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Introduction

Welcome to the Indian Journal of Legal Affairs and Research (IJLAR), a distinguished platform dedicated to the dissemination of comprehensive legal scholarship and academic research. Our mission is to foster an environment where legal professionals, academics, and students can collaborate and contribute to the evolving discourse in the field of law. We strive to publish high-quality, peer-reviewed articles that provide insightful analysis, innovative perspectives, and practical solutions to contemporary legal challenges. The IJAR is committed to advancing legal knowledge and practice by bridging the gap between theory and practice.

Preface

The Indian Journal of Legal Affairs and Research is a testament to our unwavering commitment to excellence in legal scholarship. This volume presents a curated selection of articles that reflect the diverse and dynamic nature of legal studies today. Our contributors, ranging from esteemed legal scholars to emerging academics, bring forward a rich tapestry of insights that address critical legal issues and offer novel contributions to the field. We are grateful to our editorial board, reviewers, and authors for their dedication and hard work, which have made this publication possible. It is our hope that this journal will serve as a valuable resource for researchers, practitioners, and policymakers, and will inspire further inquiry and debate within the legal community.

Description

The Indian Journal of Legal Affairs and Research is an academic journal that publishes peer-reviewed articles on a wide range of legal topics. Each issue is designed to provide a platform for legal scholars, practitioners, and students to share their research findings, theoretical explorations, and practical insights. Our journal covers various branches of law, including but not limited to constitutional law, international law, criminal law, commercial law, human rights, and environmental law. We are dedicated to ensuring that the articles published in our journal adhere to the highest standards of academic rigor and contribute meaningfully to the understanding and development of legal theories and practices.

STUDY OF OFFENCES RELATED TO MARRIAGE

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Abstract

This study emphasises on the Legal framework, Judicial application and implications of the offences related to marriage. Marriage is a cultural, social and legal recognition between two parties to a marriage. It establishes right and obligations between them, their children's and in-law's which is regulated and protected by specific Civil and Criminal law like Bharatiya Nyaya Sanhita, 2023 (BNS), Indian Penal Code, 1860 (IPC), The Hindu Marriage Act, 1955 and Domestic Violence Act, 2005. The core difference between Civil and Criminal law governing marriage is that the Civil law provides remedies for personal matters, including marriage, property division, monetary compensation and child custody whereas the Criminal law punishes those offences which are heinous in nature i.e. considered harmful to society like bigamy.

This research paper delves deep into the examining statutory provisions, landmark judgements, examines how the legal system addresses these offences and protects the rights of spouse and seeks to analyse the evolution of these provisions. This paper discusses about the overlapping jurisdiction of the Civil and Criminal Law and the need for speedy trial despite of having special courts as it affects the mental state of the parties to a suit and this might also result in developing a Criminal Intention in the minds of the party. This paper involves a qualitative type of analysis.

Synopsis

Marriage is a cultural, social and legal recognition between two parties to a marriage. It establishes right and obligations between them, their children's and in-law's which is regulated and protected by specific Civil and Criminal law like Bharatiya Nyaya Sanhita, 2023 (BNS), Indian Penal Code, 1860 (IPC), etc. The offences related to marriage should be dealt with proper care and prudence because these are of personal laws and matters therefore it affects a person's personal life and an individual right and dignity. This paper examines the legal framework, statutory provisions,

landmark judgements and how the legal system addresses these offences and protects the rights and dignity of spouse.

Introduction

Marriage is a cultural, social and legal recognition between two parties to a marriage. It establishes right and obligations between them, their children's and in-law's which is regulated and protected by specific Civil and Criminal law like Bharatiya Nyaya Sanhita, 2023 (BNS), Indian Penal Code, 1860 (IPC), The Hindu Marriage Act, 1955 and Domestic Violence Act, 2005. This statute aims to safeguard and protect the spouses against exploiting each other and to protect the rights and dignity of the spouses. The offences relating to marriage are explained in the Sub-Chapter of Offences related to marriage under Chapter V (Of Offences Against Women and Children) of the Bharatiya Nyaya Sanhita, 2023. Earlier, in the IPC it was under the Chapter XX (Of Offences Relating to Marriage).

This Research aims to assess the legal framework of the offences related to marriage in both Bharatiya Nyaya Sanhita, 2023 and the Indian Penal Code, 1860 and make a comparative study between the both.

