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MAINTENANCE, ALIMONY AND DOMESTIC VIOLENCE: EXAMINING GENDER NEUTRALITY IN INDIAN FAMILY LAW

~ *Srilekha Sankhamraju*

1. ABSTRACT

This paper examines the legal position of men within the frameworks governing maintenance, alimony and domestic violence in India. It analyses Section 144 of the Bharatiya Nagarik Suraksha Sanhita, 2023, Sections 24 and 25 of the Hindu Marriage Act, 1955, and the Protection of Women from Domestic Violence Act, 2005, with particular focus on questions of gender neutrality and financial dependency. Through a doctrinal analysis of statutory provisions, judicial decisions and selected comparative jurisdictions, the paper explores the gap between legislative text and practical application. The paper refers to recent decisions including *Rajnish v Neha*, *Parvin Kumar Jain v Anju Jain*, *Rinku Baheti v Sandesh Sharda* and *Chetram Mali v Karishma Saini*. The analysis indicates that differences still exist between the wording of certain provisions and the manner in which they operate in practice.

Keywords: Maintenance, Alimony, Gender Neutrality, Family Law, Hindu Marriage Act, Domestic Violence, Spousal Support, Bharatiya Nagarik Suraksha Sanhita

2. INTRODUCTION

The areas discussed in this paper, maintenance, alimony and domestic violence are studied separately. Discussions on maintenance mainly focus on Section 125 of CrPC, now Section 144 of the Bharatiya Nagarik Suraksha Sanhita, 2023, and its application to wives and children. Discussions on alimony are largely tied to Sections 24 and 25 of the Hindu Marriage Act, 1955. Likewise, discussions on domestic violence are almost entirely focused on the Protection of Women from Domestic Violence Act, 2005. However, these issues are rarely examined together.

This paper attempts to study all these issues together instead of treating them as isolated subjects. Part II deals with maintenance, including the statutory framework, the structural concerns within the system, and the effect of BNSS recodification. Part III examines alimony under HMA, where gender neutral language does exist but gender-neutral application often does not. Part IV focuses on domestic violence law and the challenges it creates for any reform-oriented discussion. Part V analyses judicial trends across all three areas and identifies both the progress achieved and the limitations of relying only on judicial interpretation without legislative reform. Part VI looks at comparative approaches and Part VII proposes possible reforms.

3. LITERATURE REVIEW

A considerable amount of writing already exists on maintenance, alimony and domestic violence in India. However, these subjects are usually discussed separately rather than together. Questions relating to gender neutrality especially the legal position of men within these frameworks have received comparatively less attention.

Maintenance law has been discussed extensively by authors such as Paras Diwan in *Law of Marriage and Divorce*¹ and in *Mulla's Principles of Hindu Law*². More recent discussions have focused on the impact of *Rajnish v Neha (2021)*³ particularly its emphasis on financial disclosure and the assessment of the financial position of both parties. Nimal Farhan Aripurath's article, "Revisiting Maintenance Laws: Ensuring Fairness in Matrimonial Disputes,"⁴ is one such example.

The question of gender neutrality in alimony has also received attention in recent years. Ragha Sudhan's working paper⁵ argues that courts have often imposed additional requirements on husband claimants that do not appear in Sections 24 and 25 of the Hindu Marriage Act. Similar concerns are reflected in the Amikus Qriae article, "Men's Right to Alimony: Reimagining Gender Neutrality in Indian Family Law"⁶.

¹Paras Diwan, *Law of Marriage and Divorce* (6th edn, LexisNexis 2011).

² DF Mulla, *Principles of Hindu Law* (Satyajeet A Desai ed, 22nd edn, LexisNexis 2020).

³ *Rajnish v Neha* (2021) 2 SCC 324.

⁴ Nimal Farhan Aripurath, 'Revisiting Maintenance Laws: Ensuring Fairness in Matrimonial Disputes' (2025) 8 *International Journal of Law Management and Humanities* 4469.

⁵ Ragha Sudhan S, 'Gender Neutrality in Maintenance and Alimony' (SSRN, 28 February 2023) https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4316231 accessed 1 June 2026.

