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Legal Rights of Women in Live in Relationships in India: Judicial Interpretations and Legislative Safeguards

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ABSTRACT

This paper examines the evolving legal rights of women in live in relationships in India. The rights of women within relationships in India have become a critical subject of legal, social and cultural discourse in recent decades. Traditionally, gender roles were shaped by patriarchal norms that often limited women's autonomy and decision-making power in marital and domestic spheres. However, the constitutional guarantee of equality and subsequent legal reforms have gradually expanded the recognition of women's rights in relationships, particularly in areas of marriage, divorce, maintenance, and protection from violence. The enactment of laws such as the Protection of Women from Domestic Violence Act (2005) and amendments to the Hindu Marriage Act and other personal laws underscore the state's effort to ensure dignity and security for women in intimate partnerships. Beyond legal frameworks, social awareness and feminist movements have contributed to redefining the understanding of consent, agency, and respect in relationships. Despite these advances, challenges persist due to deep-rooted cultural practices, lack of effective enforcement, and societal resistance to change. Therefore, examining women's rights in relationships in India highlights both the progress made and the barriers that continue to undermine gender justice. Strengthening awareness, legal literacy, and institutional support remains essential for ensuring equitable and respectful partnerships. Obtaining all the constitutional provisions, legislative frameworks, and judicial precedents, This paper explores rights of women relating to domestic violence protection, maintenance, property, and children's legitimacy. Given societal constraints and legislative gaps, the study is emphasising on the need for clearer legal statutes to ensure gender justice and protection of women's rights.

Keywords: *Women's legal rights, Live-in relationships in India, Legal framework, Gender justice, Cohabitation, Judicial interpretation, Domestic violence protection, Section 114 Indian Evidence Act, Right to Residence, Legitimacy of Children, Women's Autonomy and Dignity, Succession Rights in Live in Relationship, Bigamy and Fraudulent Relationship, Social Stigma and enforcement challenges.*

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I. INTRODUCTION

The legal rights of women in intimate and marital relationships occupy a critical space in the contemporary discussion on gender equality and constitutional justice in India. Despite significant progress in women's empowerment through legislation, judicial interpretation, and policy reforms, the reality of intimate relationships continues to reflect structural inequalities, patriarchal norms, and systemic barriers that has always existed and still hinder women from exercising their rights fully. Law, as a reflection of social morality and a tool for social change, has had to confront the complex realities of women's lived experiences—be it marriage, domestic partnerships, cohabitation, and live-in relationships to situations of separation and divorce. Against this backdrop, understanding the evolution, scope, and enforcement of women's legal rights in relationships is crucial to evaluating the strengths and limitations of India's legal system in promoting gender justice.

Historically, Indian society placed women within the framework of familial subordination, where marriage was often perceived less as a partnership and more as a sacrament imposing more duties on women without recognizing equal entitlements. Women's rights within marital relationships were largely comprised under the authority of husbands and families, reinforced by personal laws grounded in religious traditions. However, constitutional guarantees of equality under Articles 14, 15, and 21 of the Indian Constitution introduced a transformative vision, mandating the State to dismantle practices that perpetuate gender discrimination. This constitutional morality has gradually expanded the recognition of women's entitlements within relationships, emphasizing dignity, autonomy, and freedom from violence.

Over the past few decades, legal reforms have sought to strengthen women's rights across different aspects of relationships. The enactment of the Hindu Marriage Act, 1955, the Special Marriage Act, 1954, and the Indian Divorce Act, 1869 restructured matrimonial rights and remedies, although gaps in uniformity persist due to the coexistence of diverse personal laws. The recognition of domestic violence as a legal wrong under the Protection of Women from Domestic Violence Act, 2005 (PWDVA) marked a significant shift, acknowledging that relationships are not confined to the institution of marriage but include live-in partnerships and other domestic arrangements. This expanded understanding is crucial in addressing contemporary realities where women's vulnerability to abuse and coercion extends beyond formal marital bonds.

Judicial pronouncements have also played a transformative role in reshaping the rights of women in relationships. The Supreme Court and various High Courts have repeatedly

underscored women's right to dignity, bodily autonomy, and protection from patriarchal domination within intimate spheres. For instance, decisions striking down discriminatory practices such as instant triple talaq, recognizing the rights of women in live-in relationships to claim maintenance, and affirming the constitutional invalidity of marital rape immunity (under active consideration) represent milestones in advancing substantive equality. These judicial developments signal a broader shift toward situating women's rights within relationships not merely as private or family matters, but as issues of constitutional concern.