Historical Background

The historical background of marriage in India is rooted in ancient customs, religious scriptures, and diverse social norms that have evolved over thousands of years.

The early Indian text has various types of marriage like arranged union (Brahma Vivaha) and also love based marriages (Gandharva Vivaha). As the time passed, arranged marriage gained prominence as it helps to maintain family alliances, social order and to maintain kinship ties with community.¹

¹ ARYA SAMAJ PANDIT, 8 Types of Hindu Marriages: Ancient Traditions to Modern Love (2025), <https://www.aryasamajpandit.com/types-of-hindu-marriages/> (last visited Oct. 20, 2025).

As the Vedic religion evolved into classical orthodox Hinduism (500BC), the social ideas advanced by Manu gained prominence, and large sections of Indian society moved towards patriarchy and caste-based rules. Manu and others attacked the Gandharva and other similar systems were only suitable for small sections of society². Under the system they advocated (sometimes called Manuvad), women were stripped of their traditional independence and placed permanently in male custodianship: first of their fathers in childhood, then of their husbands through married life, and finally of their sons in old age.³

Research Objectives

- To analyse the legal framework governing the offences related to marriage under Bharatiya Nyaya Sanhita, 2023 (BNS) and other personal laws
- To analyse the judicial interpretation of offences related to marriage such as dowry death, deceitful induction, domestic violence, cruelty etc.
- To compare the legal provision of Bharatiya Nyaya Sanhita, 2023 (BNS) and Indian Penal Code, 1860 (IPC).

Questions

- What are the challenges faced in investigation and prosecution of such offences?
- Does a gender-neutral legislation required for the offences related to marriage?
- Does the existing legal provision sufficient for preventing the offences related to marriage? Or does any reformation is needed.
- How does social cultural factors affect the reporting of marriage related offences?
- How does repealing the offence of adultery affect the marriage related offences?

Scope

This paper examines the Offences related to marriage in India. It focuses on the provisions made, interpretations of the law by courts, and how they promote justice.

² Wikipedia, Arranged marriage in the Indian subcontinent, https://en.wikipedia.org/wiki/Arranged_marriage_in_the_Indian_subcontinent (as of Oct. 20, 2025).

³ Wikipedia, Gandharva marriage, https://en.wikipedia.org/wiki/Gandharva_marriage (as of Oct. 21, 2025).

Limitations

It relies on secondary data only and does not include field work.

Methodology

This study uses analytical and doctoral research methodology; it analyses relevant legal provisions and Judicial application and case laws. The Study has gathered data from law repositories, reports and journal articles.

Legal Framework

This section focuses on the legal provisions of offences related to marriage. This section mainly focuses the offences criminalized in Bharatiya Nyaya Sanhita, 2023. The offences related to marriage are defined under chapter V (Of Offences Against Women and Children) in sub-chapter “Of offences relating to marriage” of the Bharatiya Nyaya Sanhita, 2023.

Section 80 of the Bharatiya Nyaya Sanhita, 2023 states that “Where the death of a woman is caused by any burns or bodily injury or occurs otherwise than under normal circumstances within seven years of her marriage and it is shown that soon before her death she was subjected to cruelty or harassment by her husband or any relative of her husband for, or in connection with, any demand for dowry, such death shall be called “dowry death”, and such husband or relative shall be deemed to have caused her death” and it also states that “Whoever commits dowry death shall be punished with imprisonment for a term which shall not be less than seven years but which may extend to imprisonment for life”.

Section 81 of the Bharatiya Nyaya Sanhita, 2023 states that “Every man who by deceit causes any woman who is not lawfully married to him to believe that she is lawfully married to him and to cohabit or have sexual intercourse with him in that belief, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine”.⁴

⁴ The Bharatiya Nyaya Sanhita, 2023, Act No. 45, 2023, Ministry of Home Affairs, <https://www.indiacode.nic.in/handle/123456789/20062> (last visited Oct. 22, 2025).

Section 82 of the Bharatiya Nyaya Sanhita, 2023 states that “Whoever, having a husband or wife living, marries in any case in which such marriage is void by reason of its taking place during the life of such husband or wife, shall be punished with imprisonment of either description for a term which may extend to seven years, and shall also be liable to fine”.

