

# Long overdue was the insertion of irretrievable breakdown as a ground for divorce

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## Abstract:

The religious importance of marriage also contributed to the belief that it was a holy and unbreakable union. Recent events have undermined the popular conception of marriage as an indestructible connection. It's been increasingly challenging for married couples to adapt to the changing values, opinions, and opportunities of modern society. Some of the missteps each partner makes when learning to live together might have detrimental impacts on the family. These lapses might have occurred for various reasons, including a marriage that has lost its purity is unhealthy, and it's sometimes difficult to define precisely who is to blame. Divorce has gradually lost its stigma and is often considered a viable choice for couples. After being placed on hold indefinitely, the Marriage Laws (Amendment) Bill of 2010 and 2013 has been reintroduced along with Suggested Changes. The Union Cabinet has adopted a measure that would considerably amend the Hindu Marriage Act, enacted in 1955, and the Special Marriage Act, which was formed in 1954. Numerous observers have referred to this move as really momentous. This article aims to analyze whether the new divorce law that enables spouses to claim an irretrievable breakdown in their marriage is compatible with the values of today's society.

**Key Words:** Irretrievable breakdown, Marriage, Judicial, Divorce, Marriage Laws, Hindu Marriage Act

## 1. Introduction:

Marriage is the bedrock of a well-ordered society because it discourages immoral behaviour and ensures the continuation of family structures. Hindu Dharmasastras define marriage as a lifelong commitment between one man and woman to form a happy, stable family in which the parents may raise their children together peacefully. However, the idealized notion of marriage has changed significantly as contemporary cultures' perspectives have evolved and grown more nuanced. In modern society, remarriage after divorce or death is not looked down upon (because now it can be dissolved at any time). Once considered a bad thing and permitted only in extreme instances, divorce is progressively becoming more prevalent nowadays owing to legislative and judicial action. Since unhappy marriages are bad for everyone involved, including the community at large, divorce has become more accepted. You can't have it both ways regarding marriage and this. It was never meant to be a replacement for traditional, monogamous families but rather a means to alleviate pain when keeping a marriage together seemed hopeless.[1] Therefore, it is preferable that spouses have the option of ending their marriage if they so desire; that they have the autonomy to do so when the emotional connection between them has died; that they believe they cannot live a happy and harmonious life together; and that they recognize that a permanent separation through the process of divorce will be a blessing for both parties and society as a whole.

According to the Hindu Marriage Act of 1955, divorces are only legal for one of thirteen reasons, and monogamy is tightly enforced. In this piece, I'll make an effort to assess whether or not the recent amendment that makes it possible to petition for divorce based on irretrievable collapse is appropriate to the evolving social demands of the community.

### A. The Divorce Concept:

Divorce is the legal procedure through which a marriage that does not conform to the law may be terminated. After a divorce, neither spouse has any further moral or legal responsibilities to the other. It is unclear how a divorce is handled in India. Divorce was not permitted under Hindu shastras law because Hindus see marriage as a sacred union between a man and a woman for the sake of the stage religious and sacramental rites. This was the case because Hindus see marriage as a blessed contract between a man and a woman. Divorce was legal and relatively common, particularly among the lower classes. In 1955, the government passed the Hindu Marriage Act, making divorce possible for those married Hindus who meet specific requirements. Divorce had taken on a very different meaning in Hindu culture since 1955 when the Hindu Marriage Act was passed. Divorces based on blame and those based on mutual consent are both recognized under this legislation. According to the blame theory, one spouse's fault is required for the marriage to warrant dissolution. [2] One spouse must be at fault for a divorce to be filed, and the other must be innocent, so the reasoning goes. In any case, whoever is guilty can't. Unfortunately, the dispute cannot be settled if both parties are to blame.

