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Live-in Relationships reorganization under Uniform Civil Code: A Critical Evaluation of Emerging Legal Trends

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Live-in Relationships reorganization under Uniform Civil Code: A Critical Evaluation of Emerging Legal Trends

ABSTRACT

Live-in relationships have emerged as a significant feature of contemporary family and social life, particularly in the context of globalization, urbanization, changing social attitudes, and the increasing recognition of individual autonomy. Unlike traditional marriages, live-in relationships are generally formed without formal solemnization or registration, thereby creating a distinct legal and social category. While courts in several jurisdictions, including India, have progressively recognized certain rights arising from such relationships, the absence of a comprehensive and uniform legal framework continues to create uncertainty concerning the rights, duties, and responsibilities of the parties involved. This paper seeks to examine the need for a coherent legal framework governing live-in relationships, with particular emphasis on the protection of individual rights, financial and property interests, maintenance, inheritance, domestic violence, child welfare, and dissolution of the relationship. It further explores whether legal recognition should necessarily be accompanied by corresponding duties and obligations between partners. The study critically evaluates the existing judicial and legislative approaches and identifies gaps arising from fragmented regulation. It argues that legal intervention should neither impose the complete structure of marriage upon live-in relationships nor leave vulnerable partners without adequate protection. A balanced framework, based on autonomy, equality, accountability, dignity, and protection against exploitation, is therefore necessary to address the evolving realities of intimate relationships in contemporary society.

KEYWORDS

Live-in, Relationships, Regulation, Rights, Autonomy

INTRODUCTION

Social change is a natural phenomenon. New conditions emerge and to meet new challenges a society adopts, adjusts and change. After 75 years of independence, we cannot expect Indian society to remain static and completely traditional. Among the institutions that have shaped human civilization, marriage and family occupies a vital position. These together not only form the cradle of our future society, but also the hub of social

life for the people. Like other institutions of the society, marriage also has been undergoing a gradual transformation and adjustment in different situations and epochs of history. The story of change in modern India begins particularly, with the advent of British colonial rule. Later on, the advent of Western education, the process of urbanization, modernization and industrialization accelerated these changes. The rural and normative guidelines regulating marriage are also bound to change to meet new demands and expectations. Simultaneously many factors such as legalistic, political, socio-economic and cultural also have cumulative impact upon the institution of marriage.¹

During the last few decades, the idea of marriage as a sacrament has weakened and the trend of the “personal concept of marriage” is gaining ground. Young people today marry not for performing religious duties but for companionship, and the marital relations are no longer supposed to be an unbreakable tie, as divorce is socially and legally permissible. The liking and the needs of the people have changed with changing circumstances and companionship with independence has taken the place of sacrament and obligations of marriage.

The formulation of a Uniform Civil Code (UCC) as envisioned under Article 44 of the Directive Principles of State Policy has long stood as one of the most polarizing debates in Indian constitutional law. While the primary axis of controversy traditionally revolved around the reconciliation of secular civil laws with community-specific personal laws governing marriage, divorce, and succession, a novel and highly contested front has emerged, the formalization and regulation of unconventional, non-marital cohabitations, commonly referred to as "live-in relationships."

For decades, live-in relationships operated within a statutory vacuum. They were neither explicitly prohibited by law nor formally recognized as a distinct legal status. The regulatory framework was largely a creature of judicial pragmatism. The Supreme Court of India and various High Courts progressively constructed a protective jurisprudence, viewing these relationships through the lens of individual choice, bodily autonomy, and the mitigation of socio-economic vulnerability—particularly for abandoned women.

However, the legal status of non-marital cohabitation has fundamentally transformed. The state of Uttarakhand enacted the Uniform Civil Code of Uttarakhand Act, which, along with its corresponding procedural rules, became fully operational. This legislative development was mirrored by the passage of the Gujarat Uniform Civil Code. These codes

¹ <https://www.khuranaandkhurana.com/2023/04/29/emergence-of-live-in-relationship-in-nexus-family-laws-in-indian-context>

explicitly integrate live-in relationships into the civil law apparatus. They mandate compulsory registration of such unions, introduce sweeping investigative powers for state registrars, involve law enforcement, and penalize non-compliance with imprisonment.

