

Right to Stridhan of Woman: A Comparative Study

Bilashi shaha

Department of Law and Land Management, Islamic University, Bangladesh

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ABSTRACT

In the past, women were not given any share of property. Instead, they were considered as property themselves. The concept of stridhan has granted women the right to own and keep their own property. The origins of stridhan can be traced back to Manu. Women had very limited rights over property from ancient times, while husbands had full authority and control over all properties, including stridhan. This article undertakes a comparative study of the legal and historical evolution of stridhan rights with a focus on judicial interpretation and statutory development. The study examines the transition from ancient scriptures to contemporary legal framework highlighting how courts have upheld Hindu women autonomy over her stridhan. This paper aims to refine the concept of stridhan, the rights of women, its types, sources, challenges faced by women in reclaiming their stridhan, accesses the adequacy of existing legal remedies and the laws and regulations governing it.

INTRODUCTION

In ancient Hindu law, *Stridhan* refers to the property that a woman receives during her lifetime—particularly at the time of her marriage—from her family, husband, or in-laws, which she retains absolute ownership of. Over time, this concept has evolved in both legal theory and judicial interpretation, serving as a crucial instrument in ensuring economic security and autonomy for women. Stridhan refers to the property of the women which is come from various ways line during marriage, childbirth or gift from husband, father, brother or relatives. In other word, property given before nuptial fire, presented in the bride procession, conferred on her by husband through affection, received from brother, father or mother are to be considered as stridhan. In such property women have absolute right to enjoy. By this article it is compared that its historical foundation, statutory evolution and judicial interpretation existing in legal system. It also highlights both the progress made and gaps that persist in actualizing economic justice for Hindu women.

Significance of the Study

Concepts like Karta, Succession Laws, HUF (Hindu Undivided Family), Stridhan, etc., are included under Hindu law, which was established for the even operating of the family and the object was to secure the protection of the interests of various family members. One more factor that is necessary to be considered is the factor which includes the right to use "Stridhan". It is pertinent to understand that if the situation arises where dowry was refused, the bride shall not forfeit the right over "Stridhan" where her husband isn't entitled to regard that property as his own within areas, she has acquired the "Stridhan". Stridhan and dowry are fundamentally two different notions that one needs to apprehend. It is important to note here that patriarchal parents sometimes divest their daughters from possessing equal rights in their property under the mask of dowry-less marriage. Stridhan is legally her own, manage and dispose of her own interest or discretionary power. Stridhan is recognized as a cornerstone of women's financial independence.

Problem of the Study

Stridhan is an asset obtained by a woman during marriage events and entirely varies with the term dowry and voluntary gifts assigned to women with happiness during marriage ceremonies. To establish more clarity courts have clearly laid down the distinctions. Further, it added that stridhan is the absolute property of women only. In earlier times, the idea of stridhan existed under Hindu law, but complete ownership was not assigned to women at that very time. Women had very limited rights over property from ancient times, while husbands had full

authority and control over all properties including stridhan. The definition given for stridhan is not clear legally, socially and culturally. The study is limited to Hindu women under the Hindu personal law framework and does not extend to Muslim, Christian or other personal law system. Additionally, while the study draws from relevant south Asian legal systems for comparison it does not exhaustively cover all international jurisdiction.

Object of the Study

The objects of this studies are:

- To examine the legal and cultural framework about the concept of stridhan.
- To highlight the right of Hindu women to claim and retain their right to stridhan
- To analyze the historical context, statutory provision and judicial interpretation to ensure stridhan to Hindu women.
- To raise awareness about her legal recourse in case of denial or misappropriation of such rights.
- To provide women with financial security and autonomy.
- Ensures women have assets independent of their husband or marital family.
- Offers a financial safety net in cases of marital discord, separation or domestic violence.
- Prevent economic coercion within marriage.
- Establishes clear ownership of property in the women's name.
- Affirms the women's right to control, use and disposes of her property.
- Encourages equal property distribution and rights in families.