### B. Dissolution of Marriage Theory:

Ancient judicial and legislative precedents may have inspired the breakdown hypothesis of divorce. A divorce was finalized after lengthy judicial proceedings. As we've seen, Salmond J.'s explication of the breakdown principle is primarily considered a landmark publication. Call for evidence of previous work: [3]

*The legislature must have meant for a separation of three years to be taken as prima facie evidence of genuine grounds for divorce, and this Court should follow suit. Any marriage that ends during that window must have done so lawfully, barring exceptional circumstances if nothing out of the norm happens to prevent it. Maintaining their marital status is not in anyone's best interest,*

*including the couple's, after they have stopped living together as husband and wife for a significant amount of time. This is true. If one or both spouses decide to move out, the marriage may not survive.*

**C. Persistence is often not only unless but also malicious:**

The "breakdown of marital hypothesis" is a guiding premise underpinning the Matrimonial Causes Act of 1973. Australia was the first nation to legally recognize divorce after five years of living apart in 1966. It is even more amazing that Russia and the Nordic nations have formally recognized it. Therefore, divorce is legally recognized in many nations once a certain time has passed. The highest Court in a legal system [4] To paraphrase one observer, "we could be facing a new scenario in terms of the focus to be given to a particular issue," in this case, the dissolution of marriage. This was a bone of contention since it included the reason for the breakup. Friedman is quite correct in bringing it out. [5];

*The marriage is likely doomed if the pair has been divorced for a long time and hasn't tried to reunite. In the absence of hope of reconciliation, long-separated spouses may resort to legal mechanisms to maintain the image of marital harmony. As a result, partners may feel less comfortable talking openly or freely about their desire to have sexual or other connections outside their marriage with people they don't know. By protecting the righteous, this rule will encourage infidelity, fortification, and personal hatred rather than marital purity.*

*The original Section 13(1A) of the Hindu Marriage Act of 1955 was enacted. Any spouse may file for divorce under this provision if the marriage has been legally separated for at least two years and conjugal rights have not been restored. Divorce's "breakdown hypothesis" is lawfully enshrined in law for the first time. Before the amendment, "only the deemed innocent party had the authority to apply for divorce," as stated by V.S. Deshpande J. Judicial separation and the non-restoration of marital rights is an issue that has received increasing attention in recent years. Regardless of "whose fault the collapse of the marriage was," a divorce must be granted since this represents a violation of the marital contract. [6]*

Before 1964, divorce was not legally recognized and was only allowed in "limited degrees." The Marriage Laws (Amendment) Act of 1976, which added the words "by mutual consent," gave the breakdown theory of divorce the requisite legal basis.[7] The breakdown hypothesis best shows modern views on divorce, which are inextricably linked to the no-fault approach. For proponents of this view, a marriage may be legally dissolved if one or both partners can demonstrate that the union has irretrievably broken down and that they desire to move on from the miserable status quo. A marriage could be considered unsuccessful if the couple cannot cooperate to achieve the goals they set for themselves before becoming married. Once a marriage has been irreparably destroyed, it may be beyond repair.[8]

Published in 1978, the 71st Report of the Law Commission examined the state of marital law and advocated for establishing a three-year separation and divorce as a legal cause. This proposal came up simultaneously with the Law Commission's examination of the country's marriage rules.[9]

In light of all the recommendations, In 1981, a measure was introduced, but it never became law due to widespread opposition from women's groups. Moreover, some authorities were concerned that unreliable males might dump their spouses to take advantage of this situation. These doubts helped doom the measure to defeat.[10] According to the findings, there's no use arguing about divorce if the marriage is already over. Ultimately, it is up to the people in the relationship to determine whether they are experiencing fulfilment from it. Remember that divorce is a natural choice and may help you escape a jam. The purpose of a collaborative divorce is not to air past grievances but to assist divorcing couples, and their children adjust to their new realities in a manner that causes them the least amount of stress and pain. [11]

In many jurisdictions, irretrievable marriage breakdown is a good cause for divorce. This is because it can never be fixed once a marriage has been harmed. The existing legal framework for marriage in India does not distinguish between an irretrievable marriage breakdown and other grounds for divorce. Unfortunately, this is not a valid ground for divorce in India. When a marriage is hopelessly broken, the best option is for both parties to agree to end it. Neither spouse should be blamed or judged for their choice to end their marriage via divorce. It is unreasonable to assume that the state would ignore a couple's request for a divorce when the wedding is hopelessly destroyed.[12] It is reasonable to suppose that a marriage connection that has been in a state of separation for a long time cannot be repaired to its previous condition. By failing to protect the sanctity of marriage in such cases, the law displays shocking indifference to the emotional needs of the couples involved. Weddings should be preserved for as long and in as many places as feasible for the benefit of the general welfare but should be considered dissolved when this becomes impossible.

