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Live-In Relationships in India: Social and Political Perspective

Dr. Karunendra Kumar*

***Government College, Alote (M.P.) INDIA**

Abstract: The institution of live-in relationships - defined as cohabitation between two consenting adults outside the formal framework of marriage - has emerged as a significant and often contentious social phenomenon in contemporary India. As rapid urbanization, liberalized economic policies, and expanding higher education have reshaped the aspirations and lifestyles of younger generations, traditional frameworks of courtship, marriage, and domesticity have come under increasing scrutiny and challenge. This paper examines live-in relationships in India from dual social and political perspectives, analyzing their historical evolution, legal ambiguity, judicial interpretation, legislative responses, and socio-cultural contestations. Drawing upon landmark Supreme Court and High Court judgments, sociological surveys, legislative debates, and feminist discourse, the paper argues that live-in relationships occupy a paradoxical space in Indian public life — simultaneously gaining limited legal recognition while remaining socially stigmatized, morally contested, and politically instrumentalised. The paper further explores the gendered dimensions of cohabitation, the rights of children born from such unions, and the divergent approaches of progressive and conservative political actors. It concludes that the absence of a comprehensive statutory framework, combined with entrenched patriarchal norms and the electoral politics of cultural conservatism, continues to leave partners in live-in relationships — particularly women — in a precarious and legally uncertain position. A nuanced, rights-based legislative approach is proposed to bridge the gap between constitutional guarantees and social reality.

Keywords: Live-in relationship, Article 21, domestic violence, social stigma, personal autonomy, political discourse, Hindu conservatism, gender rights.

Introduction - India stands at a crossroads between tradition and modernity. For millennia, the family has been the foundational unit of Indian society, and marriage — sanctified by religion, codified in personal laws, and celebrated through elaborate ritual — has been the only socially acceptable arrangement for cohabitation between men and women. Yet the Twenty-first century has witnessed a quiet but discernible transformation in the domestic arrangements of a growing segment of the urban Indian population. Live-in relationships, once confined to the margins of bohemian intellectual circles or to whispered scandal, have become increasingly visible in metropolitan cities such as Mumbai, Delhi, Bengaluru, Hyderabad, and Pune.

The phenomenon is not homogeneous. For some, cohabitation is a pragmatic prelude to marriage — a way of testing compatibility before committing to a lifelong legal contract. For others, particularly among educated urban women who have experienced economic independence, it represents a conscious rejection of the patriarchal structures embedded in traditional marriage. For migrant workers sharing accommodation out of economic necessity rather than romantic partnership, the lived reality is different still. What unites these diverse arrangements, however, is their position outside the formal legal structure of matrimony — and it is precisely this extralegal status that has generated intense judicial, legislative, and political contestation. The Indian state has adopted an ambivalent posture towards live-in relationships. On the one hand, the Supreme Court of India has, through a series of landmark pronouncements, recognized cohabitation as falling within the ambit of the right to life and personal liberty guaranteed under Article 21 of the Constitution of India. On the other hand, Parliament has not enacted specific legislation to govern the rights and obligations arising from such relationships, leaving courts to extrapolate from existing statutes designed for married couples. The result is a patchwork of judicial precedent that offers partial recognition but limited protection — particularly to women and children.

Politically, live-in relationships have become a flashpoint in the broader culture wars that have intensified in India since the early 2000s. Hindu nationalist organizations and conservative political formations have denounced cohabitation as a Western import incompatible

with Indian cultural values. Progressive and feminist organizations have countered that personal choice in domestic arrangements is a fundamental right that the state must protect rather than penalise. Between these poles, mainstream political parties have largely been content with strategic ambiguity, seeking neither to champion nor to alienate constituencies on either side of the debate.

This paper seeks to provide a comprehensive, interdisciplinary analysis of live-in relationships in India. Section 2 traces the historical and socio-cultural context. Section 3

Examines the evolution of judicial interpretation. Section 4 analyses the legislative landscape. Section 5 explores the gendered dimensions and impact on children. Section 6 assesses the political discourse. Section 7 offers a comparative perspective, and Section 8 concludes with policy recommendations.