⁶ 'Men's Right to Alimony: Reimagining Gender Neutrality in Indian Family Law' (The Amikus Qriae, 2023) <https://theamikusrqiae.com/mens-right-to-alimony-reimagining-gender-neutrality-in-indian-family-law/> accessed 1 June 2026.

Domestic violence has attracted a larger amount of writing after the enactment of the Protection of Women from Domestic Violence Act, 2005. While earlier discussions focused on the scope of the Act and the remedies available under it, more recent writing has considered questions relating to male victimisation and gender neutrality. Comparative discussions on spousal support frequently refer to the Canadian Spousal Support Advisory Guidelines⁷ and the decision in *Waggott v Waggott (2018)*⁸.

A review of the available literature shows that maintenance, alimony and domestic violence are generally examined as separate subjects. This paper attempts to study these issues together and examine how they interact with one another.

4. METHODOLOGY

This paper follows a doctrinal method of research. The study is based on statutes, judicial decisions, books and journal articles relating to maintenance, alimony and domestic violence.

The analysis focuses on the Hindu Marriage Act, 1955, the Protection of Women from Domestic Violence Act, 2005, and the Bharatiya Nagarik Suraksha Sanhita, 2023. Relevant decisions of the Supreme Court and High Courts have also been considered. Reference has been made to the laws of the United Kingdom, the United States and Canada for comparative purposes.

5. MAINTENANCE: THE SECULAR FRAMEWORK AND ITS LIMITATIONS

5.1. Section 125 of CrPC and its Successor

For many years, Section 125 of the Code of Criminal Procedure, 1973⁹, remained the main secular maintenance provision in India. Unlike personal laws, it applied across religious communities and was meant to provide a quick remedy to persons who were unable to maintain themselves financially. Under this provision, wives, children and parents could seek maintenance from a person with sufficient means who had neglected or refused to maintain them.

⁷ Carol Rogerson and Rollie Thompson, *Spousal Support Advisory Guidelines* (Department of Justice Canada 2008).

⁸ *Waggott v Waggott* [2018] EWCA Civ 727.

⁹ Code of Criminal Procedure 1973, s 125.

However, the limitation within Section 125 was clear from its language. The provision imposed a duty on husbands while creating rights mainly for wives, children and parents. A husband who was financially dependent on his wife had no remedy under this framework. The possibility that a husband may require financial support from his wife was not something the law seriously accounted for at that time.

This issue becomes more relevant after the enactment of the Bharatiya Nagarik Suraksha Sanhita, 2023, which came into force on 1st July, 2024, and replaced the CrPC. The BNSS was introduced as a major reform of India's criminal procedure system. Section 125 of CrPC was replaced by Section 144 of BNSS¹⁰, but the substance of the maintenance provision remained largely the same.

This was not simply a continuation of an old provision without review. The Parliament revisited the entire criminal procedure framework and still retained a maintenance structure that treats husbands primarily as providers and wives primarily as dependants. As a result, assumptions about marriage and financial dependency that shaped the earlier law continue to remain part of the present framework as well.

5.2. Section 24 of the Hindu Marriage Act

Section 24 of the Hindu Marriage Act, 1955¹¹, deals with the financial support given to a spouse while matrimonial proceedings are still going on, including the expenses of the case. Unlike Section 25, which applies after the proceedings are over and relates to permanent alimony, Section 24 only applies during the continuation of the case.

The wording of Section 24 makes it important. The provision uses the phrase "either the wife or the husband", making it one of the clearest gender-neutral maintenance provisions in Indian law. A spouse seeking relief under the section only needs to show lack of sufficient income for support and for meeting the expenses of the proceedings. The language of the statute does not create separate standards for husbands and wives.

The Supreme Court's judgment in *Parvin Kumar Jain v Anju Jain (2024)*¹² is relevant here, but only to a limited extent. The Court held that Section 24 proceedings have an independent existence. They do not automatically end just because the main divorce petition is withdrawn.