RESEARCH METHODOLOGY

The present study adopts a doctrinal and analytical research methodology to critically examine the evolving legal framework governing live-in relationships under the emerging Uniform Civil Codes in India. The research is primarily based on secondary sources of data, including constitutional provisions, statutory enactments, judicial decisions, government reports, scholarly articles, books, law commission reports, and other academic literature relevant to family law, constitutional law, and human rights jurisprudence.

OBJECTIVES OF THE STUDY

The primary objective of this study is to critically examine the legal status and regulation of live-in relationships within the emerging framework of the Uniform Civil Code in India. The study seeks to analyse the evolution of judicial recognition of live-in relationships and their protection under constitutional principles of equality, dignity, privacy, and personal liberty. It aims to evaluate the shift from a rights-based judicial approach to the regulatory framework introduced by the Uniform Civil Code of Uttarakhand and similar legislative developments. The study further examines the constitutional validity of mandatory registration requirements and their impact on individual autonomy and privacy. Special attention is given to the rights of women, children, inter-faith couples, inter-caste couples, and LGBTQ+ individuals who may choose non-marital forms of cohabitation. Finally, the study seeks to assess whether the emerging legal framework effectively balances social welfare objectives with fundamental rights and to suggest reforms that promote both legal protection and personal freedom.

EVOLUTION OF LIVE-IN RELATIONSHIPS IN INDIA

Long before the term "live-in relationship" gained contemporary currency, the judiciary confronted situations where couples cohabited for extended periods without formalizing their union through religious or civil ceremonies. In the foundational case of *Badri Prasad v. Director of Consolidations* (1978),² the Supreme Court held that where a man and woman have lived together continuously for a long spell, law presumes in favour of wedlock and against concubine. The court emphasized that

² AIR 1978 SC 1557

while this presumption is rebuttable, an exceptionally heavy burden of proof lies on the party seeking to deprive the relationship of legal sanctity. This initial approach did not seek to validate non-marital cohabitation as an independent lifestyle choice; rather, it protected the parties by treating their sustained cohabitation as an informal or de facto marriage.

CHANGING FAMILY STRUCTURES AND SOCIETAL ACCEPTANCE

From a sociological perspective, live-in relationships are often chosen precisely because they offer an alternative to the rigid institutional, legal, and social requirements of formal marriage. They provide a space for consenting adults to organize their personal lives based on mutual autonomy rather than state-regulated roles. With Live-in relations getting legal recognition and new aspirations among the young generation, youngsters now are preferring 'no strings attached' kind of relations i.e. 'Live-in relation' over traditional marriage. Today individuals have become career oriented. Women are going out for work. This is preventing them to go into the bonds of married life that is full of responsibility. Economic independence of people in urban society also paves way to live-in relations as these people don't want any interference in their personal life. Moreover, when the relationship is about bond, they why not stay together without the fear of burden on the girl side and boys too free from the clutches of the law. No headache of getting divorced and facing long trials of 15 years.

CONSTITUTIONAL AND STATUTORY VALIDATION

The turn of the twenty-first century witnessed a distinct shift. The judiciary began to view live-in relationships not merely through the prism of evidentiary presumptions, but as a legitimate expression of individual liberty and personal autonomy protected under Article 21 of the Constitution of India.

The enactment of the Protection of Women from Domestic Violence Act, 2005 (PWDVA) provided the first indirect legislative acknowledgment of non-marital unions. Section 2(f) of the PWDVA defined a "domestic relationship" to include two persons who live or have lived together in a shared household through a "relationship in the nature of marriage."

In *D. Velusamy v. D. Patchaiammal* (2010)³, the Supreme Court formulated specific criteria to determine what constitutes a "relationship in the nature of marriage" under the PWDVA. The court ruled that the couple must hold themselves out to society as akin to spouses, be of legal

³ (2010)10 SCC 469.

age to marry, be otherwise qualified to enter into a legal marriage, and have voluntarily cohabited for a significant period. While this ruling narrowed the scope of protection to exclude casual or transient relationships, it ensured that women in stable, long-term live-in arrangements could claim maintenance and protection from domestic abuse.

Furthermore, in *Indra Sarma v. V.K.V. Sarma* (2013)⁴, the Supreme Court categorically evaluated distinct categories of live-in relationships, noting that the exclusion of certain non-matrimonial relationships from social welfare benefits could leave women entirely destitute. The court held that a live-in relationship between two consenting adults is not illegal and it does not amount to an offense. The court also observed that if a man and a woman are living together as husband and wife for a long period, the presumption would be that they are legally married unless proved otherwise.