Because of the limited nature of human existence, awful conditions can't be permitted to persist endlessly. Eventually, it will be necessary to put a stop to this. Legislators must recognize these crises and react effectively to inevitable demands.

In a landmark ruling, the Supreme Court of India urged the Indian government to add "irretrievable collapse of the marriage" to the Hindu Marriage Act of 1955 as a distinct cause for divorce. The Hindu Marriage Act of 1955 was passed in India's history.[13] Furthermore, the Delhi High Court [14] stated that it is unfair to expect the couple to behave like they are still in love even when their feelings for one another have changed significantly, and they have no future as husband and wife.

Yes, at this point, it is reasonable to state that the couple is no longer together. For legal purposes, a couple is considered to have broken up if they have lived in separate residences for a significant period without attempting to reconcile. If the Mortimer Committee finds that "there is no reasonable possibility that the couples will ever again live together as husband and wife" because

of "a breakdown in the marital relationship or analogous unfavourable circumstances," the marriage may be legally dissolved.[15] The Bombay High Court [16] The application of Section 13 (1A) was seen as a legislative acknowledgement of the belief that it is in society's best interest not to keep the partners tied together if their relationship had broken down in 1964. This hypothesis was confirmed to be true in 1964. As a result, the breakdown hypothesis is now codified in Indian law as a provision that permits divorce for both "innocent" and "guilty" spouses. Or, the petitioner did not show that they were not trying to take advantage of the respondent's error or incompetence, which is one of the limitations of marital remedies.[17]

### 1.1. The response of the Courts and Irretrievable Breakdown of Marriage

India's divorce laws do not recognize irretrievable breakdowns as a separate reason for dissolution, which is contrary to the norm in most modern nations. Recently, there has been a shift toward a more egalitarian and communal view of family life. In some households, the husband and wife have jobs and contribute financially to the home. As more women have entered the labour and public sphere, the traditional family has evolved into a coalition. If the alliance is doomed to collapse, it is imperative that legal backing be withdrawn immediately.

Within the bounds of the law, our courts have chosen to be generous in their interpretation of the divorce-by-mutual-consent provision to promote the interests of justice. Our legal system reached this conclusion because the law is dynamic and must adapt to changing circumstances. If the marriage has ended and both parties want a divorce, some courts have ruled that the current legal status quo would inflict more anguish and suffering on the pair.[18]

Since the sentence had already fulfilled its purpose after thirteen years, the Court decided not to extend it. The judge indicated that the show ought to end at some point. The term "irretrievable collapse of marriage" describes a marriage that has reached a point where maintaining it would be like condemning both partners to a life of unending agony. That the marriage is doomed and beyond repair. [19] The Supreme Court found that marriage had irretrievably broken down in *Rishikesh Sharma v. Saroj Sharma* [20] because the respondent woman had been living apart from her husband since 1981. For both couples, staying together would be "marriage for the sake of marriage"; therefore, the Court approved the divorce. It was based on this comment that the Court granted him a divorce.