Yet, challenges remain. Social stigma, economic dependence, lack of legal awareness, and procedural hurdles in accessing remedies often impede the enforcement of women's rights. Moreover, the persistence of personal law pluralism creates inconsistencies, leaving many women without equal protections. The tension between community practices and constitutional mandates continues to generate debate, particularly in areas such as inheritance, guardianship, and marital consent. As India balances its commitments to gender equality with respect for cultural diversity, the rights of women in relationships stand at the intersection of law, society, and politics.

This research paper seeks to examine the legal framework governing women's rights in relationships in India, analysing constitutional provisions, statutory laws, and judicial interventions. It aims to critically evaluate the extent to which these rights have been realized in practice, the gaps that persist, and the reforms necessary to ensure that the law functions as a true guarantor of equality and dignity within personal and intimate spheres. In doing so, it emphasizes that the recognition and protection of women's rights in relationships is not only a matter of legal reform but also a vital step toward achieving substantive gender justice in Indian society.

II. CONSTITUTIONAL FRAMEWORK AND LEGAL RIGHTS

The concept of live-in relationships—where two adults choose to cohabit without formally solemnizing their union through marriage—has become increasingly visible in India, reflecting social change and evolving notions of companionship. However, such relationships have historically existed in a grey area of law, as Indian family law has traditionally revolved around the institution of marriage. This lacuna has posed challenges for women, who often face vulnerability and social stigma when cohabitation ends abruptly, or when issues of maintenance, inheritance, or violence arise. In the absence of a comprehensive statute governing live-in relationships, constitutional provisions, statutory interpretation, and judicial pronouncements have together created a legal framework that protects women's rights in such partnerships.

(A) Constitutional Foundations

The Constitution of India provides the bedrock for recognizing and protecting women's rights within live-in relationships. Article 14 guarantees equality before the law and equal protection of laws, preventing arbitrary discrimination against women on the basis of their marital status. Article 15(3) empowers the State to make special provisions for women and children, which justifies gender-sensitive interpretations of existing laws to protect women in vulnerable domestic settings. Article 21, perhaps most significant, has been expansively interpreted by the Supreme Court to include the right to dignity, privacy, and autonomy. These rights extend to the freedom of adults to choose their partners and the right of women in live-in relationships to protection from exploitation and violence. The Court has repeatedly held that personal liberty encompasses the freedom to cohabit outside of marriage, insulating such choices from unnecessary State interference.

(B) Right to Protection from Violence

The most significant statutory recognition of live-in relationships comes from the Protection of Women from Domestic Violence Act, 2005 (PWDVA). The Act adopts a broad definition of "domestic relationship" in Section 2(f), which includes not only relationships by consanguinity and marriage but also "a relationship in the nature of marriage." This deliberate inclusion extends civil protections to women in live-in partnerships, entitling them to seek residence orders, protection orders, and maintenance. The PWDVA thus recognizes the reality that women in non-marital relationships may face abuse, financial abandonment, or eviction similar to married women, and it ensures that remedies are available to them.

(C) Right to Maintenance and Financial Support

Section 125 of the Code of Criminal Procedure, 1973, traditionally providing maintenance to wives, is judicially interpreted to include women in long-term live-in relationships, equating them to de facto wives for maintenance claims. A recurring concern for women in live-in relationships is financial insecurity when the partnership ends. The judiciary has progressively acknowledged their entitlement to maintenance. It emphasized that women in long-term live-in relationships should not be denied maintenance simply due to the absence of a formal marriage. It urged Parliament to amend laws to explicitly cover such cases, ensuring women are not left destitute. Similarly, the presumption of marriage arising from long cohabitation under Section 114 of the Indian Evidence Act, 1872 strengthens women's claims to financial support.

(D) Right to Residence

The PWDVA also grants women in live-in relationships the right to reside in the "shared

household.” This prevents arbitrary eviction by the male partner and ensures continuity of shelter. Judicially, this has been reinforced by *Velusamy v. D. Patchaiammal*, (2010) 10 S.C.C. 469 (India), where the Court stated that a relationship “in the nature of marriage” could entitle women to residence orders.