METHODOLOGY

This study adopts a qualitative doctrinal research approach to examine the legal framework, judicial interpretation and socio-cultural challenges related to the maintenance rights of Hindu women in Bangladesh. This methodology involves primary and secondary sources of data. The primary sources of data include statutory laws, personal laws and case laws. Basically, there is analyses The Hindu Married Women's Right to separate Residence and Maintenance Act of 1946, The Hindu Widow's Remarriage Act of 1856, The relevant Provisions of the Hindu Succession Laws and judicial decision of the court interpreting maintenance rights. For secondary sources, a review of academic articles, law commission report, NGO publication and legal commentaries was conducted to understand this provision.

Stridhan

The word Sridham is composed of two words stri-woman and dhan-property. It means property belonging to a woman or a woman's property. It has etymological meaning but technical meaning given in law. It means property over which the woman has control. In other words, Sridham belonging to a woman is a property of which she is the absolute owner and which she may dispose of at any time at her pleasure. Broadly speaking, whether particular kinds of property could be called stridhan would depend on the source from which the property is acquired, the status of a woman at the time of acquisition and the school of Hindu law to which she belongs.

Mitakshara school: It includes everything given to a woman before the nuptial fire at the time of her marriage by the parents, husband or brother and presented by maternal uncle and the rest; gift made on second marriage and on succession and property obtained by inheritance, purchase, partition, seizure and findings.

Dayabgaga school: Sridhan, which she has the power to give, sell or use independently of her husband's control.

Characteristics of Sridhan

The characteristics of stridhan are such gift may be made to a woman during maidenhood, conversions, or widowhood by her parents or their relations or by her husband and his relation; Gift and bequest from non-relation/strangers; Property acquired by self-exertion, science and art; Property purchased with the income of Sridham, compromise deed, adverse possession and partition.

Kind of Stridhan

There are variots kinds of stridhan, and they are father, mother, brother, husband, the gift received before the nuptial fire and the gift received from the father-in-law's house. The following properties are:

- 1. Yautaka (gift):** All gifts are to be given before the nuptial fire or the actual ceremony of marriage and gift received in her father's house either before or after the actual marriage ceremony.
- 2. Sulka:** Sulka is to be considered as bride price given at the time of the marriage ceremony.
- 3. Adhyabahanika:** It consists of what is given to the bride when she is conveyed from her father-in-law's house. In Bangladesh, there are two occasions to give such gift like the bride is taken to her fathers-in-law house just after the nuptial fire and the bride is conveyed to her father-in-law's house for permanently residing house
- 4. Anvadheyaka:** It means gift subsequent. Gifts which are received by a woman after her marriage from her husband, parents, or other relatives.
- 5. Adhivedanika:** It is a gift that a husband is to make his wife on the occasion of marring another wife.
- 6. Vritti:** Property or substance which given in lieu of maintenance is called vritti.
- 7. Ornaments:** All ornaments, except family ornaments, are allowed to be worn on particular occasions are Sridhan.

Besides, stridhan is to be called as to the acquisition by the practice of mechanical arts, a gift from strangers, a Husbands gift, property obtained by compromise, gift by affectionate kindred or near relation, property obtained by adverse possession, property acquired by inheritance, property purchased with Sridhan, the savings of the income of the Sridhan, property obtained by partition, stridhan by custom and property acquired from others sources.

Rights of Woman over her Stridhan

From katyayana and Narada, the following rights of woman over her stridhan:

1. Women get property either after marriage or before it, from husband or from father and such a gift having by them is declared by law to be her absolute property.
2. The absolute exclusive dominion of women is to be established over such a gift and they have the power to sell or give it as they please whether it is land or houses.
3. The wealth which is earned by mechanical arts or received through affection from any other than a relation becomes the subject of husband ownership. But the rest of other property is ordained Sridhan.
4. Woman have received as a gift from her husband she may dispose of at pleasure after his death if it is movable.
5. Property which is given to her husband through pure affection she may enjoy at her pleasure after his death or may be given away except land or houses.

