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# Maintenance Laws in India and Gender Inequality

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## ABSTRACT

*This paper addresses the maintenance laws in India, including Hindu Adoptions and Maintenance Act, 1956, Muslim Women (Protection of Rights on Divorce) Act, 1986, Hindu Marriage Act, 1955, Indian Divorce Act, 1869, Parsi Marriage and Divorce Act, 1936 and Section 125 of CRPC. The aim of the paper is to bring to light the gender parity in these laws and their bias towards men but also need of protection of women, as women have been oppressed and treated as mere chattel for decades, and this law was sought to even the marginalized section of society, that were women. The paper seeks to address the issue and point out that the protection of women although is necessary needs to be reformed now, and provide for a gender-neutral law. The law seeking to uplift women is starting to suppress men; the law must take into account maintenance from a purely financial aspect with certain provisions for the poorly equipped, and provide the same legislative footing to all. In the changing society where women are being more participative, the law must take that into account and adjust to today's dynamic environment.*

## I. INTRODUCTION

Personal laws in India have deep roots in religion, the same goes for family laws. Family laws in India deal with marriage, divorce, child support, child custody, maintenance, partition, succession and other disputes that takes place within the boundaries of the institution of a family. Family law being deep rooted in religion also borrows inspiration from the customs of these religions as law. Each person is dictated and governed by the religion they adopt or grew up with in terms of family law, and each religion has a different set of customs and traditions that have been incorporated as the binding legal principles. Family law has been in discussion for a few years seeking to abolish it and bring in Uniform Civil Code, due to the number of laws in place and the different legislation for each individual merely due their belongingness in that religion. Although, it is not be implemented in the recent years it only speaks to the fact that there is a need for a reform.

This personal law is the branch that covers the aspect of maintenance. As previously mentioned,

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personal laws are the laws that cover all the legal aspects that cover a family Maintenance is where after the judicial separation or divorce of the couple the spouse (husband or wife) pays a specified amount to support the other, in case of a child in the marriage then the support extends to the child as well. Maintenance is a form of monetary support and is decided based on factors such as standard of living of party, receiver's ability to support one self, payer's ability to pay, health and more. According to section 23 of the Hindu Adoptions and Maintenance Act, the court after considering all the factors awards a certain amount that needs to be paid.<sup>2</sup> This principle although on paper seems fair, has certain provisions and lenience provided to women that aren't provided to men. There have been multiple situations wherein the court has leaned towards the woman.

Maintenance laws are not uniform and are different in each personal law, such as, in the *Muslim Women(Protection of Rights on Divorce) Act,1986*, the wife was entitled to maintenance from her husband only during the period of "iddat" but according to the recent Supreme Court ruling in the case of *Shah Bano v Union of India*<sup>3</sup>, wherein it was held that a Muslim women can claim maintenance after divorce under Section 125 of the CRPC is entitled to maintenance and extends on the account that she doesn't remarry and is unable to maintain herself, as it is the husbands duty to take care and to provide for his family as long as she stays faithful to him and obeys his reasonable commands<sup>4</sup>; and in *Indian Divorce Act, 1869*, the husband is entitled to pay maintenance to his wife regardless of who instituted the suit; under the *Hindu Adoption and Maintenance Act, 1956*, the son is to be paid maintenance until the age of 18 whilst the daughter is to be paid until she marries if she cannot maintain herself<sup>5</sup>; in *Section 125 of CRPC*<sup>6</sup>, which is the maintenance law that is detached from religion and is for all communities, is for the maintenance of wives, children and the elderly by the husband. These are one of the few many instances of gender bias, whether it is inscribed on paper or not. Although at face value they seem biased, are they really discriminatory laws or do they serve a higher purpose, especially in a patriarchal society like India.