¹⁰ Bharatiya Nagarik Suraksha Sanhita 2023, s 144.

¹¹ Hindu Marriage Act 1955, s 24.

¹² *Parvin Kumar Jain v Anju Jain* 2024 INSC 961 (10 December 2024).

The case mainly dealt with this jurisdictional issue. The Court did not directly discuss gender neutrality, and the maintenance claim had been filed by the wife.

At the same time, the judgement does have an important implication. If Section 24 proceedings are independent and are to be decided on the basis of Section 24 itself, then the wording of the provision becomes important. Section 24 uses the phrase “either the wife or the husband”. Once the provision is read in this manner, it becomes difficult to justify imposing extra conditions on husbands that the statute itself does not mention. In that sense, the judgment in *Parvin Kumar Jain v Anju Jain (2024)*¹³ may be read as reinforcing the importance of the statutory language of Section 24 itself. Since the provision uses the phrase 'either the wife or the husband', the decision lends some support to arguments favouring a textual interpretation of the provision.

5.3. The Problem of Indefinite Maintenance

Apart from the issue of gender imbalance, Section 144 of BNSS retains another long-standing problem, which is the absence of any real limit on maintenance obligations. In practice, once maintenance is awarded in India, it generally continues until the wife remarries, enters into another relationship similar to marriage or the court changes the order after proof of changed circumstances. There is no statutory expectation that maintenance should eventually lead towards financial independence or self-sufficiency.

This often turns maintenance into something more than temporary support after separation. In certain cases, it continues for several years after the marriage has ended, even when the recipient may have the ability to earn independently. Courts have sometimes attempted to address this issue through interpretation but without legislative reform, such approaches remain inconsistent.

5.4. Judicial Interpretation under Section 125/ 144

The Supreme Court’s judgement in *Rajnesh v Neha (2021)*¹⁴ came at a time when maintenance proceedings had become increasingly difficult to manage. Parties were often filing claims under multiple laws at the same time, including Section 125 of CrPC, Section 24 of HMA, and the DV Act. This frequently led to parallel proceedings and overlapping maintenance orders being passed without any proper coordination between courts.

¹³ *Parvin Kumar Jain* (n 12).

¹⁴ *Rajnesh* (n 3).

The Court tried to address this issue by laying down certain guidelines for maintenance cases. It directed both parties to place their financial details before the court through affidavits and stated that courts should look into factors such as income, assets, liabilities and overall financial position of both spouses instead of proceeding on assumptions alone.

The judgement did not change the actual structure of Section 125, which still continues functioning within a gender specific framework. However, the approach adopted by the Court is important because it shifted the focus towards the actual financial circumstances of both spouses. By asking both parties to disclose their financial position, the Court recognised that questions of dependency within marriage cannot always be decided through traditional assumptions about gender roles alone.

6. ALIMONY: SECTION 25 HMA AND THE POST-DECREE SETTLEMENT

6.1. The Provision and Its Purpose

Section 25 of the Hindu Marriage Act¹⁵ deals with permanent alimony and maintenance, meaning the financial arrangement that may be ordered after matrimonial proceedings come to an end. Unlike Section 24, which applies during the pendency of proceedings, Section 25 deals with the financial position of the parties after the marriage has broken down and the case has concluded.

The provision follows a gender-neutral language and allows “either the wife or the husband” to seek permanent alimony from the other. On paper, the section clearly recognises that either spouse may be financially dependent after divorce. However, in practice, courts have often viewed claims made by husbands with much greater suspicion and have continued to treat such claims differently from those made by wives.

6.2. Judicial Inconsistency in Alimony Awards

Even in cases where alimony is sought by wives, which are the majority of claims, there is considerable inconsistency in the way courts determine the amount to be awarded. In *Rajnish v Neha (2021)*¹⁶, the Supreme Court laid down several factors that courts should consider while deciding maintenance and alimony. However, these factors remain broad and courts still retain wide discretion while applying them. As a result, two courts dealing with very similar financial situations may still arrive at very different outcomes.

¹⁵ Hindu Marriage Act 1955, s 25.