Woman's Estate

A Hindu widow takes only a limited estate in the property of her deceased husband which is inherited by her and the estate taken by her in such property is called widow's property. It is settled by both Mitakshara and Dayabhaga School that the widow has only limited interest in the property she inherits from her husband.

Characteristics of Woman's Estate

The characteristics of a woman's estate are the following:

- The widow's position is like a legal representative
- Her power is limited
- She takes special and qualified estate
- It is a proprietary interest
- It is limited in use
- She has a life interest in such property.

Incident of widow's estate

- The widow is the owner of the property inherited by her from her husband, except that she cannot sell, mortgage or effect any transfer of the corpus of the property unless for legal necessity, for the benefit of the estate, with the consent of the next reversionary, for the religious or charitable purpose
- She fully represents the estate. She can sue and be sued in respect of the property
- She holds the absolute possession of the property.
- She has every right to manage the estate fairly as a prudent owner so as not to damage the interest of the expectant heir.
- She can transfer her life interest even without necessity and such transfer would be good during his lifetime unless she remarried or adopted son of her deceased husband or surrendered the estate to the next reversionary.
- She has the beneficial enjoyment of the estate and she can enjoy the whole income of the property and spend it in any way she pleases.
- She can claim partition with collaterals
- She is not subject to the control of her kinsman
- Her life interest in the property is liable to be seized for her personal debt
- The estate is liable to be divested on her remarriage.

Distinction between Sridham and Woman Estate

The following are the distinctions:

- Stridhan passes to her own heir on her death but the widow's estate is inherited by her husband's heir.

- Stridhan belonging to a woman is an absolute right, but a woman's estate has only limited ownership of such property.
- She can dispose of Stridhan at her pleasure but there is no such scope in widow's estate.
- In Sridhan, a woman can sell, mortgage, give away or otherwise dispose of at her will, but the widow's estate possesses but cannot alienate.

Liabilities and Alienation of Woman's Estate

There are two purposes of alienation of widow's estate and they are:

1. Religious and charitable purposes: Religious and charitable purposes which are supposed to conduce to the spiritual welfare of the deceased husband, give the wife larger power of alienation than for worldly purposes over the husband's estate. There are two sets of religious acts like obsequies of the deceased and the periodical performance of the obsequies rites which are considered essential for the rescue of the soul of the deceased; it is not essential or obligatory but regarded as a pious observance that is conducive to the welfare of the deceased soul.

2. The Essential and Obligatory Activities: Payment of debt of the deceased owner is an obligatory act. Another obligatory act is the performance of the obsequies' rites and sraddha ceremonies of the deceased owner¹.

Some acts are optional but these are spiritually beneficial to the deceased soul like performance of religious ceremonies of persons whose ceremonies the deceased owner was bound to perform; pilgrimage to Gaya to perform her husband, Sraddha; a gift from Bgoog to the deity at the temple of Jagannath at Puri; a gift made by the daughter at the time of her father's Sraddha; a gift for erecting and maintaining a temple for the benefit of her husband's soul; a gift to her husband Purohit on the occasion of her visit to Gaya g. a gift to a family deity.

Legal Necessity and for the Benefit of the Estate

The benefit of the estate includes the preservation of the estate from extinction, its defence against hostile litigation and its protection from inundation and similar circumstances.² The legal necessities are: cost of taking out probate or letter of administration or a succession certificate in respect of the estate of the deceased husband; payment of government revenue and the like; maintenance of the widow or limited heir or of the person like mother, paternal grandmother, unmarried daughter and the like³; marriage of the relation of the deceased owner such as daughter, son's daughter, grandson daughter, paternal uncle son daughter and the like; gift by a widow to her daughter on the occasion of her marriage or dwiragamana; the cost of litigation necessary for preserving the estate and alienation for the purpose is for the benefit of the estate.