*Article 15(1)*<sup>7</sup> and *15(3)*<sup>8</sup> of the *Indian Constitution*, are the sections that have been referenced

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<sup>2</sup> Shipra Singh, *Alimony and Streedhan: Financial Aspects Decoded*, ECONOMIC TIMES, (Nov. 19, 2018), <https://economictimes.indiatimes.com/wealth/plan/alimony-and-streedhan-financial-aspects-decoded/articleshow/66664847.cms?from=mdr>

<sup>3</sup> *Shah Bano v Union of India*, 1985 SCR (3) 844

<sup>4</sup> Chahat Agarwal, *Maintenance of Wife under Muslim Law*, AMIE LEGAL, (Jan. 15, 2019), <https://amielegal.com/maintenance-of-wife-under-muslim-law/>

<sup>5</sup> Devika, *Maintenance-Wife*, SCC ONLINE, (Jan. 4, 2019), <https://www.sconline.com/blog/post/2019/01/04/maintenance-wife/>

<sup>6</sup> Act No. 2 of 1974, CODE CRIM. PROC.(1973)

<sup>7</sup> INDIA CONST. art 15, cl 1

<sup>8</sup> INDIA CONST. art. 15, cl 3

while defending the need for these laws, as in art. 15(1) it is stated that discrimination should not be based on sex, caste, creed, colour or race but these laws are not innately to discriminate based on gender but to uplift the weaker section, being women, and art. 15(3) reads that the state has all the right to make provisions for women. The same applies in *Article 14 of the Indian Constitution*<sup>9</sup>, wherein, it describes not only ‘equality before law’ but also ‘equal protection before law’, meaning those at an existing disadvantage should be given some benefits to be brought up to the already privileged section, reservation being a good example. The UN, too has the same ideology in the meaning of equality and non-discrimination where, the International Convent on Civil and Political Rights, the Human Rights Committee stated, “*that the term ‘discrimination’ as used in the Convent should be understood to imply any distinction, exclusion, restriction, preference which is based on any ground such as race, colour, sex, language, religion, political or other opinion, national or social origin, property birth or status, and which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise by all persons, on an equal footing, of all rights and freedoms.*”<sup>10</sup> Yet, the committee also added that, “*the enjoyment of rights and freedoms on equal footing...does not mean identical treatment in every instance*”<sup>11</sup> This means that in certain cases, the laws can be made in such a way as to promote certain groups of people. Considering women are at a disadvantage in the country, the laws have been constructed in such a manner as to not disregard, dispose or disrespect her. According to *Article 21 of the Indian Constitution*<sup>12</sup>, she has a right to live with dignity, as many women in India are either forced to stop working after marriage or sacrifice it willingly due to the mandate of the social structure that a child’s care is to be in the hands of a mother, she loses economic independence, so after divorce it becomes difficult for the wife to support herself and/or her children all by herself, and seeks the help of the husband. This is also stated by the Ministry of Women and Child Development in the National Policy for the Empowerment of Women (2001), that “*the underlying causes of gender inequality are related to social and economic structure, which is based on informal and formal norms, and practices*”<sup>13</sup> These practices are the social structure that curtail a women and her freedom, and to which end push her into requiring support. This support, through monetary means provides a dignified life as prescribed in Art.21 which must not be denied to her. This two-fold aspect of the law makes it difficult to state that the law is gender biased taken at face value and asks for

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<sup>9</sup>INDIA CONST. Art. 14

<sup>10</sup>Ibid., p. 135, para 7; emphasis added

<sup>11</sup>Ibid., p.p. 135-136, para. 8; emphasis added

<sup>12</sup>INDIA CONST. art. 21

<sup>13</sup>MINISTRY OF WOMEN AND CHILD DEVELOPMENT, NATIONAL POLICY FOR THE EMPOWERMENT OF WOMEN (2001)

a much deeper evaluation.

The issue this paper addresses is crucial, as at this time progressive and liberal laws are the new norm, and men are equally participative in this protest. These laws being archaic, and instituted at a time when men were known to be heads of the family has changed, and so must the law. Laws such as adultery<sup>14</sup>, section 377 of IPC<sup>15</sup>, Triple Talak<sup>16</sup>, etc, all address the gender discrimination and seek to normalise it, this too comes under the same umbrella and must be normalised. This paper used doctrinal research as all the necessary information is already available through articles, bare acts and research papers. The source for the data is secondary data, as they exist on online platforms through the above mentioned modes. The paper is analysed qualitatively and not quantitatively as the assessment is through the mentioned sections and acts and not quantifiable figures. The objectives of the paper are to identify the nature of these laws and analyse whether there exists a gender bias in these laws. The paper also seeks to highlight the plight of the women at the same time and question whether the law is just as women need more protection in the society and the constitution through section 15(3) gives the parliament to make provisions for women. The paper in conclusion seeks to analyse the nature of these laws and if they really benefit the intended group in society or if their bias has a more harmful repercussion.