Before this, the Supreme Court of the United States had stated. [21]: Divorce should be possible if a marriage has really broken down and both spouses agree. We encourage lawmakers to take action to simplify and modernize the nation's marriage and divorce laws so that all couples have a fair and equitable path to the resolution of their marital conflicts. This would be done so that the country's divorce and marriage laws are consistent. Naveen and Neelu Kohli: A Comparison [22] This recommendation is based on a careful analysis of all data at hand. The Secretary of the Ministry of Law and Justice at the Indian Government's Department of Legal Affairs has to see a copy of this verdict before any action can be taken. We concur with the conclusions made in the 71st Report of the Law Commission of India on "Irretrievable Breakdown of Marriage," based on our study and review of instances worldwide. Many of the judicially addressed cases of mental cruelty in marriage have characteristics. Dissolution of marriage in India is the topic of the 71st Report of the Law Commission of India, which is now available for consideration. [23]

In *Manish Goel v. Rohini Goel* [24], the Supreme Court has repeatedly affirmed the right to divorce in circumstances of total emotional and psychological incompatibility. This still holds even if there is no chance of saving the marriage. Due to the absence of adequate divorce legislation, the Supreme Court has on occasion issued contradictory rulings on the meaning of an irretrievable divorce. *Vishnu Dutt Sharma vs. Manju Dutt Sharma* is a case in point. [25] The two-judge bench denied the divorce, notwithstanding the apparent dissolution of the marriage. The Court said that amending the Hindu Marriage Act of 1955 to include such a premise would fall within the purview of the Legislative Branch. We have seen a wide variety of perspectives on this slight issue in the twenty years after the Supreme Court's ruling in the case of *V. Bhagat v. D. Bhagat*. [26] The Supreme Court ruled in favour of divorce for *Anil Kumar Jain and Maya Jain*, finding that the couple's marriage had "irretrievably broken down." [27] They refuse to separate despite the evident problems in their marriage.

In allowing divorce for irretrievable breakdown of the marriage, the courts have been helping the impoverished. Due to the tremendous expense of having all plaintiffs' spouses appear before the Supreme Court, there have only been a few situations when such assistance has been given. Without including "irretrievable breakdown of marriage" Divorce applications based on irretrievable breakdown would therefore be admissible in Court. The current system is unfavourable because of the inconsistent court rulings that reflect the preferences and viewpoints of individual judges. Putting someone's fate as serious as life or death in the hands of a judge or judge is unjust. For the sake of everyone involved, we need to establish unequivocally whether or not irreparable breakdown may be used as a legal basis for divorce.

### 1.2. A Bill to Amend the Marriage Law, Introduced in 2010

The Bill has been sitting in Congress's queue since 1981. The Bill's purpose is to add "irretrievable breakdown" as a reason for divorce to the Special Marriage Act of 1954 and the Hindu Marriage Act of 1955. In India, marriage is regulated by these laws. When the Law Commission of India began its probe, nothing was done. The 217th report from the Commission, delivered in March 2009, expressed unanimous approval for this measure. By the Hindu Marriage Act of 1955 and the Special Marriage Act of 1954, "Irretrievable Breakdown of Marriage" must be included as a valid reason for divorce. These two laws have an impact on married life in India. The Commission suggested that the Court consider the welfare of both spouses and any children they may support before granting a divorce based on irretrievable breakdown. This must occur before the Court may sign the

divorce decree.

The Court ruled that because it was clear that the couple hadn't lived together in over a year. A half since the edict restoring their conjugal rights was issued, both the husband and the wife should be entitled to file for divorce on the ground that cohabitation has not been restarted for two years or more from the date of reparation of conjugal rights. Therefore, getting married isn't necessary to solidify the relationship. [28] According to the proposed Section 13C, for a court to rule that a marriage has irretrievably dissolved, it must be satisfied that the parties have been living apart for at least three years prior to the presentation of the petition. This need must be met for the Court to rule that a marriage has irretrievably broken down. Separation of at least three years, with no more than three-month intervals of reconciliation, is necessary for spouses to dissolve a marriage or civil union lawfully. The Court won't sign off on a divorce unless it's sure the wife and kids will be taken care of. They say it's a good idea since it would make it simpler for individuals to end toxic marriages. Nonetheless, the irreparable breakdown clause's cultural ramifications must be considered. However, the "irretrievable collapse" explanation is not a new line in Provision 13 of the Hindu Marriage Act.

