, decisional autonomy, privacy, and the freedom to make intimate personal choices relating to marriage, procreation, and cohabitation. This constitutional evolution has played a crucial role in challenging traditional social norms that restrict individual freedoms on the basis of societal morality.

A landmark development in this regard was the decision of the Supreme Court in *Justice K.S. Puttaswamy (Retd.) v. Union of India*,⁷ where a nine-judge Constitution Bench unanimously recognised the right to privacy as a fundamental right under Article 21. The Court held that privacy extends beyond physical spaces and includes decisional autonomy, that is, the freedom

⁵ The Code of Criminal Procedure, 1973, No. 2, Acts of Parliament, 1974, § 125 (India); see now The Bharatiya Nagarik Suraksha Sanhita, 2023, No. 46, Acts of Parliament, 2023, § 144 (India).

⁶ INDIA CONST. art. 21.

⁷ *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 SCC 1 (India).

of individuals to make personal and intimate choices without unwarranted State interference. Emphasising the centrality of privacy to constitutional liberty, the Court observed:

“The right to privacy is an intrinsic part of the right to life and personal liberty. It includes the preservation of personal intimacies, the sanctity of family life, marriage, procreation, the home, and sexual orientation.”

This broad understanding of privacy laid the constitutional groundwork for recognising live-in relationships as private and consensual arrangements deserving legal protection.

The principles established in *Puttaswamy* were further reinforced in *Navtej Singh Johar v. Union of India*,⁸ where the Supreme Court decriminalised consensual same-sex relations and underscored the importance of constitutional morality over societal morality. The Court affirmed that matters relating to sexual autonomy, personal relationships, and the choice of a life partner fall within the protected sphere of individual liberty and dignity. It categorically held that:

“Societal morality cannot override constitutional morality. Discrimination based on sexual orientation is profoundly offensive to the dignity and self-worth of an individual.”

Although the case primarily concerned same-sex relationships, its underlying principle, that the State should not interfere in the private lives of consenting adults, equally supports the legitimacy of live-in relationships.

Similarly, in *Shafin Jahan v. Asokan K.M.*,⁹ the Supreme Court reaffirmed that the right to choose one’s partner is an integral component of personal liberty and individual dignity. The Court set aside the decision of the Kerala High Court, which had annulled the marriage of an adult woman on the basis of parental objections. Stressing the importance of individual autonomy, the Court held that an adult’s choice of a life partner lies within the protected domain of privacy and personal liberty. While the case concerned a legally valid marriage, its emphasis on freedom of choice and self-determination equally validates voluntary non-marital relationships between consenting adults.

Collectively, these judicial pronouncements establish that the rights to privacy, dignity, autonomy, and personal liberty under Article 21 extend to the decision of consenting adults to cohabit without marriage. Consequently, live-in relationships cannot be regarded as unlawful merely because they depart from traditional social norms. Instead, they constitute an exercise

⁸ *Navtej Singh Johar v. Union of India*, (2018) 10 SCC 1 (India).

⁹ *Shafin Jahan v. Asokan K.M.*, (2018) 16 SCC 368 (India).

of constitutionally protected personal choice and individual freedom in a democratic society governed by the rule of law.

B. Recognising the freedom to make personal choices

The constitutional recognition of individual autonomy has significantly contributed to the judicial acceptance of live-in relationships. In *Nandakumar v. State of Kerala*,¹⁰ the Supreme Court adopted a rights-based approach by affirming the right of two consenting adults to cohabit, even where one of the parties had not attained the legal age required for marriage. The Court observed that, while the parties may not possess the legal capacity to enter into a valid marriage, they nevertheless retain the freedom to live together as consenting adults.

The judgment underscored that the right to choose a partner and cohabit with that person flows from the broader guarantees of personal liberty and autonomy under Article 21 of the Constitution. By recognising cohabitation as a matter of individual choice rather than legal status, the Court reinforced the principle that adults are entitled to make decisions concerning their personal relationships without unwarranted interference from the State or society. This decision further strengthened the constitutional protection accorded to live-in relationships and affirmed the importance of individual freedom in matters of intimate association.