Section 84 of the Bharatiya Nyaya Sanhita, 2023 states that “Whoever takes or entices away any woman who is and whom he knows or has reason to believe to be the wife of any other man, with intent that she may have illicit intercourse with any person, or conceals or detains with that intent any such woman, shall be punished with imprisonment of either description for a term which may extend to two years, or with fine, or with both”.

Section 85 of the Bharatiya Nyaya Sanhita, 2023 states that “Whoever, being the husband or the relative of the husband of a woman, subjects such woman to cruelty shall be punished with imprisonment for a term which may extend to three years and shall also be liable to fine”.

Section 87 of the Bharatiya Nyaya Sanhita, 2023 states that “Whoever kidnaps or abducts any woman with intent that she may be compelled, or knowing it to be likely that she will be compelled, to marry any person against her will, or in order that she may be forced or seduced to illicit intercourse, or knowing it to be likely that she will be forced or seduced to illicit intercourse, shall be punished with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine; and whoever, by means of criminal intimidation as defined in this Sanhita or of abuse of authority or any other method of compulsion, induces any woman to go from any place with intent that she may be, or knowing that it is likely that she will be, forced or seduced to illicit intercourse with another person shall also be punishable as aforesaid”⁵

All these sections from the Bharatiya Nyaya Sanhita, 2023 protect the parties to a marriage from being subjected to cruelty, exploited, deceitful induction and to protect the dignity and rights of a women. Most of the offences related to marriage are not gender neutral only some

⁵ The Bharatiya Nyaya Sanhita, 2023, Act No. 45, 2023, Ministry of Home Affairs, <https://www.indiacode.nic.in/handle/123456789/20062> (last visited Oct. 22, 2025).

offences/sections like Bigamy (S.82), Section 83 are partially gender neutral. There is other gender-neutral sections but here the women are always considered the victim and this issue is also discussed in the study.

Comparison between Indian Penal Code, 1860 and Bharatiya Nyaya Sanhita, 2023

The offences relating to marriage are explained in the Sub-Chapter of Offences related to marriage under Chapter V (Of Offences Against Women and Children) of the Bharatiya Nyaya Sanhita, 2023 but earlier in the IPC it was under a separate chapter i.e. Chapter XX (Of Offences Relating to Marriage). The section 80 of BNS which criminalises dowry death corresponds to section 304B of IPC. The section 81 of BNS which criminalises Cohabitation caused by man deceitfully inducing belief of lawful marriage corresponds to section 493 of IPC. Section 82 of BNS which criminalises marrying again during lifetime of husband or wife corresponds to section 494 of IPC. Section 83 which criminalises marriage ceremony fraudulently gone through without lawful marriage corresponds to section 496. Section 84 of BNS which criminalises enticing or taking away or detaining with criminal intent a married woman corresponds to section 498 of IPC, section 87 of BNS which criminalises kidnapping, abducting or inducing woman to compel her marriage corresponds to section 366 of IPC and section 85 of the BNS which punishes the husband or relative of husband of a woman subjecting her to cruelty, corresponds to section 498A.

Section 497 of Indian Penal Code, 1860 talks about adultery. It states that “Whoever has sexual intercourse with a person who is and whom he knows or has reason to believe to be the wife of another man, without the consent or connivance of that man, such sexual intercourse not amounting to the offence of rape, is guilty of the offence of adultery, and shall be punished with imprisonment of either description for a term which may extend to five years, or with fine, or with both”⁶. This section has been repealed from Bharatiya Nyaya Sanhita, 2023. The Supreme Court repealed this section through the ruling in the case “Joseph Shine vs Union of India”. The court removed the section stating that it is unconstitutional, as it violates gender equality, as it punishes

⁶ The Indian Penal Code, 1860, Act No. 45, 1860, Ministry of Law and Legislative Affairs, <https://www.indiacode.nic.in/handle/123456789/12850> (last visited Oct. 23, 2025).

only the man who had consensual sexual intercourse and not the women, it treats her as a victim which is unfair and it also does not allow the wife to sue her husband for adultery who had consensual sexual intercourse with a married woman.

The removal of adultery as a criminal offence has significantly affected marriage related offences with respect to criminal domain but its implication under civil law is valid. Adultery is still a valid ground and plays a important role in divorce, alimony and maintenance and child custody.