## **II. MAINTENANCE UNDER INDIAN LAWS**

Indian maintenance laws have different maintenance provisions in each personal law and under the uniform law under CRPC, and the gender parity differs in each one, hence, to understand their view on a broad spectrum a gist of all the laws is required, which is herein elaborated,

### **(A) Maintenance under Hindu Law**

Under Hindu law there are two governing laws for the maintenance of a Hindu wife, they are- Hindu Adoptions and Maintenance Act, 1956 and Hindu Marriage Act, 1955, the wife can choose to initiate proceedings under either law, although both laws have similar clauses.

Under the Hindu Adoptions and Maintenance Act, 1956, the wife is entitled not only to maintenance from her husband after divorce or judicial separation, but also if she is living separated from him in circumstances when the wife finds an impossibility to continue living with her spouse. The grounds on which she can obtain this maintenance if proved are provided in section 18, cl.2., of the Hindu Adoptions and Maintenance Act

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<sup>14</sup> Joesph Shine v Union of India, 2018 SCC Online SC 1676

<sup>15</sup> Navtej Singh Johar v. UOI; Akkai Padmashali v. UOI, WP (CrI.) 76/2016; WP (C) 572/2016

<sup>16</sup> Shayara Bano v. Union of India, writ petition (C) No. 118 of 2016

Under, section 18(1) of the Hindu Adoptions and Maintenance Act, the wife is entitled to maintenance from her husband for her lifetime but the above section is only provided in cases of separate residence.

Section 24 and 25 of the Hindu Marriage Act, 1955, grants maintenance pendente lite and permanent maintenance respectively, which is the monetary support for seeking legal aid in the cases wherein, she doesn't have an independent income. Under section 24 and 25 of this act,<sup>17</sup> the court decides the maintenance pendente lite and permanent maintenance considering the income of both parties, the amount is not expressly mentioned and is upon the discretion of the court. Under Hindu Adoptions and Maintenance Act, 1956, the amount of maintenance is not mentioned but is decided considering the suitable wants of the wife, her life during the marriage, her needs and the husband's disposable income and is upon the discretion of the court, as according to section 23, sub-section (2) and sub-section (3) of the Hindu Adoptions and Maintenance Act, 1956. However, the wife will not be entitled to this maintenance if she participates in adultery or converts her religion deeming her not Hindu, as according to Section 25(3) of the Hindu Marriage Act, 1955 and Section 18(3) of the Hindu Adoptions and Maintenance Act, 1956.

### **(B) Maintenance under Muslim Law**

Maintenance under Muslim Women (Protection of Rights on Divorce) Act, 1986, it is explained as all articles that are required to support one's life, it is entitled to the wife, children, parents and other relations just as in the Hindu law. The wife is herein, is allowed to receive maintenance regardless of her status or conjugal life but there are circumstances under which the wife can lose her right to maintenance under they are:

- a) If she is a minor and cannot consummate the marriage
- b) If she forbids accessibility without reasonable cause
- c) Is proved to be disobedient
- d) Does not frequent his place of residence
- e) Forbids cohabitations for unreasonable causes
- f) Leaves marriage home without reasonable cause
- g) Leaves him for an extended period of time (deserts)
- h) Marriage/runs away in secret

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<sup>17</sup>Hindu Marriage Act, No. 25 of 1955, INDIA CODE, (1955)

There are at times agreements under the Muslim marriage drawn to cover these elements of marriage, the terms cover the circumstances mentioned above that on their happening as well maintenance can be recovered by the wife. Agreements can have terms regarding the maintenance the wife will receive- if the husband treats her with cruelty and she must live separately, maintenance to first wife in case the first and second wife are not able to live in the same residence, if the husband brings the second wife to the place of their marriage residence in which case she will live with her father and the husband will pay maintenance or in case of a disagreement where she will reside separately and the husband pays maintenance<sup>18</sup>. Even under Muslim personal law maintenance of children is to borne by the father, and upon failing to do so the mother then the grandfather<sup>19</sup>. The maintenance is to be awarded to only the legitimate child, which was later changed to also being applicable for the illegitimate child under section 488 of the CRPC, but is given only when expressly asked for, as illegitimate children are recognized with the same rights as their legitimate counterparts under Indian law.

