
Legal Status of Live-In-Relationship in India and Finland: A Reflection

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Abstract

Many foreign cultural ideas have been absorbed into the traditional culture of India as modernization progressed. One of these exotic cultures is the practice of live-in relationships. For many years, people have been living together. The main difference is that people were hesitant to announce their relationship status owing to social pressures back then, but today's Indian society openly acknowledges this type of partnership. This arrangement has become an option for marriage, especially in India's metropolitan cities, where individuals prioritize independence and people strive to avoid the duties and commitments of married life. However, this new type of family is precarious. There are no explicit laws in India that address such relationships. The laws that regulate such relationships take the shape of judicial decisions. Pertinent to note, the live-in relationship is natural as well as predominant in the Western World. As a result, it is vital to recognize the rights and duties of partners who are living together without marriage everywhere around the world to have a better understanding of where India stands as it is an emerging concept for India. Through this paper, the author attempts to study the current legal status of Live-in-relationship in India. Further, this paper also compares the legal status of the Live-in Relationships in India to that of Finland.

Keywords: India, Live-in relationship, Finland, Rights, legal status.

Introduction

Live-in relationship is defined as "a living arrangement in which unmarried partners live together in order to conduct a long-term relationship similar to marriage." [1] The notion behind the concept of live in is that individuals want to check compatibility or establish financial security prior to actually marrying primarily to avoid divorce and to understand the subtle differences between commitments to remain together like a couple without committing to the vows of marriage and obligation to live in marital relationship. When it comes to India, the notion of live-in relationships isn't new. In ancient times, 'Maitri Karar' or 'Friendship Agreements' were entered between married Hindu man & his 'other women' in order to offer the said woman a sense of security, and such relationships were also discovered to be registered with District Collectorate. [2] The main difference between the past and the present in terms of live-in relationship is that people have come to embrace this position in front of society, which was formerly hidden owing to social or other anxieties or fears.[3] However, it is crucial to remember, that India continues to be a traditional nation. As a result, there are still a few individuals in India who refuse to accept the idea that a couple may live together without being married.[4] Furthermore, there isn't any specific legislation on this matter in India. The laws take the shape of judicial judgments issued by prominent Supreme and High Court judges.

Status Of Live-In Relationship in India

Historical Evolution

In India, the status of a live-in relationship is ambiguous, and no clear description exists. The scope of a live-in relationship is unknown/not clear. In India, there isn't any particular legislation addressing the matter. The laws take the shape of judicial judgements issued by prominent Supreme Court & High Court justices. Thus, even though the statute does not provide clear cut rulings on women's rights. The courts are willing to acknowledge their rights. The notion of live-in relationships has been provided legality by the judiciary, and rights of the partners and their children have been safeguarded.

In cases prior to independence, such as *A Dinohamy v. WL Blaham*, [5] Privy Council established a broad rule proposing that, "Where a woman and a man are evidenced to have lived respectively like a man and spouse, the law would then assume, except if the contrary be plainly indicated, that they lived respectively as a result

of substantial marriage & not in a situation of concubinage." Similar decision was repeated in another case. [6] After independence, Supreme Court of India was the first to acknowledge this idea in a case [7] where court granted legitimacy to a couple who were living together for 50 years without getting married. Later, in case of Patel and others, [8] the Supreme Court ruled that live-in relationships are not prohibited and cannot be termed as illegal. In *Tulsa v. Durghatiy*, [9] identical argument was maintained. In the Khushboo case, [10] the Supreme Court gave further permission to live together. This viewpoint, however, is not entirely binding. In a recent case named *Alok Kumar v. State*, [11] the Delhi High Court stated that a live-in relationship is a walk-in/walk-out partnership. As a result, while the court has shown more or less homogeneity in positive direction when it comes to live-in partnerships, the law doesn't cut a clear image.