Additionally, in another case in 2015, the Supreme Court in *D. Velusamy v. D. Patchaiaammal* recognized live-in relationships under the provisions of the Protection of Women from Domestic Violence Act, 2005. The court held that a woman in a live-in relationship is entitled to protection under the Act if she can establish that she has been in a domestic relationship with the respondent and has been subjected to domestic violence.

Regarding children born from these unions, the judiciary consistently leaned toward securing their legal status. In *Revanasiddappa v. Mallikarjun* (2011) and subsequent structural assessments, the courts affirmed that children born out of prolonged live-in relationships cannot be denied legitimacy or the right to inherit their parents' property. The judicial consensus focused entirely on a rights-based approach: expanding protections, mitigating vulnerabilities, and securing individual rights without imposing state-directed institutional patterns on the couple's private choices.⁵

The judiciary also tackled the economic vulnerabilities that frequently surface when a live-in relationship dissolves, particularly regarding the financial dependence of women and the legitimacy of children.

UNIFORM CIVIL CODE AND IT ORIGIN

The Nation of *Bhinnata Mei Ekta* “BHARAT” has always accepted the truth of religion being sole code of conduct of human beings. But the secularist country Bharat soon became a hub of religious monarchy, the

⁴ 2013 (15) SCC 755

⁵ <https://timesofindia.indiatimes.com/legal/news/live-in-relationships-and-the-law-in-india-rights-protections-and-what-courts-have-ruled/articleshow/131225580.cms>

rights and customs became stricter but the basic foundations of religion became more fragile. So in the clouds of farrago of caste and creed the lamp light of expression, of belief and faith called UNIFORM CIVIL CODE- One Nation One Religion and religion is Humanity. It is a blessing for future generations, hope for building nation, and strong voice for women's rights. It is interesting to note that whereas the founders of the Constitution in Art 44 in Part IV dealing with "Directive Principles of state policy had hoped & expected that the state shall endeavour to secure for citizens a UCC throughout the territories of India, till date no action has been taken in this the regard.⁶

BACKGROUND

The origin of UCC dates back to colonial India when the British government submitted its report in 1835 stressing the need for uniformity in the codification of Indian laws relating to crimes, evidence, and contracts, specifically recommending that personal laws of Hindus & Muslims be kept outside such codification.⁷

- Increase in legislation dealing with personal issues in the far end of British rule forced the government to form the B.N. Rau Committee to codify Hindu Law in 1941.
- Based on these recommendations, a Bill was then adopted in 1956 as the Hindu Succession Act to amend and codify the law relating to intestate or unwilled succession, among Hindus, Buddhists, Jains and Sikhs.
- However, there were separate personal laws for Muslim, Christian and Parsis.
- In order to bring uniformity, the courts have often said in their judgments that the Government should move towards a UCC.

The Judgment in the Mohd. Ahmed Khan v. Shah Bano Begum landmark case famously known as "*SHAH BHANO CASE (1985)*"⁸ Where Apex Court granted her maintenance under secular criminal law, the Indian Government bowed to religious pressures and passed the Muslim Women (Protection of Rights on Divorce) Act 1986, which nullified the judgment and denied divorced Muslim Women the right to continuous alimony.

Sarla Mudgil v. Union of India⁹ laid down the principles against the practice of solemnizing second marriage by conversion to Islam, with

⁶ <https://www.legalserviceindia.com/legal/article-1234-uniform-civilcode-a-practical-panorama-or-illusion-of-law-makers.html>.

⁷ <https://www.lloydlawcollege.edu.in/blog/uniform-civil-code-act.html>.

⁸ 1995(2) SCC 556.

⁹ 1995 SCC (3) 635.

first marriage not being dissolved and Bigamy of conflict between the personal Laws existing on matters of marriage.

PRE-INDEPENDENCE (COLONIAL ERA)

- The Lex Loci Report of Oct 1840 - It stressed the importance and necessity of uniformity in the codification of Indian law, relating to crimes, and evidence of contract.
- The Queen's 1859 Proclamation - It promised absolute non-interference in religion matters.
- So, while criminal laws were codified and became common for the whole country, personal laws continue to be governed by separate codes for different communities.

POST-COLONIAL ERA (1947-1985)

- During the drafting of the Constitution, prominent leaders like Jawaharlal Nehru & B.R Ambedkar pushed for a Uniform Civil code. However, they included DPSP (Art -44) mainly due to opposition from religious fundamentalism and lack of awareness among the masses during the time.