#### **(C) Maintenance under Christian Law**

Under Christian law, the suit can be criminal or civil for claiming maintenance; under civil, the spouse who requests for divorce can do so under section 36 of the Indian Divorce Act, 1869, it is almost identical to section 24 of the HMA with the exception being that under this act permanent maintenance and maintenance pendente lite can be awarded only to the wife<sup>20</sup>. Under section 37 of the act, the wife is entitled to claim maintenance and/or alimony, in both civil and high court, for which the court upon its discretion will award the same. Under the Indian Divorce Act, the husband in situations wherein he is unable to earn an income and becomes incapacitated to maintain his wife can, upon the discretion of the court, suspend the amount for the time period, reduce the amount or even dispose of the amount till such time that he is capable again and thus revives the order.<sup>21</sup>

#### **(D) Maintenance under Parsi Law**

Maintenance under the Parsi Marriage and Divorce Act, 1936, maintenance is awarded to both the husband and wife whoever is in need of maintenance. Under this law, the court awards both alimony pendente lite and alimony permanent. According to section 39 of the Parsi Marriage and Divorce Act, 1936, alimony pendente lite is decreed by the court as one-fifth of the husbands total income to the wife, and for permanent maintenance, like the other personal laws

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<sup>18</sup> Mansoor Ali v. Azizul Rahman And Ors, AIR 1990 Pat 224

<sup>19</sup> Smt. Y.J. Padma Sree, *Maintenance under Various Laws*, DISTRICTS.ECOURTS.GOV, (Last Visited Oct. 19, 2020), <https://districts.ecourts.gov.in/sites/default/files/1-Maintenance%20-%20by%20Smt%20YJ%20Padmasree.pdf>

<sup>20</sup> Indian Divorce Act, No. 4 of 1869, INDIA CODE (1869)

<sup>21</sup> §37, Indian Divorce Act, No. 4 of 1869, INDIA CODE (1869)

depends on factors such as the wife's current assets, the husband's annual income and reasonable needs to maintain the lifestyle of the wife, and considering all these factors is decided at the discretion of the court. Section 40 of this Act,<sup>22</sup> says that the amount can be paid in installments or annually considering the lifetime of the plaintiff and the financial status of both parties and under section 40(3) of the Parsi Marriage and Divorce Act, the maintenance awarded to the party can be modified or disposed if the party receiving the maintenance has participated in adultery.

### **(E) Maintenance under Section 125 of CrPC**

This law is available to everyone regardless of their religion, and all Indian citizens can avail this law without considering their personal laws, an individual who has been awarded maintenance through their personal laws can still avail maintenance through this section. Section 125 of CRPC, is constructed with a purpose of not neglecting one's wife, children or parents. Maintenance under this section cannot be availed by the husband. Under this section, the wife is not have participated in adultery to be qualified to avail the maintenance sum.

## **III. ANALYSIS OF MAINTENANCE LAWS**

Under Hindu Adoptions and Maintenance Act, section 125 of CRPC and Indian Divorce Act it is evident that only women and children enjoy the rights of maintenance. It is only the Parsi Marriage and Divorce, Act and the Hindu Marriage, Act, can both parties enjoy the same right. This is built over the predisposition that men are to protect and provide for their family, i.e., he must be the one to maintain his wife and provide maintenance.<sup>23</sup> This archaic law is upheld even now and is codified, even an able woman who has the potential to take care of her husband is not by law viewed to pay maintenance, yet the husband has to pay maintenance even after his retirement. In the case of *Chandaram Bunkar v Smt. Ramadevi*<sup>24</sup>, it was held that the husband was to pay one-fifth of his income as maintenance to his wife which was Rs. 3,000 out of his Rs. 35,000 salary, yet the Rs.3000 was to be given even when the husband retired and received only Rs.15,000 through the pension scheme as his income. Under the Muslim Women (Protection of Rights on Divorce) Act, 1986, the woman is again entitled to maintenance from the husband under section 3. The courts have recently also held that the wife will be entitled to maintenance even after the iddat period, and after divorce the husband is liable to pay and even her relatives or in absence, the State Wakf board<sup>25</sup>, with so many provisions made to the wife,