Legality of Live-In Relationships in India

The Allahabad High Court validated that live-in relationships aren't illegal or unlawful, implying that two people could live together even if they are not married. [12] It might be regarded as a disgrace & immoral for society, yet it is not illegal in any way. The Supreme Court ruled that a couple in live-in is treated the same as a married couple, and their children are regarded legitimate if the couple has been living together for a long time without marrying. [13]

Furthermore, the Supreme Court stated that this relationship between two people cannot be considered an offence. [14] The Apex Court of India ruled in *Lata Singh v. State of U.P. & Anr.* [15] that live-in relationship b/w two consenting adult of heterogenic sex doesn't constitute an offence (with the apparent exception of 'adultery'), even if it is considered as immoral. Further, Supreme Court ruled [16] that live-in or marriage-like relationship is not a crime nor a sin, although being socially undesirable in this nation. The decision whether to marry or not to marry, or to be in heterosexual relationship, is very personal one. In case [17] Court held that two persons in live-in relationship without any formal marriage aren't criminal criminals. Therefore, live-in relationships are legal in India and are not an offence.

Pertinent to note, the Supreme Court has established specific parameters to bring live-in relationships under the definition of 'relationship in the form of marriage' in order to safeguard women under the Domestic Violence Act. [18] The recommendations cover topics such as partnership length, resource pooling, shared housing, and so on. "The guidelines included presence of sexual relationship, presence of children, and presence of marriage-like relationship, which refer to sexual relationship not solely for the pleasure but also for emotional as well as intimate relationship & procreation of children, to provide emotional support, affection, companionship, caring, and so on."

Constitutional Validity of Live-In Relationship

Courts in India have repeatedly recognised the legitimacy of such partnerships while differentiating morality from law and keeping constitutional concerns in mind. According to Article 19 of the Indian Constitution, Indians have a basic right to free speech as well as expression, and the right to dwell and settle in India's any part. Furthermore, Article 21 grants everyone the right to life. The above-mentioned rights as freedoms control one's desire to live with a partner of one's choosing and form a sexual relationship. It should be noted, however, that such rights & liberties aren't absolute.

The Supreme Court ruled in the historic case [19] that a living connection is protected by the right to life under Article 21 of Constitution. The Court also ruled that it is legitimate and not illegal.

Furthermore, in *Shafin Jahan v. Asokan K.M.*, [20] Supreme Court reaffirmed the freedom to select a spouse and held that there is liberty to marry a person of one's choice under Article 21. "The freedom of everyone to make judgments on subjects vital to the pursuit of happiness is intrinsic to the liberty guaranteed by the Constitution as a basic right." Furthermore, the Supreme Court ruled [21] that "Choice assertion is an essential aspect of liberty & dignity."

Legislative framework on Live-In Relationships in India

None of the marriage legislations of India, such as HMA, 1955, the Special Marriage Act of 1954, and so on, explicitly acknowledge live-in relationships. PWDVA, 2005 is regarded as the first law that recognised an individual's right to protection in a 'relationship in nature of marriage.'

Domestic Violence Act 2005

This Act is largely regarded as the first to recognise the reality of non-marital adult heterosexual relationships. [22]

Two persons who are related by consanguinity or marriage, or another relationship such as adoption or marriage, or relative who live like a joint family, as defined in Sec 2(f) of 2005 Domestic Violence Act, reside or have shared a common household at some point. When the Court broadens the definition of 'relationship in nature of marriage,' which is included in the definition of domestic relationship, it presupposes that live-in relationship is included in field of expression because terms like 'nature of marriage' & 'live-in relationship' are

interchangeable in the Indian judiciary. This Act has been widely praised as the major legal method for detecting adult heterosexual relationships which aren't marriage.

"Any woman who is/was in local relationship with respondent and alleges to have been exposed to psychological or physical abuse at home," according to the Act, is an 'aggrieved person'.^[23] As a result, while the Act does not grant non-marital partnerships legal status, it does recognise their existence and right of women in such a relationship to be protected from abuse.^[24] In *S. Khushboo's case*,^[25] the Apex Court of India for the very first time recognised live-in relations as domestic relations under DV Act, 2005.

Criminal Procedure Code 1973

Justice Malimath Committee & Indian Law Commission believe that a female who's been in a long-term live-in relationship must be entitled to all the spouse's legal rights. Similarly, the Committee advocated changing the meaning of 'wife' under Sec 125 of CRPC. The term 'wife' has been expanded to include women who were previously in live-in relationship. His accomplice has now abandoned her against her choice in order to supply the status of wife to a lady in a live-in relationship. And, as soon as she is awarded legal status, she is entitled to support u/s 125 of the Code. However, some argue that even if the role of wife is granted to women in live-in relationship, the partners can't divorce since they aren't legally married. As a result, how might a women defend their right to be maintained u/s 125 of the Criminal Procedure Code of 1973? For the very first time, Supreme Court ruled in case of *Chanmuniya v. Virendra Kr. Kushwaha and Another* ^[26] that live-in couples had right to maintenance.