The enactment of the Hindu Succession Act is a welcome step towards strengthening the property rights of Hindu women. As a part of this Act, women are given certain privileges that have been denied them for decades. It is also a colossal step in the defense of women's rights, as it has abolished a woman's disability to gain and keep land as its absolute owner. Section 14 of the Hindu Succession Act of 1956 has definitely been a safety guard for women, especially Hindu women. It has provided women with those rights which were denied to her for centuries.

This section removes the disability of a female to gain and hold property as an absolute owner and to convert any estate already held by a woman on the date of beginning of this Act as a limited owner, into an absolute estate. In case of her death intestate, she becomes a fresh stock of descent and the property devolves by succession on her own heirs.

¹ [srimohan v.brijbehari 1909 36 cal 753]

² chunnu mia v monindra lal ray 39 DLR, AD 1987, 42]

³.[darbarilalv.gobind1924 , 4 all 822, 80ic, 31]

Laws Governing Stridhan in India

1. Hindu Succession Act, 1965: The right of a woman over a Stridhan is protected under the regulation of the Hindu Marriage Act, 1955. Section 14 of the Act, 1956 when read with section 27, establishes that when asked by the woman, even if it is kept within the possession of the woman's husband or her in-laws they are bound to return back to her as if they are the depositories or trustees assigned for that property.

2. Domestic Violence Act, 2005: In cases where she is a target of domestic abuse, Section 12, Domestic Violence Act, 2005 specifies for stridhan for women to which she is entitled. It is easy to enforce the protections of this law in order to recover Stridhan. The magistrate can order the offender to deliver her Stridhan to the hands of the aggrieved person or any other asset or precious protection to which she is subjected. Fortunately, 18(ii) of the above Act states that while empowering women to obtain Stridhan's possessions, her clothes and jewelry, necessary articles were included. Under the Act, the word 'economic exploitation' was also elaborated.

3. Criminal Breach of Trust: when all of the necessary components are found to have been met, may be an offence within Section 405 is considered to be executed smoothly. Temporary misappropriation might also stand to be strong enough for warranting prosecution under this provision, as in the matter of criminal misappropriation. Even if the defendant plans to recover the property in the future, it is a criminal breach of confidence at the time of misappropriation. The Apex Court mentioned in the matter of Rashmi Kumar vs. Mahesh Kumar Bhada² that in situations where the woman assigns the property or stridhan into the hands of her husband or her in-laws with superiority over it and if the family or husband with dishonest intentions, use that property for his or their own benefit or make the woman suffer through that property deliberately then criminal breach of trust has been said to be established by the wrongdoer.

Law governing stridhan in Bangladesh

During Maidenhood

A Hindu female can dispose of her Sridhan of every description at her pleasure. But a minor female cannot alienate her property except through guardians.

During Marriage

Property which is received from relative other than her husband is called saudayika property and that property she can dispose of such Sridhan. Non-saudayika property which a woman acquired from stranger or friends has no power to dispose of without the consent of her husband.

During Widowhood

During widowhood, a woman has absolute power of disposal over every kind of Sridhan whether acquired before or after her husband's death. All schools except Dayabgaga school accept these rules.

Distinction of Stridhan from Dowry

Though 'Stridhan' is fully distinct from 'Dowry', they are commonly misconstrued to imply alike. Though 'Stridhan' and 'Dowry' are fully distinct, they are commonly misconstrued to mean alike. Dowry, within domestic legislation, implies property or valuable protection which is provided or consented to be furnished to the bridegroom's family by the family of the bride's side during the persistence of the marriage period. The primary distinction between 'dowry' and 'Stridhan' seems to be the effect of demand or coercion or undue influence aspect whose traces are found in the former but lacking in the latter condition. Stridhan revolves around gifts offered to women willingly, but it is not the product of demand, unfair force or coercion. In a variety of cases, the courts drew a line pointing down the distinction between Stridhan and dowry. The key reason behind the distinction of the courts is that if the wedding falls apart hereafter, the lady has the option of recovering the goods she acquired as Stridhan; that is not the case with dowry gifts. The Supreme Court defined⁴ the distinction between dowry and Stridhan after witnessing the agony of an alienated wife. The woman was held to be her Stridhan's utter