(E) Legitimacy and Rights of Children

Children born from live-in relationships are protected from being stigmatized as illegitimate. The Supreme Court in *Tulsa v. Durghatiya*, (2008) 4 S.C.C. 520 (India) held that children from long-term live-in relationships are to be treated as legitimate and can inherit property from their parents. Earlier, in *S.P.S. Balasubramanyam v. Suruttayan*, (1992) 1 S.C.C. 304 (India), the Court observed that prolonged cohabitation raises a presumption of valid marriage, ensuring legitimacy for children. These rulings are crucial in securing the rights of women and their children against social stigma and economic exclusion.

(F) Right to Autonomy and Choice of Partner

The constitutional guarantee of liberty under Article 21 protects the right of adults to cohabit without State interference. In *S. Khushboo v. Kanniammal*, (2010) 5 S.C.C. 600 (India), the Supreme Court recognized that living together outside marriage is not an offense. Similarly, *Lata Singh v. State of Uttar Pradesh*, (2006) 5 S.C.C. 475 (India) upheld the right of consenting adults to live together, free from familial or societal pressure. More recently, *Nandakumar v. State of Kerala*, (2018) 16 S.C.C. 602 (India) affirmed that even if a relationship does not qualify as a marriage under personal law, partners have the right to live together.

(G) Right to Dignity and Privacy

The landmark decision in *Navtej Singh Johar v. Union of India*, (2018) 10 S.C.C. 1 (India), though focused on same-sex relationships, reinforced the principle that consensual adult relationships fall within the ambit of dignity and privacy under Article 21. By extension, this principle protects women in live-in relationships from moral policing and affirms their right to personal autonomy.

(H) Recent Developments: Uniform Civil Code (UCC) in Uttarakhand

The UCC Act mandates registration for live-in relationships, grants inheritance and maintenance rights, and ensures legal recognition—though implementation is nascent and debated.

III. JUDICIAL INTERPRETATIONS AND LANDMARK CASE LAWS

Since the statute left the term “relationship in the nature of marriage” undefined, the judiciary

has played a central role in shaping its contours. In **Velusamy v. D. Patchaiammal**, (2010) 10 S.C.C. 469, the Supreme Court held that not every live-in arrangement qualifies for protection under the PWDVA; the relationship must have features of marriage, such as shared responsibilities, social recognition, and long-term stability. This case made clear that casual relationships or those maintained only for sexual purposes would not fall within the statutory protection.

Building on this, **Indra Sarma v. V.K.V. Sarma**, (2013) 15 S.C.C. 755, provided a detailed set of factors to determine when a live-in relationship is akin to marriage: the duration of cohabitation, pooling of financial and domestic resources, the existence of children, social acknowledgment, and the intention and conduct of the parties. While recognizing women's vulnerability, the Court also cautioned that adulterous or bigamous relationships cannot claim legal protection, thereby balancing moral considerations with women's rights.

The right of women in live-in partnerships to seek maintenance has also been judicially affirmed. In **Chanmuniya v. Virendra Kumar Singh Kushwaha**, (2011) 1 S.C.C. 141, the Court held that denying maintenance to women in de facto marriages would defeat the purpose of social welfare laws. It recommended legislative reform to ensure that women who are abandoned after long-term cohabitation are not left destitute.

An equally significant development relates to the status of children born from such relationships. In **Tulsa v. Durghatiya**, (2008) 4 S.C.C. 520, the Supreme Court held that if a man and woman lived together for a long period and presented themselves as husband and wife, the law would presume them to be legally married, and children born from such a union would not be treated as illegitimate. This ruling was vital in securing inheritance and social recognition for children of live-in relationships, protecting their constitutional right to dignity and equality.

(A) Additional Case Laws on Women's Rights & Live-in Relationships in India

1. *Madan Mohan Singh v. Rajni Kant*, (2010) 9 S.C.C. 209 (India).

The Supreme Court held that a long-term live-in relationship could raise a presumption of marriage under Section 114 of the Indian Evidence Act, 1872. Children born from such a relationship were entitled to be considered legitimate.

2. *Badri Prasad v. Dy. Director of Consolidation*, (1978) 3 S.C.C. 527 (India).

One of the earliest landmark rulings: the Court upheld the presumption of marriage in a relationship that lasted for 50 years, legitimizing children born from the union.

3. *Payal Sharma v. Superintendent, Nari Niketan, Agra*, 2001 Cri. L.J. 389 (All.) (India).