Indian Evidence Act

Living together for a long time was thought to constitute a presumption of marriage unless specific circumstances proved differently under Sec 114 of Indian Evidence Act. According to Section 114 of the Indian Evidence Act, when a man & a woman have lived together as a couple for long time, then the Court could indeed believe in any reality that it appears to believe is likely to have taken place with respect to natural course of events as well as human action in their relationships to the circumstances, realities and situation. Marriage is heavily religiously emphasised.

As a result, there are various cases where Indian courts have continued to observe favourably in terms of extending protection to couples in live-in relationship. Apart from the Supreme Court, high courts in other states across the country have recognised the notion of live-in partnerships and extended a shield of protection to them. Punjab & Haryana High Court went on to say in *Soniya and Others v. State of Haryana and Others* ^[27] that while a live-in relationship might not be acceptable to everyone in a society, it can't be said that such kind of relationships are not legal or that living together without sanctity of marriage is an offence.

Contradicting Judicial Attitude Towards Live-In-Relationship: The Problem

In circumstances when a man and a woman have indeed been living together for reasonable amount of time, Indian courts have established a compelling case in favour of marriage. Furthermore, there is a huge series of judgments favouring a preponderance of marriage above that of 'concubinage,' demonstrating the judiciary's strong commitment to assist such helpless women. As a result, it can be argued that Indian legal system doesn't always seek rigorous proof on the legitimacy of a marriage when other circumstantial evidence shows the presence of 'relation in the form of marriage.'

However, in recent past, judicial interpretations of live-in partnerships have been stormy. The Rajasthan High Court recently granted police protection to one live-in couple on grounds that denying them protection would amount to court subscribing to the social morality rather than constitutional morality & that courts must protect individuals' fundamental right to life & liberty & ensure its commitment to the individual autonomy in face of societal pressures.^[28]

Previous decisions that have extended police protection to the live-in couples have mirrored this logic in some way. However, in other cases, courts have sharply disagreed with this rationale and have refused such couples protection, even going so far as to suggest that giving such protection will amount to the court endorsing an illegal and morally repugnant behaviour.^[29]

Similarly, in September 2021, Punjab & Haryana High Court in *Paramjit Kaur's case*,^[30] ruled that if 2 adults are in a live-in relationship, even if they were previously married to someone else, no crime would be committed. The Court also voiced its dissatisfaction with the previous month's judgement by the Allahabad High Court. While rejecting an identical writ petition seeking protection by a married lady who was living with her partner, the Allahabad High Court issued a Rs 5,000 fine and said that such relationship was 'illicit'. ^[31]

Similarly, in May 2021, Punjab and Haryana HC rejected a petition by one runaway couple in a live-in relationship, stating its social and immoral acceptance and also no protection can be granted to such petitioners.^[32] However, only days later, in case of *Pardeep Singh v. the State of Haryana*,^[33] another bench of high court adopted a completely opposite stance while dealing with a similar issue in which a couple in live-in relationship claimed that their family were threatening to cause them bodily damage. The court rejected the

state counsel's argument that the couple should not be given protection since live-in relationship is illegal & frowned upon by society.

Consequence Of Absence of Legislation: Conflicting Views

The High Courts of Allahabad, Bombay [34] and Rajasthan have consistently declined to award such live-in couples protection, citing the fact that live-in relationship b/w married and unmarried individual is prohibited. Punjab & Haryana High Court [35] went even farther, labelling these partnerships as 'unacceptable,' arguing that they harm the country's 'social fabric.' In contrast, Delhi High Court took a broader approach, affirming rights and freedom of female live-in partner regardless of both people's marital status. [36]

Thus, according to the preceding judgments, it is obvious that, in the absence of legislation on the subject, various courts frequently render different judgments in more or less comparable situations. The above discussion indicates a schism at the core of India's judiciary on the protection of live-in couples. Judicial inconsistency reveals to those seeking shelter that much is dependent on chance, which chills others like them.