However, the more accurate interpretation is that it reveals a profound disruption in the fundamental institutional structure of India's Family Law. There is a shift from "fault" divorce conditions to "no-fault" divorce terms if the marriage has broken down beyond repair. Once the term "irretrievable collapse of marriage" is recognized as the basis for obtaining a divorce following the relevant Acts, things are sure to change. But the breakdown concept may only be acknowledged and utilized in the same manner it has been thought of, tested, and employed within the Common Law system. This is the sole acceptable procedure under the law for adopting this kind. The group's founders think that moral judgments, such as who is guilty and who is innocent, have no role in deciding whether a marriage should be dissolved. This is because there is no way to determine who is "completely innocent" or "entirely guilty" in any specific circumstance that may emerge within a marriage.

### 1.3. A Bill to Amend the Marriage Law, Introduced in 2013

The Marriage Act of 2013 was first suggested on August 4, 2010. It has been decided that the discussion will take place in 2013. The Bill's passage was met with an onslaught of criticism from people and organizations concerned with protecting their rights. Women's groups reportedly voiced strong criticism and called for the plan's abandonment. Activists advocating for women's rights say that the Act's passage will inflict substantial harm on women due to women's unequal standing within the Indian social order. The Parliamentary Standing Committee on Personnel, Public Grievances, Law and Justice is headed by Jayanti Natrajan, according to a statement by the Rajya Sabha Chairman on August 23, 2010. The Standing Committee considered many different points of view. Legislators amended the Bill and adopted a new version after hearing from law school teachers, organizations working for women and children, and groups fighting for men's rights.[29]

Furthermore, the Standing Committee issued a press statement requesting public comment. Standing Committee improved Marriage Law (Amendment) Bill, 2010, by hearing all sides and considering all relevant issues. During the 2013 session, the Marriage Law (Amendment) Bill underwent significant revisions and was reintroduced in the Rajya Sabha (Upper House). The upper house of parliament, the Rajya Sabha, passed the Bill on August 26, 2013. The measure is now being debated in the House of Representatives.

### 1.4. The Suggested Changes

This Bill seeks to amend the Hindu Marriage Act of 1955 and the Special Marriage Act of 1954 to broaden the grounds for divorce when a marriage has irretrievably broken down. The Bill also considers and investigates the consequences of how the property would be split should a divorce be granted for the cause mentioned above. Two significant problems discussed above drove the development of this statute. In addition to these mandatory discussions, the Act included other issues, such as how the waiting time should be shortened if both parties agree. This proposed amendment seeks to offer a reason for divorce based on irreconcilable disagreements inside the marriage, in addition to protecting property rights. This provision provides the impetus for the present proposal. Therefore, it was intended to include the two significant difficulties discussed below as grounds for divorce under section 13 of the Hindu Marriage Act, 1955 and section 28 of the Special Marriage Act, 1954. The proposal argues for expanding the list of legally permissible reasons for divorce to include "the continuing of the marriage is not in the best interests of either party." [30]

### Conclusion:

Given the potential for rapid change, a static set of rules is impractical. The requirements and goals of a given community should play a significant role in shaping the adoption of legislation and the degree to which it is executed. So too, must laws evolve to reflect shifting social mores. Many Supreme Court rulings have made it plain that the Court favours adding an irretrievable marriage breakdown as a separate reason for divorce. It has been argued before the Supreme Court that an irretrievable marriage breakdown constitutes an independent ground for divorce. We both recognize that marriage is essential to establishing stable families and communities. Everyone can take pleasure in it, and learn something that will aid them in the long run. A marriage is simply ceremonial and not meaningful when there is a significant chasm between the expectations of each spouse and the amount of trust between them. As a culture, we are moving away from the idea that husband and wife should stay together till death and instead embrace the idea that they should be happy and fulfilled in their marriage. Necessary references The only legitimate and solid basis for divorce is irretrievable collapse, especially in light of the ever-evolving socio-legal requirements of society. This is due to the fact that irreparable damage can never be repaired.

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