Goa Civil Code: Goa is the first Indian state to have UCC form of common Family Law. The Portuguese Civil Code that remains in force even today was introduced in 19th century in Goa and was not replaced after its liberation.¹⁰

THE NEW LEGISLATIVE FRONTIER: REGULATING COHABITATION UNDER THE UCC

The Historical, progressive judicial consensus underwent a structural shift with the entry of state-level Uniform Civil Codes. The Uniform Civil Code of Uttarakhand Act¹¹ and the subsequent Gujarat Uniform Civil Code moved away from the rights-centric approach of the courts, replacing it with a regulatory and registration-heavy mechanism. Uttarakhand UCC introduces an absolute statutory mandate: all live-in relationships operating within the state's territory must be registered with the designated state authority. The jurisdictional scope of this mandate is exceptionally broad. It applies not only to residents living within the state but also dictates that any resident of Uttarakhand who enters into a live-in relationship outside the boundaries of the state must submit a statement of registration to the local registrar back home.

¹⁰ <https://ijirl.com/wp-content/uploads/2022/01/GOA-CIVIL-CODE-IS-IT-UNIFORM.pdf>.

¹¹ <https://ucc.uk.gov.in/>.

The codes include provisions explicitly designed to protect women and children. It guarantees that a woman deserted by her live-in partner can claim maintenance through the courts, applying the same standards that govern formal marriages. Additionally, the statute affirms that children born out of registered live-in relationships are fully legitimate and possess secure inheritance rights.

While these protections are valuable, they do not actually require a mandatory registration system to exist. As established in *D. Velusamy* and under the PWDVA, the judiciary had already extended maintenance rights and legal legitimacy to partners and children in long-term relationships without requiring a state certificate. The UCC's innovation is not the creation of these protections, but rather conditioning them on a complex, bureaucratic registration process.

The couples who are most in need of legal protection such as inter-faith or inter-caste partners facing family hostility are precisely the ones who cannot risk submitting their details to a public registrar, alerting their parents, or triggering a local police notification.

THE CONSTITUTIONAL FOUNDATION OF LIVE-IN AND SAME-SEX RELATIONSHIPS

The recognition of LGBTQ+ rights in India has been the result of a long and evolving constitutional journey marked by judicial intervention, social activism, and a growing emphasis on individual dignity and personal liberty. For decades, members of the LGBTQ+ community faced discrimination and social exclusion due to the existence of Section 377 of the Indian Penal Code, 1860, a colonial-era provision that criminalized “carnal intercourse against the order of nature.” Although the provision did not explicitly refer to homosexuality, it was frequently used to criminalize consensual same-sex relations between adults. Over time, this law came to symbolize the legal and social marginalization of sexual minorities in India.

The movement against Section 377 can be traced back to the early 1990s. In 1991, the AIDS Bhedbhav Virodhi Andolan (ABVA), a prominent advocacy group working on issues related to HIV/AIDS and human rights, published a landmark report titled *Less than Gay: A Citizen's Report*. The report highlighted the discriminatory nature of Section 377 and called for its repeal. It was among the earliest organized efforts to challenge the constitutional validity of the provision and draw attention to the hardships faced by LGBTQ+ individuals. However, it was not until the beginning of the twenty-first century that a direct constitutional challenge was brought before the courts.

In 2001, the Naz Foundation, a non-governmental organization engaged

in HIV/ AIDS awareness and prevention, filed a Public Interest Litigation before the Delhi High Court seeking the decriminalization of consensual homosexual relations between adults. The petition argued that Section 377 violated the fundamental rights guaranteed under the Constitution of India, particularly the rights to equality, dignity, privacy, and personal liberty. Initially, the petition was dismissed in 2004, but following intervention by the Supreme Court, the Delhi High Court reconsidered the matter.

The legal battle culminated in the landmark judgment of *Naz Foundation v. Government of NCT of Delhi* (2009)¹², wherein the Delhi High Court held that Section 377, insofar as it criminalized consensual sexual relations between adults, violated Articles 14, 15, and 21 of the Constitution. The Court recognized that sexual orientation is an intrinsic aspect of an individual's identity and emphasized that constitutional protections extend to all citizens, irrespective of their sexual orientation. The judgment represented a significant milestone in the recognition of LGBTQ+ rights and was celebrated both nationally and internationally as a progressive affirmation of equality and human dignity.