Legal Status of Live-In Relationships in Finland

The continuing rise in the no. of informal partnerships in form of cohabitation in Europe is an important trend in family law. Whereas marriage was formerly the norm in many European countries, there is currently an increase in informal partnerships. [37] Cohabiting partnerships have been more frequent in the Nordic nations, especially Finland, in recent decades.[38] Since the 1970s, Finland has seen an increase in cohabitation as well as a decrease in marriage rates, both of which are typical signs of the so-called 2nd demographic shift. The share of cohabiting couples among all the couples living in partnership/union has continuously increased. In 2005, nearly one out of every 4 couples were a cohabiting couple.

Laws In Finland Relating to Cohabitation

The debate about the legal status of cohabitants began in Finland in the mid-1970s, as the no. of cohabiting couple began to rise quickly.[39] Legal consequences were initially provided piecemeal in the areas of tax and social law. In 1984, scope of legal effect was expanded by include legal effects in housing legislation. However, cohabitation has only recently been recognised as a legal relationship with rights and duties. While a change of the Finnish Code of Inheritance to provide help to surviving cohabitee was proposed in year 1983, Finnish Act on Dissolution of the Household of Cohabiting Partners wasn't adopted until 2011.

While over 70 administrative law legislation previously made mention of cohabiting spouses, Finnish Cohabitation Act made cohabitation an official family law institution. Section 3 of the Finnish Cohabitation Act defines cohabitation as having a relationship whilst living in shared household for minimum of 5 years or having or having had a joint child. Both opposite-sex & same-sex cohabiting partners are recognised by the Act. Administrative law legislation differs in their requirements for cohabitants based on context of statute in issue. The legal implications conferred by Cohabitation Act include the split of property upon cohabitation separation, including presumption of co-ownership of moveable goods and the ability to seek reimbursement for contribution to shared household. The partners have no maintenance rights during the partnership or after separation. Cohabitation has legal consequences in the domains of social welfare, social insurance, & pension legislation under administrative law.

Furthermore, the Finnish Acts governing cohabiting partners place a premium on financial security for the spouse who is left in a vulnerable situation following the breakup of the shared home or death of another partner. Thus, it appears that the governmental aim of shielding the financially weaker spouse was a critical motivation for regulating informal partnerships in Finland.

In Finland, the legal consequences given in the domain of property law, such as property separation and payments to household, reflect the legislature's goal of providing financial protection to vulnerable party. As it only needs a partnership in shared household, the definition is tied to this emphasis on household goods & contributions. When there is or was a common child, then the length requirement is reduced to reflect the additional protection.

Common-Law Relationship in Finland

Beginning a common-law partnership, the norms of the relationship, and dissolving the relationship are all private matters in Finland. There is no record of common-law ties anywhere. [40]

Unlike in marriage,

- Common-law husband & wife are not obligated to support one other.
- They don't inherit from one another.
- If their partner die, common-law husband or common-law wife cannot get surviving spouse's pension.

3.3. Informal Relationships B/W Couple as Defined by The Legislation

Cohabitation is defined differently depending on the context & the legislation in the issue. In social sector, the most common particular reference to cohabitation is a couple cohabiting in circumstances similar to marriage. The legal consequences of such relationship are the same as those of married couples.[41] This sort of statute does not define a minimum period of time for cohabitation, but assumes that the couples reside in the same home & that cohabitation is continuous. The cohabiting partners must be of opposite sex is almost entirely limited to regulations pertaining to social benefits & social insurance.[42] Even clauses that refer to "individuals cohabiting in conditions comparable to marriage" but don't expressly state that the couple must be 'a woman and a man' may be read as only being applicable to opposite sex couple. This is because, as of right now, only a woman and man may form a marital tie, and as a result, only a man & woman can have "circumstances analogous to marriage." The justification for laws like Finnish Entrepreneurs' Pensions Act (2006) and Finnish Employment Accidents Act (1948) clearly mentions such an interpretation.

On other hand, law outside of the spheres of social welfare and social insurance has specifically rejected an interpretation as per which conditions analogous to marriage could only exist in opposite-sex partnerships. For instance, it has been argued that cohabiting couples of the same sex are included in the definition of "persons living in conditions analogous to marriage" under both Finnish Criminal Investigation Act (2011) & Finnish Administrative Procedure Act (2003).