Both Indian Penal Code, 1860 and Bharatiya Nyaya Sanhita, 2023 are almost similar in respect of the offences related to marriage, the only difference between those two is that Indian Penal Code, 1860 has criminalised adultery whereas it has been decriminalised and struck down in the Bharatiya Nyaya Sanhita, 2023 by the Supreme Court stating that it is unconstitutional.

Legal Framework before Indian Penal Code, 1860 & Bharatiya Nyaya Sanhita, 2023

Before the Introduction of Indian Penal Code, 1860, the offences relating to marriage were governed by customs, religious and community-based norms rather than statutes and laws. Before Indian Penal Code, 1860, Hindu marriages were regulated by Smritis, which is a body of texts considered "remembered" tradition, which includes laws, ethics, and social conduct and Vedas, which is the oldest sacred texts that contains hymns, rituals, and philosophical discussions that form the foundation of classical Hinduism, offering insights into ancient Indian religion, culture, and society. These texts laid down the duties, rights and obligations of marriage but it did not provide any punishments for the same unlike Indian Penal Code, 1860.

Offences that are related to marriage are addressed by local panchayats, religious authorities and community elders and they're punishment and remedy depends upon the community's social norms and the religion.

Later Indian Penal Code, 1860 came into effect which codified all the offences related to marriage irrespective of religion. The Indian Penal Code, 1860 gave a clear definition of all the offences

related to marriage under Chapter XX, it also defined the punishment for those offences irrespective of religion and community. Then Indian Penal Code, 1860 was replaced by Bharatiya Nyaya Sanhita, 2023. The Bharatiya Nyaya Sanhita, 2023 addresses offences such as forced marriage and psychological cruelty which was unaddressed by the Indian Penal Code, 1860. There was some gender inequalities in the provisions related to offence under marriage of the Indian Penal Code, 1860 like adultery whereas there is some improvement in the Bharatiya Nyaya Sanhita, 2023 which struck down the offence of adultery.

There are many other statutes that address the offence related to marriage but they are more aligned towards a particular religion like Hindu Marriage Act, 1955, Muslim Personal Law (Shariat) Application Act, 1937, Dissolution of Muslim Marriages Act, 1939 and more general statutes like Dowry Prohibition Act, 1961, Special Marriage Act, 1954.

Challenges Faced

Despite the numerous legislations and framework there are still many challenges faced while implementing, investigating and prosecuting such offences that are related to marriage.

1. Low Public Awareness

Most of the population, especially in rural and marginalized communities are still unaware about the laws and offences that are related to marriage. Most of the population are unaware of their rights and remedies under marital offences such as protection against dowry, cruelty and bigamy. This can be reduced by awareness campaign, educating people about the marital offences and their rights and remedies for the same.

2. Unreported cases

According to the National Crime Records Bureau (NCRB) most of the cases related to marital offences often go unreported. Even if cases are reported, some of them are not registered either due to the lack of training for the law enforcement officials nor due to delayed investigation by the enforcement authorities. The National Crime Records Bureau (NCRB) also made clear that higher reporting of cases does not necessarily reflect increase in the number of cases related to marriages,

but it may be because of increased awareness among citizens to report such incidents due to initiatives by the Government and better enforcement of law by States.⁷

3. Economic Pressure

Economic pressure and poverty lead to increase in marriage especially child marriage. The parents aim to reduce financial burden, secure dowry and reduce financial distress rather than to find a better companion for their children.

4. Gender Inequality

Personal laws and statutory provisions often reflect patriarchal norms with legal frameworks prioritizing the men's authority and women's vulnerability, limiting women's rights and agency in marital decisions and remedies.

The Hindu Succession Act, 1956 does not treat women equally in matters of inheritance. However, the amendment in 2005 grants the daughters equal rights in parental property but still discrimination persists in practice, particularly in rural areas where traditional norms continue to prevail.