C. Asserting the right to protection

The right to life and personal liberty under Article 21 extends beyond recognising the validity of personal choices; it also imposes a positive obligation on the State to protect individuals who exercise those choices. This principle was emphatically affirmed in *Leela Bishnoi v. State of Rajasthan*,¹¹ where a live-in couple sought police protection against threats and harassment from their families and members of society. Notably, the woman involved was legally married to another person at the time.

The police and lower authorities opposed the petition on the ground that granting protection would amount to endorsing an allegedly “illicit relationship.” Rejecting this contention, the Rajasthan High Court held that constitutional protections under Article 21 are available to every individual, irrespective of marital status or the nature of their personal relationship. The Court categorically stated that neither the police nor any State authority is empowered to evaluate the morality of a consensual relationship between adults. Consequently, protection cannot be denied

¹⁰ *Nandakumar v. State of Kerala*, (2018) 16 SCC 602 (India).

¹¹ *Leela Bishnoi v. State of Rajasthan*, S.B. Criminal Misc. Petition No. 5045/2021 (Raj. H.C. Sept. 15, 2021) (India).

merely because a relationship is socially unpopular or inconsistent with prevailing moral standards.

The Court further emphasised that judicial decisions must be guided by constitutional morality rather than public or societal morality. In doing so, it reaffirmed that fundamental rights are intended to safeguard individual liberty, even when the exercise of such liberty attracts social disapproval. The judgment established an important precedent by clarifying that constitutional guarantees cannot be subordinated to majoritarian notions of morality. It also reinforced the duty of State authorities to provide protection against threats, violence, or harassment, regardless of the social acceptability of the relationship involved.

Together, these decisions demonstrate the judiciary's commitment to safeguarding the autonomy, dignity, and personal liberty of consenting adults. They affirm that live-in relationships are protected not only as expressions of individual choice but also as relationships entitled to equal protection under the Constitution.

D. Reaffirming privacy and dignity

In *Manisha Devi v. State of Rajasthan*,¹² the Rajasthan High Court further strengthened the constitutional protection afforded to live-in relationships by building upon the principles established in *Leela Bishnoi v. State of Rajasthan* and the landmark decision in *Justice K.S. Puttaswamy (Retd.) v. Union of India*. The case concerned a live-in couple seeking police protection against threats and interference, while the respondents opposed such protection on the ground that the relationship was immoral and undeserving of State support.

Rejecting these objections, the Court unequivocally held that the State has no authority to interfere in the private and consensual relationships of adults. It observed that personal autonomy, dignity, and privacy are fundamental components of the right to life and personal liberty guaranteed under Article 21 of the Constitution. The Court further emphasised that the denial of protection to individuals solely on the basis of societal disapproval or moral objections constitutes a failure of the State's constitutional obligations.

Reaffirming the principles laid down in *Puttaswamy*, the Court recognised that the right to privacy encompasses an individual's freedom to choose a life partner, determine the course of personal relationships, and live in accordance with one's preferences and identity, irrespective of whether such choices conform to traditional notions of marriage. The judgment also

¹² *Manisha Devi v. State of Rajasthan*, S.B. Criminal Writ Petition No. 394/2023 (Raj. H.C. Aug. 7, 2023) (India).

underscored that public morality cannot supersede constitutional morality, which prioritises individual rights, dignity, and liberty.

This decision significantly advanced the jurisprudence on live-in relationships by affirming that State inaction, selective protection, or discriminatory treatment based on moral considerations may amount to a violation of fundamental rights. Consequently, the ruling reinforced the constitutional position that live-in relationships between consenting adults fall within the protective ambit of privacy, dignity, autonomy, and personal liberty under the Constitution of India.