Therefore, because the Act does not explicitly state whether the term 'circumstances comparable to marriage' pertains to couple of opposite gender, its interpretation is left open to interpretation in certain instances. There has been increasing trend to replace the idea of 'conditions analogous to marriage' with idea of 'persons living in conditions akin to marriage' or with the idea of 'cohabiting partner' to remove this ambiguity.[43] Furthermore, some definitions go so far as to stipulate that cohabiting couple must share child's custody or have a common child.

3.4. Finish Cohabitation Act

All administrative sectors have approximately 70 legislation that mention cohabiting spouses but don't specifically address how cohabitation affects the law. But in 2011, the Parliament approved an Act that focuses specifically on rights & responsibilities of cohabiting couples. On 1 April, 2011, FCA went into effect. The following remarks are limited to Finnish Cohabitation Act due to numerous particular provisions and degree of diversity across different parts of the law.

Finnish Cohabitation Act governs matters of property law & process relating to cohabiting couple's separation. It applies to circumstances where the divorce is the result of spouse's death & separation. A particular definition of cohabitation that should be used in the Act's context is provided in the Finnish Cohabitation Act. The Act's justification acknowledges the possibility of further meanings. Finnish Cohabitation Act is not required, therefore deviations from practically all of its requirements are permitted provided both parties have consented to them.

The term 'cohabiting partners' is defined by Finnish Cohabitation Act as 'partners that live in a relationship, that is, a cohabiting partnership & have lived in shared household for minimum 5 years' or 'partners that have, or have had, one common child' or 'partners that has a child's joint parental responsibility.' However, an individual cannot be considered to be cohabiting partner if they are married or in registered partnership. Cohabiting partners may be of same sex or different sex. The couple is nonetheless eligible to apply for benefits under the Act despite not having reached the legal age of majority. However, as mentioned in Act's rationale, a cohabiting partner that is under the age of majority & wants to make legally binding agreements about the partnership's property implications may need a legal guardian to do so in accordance with Finnish Guardianship Services Act (1999).

3.5. Recent Developments in Finland

Since the middle of 1970s and 1980s, when no. of cohabitee relationships began to rise quickly, the status of the cohabitees has been a topic of discussion in Finland. During this time, social law & tax law were the principal areas where cohabitee relationships were granted legal validity. The rights and responsibilities of cohabiting couples was also taken into consideration by housing legislation in 1984. Initially, only rental apartments were impacted, but since 1990, the right-of-occupancy housing has now been included. The law on the limited liability housing businesses, which, together with the real estate housing, are most typical housing choices based on ownership, states that cohabitation doesn't establish rights or duties.

Until recently, cohabitation was not recognised in the primary domain of private law as relationship that could be awarded legal rights or duties. However, there are few case laws from 1980s & 1990s involving long-term cohabiting partners who were successful in bringing cases based on unjust enrichment or ownership. In the framework of the 1983 revision of Inheritance code of Finnish, it was proposed that, like engaged individual, the surviving cohabitee partner might receive support from estate of the deceased spouse to maintain his or her survival, but without becoming an heir. This suggestion, however, was rejected.

1. Comparative Analysis

It is worth noting that in Finland, cohabitation has legal consequences under written law. Unmarried cohabitation is handled in Finland by a plethora of sections of civil/family code or even by distinct statute. In Finland, there are around 70 legislations referring to cohabiting couples throughout all administrative sectors. Further, separate Law on Dissolution of Household of Cohabiting Partners were passed in 2011. The Law oversees property ties b/w unmarried couples & applies to both homosexual and heterosexual couples. "A couple is considered cohabiting partners by law if they presently live in relationship in shared household & (a) have lived in shared household for minimum 5 years or (b) have/have had joint child/joint parental responsibility for the kid (Act on Dissolution of Household of the Cohabiting Partners, 2011)." However, a married individual is not considered cohabiting partner. Unless any agreement or other circumstances indicate otherwise, the Law establishes an assumed common property system for moveable goods. Property division can occur when cohabitation ends & can be done through divorce deed or by estate distributor appointed by court. Furthermore, each party has the right to submit a compensation claim in the court if he/she considers the property partition has resulted in the undue enrichment of other cohabitant. The partners are not legally obligated to support each another & doesn't have inheritance rights towards each another. However, if surviving cohabitant wants financial assistance following death of the other partner, such cohabitant may obtain assistance from deceased's estate in form of money, other property/ usufruct.