¹⁶ *Rajnish* (n 3).

Difficulty also arises from the “standard of living” test, under which courts attempt to preserve the standard of living enjoyed by the wife during the marriage. In practicality, applying this is not always easy especially when the husband’s financial position after divorce may not realistically support two separate households at the same standard.

The Supreme Court observations in *Rinku Baheti v Sandesh Sharda (2024)*¹⁷ provide some guidance in this regard. The observations in this case reflect a broader judicial emphasis on financial need and fairness while determining alimony. This approach is more workable because it treats alimony as a form of financial support rather than as a transfer of wealth. The difficulty, however, is that the observation still remains a judicial statement and has not yet developed into a settled rule consistently followed by lower courts.

6.3. The Case for a Husband’s Alimony Claim

The Delhi High Court’s decision in *Chetram Mali v Karishma Saini (2023)*¹⁸ directly dealt with the gender-neutral wording of Section 25. The Court treated financial dependency, rather than gender, as the central consideration and applied the provision to a husband claimant without imposing any separate incapacity requirement. This reading is more consistent with the actual wording of the statute.

The difficulty is that such decisions are still uncommon. Most courts continue to approach maintenance and alimony claims made by husbands with additional suspicion and often expect something more than mere financial need, even though the provision does not create any such distinction.

What is ultimately required is a clear pronouncement from the Supreme Court stating that Sections 24 and 25 of Hindu Marriage Act must be interpreted according to their actual wording, and that financial dependency alone irrespective of gender should remain the deciding factor. Until that happens, the additional conditions created through judicial interpretation are likely to continue.

7. DOMESTIC VIOLENCE: THE HARDEST PROBLEM

7.1. The Structure of the DV Act

¹⁷ *Rinku Baheti v Sandesh Sharda* 2024 INSC 1014.

¹⁸ *Chetram Mali v Karishma Saini* 2023 SCC OnLine Del 7318.

The Protection of Women from Domestic Violence Act, 2005¹⁹, is probably the most gender-specific law discussed in this paper. At the same time, it is also the most difficult to critique because it was enacted to address a serious and long-standing social problem. The Act recognises different forms of domestic violence including physical, sexual, emotional, verbal and economic abuse and provides remedies such as protection orders, residence orders and money relief.

The Act is designed specifically for the protection of women. Section 2(a) defines an “aggrieved person” as a woman²⁰. Similarly, the provisions relating to respondents proceed on the assumption that the relief will generally be sought against a husband, male partner or male relative. Section 20 allows courts to grant monetary relief for expenses such as loss of earnings, medical costs and maintenance²¹. The overall scheme of the Act is therefore built around the idea of a female victim seeking protection from a male perpetrator.

7.2. Male Victims and the Limits of the Present Framework

Whether men can also experience domestic violence is no longer seriously disputed. Research from different jurisdictions shows that men may also face domestic abuse although the nature, frequency and severity of such abuse often differ from women experience. Economic abuse for example, can include controlling access to money, restricting financial decisions or creating financial dependence and such conduct is not limited to one gender.

The difficulty is that DV Act does not provide a similar remedy to male victims. A husband who faces economic abuse, emotional abuse or other forms of domestic mistreatment cannot seek protection orders or monetary relief under the Act. While other legal remedies may sometimes be available, there is no dedicated statutory framework comparable to the one available to women under the DV Act.

This particularly becomes relevant because the monetary relief provisions under the DV Act often overlap with maintenance laws. A wife may, depending on the facts of the case, seek relief under the DV Act while also pursuing maintenance under other legal provisions. The Supreme Court in *Rajnish v Neha (2021)*²² recognised the problem of overlapping financial

¹⁹ Protection of Women from Domestic Violence Act 2005.

²⁰ Protection of Women from Domestic Violence Act 2005, s 2(a).

²¹ Protection of Women from Domestic Violence Act 2005, s 20.

²² *Rajnish* (n 3).

orders and directed courts to account for amounts already awarded elsewhere. The broader question of unequal access to these remedies however was not directly considered.