In cases of child custody, the welfare of the child is the primary consideration, societal biases often influence custody decisions, with mothers generally receiving favourable consideration. However, in cases where allegations of infidelity or abandonment is made, the courts may favour father side, resulting in gender discrimination.⁸

While the Constitution of India provides every citizen with equal rights but there are some Criminal Laws that shows clear bias. The National Crime Record Bureau (NCRB) 2021 data highlights that out of 1,64,033 suicides in India that year, 81,000 plus were married men, compared to 28,000 plus married women. This shows that men often endure greater mental stress, especially related to family and marriage issues.⁹

One of the main issues in gender bias is that women are always assumed/considered as victims under every act like Bharatiya Nyaya Sanhita, 2023, The Protection of Women from Domestic

⁷ National Crime Records Bureau, <https://www.ncrb.gov.in/> (last visited Oct. 24, 2025).

⁸ Gender Discrimination in Family Law in India: An Analysis, KSANDK, <https://ksandk.com/private-clients/gender-discrimination-family-law-india/> (last visited Oct. 25, 2025).

⁹ Anirudh, 4 Gender-Biased Laws in India, Finology Legal, <https://blog.finology.in/Legal-news/Gender-Biased-Laws-in-India> (last visited Oct. 26, 2025).

Violence Act, 2005 and act like The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) always aim at protecting the women from harassments. The general understanding of the society is that only women can be victims of such crimes and not men. This old school ideology should be drawn out from the society and laws should be made gender neutral according to the changes.

Section 63 of the Bharatiya Nyaya Sanhita, 2023 defines the offence of rape. The language of the provision is in the way that it only recognises men as perpetrators and women as victims. Most of the laws lacks the recognition or does not consider men as victims. There is no clear law that protects men against these situations and crimes.¹⁰

5. Social and Family Pressure

Families concerned about their family reputation, social stigma and breakdown of their family honour fear to report the offence to the authorities. Sometimes even the victim due to the fear of ostracization, social stigma and honour, they do not report the incidents to the concerned authority. Deep rooted patriarchal norms and religious traditions creates resistance to change affecting the implementation of marriage laws. Community leaders or panchayats may actively oppose enforcement efforts to preserve customs, resulting in poor reporting of offences and negative responses towards victims and officials.¹¹

6. Judicial Overload and Pendency

Only a few cases reach the court the remaining cases either get backlogged or struck in the court procedures, this hinders justice a lot. Various factors contribute to the high backlog of cases, including inadequate physical infrastructure, the legal complexity of cases, nature of evidence, absence of prescribed timeframes for case disposal, and frequent adjournments. However, one reason for the backlog is the significant shortage of judges. Despite having Special family courts, the trial is still adjudicated at a slower rate because of factors like frequent adjournments,

¹⁰ Anirudh, 4 Gender-Biased Laws in India, Finology Legal, <https://blog.finology.in/Legal-news/Gender-Biased-Laws-in-India> (last visited Oct. 26, 2025).

¹¹ S. Raju, 'Khap panchayat' interference in marriage of two consenting adults absolutely illegal, rules SC, HINDUSTAN TIMES (Mar. 27, 2018), <https://www.hindustantimes.com/india-news/khaps-interference-in-the-marriage-of-two-consenting-adults-absolutely-illegal-rules-sc/story-5EP7eiujAmgPOcfBPTqdRM.html> (last visited Oct. 27, 2025).

unavailability of parties, outdated and excessive court procedures and excessive paperwork, despite all these factors one of the main reasons is the lack or shortage of Judges. There is a shortage of Judge in family court as the judges don't prefer family court as they face emotional burden and the cases are emotionally draining which affects their mental health.¹²

7. Cultural Norms

Deeply held beliefs such as about family honour, lineage, and preservation of tradition fuel resistance to legal reforms, and often override statutory age and consent requirements. Many communities treat women as an economic liability trying to marry them to another person as soon as possible with a view to reduce their financial burdens.

8. Evidentiary and Investigation Hurdles

Most of the marital offences such as cruelty, bigamy require substantial proof of the offence. Gathering the proof and evidence especially within the closed confines of family life is too difficult. Marital disputes and psychiatric or emotional cruelty typically occur behind closed doors making it difficult for outsiders to directly witness abusive or coercive conduct. Family members present are often biased or reluctant to testify due to loyalty, fear, or pressure.¹³

Suggestions/ Recommendations

1. Organize awareness campaign, educating people about the marital offences and their rights and remedies for the same.
2. Provide proper training programmes for the law enforcement officials to deal with delayed and proper investigation of personal matters.
3. Clear laws that protect men against these situations and crimes should be introduced and the old school laws that only recognise women as victims and men as perpetrators should be repealed.