VI. CONSTITUTIONAL MORALITY VERSUS SOCIETAL MORALITY

The concept of constitutional morality refers to the values, principles, and ideals embodied in the Constitution, including liberty, equality, dignity, autonomy, and justice. It serves as a guiding framework for interpreting and protecting fundamental rights, particularly when societal norms conflict with constitutional guarantees. In contrast, societal morality is shaped by prevailing cultural, religious, and traditional beliefs, which may evolve over time but often reflect dominant social attitudes. In the context of live-in relationships, these two forms of morality frequently come into conflict. While societal morality may view non-marital cohabitation as inconsistent with traditional family values, constitutional morality prioritises the protection of individual choice, privacy, and personal liberty.

The Indian judiciary has played a crucial role in ensuring that constitutional morality prevails over social prejudices and outdated conventions. Through a series of judicial pronouncements, courts have consistently upheld the rights of consenting adults to choose their partners and determine the nature of their personal relationships without unwarranted interference from the State or society. By recognising live-in relationships as falling within the ambit of constitutional protections, the judiciary has reinforced the principle that fundamental rights cannot be curtailed merely because a particular relationship lacks widespread social approval.

VII. SOCIAL AND MORAL DIMENSIONS OF LIVE-IN RELATIONSHIPS

Despite increasing legal recognition, live-in relationships continue to face significant social resistance in India. Traditional social norms place considerable emphasis on marriage as the only legitimate foundation for intimate relationships and family life. Consequently, individuals in live-in relationships often encounter social stigma, familial opposition, and moral scrutiny, particularly in rural and conservative communities. Nevertheless, changing socio-economic conditions and evolving social attitudes have gradually contributed to greater acceptance, especially among younger generations and urban populations.

A. Changing attitudes

Urbanisation, higher levels of education, economic independence, and increased exposure to global cultures have significantly influenced public perceptions of live-in relationships. Many young adults, particularly in metropolitan areas, view cohabitation as a means of assessing compatibility, emotional understanding, and long-term commitment before entering into marriage. These changing attitudes reflect a broader shift towards individual autonomy and personal choice in matters relating to intimate relationships.

B. Cultural resistance

Notwithstanding these developments, strong cultural resistance persists. Traditional conceptions of marriage as a sacred and socially sanctioned institution continue to shape public opinion. As a result, couples in live-in relationships may face social ostracism, moral policing, and pressure from families and communities to conform to conventional expectations. Such resistance is often rooted in deeply entrenched cultural and religious values that regard marriage as the exclusive framework for cohabitation and family formation.

C. Gender dynamics

The social consequences of live-in relationships are often experienced differently by men and women. Women in such relationships frequently face greater scrutiny, criticism, and reputational harm due to prevailing gender stereotypes and patriarchal attitudes. They may also encounter economic vulnerability and social insecurity if the relationship breaks down. Recognising these challenges, Indian courts and legislative measures such as the Protection of Women from Domestic Violence Act, 2005 have extended certain legal safeguards to women in relationships resembling marriage. However, societal attitudes continue to create significant obstacles to achieving substantive gender equality in this context.

VIII. THE INTERSECTION OF LIVE-IN RELATIONSHIPS AND CONSTITUTIONAL MORALITY

The judicial recognition of live-in relationships represents a significant application of constitutional morality in contemporary Indian jurisprudence. By protecting the right of consenting adults to choose their partners and cohabit outside the institution of marriage, courts have reinforced the constitutional values of liberty, dignity, privacy, and autonomy. This approach reflects the understanding that personal relationships fall within the private sphere of individual decision-making and should not be regulated solely on the basis of prevailing social norms.

The intersection of live-in relationships and constitutional morality demonstrates the judiciary's commitment to safeguarding fundamental rights against societal prejudice. It challenges traditional assumptions regarding the nature of family and intimate relationships while promoting a more inclusive and rights-oriented understanding of personal choice. Ultimately, the constitutional protection of live-in relationships affirms that individual freedoms and human dignity must prevail over social disapproval, thereby strengthening the transformative vision of the Constitution and advancing a more progressive and pluralistic society.