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<sup>22</sup> Parsi Marriage and Divorce Act, No. 3 of 1936, INDIA CODE (1936)

<sup>23</sup> *Supra* note, 15.

<sup>24</sup> *Chandaram Bunkar v Smt. Ramadevi*, Air 2010 Raj 176

<sup>25</sup> *Supra* note, 2.



the husband yet again does not have any rights. Under section 125 of CRPC, the same applies as the law is explicitly for the wife, children and parents, even being divorced from customs and religion it still leans towards women. In the case, *Shailaja & another v. Kohbbana*<sup>26</sup>, the Supreme Court held that, the potential of the wife to earn and the earning of the wife are two different things and, does not qualify to reduce maintenance. In another case of, *Abdul Salim v. Smt. Nagima Begum and Anr*<sup>27</sup>, the court held that it isn't necessary for a wife to be in a deplorable condition to qualify for maintenance, but the fact that her adequate needs aren't satisfied by herself, and requires her husband's assistance is enough for her to be entitled to maintenance.

It is clear that under these laws, the women are well protected and cared for and the men are left to fend for themselves, but it is also to be taken into account that women have been degraded and treated as property for decades, it is necessary for the society to give them benefits and bring them up to the level of the already privileged, which in this context is men. Article 15(3) of the Indian Constitution, 1950, specifically says that the State has the right to make provisions for women not withstanding anything else; article 14, part 2 of the Indian Constitution also says that the unequal section of the society must be given extra care to uplift them to the already strong group (equal protection before law<sup>28</sup>). Yet, there are limitations to this; the Supreme Court has been liberal in its test to ascertain whether the laws made under article 15(3) of the Indian Constitution are just or not, there are certain cases though wherein, there is no reasonable classification to only women enjoying the benefits such as, in the case of, *M.C. Sharma Lecturer v. Punjab University Chandigarh*<sup>29</sup>, in which the Supreme Court struck down the Punjab University rule that only female teachers can be appointed as the principal for the all girls college, the court saw no reasonable classification to this as the role of an administrator is to be performed and gender should not be a deciding factor here but the skill set and qualification and hence, struck it down.

Laws have roots in the customs and practices of a society, and in a country like India the laws first aim to protect and safeguard the women due to the already difficult environment she lives in. National Sample Survey Organization of India conducted a study in which it showed that 64 percent of women in cities are engaged in household work as opposed to 60% of women in rural areas, above the age of 15 years.<sup>30</sup> The literacy rate in India for women is merely just 64.04%,

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<sup>26</sup> *Shailaja & another v. Kohbbana*, (2018) 12 SCC 199

<sup>27</sup> *Abdul Salim v. Smt. Nagima Begum and Anr*, 1980 CriLJ 232

<sup>28</sup> INDIA CONSTI. art. 14

<sup>29</sup> *M.C. Sharma Lecturer v. Punjab University, Chandigarh*, AIR 1997 PH 87

<sup>30</sup> Mahendra Singh, *64% of Urban Women Busy with Household Work, Study Reveals*, TIMESOFINDIA, (Oct. 13,

which is one of the lowest in the world.<sup>31</sup> So, considering these factors and the social structure it is understandable that a the State made laws taking into account the fact woman would not be able to hold an employment like a man and hence should be awarded a sum to maintain herself.