7.3. The Difficulty with Reform

Domestic violence law is different from maintenance and alimony because the argument for a gender-specific framework is much stronger here. Available data continues to show that women form the majority victims particularly in cases involving serious physical violence, sexual violence and abuse within intimate relationships. Any discussion on reform has to begin with that reality.

However, this still leaves the issue of male victims unanswered. At present, a man who experiences domestic abuse cannot seek relief under the DV Act in the same way that a woman can. Whether this should be addressed through amendments to the existing law or through separate legislation is open to debate. What is clear, however, is that the issue receives very little attention within the present legal framework.

8. JUDICIAL TRENDS: THE LIMITS OF INTERPRETATION

Across all three areas namely maintenance, alimony and domestic violence, the judiciary has shown an increasing awareness of the gender imbalances that exist within family law. The Supreme Court's contribution in *Rajnesh v Neha (2021)*²³ has been particularly significant. By requiring courts to consider the financial position of both parties, the judgement encouraged a more need based approach to maintenance determination, even when the statutory framework itself continues to reflect gendered assumptions.

The Supreme Court's decisions in *Parvin Kumar Jain v Anju Jain (2024)*²⁴ and *Rinku Baheti v Sandesh Sharda (2024)*²⁵, both delivered in December 2024, reflect a similar approach. In *Parvin Kumar Jain v Anju Jain (2024)*²⁶, the Court recognised that proceedings under Section 24 have an independent existence, which strengthens the argument that the gender-neutral wording of the provision should be given full effect. In *Rinku Baheti v Sandesh Sharda (2024)*²⁷, the Court clarifies that alimony is intended to address genuine financial need arising

²³ *Rajnesh* (n 3).

²⁴ *Parvin Kumar Jain* (n 12).

²⁵ *Rinku Baheti* (n 17).

²⁶ *Parvin Kumar Jain* (n 12).

²⁷ *Rinku Baheti* (n 17).

from the breakdown of a marriage and is not meant to function as a transfer of wealth between parties.

At the same time, there are limits to what courts can achieve through interpretation alone. In the context of maintenance, Section 144 BNSS is clear in its gender specific structure and courts are required to interpret the provision as enacted. Similarly, under the DV Act, Section 2(a) defines an aggrieved person as a woman. Courts cannot extend that definition to include men without going beyond interpretation and effectively rewriting the statute. Several High Courts have recognised this limitation and have declined to extend the provisions of the DV Act to male complainants because of the clear wording of the legislation.

The result is an increasing gap between judicial developments and the existing statutory framework. While courts have gradually moved towards a more gender neutral and need based understanding of family law, the relevant statutes, particularly the BNSS and the DV Act continue to reflect a different approach. Unless legislative changes are introduced, the scope of judicial intervention is likely to remain limited.

9. COMPARATIVE PERSPECTIVES

9.1. United Kingdom

Under the Matrimonial Causes Act 1973²⁸, either spouse may seek financial provision from the other. The court examines the circumstances of both parties before making an order including their financial position and future earning prospects.

The approach towards maintenance has also changed over time. In *Waggott v Waggott (2018)*²⁹, the Court of Appeal dealt with the issue of continuing maintenance after divorce. The Court was unwilling to treat maintenance as something that should automatically continue without end and stressed the importance of financial independence wherever possible.

The Domestic Abuse Act 2021³⁰ adopts gender neutral definitions and recognises that victims may be of any gender. The Act recognises that women continue to account for a large proportion of domestic abuse cases.

9.2. United States

²⁸ Matrimonial Causes Act 1973 (UK).

²⁹ *Waggott* (n 8).

³⁰ Domestic Abuse Act 2021 (UK).

The position in the United States is also gender neutral. Either spouse may seek spousal support and courts determine entitlement on the basis of factors such as the duration of marriage, the financial circumstances of the parties, the standard of living enjoyed during the marriage and the recipient's ability to become financially independent.

One feature often discussed in this context is the Gavron warning developed in California³¹. Under this approach, a court may inform the recipient spouse that reasonable efforts towards self-support are expected. The warning does not immediately end maintenance but it may become relevant when the court later considers whether support should continue.