In India, live-in relationships are still a new notion. There is no description of the legal status of such live-in couples. The commitment and rights that such couple have towards each another, as well as the status of children born from such a union, cast an ominous shadow. There is no precise legislation on the subject; further law is adumbrated in courts via various cases. None of succession or marriage acts, such as Special Marriage Act of 1954, Hindu Marriage Act of 1955, or Indian Succession Act 1925, expressly recognise live-in partnerships. Children born from such unions, however, are recognised valid under the HMA (Hindu Marriage Act) and have been given right to succession. Despite the lack of specific and clear legal consequence, there has been a significant cultural shift in attitudes regarding live-in partnerships, with multinational corporations extending health insurance coverage to domestic partner of employees. Furthermore, in India, courts are inclined to recognise their rights. However, because of the lack of a particular statute, courts have diverged in their interpretations of fairly identical fact circumstances. While multiple readings are feasible in different fact circumstances, such interpretations must be based on the facts and the legal position in the individual cases. Otherwise, contradictory judgments would exacerbate the problem rather than solve it.

2. Conclusion & Recommendation

However, there is no rule in India that deems a live-in relationship unlawful. Nevertheless, there is no particular statute providing its validity and outlining the rights and duties under it. The Supreme Court attempted to defend the rights of live-in partners and their children via numerous judgements, but it is clear that regulation of non-marital or live-in couples is inadequate in Indian law. Furthermore, given the absence of a thriving jurisprudence on the matter, persons seeking protection for their common places in the advancement of the basic rights placed upon them by Article 21 are frequently excluded from their constitutional safeguards.

In the Indian context, such a relationship must be recognised via a law that empowers both parties with rights & creates responsibilities with duties, so limiting the scope of such a partnership. Because the current laws give a loophole, the newly evolved cultural shift need specific legislation. It is crucial to highlight that women and children are the ultimate victims, regardless of religion, custom, or society. There's no legal mechanism to protect the future of the child born from a relationship that did not take the form of marriage. Because the parties' rights, duties, and obligations aren't specified, the sour relationship leads to victimisation. The preceding debate clearly demonstrated that, while a live-in relationship has found its legitimacy in Indian courts in some situations, it still isn't binding on the couples because there's no exclusive law in our country to legalise it. Depending on individuals' expectations, it might be a benefit or disadvantage for couples.

As in Finland, the legal effect must be provided to live-in partnerships in India as well. In Finland, those who reside in a live-in relationship must meet specific standards. Similarly, in India, regulation on live-in relationships may include certain requirements for recognising live-in relationships. The Act should also address property succession and other family-related issues. Furthermore, the right of the female partner in live-in relationships will have to be supported by modifications in succession, adoption, and marriage legislation. Furthermore, the adoption of specialised legislation will lessen the issue of inconsistent judgements, thereby lowering the strain on Indian Courts. As a result, there is an immediate need for legislative provisions on live-in relationships that provide a clear image while bearing in mind the current Indian social framework, which is built on culture & tradition.