#### IV. CONCLUSION AND RECOMMENDATION

Maintenance laws have an inherent gender bias, and although the argument to support it is the poor condition the women in the country are in, the laws must be progressive. The law although favors women, does so to protect them, but in today's society the number of working and independent women have increased and so has their potential to earn; the law must consider this and allow capable women to support themselves while still holding provisions for those who really are in a dependent state. Hindu Adoptions and Maintenance Act, Indian Divorce Act, Muslim Women(Protection of Rights on Divorce) Act and section 125 of CRPC<sup>32</sup>, need to be codified in the same manner as the Parsi Marriage and Divorce, Act and the Hindu Marriage, Act; both these allow for the both spouses to avail maintenance and not only the wife. In the cases of *Vasant v. Govindrao Upasrao Naik and Ors*<sup>33</sup> and *V.M. Arbat v K.R. Sawai*<sup>34</sup>, the court held that both the daughters and sons are liable to maintain their parents, and not only the son. Considering these judgments, it can be inferred that the court is holding the daughter as a dependable as women have gained more participation in society from before and with this recognition can maintain another. The same must apply in the situations of maintenance as well, and make the law gender-neutral. When the maintenance of parents can be gender-neutral, the maintenance of spouse must be as well, as the nature of transaction is the same in both cases.

The recommendation is simple, which is to enact a Uniform Civil Code. It is the only solution to address the plethora of laws that apply to this issue and the issue of codification. Uniform Civil Code will end the litany of confusion and chaos caused by personal laws, it will end not only gender injustice but also religious sentiments at the political level. The debate of UCC has been long and exhaustive. It has been at the centerfold of the political sphere for decades but the result has always been that a diverse country such as India would not be able to handle such a change. Yet, the introduction of this code must be done in stages to ease the transition, beginning with the provisions of divorce applicable in each law.

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2014), <https://timesofindia.indiatimes.com/india/64-of-urban-Indian-women-busy-with-housework-study-reveals/articleshow/44796358.cms>

<sup>31</sup> Prapti Sarkar, *Girls And the Education Sector In 2019: A Round Up*, SHETHEPEOPLETV, (DEC. 13, 2019), <HTTPS://WWW.SHETHEPEOPLE.TV/HOME-TOP-VIDEO/GIRLS-EDUCATION-2019-RECAP-INDIA/>

<sup>32</sup> §125

<sup>33</sup> *Vasant v. Govindrao Upasrao Naik and Ors*, *Criminal Revision Application No. 172/2014*

<sup>34</sup> *V.M. Arbat v K.R. Sawai*, 1987(1) SCALE 379

The State can enact provisions for the women who are unable to, and do not have the potential to support themselves due to (i) a disability, (ii) debilitating illness, (iii) lack of access beyond a reasonable doubt, (iv) seasonal low income job. These provisions will enable women under these dire conditions to be entitled to maintenance from the husband to protect the women in our society, while the law states that both spouses have the ability to seek maintenance from the other, for progressive action. In situations wherein, both spouses have the ability to support themselves, the question to be raised will be of alimony and not maintenance, as it becomes obsolete. Although the question at hand will be, that since most women in India are in such situations wouldn't the law be redundant? No, the purpose of the law is to provide equality of equal protection by law,<sup>35</sup> then the law must adhere to do so, and provide the same legislation to all; there are Supreme Court petitions<sup>36</sup> and cases asking for the same, for men to be relieved of their burden as they themselves are finding it difficult to support themselves.<sup>37</sup> Making this step forward will not only protect the men now, but provide a basis of trust to the men who are afraid of the law, and believe that the legislation is a tool to entomb them at the drop of the word by a women under section 498A of IPC, section 375 of the IPC, Hindu Succession Act, 1956, section 497 of IPC and more.

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<sup>35</sup> INDIA CONSTI. art. 14

<sup>36</sup> *Plea filed in Supreme Court seeking gender, religion neutral law for maintenance, alimony*, INDIALEGALIVE, (Oct. 3, 2020), <https://www.indialegalive.com/cause-list/plea-filed-in-supreme-court-seeking-gender-religion-neutral-law-for-maintenance-alimony/>

<sup>37</sup> Ashish Tripathi, *Man seeks relook at gender roles in alimony*, DeccanHerald, (Sept. 7, 2019), <https://www.deccanherald.com/national/man-seeks-relook-at-gender-roles-over-alimony-759816.html>