IX. RECOMMENDATIONS AND SUGGESTIONS

This study advances the following recommendations. First, Parliament should enact a comprehensive statute governing live-in relationships, clearly defining the rights and obligations of partners and ensuring legal protection in matters such as maintenance, inheritance, property rights, and financial support. Such legislation would provide certainty and consistency while reducing reliance on fragmented judicial interpretations.

Second, mandatory counselling and mediation services should be integrated into family court proceedings involving live-in relationship disputes. These mechanisms can promote amicable settlements, reduce adversarial litigation, minimise emotional distress, and facilitate mutually acceptable resolutions for the parties involved.

Third, government agencies, legal services authorities, and civil society organisations should expand legal aid and awareness programmes, particularly in rural and semi-urban areas. These initiatives should educate individuals about their rights, relevant judicial precedents, and the legal remedies available in the context of live-in relationships.

Fourth, regular training programmes should be conducted for judges and judicial officers on the evolving socio-legal dimensions of live-in relationships. Such training would foster a deeper understanding of contemporary family structures and enable courts to deliver informed, sensitive, and equitable decisions.

Fifth, law schools and continuing legal education programmes should incorporate the study of live-in relationships within family law and constitutional law curricula. This would equip future lawyers, judges, and policymakers with the knowledge necessary to address emerging legal challenges arising from changing social realities.

Sixth, specialised benches or fast-track mechanisms within existing family courts should be created to adjudicate disputes involving live-in relationships. Expedient disposal of such cases

would reduce procedural delays, ensure timely access to justice, and safeguard the rights and interests of both partners and any dependent children.

Seventh, existing legal safeguards should be expanded to ensure effective protection against domestic violence, economic exploitation, abandonment, and other forms of abuse within live-in relationships. Clear statutory remedies would help protect vulnerable partners and promote substantive equality.

Eighth, policymakers should adopt a rights-based framework that recognises live-in relationships as a legitimate exercise of personal autonomy and individual choice under the Constitution. Legal and administrative measures should focus on protecting fundamental rights rather than reinforcing social or moral prejudices.

X. CONCLUSION

The legal and constitutional recognition of live-in relationships in India reflects the dynamic evolution of family law in response to changing social realities. Although marriage continues to occupy a central place in Indian society as a legally and culturally sanctioned institution, the increasing prevalence of live-in relationships has compelled the judiciary and legislature to acknowledge alternative forms of companionship. Through judicial interpretations and statutory measures such as the Protection of Women from Domestic Violence Act, 2005, live-in relationships have gradually acquired legal legitimacy, particularly in matters concerning protection, maintenance, and the rights of women.

The constitutional framework, especially Article 21 of the Constitution, has played a pivotal role in this transformation. Judicial decisions have consistently affirmed that the rights to privacy, dignity, autonomy, and personal liberty encompass the freedom of consenting adults to choose their partners and cohabit without marriage. By prioritising constitutional morality over societal morality, courts have reinforced the principle that individual rights cannot be curtailed merely because personal choices diverge from traditional social norms.

Despite these advancements, the absence of a comprehensive legislative framework continues to create uncertainty regarding issues such as inheritance, property rights, financial obligations, and the status of children born from such relationships. Social stigma, cultural resistance, and gender-based vulnerabilities also remain significant challenges. There is, therefore, a pressing need for clear statutory regulation that balances individual autonomy with legal certainty and social protection.

Ultimately, the recognition of live-in relationships signifies the judiciary's commitment to safeguarding constitutional values in a pluralistic democracy. It demonstrates that the Constitution protects not only traditional institutions but also the freedom of individuals to shape their personal lives according to their own choices, thereby promoting dignity, equality, and justice in an evolving society.

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