However, the victory was short-lived. The judgment was challenged before the Supreme Court in *Suresh Kumar Koushal v. Naz Foundation* (2013)¹³. In a controversial decision, the Supreme Court overturned the Delhi High Court's ruling and reinstated the criminality of homosexual conduct under Section 377. The Court observed that the LGBTQ+ community constituted only a "minuscule fraction" of the population and held that the matter was better left to Parliament to decide. The judgment was widely criticized for failing to adequately protect minority rights and for overlooking the constitutional principles of equality and dignity. Human rights organizations, legal scholars, and LGBTQ+ activists across the world condemned the decision, arguing that constitutional rights cannot be denied simply because the affected group is numerically small.¹⁴

Despite this setback, the struggle for recognition and equality continued. A significant development occurred in 2014 when the Supreme Court delivered its judgment in *National Legal Services Authority (NALSA) v. Union of India*. In this case, the Court recognized the right of transgender persons to self-identify their gender and affirmed that gender identity forms an integral part of an individual's dignity and autonomy. The Court acknowledged transgender persons as a distinct "third gender" and directed governments to take affirmative measures for their social

¹² 2009(6) SCC 712.

¹³ (2014) 1 SCC 1.

¹⁴ <https://theadvocatesleague.in/assets/pdf/researches/SHRADDHA.pdf>.

and economic inclusion. The NALSA judgment represented a major advancement in the protection of gender identity rights and broadened the constitutional understanding of equality and non-discrimination.

Another important milestone was 2017 with the decision in *Justice* reached in *K.S. Puttaswamy v. Union of India*¹⁵. In this landmark case, a nine-judge bench of the Supreme Court unanimously recognized the right to privacy as a fundamental right protected under Article 21 of the Constitution. The Court held that privacy encompasses personal autonomy, bodily integrity, and the freedom to make intimate decisions regarding one's life and relationships. Importantly, the judgment expressly acknowledged that sexual orientation is an essential attribute of privacy and individual identity. By recognizing the constitutional protection of personal choices relating to sexuality, the Puttaswamy judgment laid the groundwork for a reconsideration of the reasoning adopted in *Suresh Kumar Koushal*.

The constitutional challenge to Section 377 finally reached its culmination in the historic judgment of *Navtej Singh Johar v. Union of India* (2018)¹⁶. A five-judge Constitution Bench of the Supreme Court unanimously struck down the application of Section 377 to consensual sexual relations between adults. The Court held that criminalizing consensual same-sex relationships violated Articles 14, 15, 19, and 21 of the Constitution. Emphasizing the principles of dignity, liberty, equality, and privacy, the Court declared that members of the LGBTQ+ community are entitled to the full protection of fundamental rights. It rejected the reasoning adopted in *Koushal* and clarified that constitutional rights are not dependent upon the size of a particular group. The Court observed that sexual orientation is an inherent aspect of identity and that the Constitution protects every individual's right to live with dignity and without fear of discrimination. While decriminalizing consensual homosexual relations, the Court clarified that Section 377 would continue to apply to non-consensual acts, offences involving minors, and acts of bestiality.

The *Navtej Singh Johar* judgment marked a transformative moment in Indian constitutional law. It signified the transition from a legal framework based on exclusion and criminalization to one grounded in equality, inclusion, and respect for individual autonomy. The decision was hailed as a victory not only for the LGBTQ+ community but also for the broader ideals of constitutional morality and human rights.

Supreme Court has attempted to accord legality to the concept of live-in relationships and also provide protects to the rights of parties and

¹⁵ (2004) 10 SCC 1.

¹⁶ (2018) 10 SCC 790.

children born to them. in *Bharatha Matha and Anr v. R. Vijaya Renganathan & Ors.* (2010)¹⁷ granted limited rights to children born out of live-in relationships to succeed inheritance in property of parents. Though their children are given legitimate status but yet holds partial rights in fathers succession as compared to child born out of Legal Marriage.