Historical and Socio-Cultural Context

Pre-Colonial and Colonial Antecedents: The contemporary debate over live-in relationships must be situated within a longer historical trajectory. Classical Hindu texts such as the Manusmriti and the Arthashastra acknowledge various forms of marriage and cohabitation. The Gandharva form of marriage, described in the Mahabharata and other texts, involved voluntary union between two consenting adults without formal ritual or parental consent, bearing a structural resemblance to modern cohabitation. Similarly, certain tribal communities across the Indian subcontinent have historically practiced forms of trial marriage or cohabitation prior to formal union.

The colonial period brought significant changes to the legal regulation of domestic arrangements. The codification of Hindu, Muslim, and Christian personal laws under British administration created a more rigid legal framework around marriage, simultaneously delegitimizing alternative arrangements. The Criminal Tribes Act of 1871 and the enforcement of social purity norms through legislative and administrative mechanisms narrowed the space for non-normative domestic arrangements, particularly among lower castes and tribal communities. The nationalist movement's valorisation of the Hindu family as the repository of cultural authenticity further entrenched the normativity of formal marriage, even as it sometimes opened space for educated women's entry into public life.

Post-Independence Transformations: The constitutional promise of equality between men and women, the Hindu Code Bills of the 1950s, and the gradual expansion of women's education and employment created the conditions for a slow but steady renegotiation of gender roles within Indian families. However, the pace of social change lagged considerably behind legal reform. It was not until the liberalisation of the Indian economy beginning in 1991 that structural forces began to rapidly reshape social norms around cohabitation. Urbanisation, internal migration, the growth of information technology campuses and special economic zones, the proliferation of Paying-guest accommodations, and the delayed age of marriage among educated urban professionals all contributed to creating practical conditions in which cohabitation became more feasible. A National Family Health Survey conducted in the mid-2010s indicated that while cohabitation remained statistically rare relative to formal marriage, its incidence had risen measurably in urban areas, particularly among younger, educated, economically independent respondents.

The influence of global popular culture, streamed through cable television, cinema, and the internet, normalised representations of cohabitation and premarital romance. While these cultural flows were frequently contested and condemned by conservative commentators as cultural imperialism, they nonetheless reshaped aspirations and expectations — particularly among urban middle-class youth. The result is a deepening but uneven social cleavage: cohabitation is increasingly visible and partially tolerated in metropolitan centers while remaining heavily stigmatised in smaller cities, towns, and rural areas.

Judicial Interpretation of Live-In Relationships

The Constitutional Foundation: Article 21: The judicial recognition of live-in relationships in India has its constitutional anchor in Article 21, which guarantees that no person shall be deprived of their life or personal liberty except according to procedure established by law. Over several decades, the Supreme Court has interpreted this provision expansively to include a wide range of rights — including privacy, dignity, and personal autonomy. The right to choose one's partner and the manner in which one cohabits with that partner falls, according to the Court, within this broad constitutional protection.

The foundational case in this domain is S. Khushboo v. Kanniammal (2010), in which the Supreme Court quashed criminal cases filed against a Tamil actress who had publicly endorsed premarital sex and live-in relationships. The Court held that living together is not an offence and that the moral disapproval of society cannot be translated into criminal liability. The Court unambiguously affirmed that consensual adult cohabitation was protected under Articles 21 and 19 of the Constitution.

Recognition under the Domestic Violence Act: A particularly significant development in the legal recognition of live-in relationships came through the Protection of Women from Domestic Violence Act, 2005 (PWDVA). Section 2(f) of the Act defines "domestic relationship" broadly to include relationships "in the nature of marriage", thereby extending the Act's protections — including the right to residence, protection orders, and maintenance — to women in live-in relationships.

