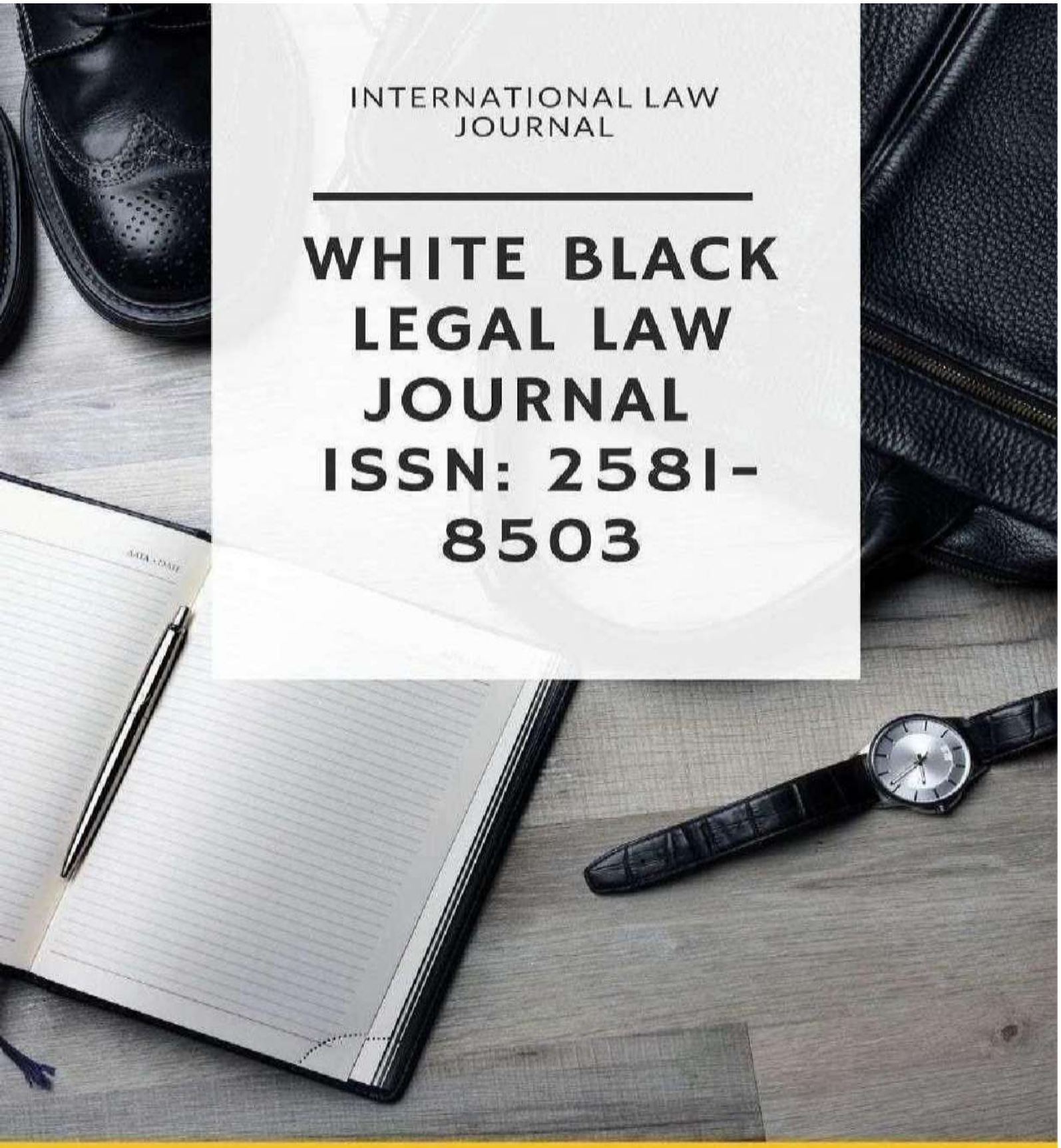

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With this thought, we hereby present to you

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A COMPREHENSIVE EXAMINATION OF SECTION 125 OF THE 1973 CODE OF CRIMINAL PROCEDURE: GROWTH AND DEVELOPMENT, AND PRESENT-DAY PROBLEMS

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Abstract

India's commitment to social justice is exemplified by Section 125 of the Code of Criminal Procedure (CrPC), 1973, which is enacted to prevent destitution of vulnerable dependents wives, children, and parents, and to claim immediate financial assistance when abandoned by those who are responsible for their maintenance. This provision, which is based on the ideals of social justice and human dignity, protects dependents who are at risk of being abandoned without support. This paper examines the legislative evolution, judicial interpretation, procedural mechanisms, and intersection with personal laws of the provision using scholarly books, judicial academy resources, and significant decisions. Given that maintenance jurisprudence was recently enacted as Section 106 of the Bharatiya Nagarik Suraksha Sanhita (BNSS), 2023, this study evaluates its continuity and reform. The analysis highlights persistent challenges in enforcement, quantification, and harmonization with religious laws and proposes structured reforms for equitable implementation.