⁴ " Pratibha Rani V. Suraj Kumar

owner, and she was empowered to use property in the way she wanted to. Further, it also established that the spouse would occupy no right of ownership in Stridhan during ordinary circumstances, but he can use it in times of serious distress but must recover it when he is able to do so.

Judicial trend towards Stridhan

In **Pratibha Rani v. Suraj Kumar**⁵, The Supreme Court observed that Pratibha Rani was tormented and denied her stridhan (dowry, gifts given to a bride at the time of her marriage) by her in-laws. Pratibha Rani's parents fulfilled the demands of her in-laws by giving gold ornaments, Rs 60,000 in cash, and other items to her husband's family. A few days after the marriage, her in-laws began harassing her for more dowry and eventually kicked her out of the house along with her two minor children without providing any money for their survival. She had lodged two complaints against her husband and in-laws under Section 125 of the Code of Criminal Procedure, 1973. The lower court favoured her in the judgment, but the High Court reversed the judgment. Later, the apex court gave the judgment in her favour. The Supreme Court said that the joint holding of a stridhan property by the husband does not constitute any co-ownership. The court further said that a woman can file a suit against her husband if he denies returning stridhan property under Section 14 of the Hindu Succession Act, 1956, as well as under Section 27 of the Hindu Marriage Act, 1955. The Pratibha Rani case is the only remarkable judgment that discusses the concept of stridhan and the applicability of Section 405 of the Indian Penal Code, 1860.

In the case of **Bhai Sher Jang Singh v. Smt. Virinder Kaur**⁶, The Punjab & Haryana High Court ruled that if a woman claims property, ornaments, or money that she received at the time of her marriage, her husband and his family are obligated to return the items to her. If they refuse to do so, they will face serious consequences. The court found Bhai Sher Jang Singh and his family guilty of committing an offence under Section 406 for dishonestly misappropriating the ornaments, which were the woman's stridhan given to her husband for safekeeping.

In **Santosh v. Saarswathibai**⁷, the ambit of Section 14(1) of HSA was expanded to include not only the land which is in the possession of the Hindu female, but also the land over which she has the right to possess.

In **Chinnappa Govinda v. Valliammal**:⁸ In 1960, the father-in-law passed away, leaving the property to his widowed daughter-in-law for her maintenance. When the daughter-in-law filed a suit for partition to claim her inheritance, the other family members insisted that she could only receive her share if she included the property given to her under the maintenance deed in the suit properties. However, the court ruled that the daughter-in-law did not have to surrender the property given to her by her father-in-law under the maintenance deed as it was considered her Stridhan.

In **Krishnamma v. Kumara Krishnan**, the Court held that any such share from property received by a woman on a partition will also be her absolute property. It is an established view that the share obtained on partition is not **Stridhan** but the woman's estate⁹.

In the matter of **Devimangal vs. Mahadeo**¹⁰ The council furnished the post-separation from their husband; the property acquired by her from their husband will never constitute a part of stridhan. Even as per the commentaries laid down in Mitakshara School, the property gained as a widow post partition will not fall under the umbrella of stridhan. Also, unless specified clearly through a contract, all her property will again rest with her husband's family heirs.

The court upheld in the case of **Sham Kunwar v. Wah Kunwar** that if the property of a dead husband rests with his widow for a period of more than twelve years, then the property will be referred to as her stridhan.

⁵1985 AIR 628, 1985 SCR (3) 191.

⁶1979 CrLJ 493.