The Supreme Court interpreted this provision in D. Velusamy v. D. Patchaiammal (2010), laying down criteria for identifying a relationship "in the nature of marriage": the couple must hold themselves out to society as akin to spouses, must be of legal marriageable age, must be

otherwise qualified to marry, and must have voluntarily cohabited for a significant period. This ruling, while providing a framework, has been criticised for its restrictive conditions — particularly the requirement that the couple present themselves publicly as akin to spouses, which disadvantages women in relationships where the male partner resists such public acknowledgement. Subsequent decisions expanded and refined the Velusamy framework. In Indra Sarma v. V.K.V. Sarma (2013), the Supreme Court emphasised the need for Parliament to enact a comprehensive law on live-in relationships, cataloguing the various categories of such relationships and the differing rights and obligations that should attach to each. The Court noted that the judiciary could only do so much through interpretation and that the protection of women in cohabitation arrangements ultimately required legislative action.

Maintenance Rights: The question of whether women in live-in relationships are entitled to maintenance under Section 125 of the Code of Criminal Procedure has generated conflicting judicial opinion. In Chanmuniya v. Virendra Kumar Singh Kushwaha (2011), the Supreme Court held that a woman in a long-term live-in relationship is entitled to maintenance under Section 125, and that such relationships should be construed as marriages if they have subsisted for a considerable period. The Court invoked the presumption of marriage under Section 114 of the Indian Evidence Act, holding that a long-standing cohabitation creates a rebuttable presumption in favour of legal marriage. This approach, while protective of women, has attracted academic criticism for conflating marriage and cohabitation rather than recognising cohabitation as a distinct legal relationship deserving its own framework. Critics argue that the judicial tendency to assimilate cohabitation into marriage, rather than recognising it as a standalone arrangement, paradoxically reinforces the primacy of marriage as the normative domestic form.

Rights of Children: On the question of children born from live-in relationships, the Supreme Court has been more clearly progressive. In Bharata Matha v. R. Vijaya Renganathan (2010), the Court held that children born to parents in live-in relationships are legitimate and entitled to inheritance rights in their parents' property. This ruling was a significant departure from older legal positions that denied legitimacy to children born outside marriage. The Court grounded its reasoning in the constitutional guarantee of equality and the best interests of the child, holding that children cannot be penalised for the domestic arrangements of their parents.

The Legislative Landscape

Absence of Specific Legislation: Despite repeated judicial calls for comprehensive legislation, India has no statute specifically governing live-in relationships. The partners in such relationships derive whatever legal protections they enjoy from interpretive extensions of laws enacted primarily for married persons — principally the PWDVA, the Hindu Marriage Act, the Special Marriage Act, the Hindu Succession Act, and the Code of Criminal Procedure. This reliance on judicial construction rather than legislative design creates significant unpredictability and leaves large categories of rights and obligations undetermined. Several Law Commission reports and Parliamentary Standing Committees have noted this gap. The 174th Law Commission Report and subsequent reviews have considered but not conclusively recommended specific legislation for live-in relationships, reflecting both the genuine complexity of the issue and the political sensitivity of any legislative intervention in the domain of personal relationships and family law.

State-Level Initiatives and Controversies: The absence of central legislation has created space for state-level interventions, not all of which have been progressive in orientation. In 2019, the Uttarakhand government proposed regulations requiring live-in couples to register their relationships with local authorities, ostensibly to provide legal protection. This proposal generated controversy: women's rights organisations argued it infantilised adult decision-making and effectively penalised non-marital cohabitation, while proponents claimed it would protect women from abandonment. The Uttarakhand Live-in Relationship Registration Regulation, ultimately enacted in 2022, remains one of the few state-level regulatory attempts at this issue, and its Implementation has raised serious concerns about privacy and state surveillance of intimate relationships.