The Allahabad High Court recognized that a man and a woman living together without marriage do not commit any offense, and adults have a right to cohabit.

4. *Nandakumar v. State of Kerala, (2018) 16 S.C.C. 602 (India).*

The Court held that even if a couple is not of marriageable age under personal law, they have the right to live together in a live-in relationship, since such cohabitation is not illegal.

5. *Ujjawal v. State of Haryana, 2021 S.C.C. OnLine P&H 2306 (India).*

The Punjab & Haryana High Court granted police protection to a live-in couple, recognizing their right to life and liberty despite social disapproval.

6. *S.P.S. Balasubramanyam v. Suruttayan, (1992) 1 S.C.C. 304 (India).*

The Court held that if a man and woman lived together as husband and wife for a long time, the law would presume them to be married, granting legitimacy to children.

IV. GAPS AND RECOMMENDATIONS IN THE LEGAL FRAMEWORK OF WOMEN'S RIGHTS IN LIVE-IN RELATIONSHIPS IN INDIA

(A) Gaps in the Current Framework

Despite incremental recognition of women's rights in live-in relationships, significant gaps remain in the Indian legal system. These gaps stem from the lack of legislative clarity, conflicting judicial interpretations, and societal resistance. While Indian courts and statutes such as the Protection of Women from Domestic Violence Act, 2005 (PWDVA) have extended certain rights to women in live-in relationships, the evolving social landscape presents significant legal challenges. These challenges reflect the tension between traditional societal values, judicial innovations, and the absence of clear legislative guidance.

1. Lack of a Comprehensive Statutory Framework

The foremost challenge lies in the absence of a dedicated legal framework governing live-in relationships. While the PWDVA recognizes relationships "in the nature of marriage," there is no legislation that explicitly addresses rights and obligations arising from such partnerships. Courts have filled this gap with inconsistent interpretations. For instance, in *Velusamy v. D. Pataiammal*, (2010) 10 S.C.C. 469 (India), the Court laid down conditions for recognizing a live-in relationship, such as the partners presenting themselves as spouses and being otherwise legally eligible to marry. This narrow approach often excludes women in vulnerable relationships, leaving them without recourse to maintenance or residence rights.

2. Ambiguity in Defining "Relationship in the Nature of Marriage"

One of the central issues is the judicially crafted but legally undefined phrase, “relationship in the nature of marriage.” In *Indra Sarma v. V.K.V. Sarma*, (2013) 15 S.C.C. 755 (India), the Court excluded relationships such as concubinage or those where one partner was married to another person. This creates a legal vacuum for women in relationships where their partner conceals marital status, effectively denying protection to those most vulnerable to exploitation. The lack of legislative clarity leaves judicial discretion as the sole determinant, resulting in unpredictability.

3. Social Stigma and Enforcement Barriers

Despite judicial recognition of live-in relationships, women continue to face intense social stigma. Fear of ostracism often discourages them from seeking legal remedies. Even when courts provide protection—such as in *Ujjawal v. State of Haryana*, 2021 S.C.C. OnLine P&H 2306 (India), where police protection was granted to a live-in couple—implementation on the ground remains weak. Law enforcement agencies are often reluctant to uphold such rights due to prevailing moral attitudes, undermining constitutional guarantees under Article 21.

4. Inheritance and Succession Rights

Although courts have legitimized children from live-in relationships (*Tulsa v. Durghatiya*, (2008) 4 S.C.C. 520 (India)), women themselves do not have automatic inheritance rights in their partner’s property unless the relationship qualifies as a “marriage.” The lack of recognition under personal laws creates significant uncertainty regarding succession rights. This remains a grey area, leaving women economically vulnerable when their partner dies without making testamentary arrangements.

5. Conflict with Personal Laws and Religious Norms

Another challenge arises from the coexistence of secular protections (PWDVA, constitutional guarantees) and religion-based personal laws. For instance, under Hindu, Muslim, or Christian marriage laws, marriage is treated as a legally sanctioned institution with defined rights and obligations. Live-in relationships, lacking such recognition, fall into conflict with these frameworks. This results in women’s rights being determined differently depending on judicial interpretation, often reinforcing inequality.