⁷ AIR 2009 SC 636 8

⁸ AIR 1969 Mad 187

⁹Devi Prasad v. Mahadeo (1912) 39 I.A. 121

¹⁰ Collector of Masulipatam v. Covery Venkata, (1861) 8 M.I.A 529

In context to Stridhan, the Punjab and Haryana High Court gave a significant ruling in the matter "**Vinod Kumar Sethi v. Punjab State**". As per the court's understanding, anything gained by the women during the marriage, including gifts, will form part of the stridhan. Under three heads, the court split the donations and dowry made to her. First, such things are provided for her exclusive use to the bride; second, items are meant to be used jointly by her spouse; and third, such gifts are entitled to be used by her husband and his relatives. She has the exclusive right over the first category, and she holds exclusive ownership of it over belongings to the second category; the courts came up with a statement that even then, claiming that both partners have authority to enjoy it, ownership of the wife would not be extinguished. Every such gift, along with presentations falling in the realm of the first two categories, shall be called stridhan in the case of marriage breaks or in compliance with the above decision.

In a later scenario, **Pratibha Rani vs. Suraj Kumar**, Supreme Court disaccord with the Punjab and Haryana High Court's proposition and held that whichever presents, representations inclusive of dowry items assigned to a married woman will be considered her property in an absolute sense. Her Stridhan is entire gold ornaments, clothing with several other dowry items assigned to Hindu women during the marriage ceremony, and she enjoys total ownership over it. The situation where a woman lives with her spouse and both are equally enjoying the assets gained through dowry won't debar her from exercising absolute ownership over such assets. It should not be understood by others that once the woman has become an integral part of her husband's family, that gained property will be subject to everyone's use and the wife will lose her absolute right over such property.

Comparison with various countries laws about Stridhan

In Bangladesh, majority population are Muslim and Muslim personal laws are applicable for them. Like stridhan Muslim women retain rights of mahr and bridal gift. For Hindus traditional Hindu law like Dayabhaga school is applicable to determine above way stridhan. In India, stridhan solely belong to the women and she has full rights and control to use and transfer it as her own choice. This stridhan is voluntarily given and protected by law. A woman can claim her stridhan even after separation or divorce. In Pakistan stridhan is similar to Haqq Mehr and bridal gift. Bridal gift, dowry and mehr legally belong to the women. Women can claim recovery of mehr and dowry under family laws but enforcement can be difficult. In Nepal, Civil Code of 2017 recognizes women's property. Gift and inheritance from parents or spouse are the women's exclusive property. A woman retains ownership over such property even after divorce. Under Kandyan law, dowry and gift may be considered women's property in Sri Lanka. Stridhan is not codified but court may enforce ownership of bridal property. In UK, there is no concept of stridhan. Here, personal gift is personal property and court equitably distributes marital property. IN USA, gift and inheritance are separate unless mingled with marital property and separated property is typically retained by the owner.

Suggestion

- Stridhan is recognized as a cornerstone of women's financial independence.
- Codification of stridhan rights as a separate statute or make specific provision relating to the right to stridhan.
- Enhance legal education for women for their property rights.
- Making or enacting separate legal provision ensuring return of Stridhan during separation or divorce.
- Sincer about the delay in trail of court for ensuring stridhan of women.
- Use case law, real-life example, and empirical data.
- Misappropriation by in-laws and as such situation effective remedies is to be taken.

CONCLUSION

The enactment of the right of stridhan is a welcome step towards strengthening the property rights of Hindu women. Women are given certain privileges that have been denied them for decades. It is also a colossal step in the defense of women's rights, as it has abolished a woman's disability to gain and keep land as its absolute owner. In India, it allows women who currently hold property as limited owners to convert it into full ownership. In case of her death intestate, she becomes a fresh stock of descent, and the property is devoured by succession to her own heirs. While ancient and modern laws uphold this rights gaps in awareness and enforcement remain. By codifying and simplifying the process to claim stridhan can empower Hindu women more effectively in Bangladesh.

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