The compulsory registration requirement raises profound constitutional questions. If Article 21 protects the right to privacy in intimate relationships — as the Supreme Court unanimously held in K.S. Puttaswamy v. Union of India (2017) — then mandating state registration of a private domestic arrangement would appear to strain against this constitutional guarantee. Civil liberties organisations have challenged such provisions on this basis.

The Special Marriage Act and Its Limitations: The Special Marriage Act of 1954 provides a secular, non-religious framework for marriage between persons of different faiths or those who prefer a civil marriage. While not directly applicable to live-in relationships, this legislation has been invoked in discussions about extending similar civil registration frameworks to cohabitation. Proponents of reform point to civil union or registered partnership regimes in European jurisdictions as models that India might adapt to provide legal clarity without mandating formal marriage. Such proposals, however, have found little legislative traction, partly because of their association with debates about same-sex partnership recognition following the Supreme Court's decision in Navtej Singh Johar v. Union of India (2018) which decriminalised consensual same-sex relations under Section 377.

Gendered Dimensions and Vulnerability

Women's Autonomy and the Double Standard: The social and legal analysis of live-in relationships in India cannot be gender-neutral. While men who cohabit outside marriage typically face limited social censure, women in such arrangements bear a disproportionate burden of stigma. A woman who enters a live-in relationship risks being labelled with derogatory terms, being ostracised by her family, losing employment in contexts where social respectability is valued, and being denied housing — as landlords frequently refuse to rent to unmarried couples, particularly in smaller cities and conservative urban localities.

This asymmetry reflects and reinforces the structural inequality between men and women in Indian society. The patriarchal construction of women's sexuality as family property and the associated honour-shame complex means that woman's decisions regarding.

Their intimate lives are subject to collective regulation in a way that men's are not. Feminist scholars have noted that this double standard operates even within progressive families and urban environments, and that the liberal embrace of live-in relationships often does not extend to questioning the underlying gender hierarchy.

Economic Vulnerability and Abandonment: One of the most serious concerns raised by feminist legal scholars and women's rights organisations is the economic vulnerability of women who enter long-term live-in relationships and are subsequently abandoned. Unlike wives, who have clearly defined rights to maintenance, marital property, and alimony, women in live-in relationships occupy a far more precarious legal position. The judicial extensions of maintenance rights under Section 125 Cr PC are helpful but insufficient: the evidentiary burden of proving a long-standing cohabitation, the discretion available to lower courts, and the practical difficulties of enforcing maintenance orders leave many women — particularly those from lower socioeconomic backgrounds — without effective redress.

The situation is further complicated by cases in which a man enters a live-in relationship while concealing an existing marriage. In such cases — which appear with considerable frequency in reported litigation — women have been deceived into cohabitation under false representations of marital availability. Courts have held in several such cases that the woman is entitled to protection under the PWDVA, but criminal liability for the man remains limited in the absence of a specific statutory provision analogous to bigamy within the live-in relationship context.

Children born from live-in relationships face a complex social and legal landscape. Despite the Supreme Court's recognition of their inheritance rights, social stigma around "illegitimacy" — a term that has no legal force but retains powerful social currency — continues to affect children's educational and social opportunities in many communities. Schools, particularly in smaller towns, have been reported to discriminate against children of unmarried parents. Community institutions, including religious bodies and caste panchayats, continue to treat such children as lesser members of the community.

The question of custody and guardianship in the event of the breakdown of a live-in relationship also remains insufficiently addressed. Courts typically apply the best-Interests-of-the-child standard derived from the Guardians and Wards Act, 1890 and the Hindu Minority and Guardianship Act, 1956, but the statutory framework was not designed with cohabitation in mind. Gaps in the law create uncertainty and expose children to protracted custody disputes.