Following these judicial developments, Parliament enacted the Transgender Persons (Protection of Rights) Act, 2019, with the objective of safeguarding the rights and welfare of transgender persons. The Act prohibits discrimination in employment, education, healthcare, housing, and access to public services. It also seeks to promote the social inclusion and rehabilitation of transgender individuals. However, despite its progressive intent, several provisions of the Act have been challenged before the Supreme Court. Petitioners have argued that certain aspects of the legislation are inconsistent with the constitutional guarantees contained in Articles 14, 15, 19, and 21. Critics contend that some provisions undermine the principle of self-identification recognized in the *NALSA* judgment and impose burdensome requirements for legal recognition of gender identity. These concerns continue to generate legal and academic debate regarding the extent to which the Act fulfills the constitutional mandate of equality and dignity.

The evolution of LGBTQ+ rights in India demonstrates the dynamic nature of constitutional interpretation and the role of the judiciary in protecting vulnerable communities. Through a series of landmark judgments, the Supreme Court progressively expanded the scope of fundamental rights to include sexual orientation, gender identity, privacy, and personal autonomy. The decisions in *Naz Foundation*, *NALSA*, *Puttaswamy*, and *Navtej Singh Johar* collectively transformed the legal landscape and affirmed that the Constitution guarantees equal dignity and respect to all individuals, regardless of their sexual orientation or gender identity.¹⁸

Although significant progress has been made, the struggle for full equality is far from complete. Questions relating to marriage equality, adoption rights, anti-discrimination protections, inheritance rights, and broader social acceptance continue to be subjects of public discourse and legal reform. Nevertheless, the constitutional journey from criminalization to recognition represents one of the most significant human rights developments in contemporary India. It reflects an evolving understanding of liberty, equality, dignity, and fraternity and reaffirms the principle that constitutional rights belong to every

¹⁷ (2010) 11 SCC 483.

¹⁸ <https://www.anilmalhotra.co.in/post/live-in-is-not-living-in-sin-2>.

individual, irrespective of societal prejudices or majoritarian perceptions.

CONCLUSION

The inclusion of live-in relationships within the emerging Uniform Civil Codes of Uttarakhand and Gujarat represents a major turning point in the regulation of intimacy in India. By moving away from the progressive, rights-based approach developed by the judiciary, these state codes have replaced individual autonomy with an intrusive, state-supervised registration system.

The India Forum

While the stated goals of these laws—protecting women from abandonment and securing the legitimacy of children—are important and valid, the mechanisms chosen to achieve them are deeply flawed. Incorporating heavy-handed state surveillance, involving law enforcement, requiring parental notification for adults, and imposing criminal imprisonment for non-registration creates an unconstitutional burden on the rights to privacy and personal liberty under Article 21.

As these state-level codes face inevitable constitutional challenges before the High Courts and the Supreme Court, the judiciary will need to carefully assess whether these laws satisfy the constitutional standards of proportionality and individual freedom. A true commitment to gender justice does not require treating adult choices as criminal acts or forcing private relationships into a single, state-approved template.

The path forward lies in decoupling social welfare benefits from mandatory state registration. The law can effectively protect vulnerable partners by expanding civil remedies and offering voluntary registration options, without using criminal sanctions to police the private lives of consenting adults. True legal modernization should focus on expanding rights and protecting individuals, rather than increasing state control over personal choices.

Uniform Civil Code application is different in each state like it applied differently in Goa as compared to Uttarakhand. Uttarakhand code completely exempts Schedule Tribes from the provisions. Goa's Code does not have such tribal exemptions and applies generally to all residents, though it accommodates specific community customs. Even in Live-in Relationship Uttarakhand's UCC strictly mandates the registration of Live-in relationships, requiring couples to submit statements and notify parents, failing to do so can lead to imprisonment. Goa has no such legal mandate. Even in Gujrat local protection has been provided by Gujrat UCC to Matiri Karaar (Friendship Agreements).

Special Provision is meant to protect unique local kinship system. It's a quasi-legal contract system in Gujrat, which typically involves a stamp-paper agreement that outlines financial support, living arrangements and relationship terms between two consenting adults, serving as a social workaround for couples unable to legally marry. In modern India mostly interfaith or queer couples are increasingly using this protection given by Gujrat UCC. Now one side while the specific 'Adultery Contracts' usage has been condemned, the Supreme Court in India Generally protects the rights of Adults to eneter into consensual, live-in relationship.¹⁹

¹⁹ <https://www.google.com/search?q=is+maitri+krar+like+live+in&oq=is+maitri+krar+like+live+in+&aqs=chrome.69i57j33i10i160l4.8472j0j7&sourceid=chrome&ie=UTF-8>