Some states have also adopted formula based methods for calculating support. New York is one such example. The formula provides a starting point for determining maintenance while still allowing courts to make adjustments based on the facts of a particular case.

9.3. Canada

Canada also follows a gender-neutral approach to spousal support. Under the Divorce Act³², courts may grant support after considering factors such as economic hardship, childcare responsibilities and the financial consequences that may arise from the marriage or its breakdown. The legislation also refers to the objective of encouraging self sufficiency within a reasonable period.

Canadian courts frequently refer to the Spousal Support Advisory Guidelines while dealing with support claims. The guidelines are used when determining the amount and duration of support and take into account factors such as the length of the marriage, difference in income between the parties, and the presence of children.

10. ISSUES FOR FUTURE CONSIDERATION

10.1. Maintenance

Section 144 of BNSS continues to follow a gender specific framework under which maintenance claims are available to wives but not to financially dependent husbands. This position appears difficult to reconcile with changing social and economic realities particularly in situations where financial dependency may exist irrespective of gender. The gender-neutral

³¹ *In re Marriage of Gavron* 203 Cal App 3d 705 (Cal Ct App 1988).

³² Divorce Act, RSC 1985, c 3 (2nd Supp) (Canada).

language already found in the HMA and the approach adopted by the Supreme Court in *Rajnesh v Neha (2021)*³³ show a different model.

Another issue relates to the duration of maintenance. Maintenance orders may continue for long periods unless modified by a court. The law provides little guidance regarding the period for which maintenance should ordinarily continue or to the extent to which financial independence should be encouraged. The Gavron warning issued in California represents one approach to this issue.

10.2. Alimony

In the case of alimony, the wording of the HMA is not the primary difficulty. Section 25 permits claims by either spouse. The issue arises from judicial decisions that in some cases have imposed additional requirements on husband claimants despite the absence of such requirements in the statutory text.

This has resulted in situations where the wording of the statute and the manner in which it is applied do not always align. Canada provides one example of a jurisdiction where advisory guidelines are used in matters relating to spousal support.

10.3. Domestic Violence

The DV Act differs from maintenance and alimony provisions discussed earlier. It was enacted to address domestic violence against women and continues to operate on that basis.

Male victims are not covered by the remedies available under the Act. Protection orders, residence orders and monetary relief under the DV Act are only available to women. The position in the United Kingdom is different because domestic violence there is not limited to one gender.

10.4. Institutional Reform

The availability of data is another issue. Information relating to maintenance, alimony and domestic violence litigation is limited in a number of areas including the outcomes and claimant patterns.

This makes it difficult to examine broader trends and patterns within family law litigation. It also limits the amount of empirical material available for future study.

³³ *Rajnesh* (n 3).

11. CONCLUSION

Although maintenance, alimony and domestic violence are governed by different legal frameworks, similar questions arise in all of them. Questions relating to financial support, dependency and legal protection appear across all three areas. The discussion in this paper shows that these issues remain relevant in contemporary family law.

The statutory framework reflects this. Section 144 BNSS continues to retain a gender specific maintenance model. The DV Act remains limited to female victims. At the same time, Sections 24 and 25 of the HMA use gender neutral language, although their application has not always been entirely consistent with that wording.

The decisions discussed in this paper, particularly *Rajnish v Neha (2021)*³⁴ and the more recent judgments examined earlier, indicate a growing focus on financial need and the actual circumstances of the parties. Greater attention is being paid to income, dependency, and financial position rather than assumptions regarding who is expected to provide support and who is expected to receive it.

The purpose of this paper has been to examine whether the present framework adequately addresses situations that fall outside traditional understandings of dependency and vulnerability. A gap continues to exist between certain statutory provisions and the realities of contemporary family relationships.

Questions relating to financial dependency and access to legal remedies continue to arise before courts. The outcome of such disputes depends largely on the facts before the court and the provisions being applied in a given case. Questions relating to these areas continue to arise in family law litigation.

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