Political Discourse on Live-In Relationships

Conservative and Hindu Nationalist Perspectives: The political right in India — encompassing organizations of the Sangh Parivar, the Vishwa Hindu Parishad, and associated formations — has consistently opposed the normalisation of live-in relationships on the grounds that it threatens the traditional Hindu family structure, encourages immorality, and represents the colonisation of Indian minds by Western cultural values. Spokespersons for these organisations have called for legal prohibition of cohabitation outside marriage or, alternatively, for "protective" registration requirements designed to create administrative visibility and thereby deter non-marital cohabitation. This position is rooted in a conception of Indian culture — specifically Hindu culture — as fundamentally opposed to individualism in matters of family formation. The argument draws upon the Brahmanical textual tradition that valorises the pativrata ideal for women, upon the observation that marriage rates in India remain high relative to Western nations as evidence that Indians "naturally" prefer marriage, and upon the claim that the breakdown of the traditional family generates social pathologies including crime, substance abuse, and mental illness.

Progressive and Liberal Political Perspectives: Progressive political formations — including left parties, liberal wings of centrist parties, and feminist organisations — have generally defended the right to live-in relationships as an expression of personal autonomy protected by the Constitution. These actors have argued that the state has no legitimate interest in the domestic arrangements of consenting adults and that the state's obligation is to ensure that those within such arrangements — particularly women — are protected from exploitation and abuse, not to coerce conformity to a particular family form.

Feminist scholars and activists have, however, complicated this liberal position by pointing out that formal legal recognition of live-in relationships can become a mechanism for disciplining women rather than liberating them. If registration is mandatory, if the state Acquires power to adjudicate which relationships qualify for legal recognition, and if recognition carries with it obligations as

well as rights, then the state apparatus can be used to penalise women who do not conform to the terms of recognised cohabitation. The demand, from this perspective, is not simply for the extension of marriage-like recognition to cohabitation but for a fundamental rethinking of the state's role in regulating intimate relationships.

Electoral Politics and Strategic Ambiguity: Mainstream political parties have largely adopted positions of strategic ambiguity on live-in relationships. The Congress party, historically associated with a secular and progressive constitutional vision, has at times signaled support for extending legal protections to cohabiting couples but has consistently avoided legislating on the issue, fearing electoral backlash from conservative constituencies. The Bharatiya Janata Party, ideologically aligned with Hindu nationalist social conservatism, has also been inconsistent — allowing Supreme Court judgments recognising cohabitation to stand without legislative challenge while rhetorically affirming the sanctity of traditional marriage in electoral campaigns. Regional parties reflect the social conservatism of their respective political ecosystems. In states such as Uttar Pradesh, Rajasthan, and Madhya Pradesh, political discourse on live-in relationships has often been dominated by community panchayat perspectives that are openly hostile to cohabitation, and political parties have calibrated their positions accordingly. In contrast, in Maharashtra and Karnataka, where urban professional constituencies carry greater weight, parties have been somewhat more tolerant of judicial recognition of cohabitation rights.

The Khap Panchayat Problem: Any political analysis of live-in relationships in India must grapple with the role of khap panchayats — extra-judicial caste and community bodies concentrated in the north Indian states of Haryana, Punjab, Uttar Pradesh, and Rajasthan — in policing domestic arrangements. Khap panchayats have issued diktats prohibiting not only live-in relationships but same-gotra marriages, inter-caste relationships, and other forms of association that violate their interpretation of community norms. In numerous documented cases, couples — whether married, cohabiting, or merely associated — have been subjected to social boycotts, forced separation, and in extreme cases violence, including honour killings, at the instigation or with the tacit approval of khap bodies. The Supreme Court addressed the khap panchayat problem Directly in Shakti Vahini v. Union of India (2018), directing state governments to prevent and punish khap-sponsored violence and directing district authorities to set up protection mechanisms for couples facing threats from their communities. The enforcement of this directive, however, has been uneven. Political parties in affected states have maintained ambiguous relationships with khap bodies, recognising their importance as vote-mobilising institutions while formally endorsing the rule of law.