¹² Why Are 5.3 Crore Cases Pending in Indian Courts? Missing Lawyers & Witnesses, Long Stays..., THE TIMES OF INDIA (Sept. 25, 2025), <https://timesofindia.indiatimes.com/india/why-are-5-3cr-cases-pending-in-indian-courts-missing-lawyers-witnesses-long-stays-/articleshow/124187297.cms> (last visited Oct. 27, 2025).

¹³ Standard of Proof in Matrimonial Offences, Lawweb.in, <https://www.lawweb.in/2012/04/standard-of-proof-in-matrimonial.html> (last visited Oct. 29, 2025).

4. Victims and other persons should be encouraged to report the offences related to marriage in spite of fear of ostracization, social stigma and honour
5. Proper and adequate physical infrastructure, the outdated and excessive court procedures and excessive paperwork should be dealt with, because these are of personal laws and matters therefore it affects a person's personal life.

Conclusion

Marriage related offences are a serious concern due to their impact on personal life, individuals' rights and dignity. Therefore, a proper and strong legal framework is necessary for governing matters and offences related to marriage. The existing statutes that govern marriage related offences like Dowry Prohibition Act, 1961, The Protection of Women from Domestic Violence Act, 2005 and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) faces many challenges like low public awareness, social and family pressure, cultural norms and other challenges but the most important challenge is the gender specific laws and provisions that only considers women as a victim and neglects men as a victim and always considers them as perpetrators especially in offences related to marriage.

The preamble of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) states that "An Act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto" and the preamble of the Protection of Women from Domestic Violence Act, 2005 states that "An Act to provide for more effective protection of the rights of women guaranteed under the Constitution who are victims of violence of any kind occurring within the family and for matters connected therewith or incidental thereto.". This supports my statement that the laws are gender specific and needs to be reformed for the betterment of society and justice.

In the case *Rajnish vs Neha*, Supreme Court made a significant ruling against orders for interim maintenance passed by the Family Court, which was upheld by the High Court. It is a landmark judgment addressing systemic issues in maintenance proceedings.¹⁴

The respondent-wife, Neha, left the matrimonial home shortly after the birth of their son then she filed an application for interim maintenance under Section 125 of the Code of Criminal Procedure (CrPC) on behalf of herself and their minor son. The basis for her claim was financial dependency and inability to support herself and her child.

The appellant-husband, Rajnish, contested the claim, pleading financial incapacity. During the proceedings, he claimed that he was unemployed, did not own any immovable property, and had only one operational bank account. The wife countered these assertions, alleging that the husband had made investments in real estate projects and other businesses and diverting income to his parents. She also alleged that he had retained illegal possession of her *Streedhan*.

The issue revolving around this case are

1. Overlapping jurisdictions in maintenance cases filed under different statutes
2. Appropriate criteria for determining the quantum of maintenance
3. Date from which maintenance should be awarded
4. Enforcement of the maintenance orders

Let's just focus on the issue of Overlapping jurisdictions in maintenance cases filed under different statutes. The Supreme Court ruled that the parties are not precluded from approaching courts under different statutes as each statute provides distinct remedies. But the court added that this often leads to multiplicity of proceedings and conflicting orders, which is unfair for the husband. The Court held that when maintenance is awarded under one statute, this should be taken into account when awarding maintenance under another statute to avoid double benefit and to reduce the burden of the husband.

¹⁴ *Rajnish v. Neha*, (2021) 2 SCC 324, Case Analysis: Maintenance from Date of Application, The Edu Law, [https://www.theedulaw.in/content/judgements/52/Case-Analysis:-Rajnish-v.-Neha-\(2021\)-2-SCC-324---Maintenance-from-Date-of-Application](https://www.theedulaw.in/content/judgements/52/Case-Analysis:-Rajnish-v.-Neha-(2021)-2-SCC-324---Maintenance-from-Date-of-Application) (last visited Oct. 29, 2025).

This Judgement has a significant impact on men, trying to protect them. It prevents wife who are seeking maintenance under different statutes with '*Malafide Intention*'. It protects men from being exploited or abused under statues governing maintenance. This case has made a step towards making a more balanced decision without any gender bias and fair treatment of both male and female.