6. Child Custody and Guardianship Issues

While legitimacy of children has been recognized, questions of custody and guardianship remain unresolved. The Guardians and Wards Act, 1890, does not expressly cover live-in relationships, leaving custody disputes to judicial discretion. Courts may apply the “welfare of

the child” principle, but without statutory clarity, outcomes remain uncertain, disproportionately affecting women who bear primary caregiving responsibilities.

7. Privacy and Protection from Moral Policing

Despite progressive rulings like *S. Khushboo v. Kanniammal*, (2010) 5 S.C.C. 600 (India) and *Navtej Singh Johar v. Union of India*, (2018) 10 S.C.C. 1 (India) affirming the autonomy of adult relationships, women in live-in arrangements continue to face moral policing. This not only restricts their privacy but also exposes them to harassment and violence, both from families and local communities. Effective state protection is often absent, weakening constitutional safeguards.

(A) Recommendations

To address these challenges, a multi-pronged approach involving legislative reform, judicial consistency, and social change is necessary.

1. Enact a Comprehensive Statute on Live-in Relationships

Parliament should introduce legislation clearly defining live-in relationships and codifying the rights of women within them. Such a statute should cover maintenance, residence, property rights, custody of children, and protection from violence. Drawing from models like France’s *Pacte Civil de Solidarité (PACS)* or common-law marriage principles in some U.S. jurisdictions could provide useful guidance.

2. Harmonize Judicial Interpretation

The Supreme Court should issue authoritative guidelines or the legislature should codify standards to resolve inconsistencies across cases. For example, defining “relationship in the nature of marriage” broadly to include stable, long-term partnerships would prevent exclusion of women who are economically or socially dependent.

3. Extend Property and Succession Rights

Statutory reform should recognize women’s right to inherit or claim a share in the property of their partner in long-term live-in relationships. This would prevent exploitation and ensure economic security, especially in cases of sudden death of the male partner.

4. Address Custody and Guardianship

The Guardians and Wards Act, 1890 should be amended to explicitly include live-in partnerships, ensuring that custody and guardianship decisions prioritize the welfare of the child without penalizing the mother’s relationship status.

5. Strengthen Awareness and Enforcement

Awareness campaigns led by government agencies and NGOs are essential to reduce stigma and encourage women to seek remedies. Training programs for law enforcement officials are equally important to ensure compliance with judicial rulings protecting live-in partners.

6. Align Personal Laws with Constitutional Guarantees

Since personal laws are silent on live-in partnerships, reforms must ensure that secular protections under Article 21 (right to life and personal liberty) override religious or customary practices that undermine women's autonomy and dignity.

V. CONCLUSION

The discourse on women's rights in live-in relationships in India reflects the evolving tension between societal traditions, constitutional guarantees, and judicial innovation. While the judiciary has taken notable steps to extend protection to women through landmark cases such as *Velusamy v. D. Patchaiammal* and *Indra Sarma v. V.K.V. Sarma*, the absence of a comprehensive statutory framework continues to undermine the consistency and effectiveness of these protections. At present, women in such relationships find themselves in a precarious position where their rights to maintenance, residence, inheritance, and custody are often contingent upon judicial discretion rather than clearly codified entitlements.

The recognition of live-in partnerships under the Protection of Women from Domestic Violence Act, 2005 has been a progressive development, yet its limited scope—focusing primarily on domestic abuse—fails to address broader concerns such as property rights and succession. Moreover, the stigma surrounding such relationships further hampers the practical enforcement of rights. In many instances, state authorities and law enforcement remain hesitant to act, revealing the gap between legal recognition and societal acceptance.

Going forward, India must acknowledge that live-in relationships are not an anomaly but a legitimate form of companionship increasingly chosen by adults. Ensuring the dignity and security of women in these relationships is not merely a matter of social reform but a constitutional imperative under Articles 14, 15, and 21. A dedicated statute that codifies the rights of women in live-in arrangements—covering maintenance, property, child custody, and succession—is urgently required. Alongside legal reform, social awareness and sensitization of enforcement authorities are necessary to ensure meaningful implementation.

In conclusion, bridging the gap between judicial recognition and legislative action is the only way to safeguard women's rights in live-in relationships, thereby reinforcing India's

commitment to equality, justice, and personal liberty. Indian law, through progressive judicial pronouncements and existing statutes like PWDVA and CrPC, protects key rights of women in live-in relationships. However, uniform legislative clarity is essential to fully secure these rights and social acceptance.

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