Comparative Perspective: A comparative perspective illuminates both the distinctiveness of India's approach to cohabitation and possible directions for reform. In many European jurisdictions — France, the Netherlands, Germany, Sweden, and others — specific civil partnership or registered cohabitation regimes exist alongside marriage, providing legal clarity and protection to cohabiting couples without requiring them to enter formal matrimony. The French Pacte Civil de Solidarité (PACS), introduced in 1999, has become a widely used alternative to marriage, particularly among younger couples, offering a flexible, dissolvable agreement that confers specific rights regarding taxation, property, and inheritance.

The United Kingdom adopts a different approach: there is no specific civil partnership regime for heterosexual cohabiting couples, but courts have developed a body of common law and equitable doctrines — including resulting trusts, constructive trusts, and proprietary estoppel — to protect cohabitants' property interests. The Law Commission of England and Wales has repeatedly recommended reform to provide clearer statutory rights to cohabitants on relationship breakdown, though comprehensive legislation has yet to be enacted.

South Asian comparators are instructive. Nepal, which underwent significant constitutional and social transformation in the 2010s, has moved towards more explicit recognition of diverse family arrangements. Bangladesh, a Muslim-majority nation with significant Hindu and other minorities, adheres more closely to religious personal law frameworks. Pakistan's position on live-in relationships is substantially more restrictive, with cohabitation potentially actionable under its interpretation of Islamic law.

India's situation is unique in combining a liberal constitutional framework — which clearly supports personal autonomy in intimate matters — with pluralistic personal law regimes, entrenched patriarchal social norms, significant variation across regions and Communities and a political environment in which cultural nationalism exerts strong pressure on family law reform. Any approach to legislative reform must navigate these dimensions simultaneously.

Conclusion and Policy Recommendations: The foregoing analysis demonstrates that live-in relationships in India occupy a contested and legally precarious position. The judiciary has made significant strides in extending constitutional protection and limited statutory rights to cohabiting couples, particularly under the PWDVA, but has rightly called for comprehensive parliamentary action. That action has not been forthcoming, leaving a critical gap between constitutional promise and social reality — a gap that is borne most heavily by women and children.

Politically, the issue has become entangled in broader culture wars over Indian identity, modernity, and the

appropriate role of the state in regulating intimate life. Conservative formations have sought to restrict non-marital cohabitation; progressive actors have defended personal autonomy; mainstream parties have mostly avoided legislating. The result is a status quo that satisfies no one and protects too few.

Several policy recommendations emerge from this analysis:

First, Parliament should enact a Cohabitation Rights Act that establishes a voluntary registration mechanism for live-in couples, confers defined rights regarding property, maintenance, and inheritance on registered partners, and extends child legitimacy protections regardless of registration. The Act should make registration genuinely optional and should not impose penalties or stigma on unregistered cohabitation.

Second, the PWDVA should be amended to remove the requirement that a live-in relationship be "in the nature of marriage" as a precondition for protection, extending its remedies to all cohabiting couples regardless of whether they hold themselves out as spouses.

Third, the right to privacy recognised in Puttaswamy must be explicitly applied to protect cohabiting couples from intrusive state and community scrutiny. Mandatory registration requirements imposed without adequate privacy safeguards should be subject to judicial review.

Fourth, comprehensive anti-discrimination legislation should be enacted to prohibit discrimination by landlords, employers, and educational institutions on the basis of domestic arrangement or marital status.

Fifth, the enforcement of the Supreme Court's directives against khap panchayat violence should be strengthened through dedicated institutional mechanisms, including fast-track courts and victim protection schemes for couples facing community-based persecution.

Ultimately, the question of live-in relationships in India is a question about the kind of society India wishes to be: one in which constitutional guarantees of liberty, equality, and dignity are substantively realized across the full diversity of its citizens' lives, or one in which formal constitutional commitments are subordinated to the enforcement of community norms that have historically served to discipline women and consolidate patriarchal authority. The trajectory of judicial interpretation suggests the former aspiration; the trajectory of legislative and political action has too often reflected the latter tendency. Closing this gap is both a legal imperative and a democratic necessity.

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