References

- [1] Dave, R. (2019) Legal Status of Live in relationship in India, 9 IJAR 17.
- [2] Aakanksha, et. al., Whether Live-in relationships need to be regulated- a study, from a feminist perspective, 2 IJLLJS 3, 3-5.
- [3] Aakanksha, et. al., Whether Live-in relationships need to be regulated- a study, from a feminist perspective, 2 IJLLJS 3, 3-5.
- [4] Pandey, A. (2021) A Comparative Study of Live in Relationship in India with Other Countries, 4 IJLMH 26.
- [5] A Dinohamy v. WL Blaham, AIR 1927 P.C. 185.
- [6] Mohabhat Ali v. Mohabhat Ibrahim Khan, (1929) 31 BOMLR 846.
- [7] Badri Prasad v Dy Director of Consolidation, (AIR 1978) SC 1557.
- [8] Patel and others, (2006) 8 SC 726.
- [9] Tulsa v. Durghatiya, (2008) 4 SCC 520.
- [10] S. Khushboo v. Kanniammal (2010) 5SCC 600.
- [11] Alok Kumar v. State, CrI M.C. No. 299/2009.
- [12] Payal Katara v Superintendent, Nari Niketan and others, (AIR 2001) ALL 254.
- [13] Radhika v State of MP, (AIR 1966) MP 134.
- [14] Patel and others, (2006) 8 SC 726.
- [15] Lata Singh V. State of U.P. & Anr., AIR 2006 SC 2522.
- [16] Indra Sarma vs V.K.V.Sarma (2013) 15 SCC 755.
- [17] Ramdev Food Products Pvt. Ltd. v. Arvindbhai Rambhai Patel, AIR 2006 SC 3304.
- [18] Indra Sharma v VKV Sharma JJ, (2013) 15 SCC 755.
- [19] S. Khushboo v. Kanniammal (2010) 5SCC 600.
- [20] Shafin Jahan v. Asokan K.M, Criminal Appeal No. 366 of 2018 (arising out of SLP (Crl.) No. 5777 of 2017).
- [21] Shakti Vahini v. Union of India, (2018) 7 SCC 192.
- [22] Karanjawala, T. and Chugh, S. (2009) The Legal Battle Against Domestic Violence in India: Evolution and Analysis International Journal of Law, Policy and the Family.
- [23] The Protection of Women from Domestic Violence Act, 2005, § 2(a) No. 43, Acts of Parliament, 2005 (India).
- [24] Jamwal, M. (2014) Live-in relationship in India: Legal Moves and Judicial attitude: Some Observations, 4 RGNUL Law Review 1.
- [25] S. Khushboo v. Kanniammal, (2010) 5SCC 600.
- [26] Chanmuniya v. Virendra Kr. Kushwaha and Another, (2011) 1 SCC 141.
- [27] Soniya and Another v. State of Haryana and Others, CRWP-4533-2021(O&M).
- [28] Leela v. State of Rajasthan
- [29] Upadhyay, S. (2021) Married Woman In Live-In Relation- Can't Permit Such An Illegality: Allahabad High Court Dismisses Protection Plea With 5k Cost, Live Law.
- [30] Paramjit Kaur & Another v. State of Punjab, CRWP-7874 of 2021.
- [31] Smt. Aneeta and Another v. State of U.P. and others, Writ-C No.-14443 of 2021.
- [32] Gulza Kumari & Another v. State of Punjab and others, SCC OnLine P&H 896.
- [33] Pardeep Singh v. the State of Haryana, CRM-M No. 24369 of 2021 (O&M).
- [34] Mandhani, A. (2015) Woman living with a married man for 15 years: Bombay HC finds it is not a 'live-in' and denies relief under Domestic Violence Act, Livelaw.
- [35] Gulza Kumari & another v. State of Punjab and others, SCC OnLine P&H 896.
- [36] Manubarwala, A. & Kapoor, B. (2021) Live-in relationships vs morality: A case for strengthening Domestic Violence Act, The Week.
- [37] Mol, C. (2016) Reasons for Regulating Informal Relationships: A Comparison of Nine European Jurisdictions, 12 UTRECHT L REV. 98.
- [38] Mäenpää, E. (2009) Cohabiting Partners Socioeconomic Characteristics and the Transition to Marriage in Finland, 44 FINNISH YEARBOOK OF POPULATION RESEARCH 63.
- [39] Silvola, S. (2015) 'Finnish Report', as incorporated in K. Boele-Woelki et al. (eds.), European Family Law in Action Volume V: Informal Relationships
- [40] Common-law relationship, INFOFINLAND.FI (Apr. 13, 2022), <https://www.infofinland.fi/family/common-law-relationship>.
- [41] Section 3 of the Finnish Act on Social Assistance (1412/1997) and S. 7a of the Finnish Act on Customer Payments in Social and Health Care (734/1992).

[42] The Finnish National Pensions Act (568/2007, the Finnish Act on the Protection of the Livelihood of Unemployed Persons (1290/2002), the Finnish Health Insurance Act (1224/2004), the Finnish Act on Social Assistance (1412/1997) and the Finnish Act on a General Housing Allowance (938/2014).
[43] Finnish Act on the Dissolution of the Household of Cohabiting Partners (26/2011), the Finnish Adoption Act (22/2012).