Keywords: Section 125 CrPC, Maintenance, BNSS 106, Uniform Civil Code, Judicial Interpretation, Gender Justice, Enforcement Mechanisms

1. Introduction

"Poverty is the worst form of violence." – Mahatma Gandhi

A quasi-civil remedy incorporated in India's Criminal Justice System, Section 125 CrPC, is a tangible manifestation of India's constitutional guarantee of social justice (Articles 38 and 39). This provision, which has been put in place to curb destitution and vagrancy, gives magistrates the authority to mandate regular payments for dependents who have been ignored by family members who have "sufficient means." Its secular application surpasses boundaries of faith and provides a consistent safety net, unlike personal laws (Saurabh, K. 2021). The short and

simple characteristics of the provision sets it apart from prolonged civil suits by focusing on speed over procedural laxity. ***(Badshah v. Urmila Badshah Godse, 2014).*** The latest modifications introduced under the BNSS 2023 modernize language for accessibility while maintaining its primary objectives. Using primary materials such as judicial training manuals, law commission reports, and landmark judgments, this study examines Section 125 from various viewpoints, including its historical bases, jurisprudential expansion, operational difficulties, and future perspectives.

2. History of Legislation and the Constitutional Foundations:

2.1 Colonial Roots and Current Reforms

Section 488 of the 1898 CrPC, which recognized maintenance claims for wives and children, led the foundation for Section 125. Sec 125 CrPC was the result of the Law Commission's recommendation in its 41st Report (1969) to expand the categories to include parents and divorced wives. (*(National Judicial Academy, 2020)*

To prevent delays that affect claimants, the 2001 amendment added interim maintenance as a proviso to Section 125(1). Section 125 was replaced by BNSS Section 106 in 2023, which kept the essential provisions while simplifying the wording for readability. *(Ratanlal & Dhirajlal, 2023).*

2.2 Alignment with the Constitution and the International Community

By guaranteeing dignity through financial security, this section puts into practice Directive Principles (Articles 39(e) and 41). Judicial interpretations associate it to the right to life guaranteed by Article 21 as in ***Danial Latifi v. Union of India, (2001).*** On an international level, it reinforces nation's obligations to uphold family rights by aligning with CEDAW (Article 16) and under Article 25 of the Universal Declaration of Human Rights. (Saurabh, K. 2021).

3. Eligibility and Judicial Expansion of Claimant Categories

3.1 Wives: Transition from Lawful marriage to De facto Unions

A wife can seek maintenance if she establishes the existence of a valid marriage (*Badshah,* 2014), that she is unable to support herself (***Kirti v. Oriental Insurance Co,* 2021)** and that her husband has sufficient, means but he neglects or refuses to maintain her. **(*Vijay Kumar Prasad v. State of Bihar, 2004*)**

A divorced wife can also seek maintenance under this section unless she remarries (*Danial Latifi*, 2001). In ***Shabana Bano v. Imran Khan (2010)***, Section 125 of the Muslim Women (Protection of Rights on Divorce) Act, 1986, (hereinafter called MWPRD Act), had been interpreted in a way that assured Muslim women's maintenance rights continued even after the iddat period.

In the case of ***D. Velusamy v. D. Patchaiammal*** **(2010)**, courts recognized maintenance claims in long-term, stable live-in relationships, despite their customary exclusion. This field of law is still controversial and developing.The following prerequisites were set forth by the Supreme Court in this case:

(a) Capacity to marry and legal age,

(b) Publicly showing them as husband and wife,

(c) Cohabitated for a 'significant period'.

Divergent responses to maintenance claims involving non-formal marital relationships have been shown by the judiciary. The Court in ***Savitaben Somabhai Bhatiya v. State of Gujarat, AIR (2005)*** took a rigid formalist stance, refusing maintenance in cases where the couples did not have a lawful marriage. This stance, which insisted on documentary confirmation of marriage as a prerequisite for relief under Section 125 CrPC, put technical validity ahead of socioeconomic realities.

However, a turning point case that embraced a social justice framework was ***Badshah v. Urmila Badshah Godse (2014***). The Court determined that prolonged cohabitation warrants a presumption of marriage, acknowledging that the section's humanitarian objectives transcend rigorous requirements. The Bench stressed: "Section 125 must be read with equity in mind to prevent destitution. When partners routinely live together, the absence of ceremonial rituals does not release them from maintenance obligations.

The jurisprudential dispute between these judgements was progressively concluded in ***ABC v. XYZ (2025 INSC 129)***, providing protection to second spouses in de facto divorces. The Court declared that the essence of the relationship, not merely its formality, determines a husband's moral duty to provide for his wife. If a man purposefully enters a second marriage while the first is still in effect, he cannot evade maintenance by arguing that the marriage is null and void.

The judiciary's conformity with Section 125's constitutional mandate under Articles 15(3) and

39 is reflected in this trifurcated development, which began with *Savitaben's* rigidity and progressed to Badshah's sociological awareness and ABC's moral necessity. According to ABC v. XYZ Maintenance is the corresponding right of dignity under Article 21 and not charity. The essence of the provision is undermined by overly technical objections. According to this synthesis, ABC v. XYZ harmonizes the doctrine by requiring rights to be conditioned on substantive equity instead of technicality, even though Savitaben and Badshah cases represented opposing poles. **Principle of ethical correlativity** is thus crystallized by this ruling: if one accepts the advantages of a partnership, they must also endure its liabilities.

3.2 Obligation for children:

Minor children, whether illegitimate or legitimate, can seek maintenance unless they attain the age of majority. (***Kirtikant D. Vadodaria v. State of Gujarat***, (1996). Adult who is disabled can receive support if disability prevents self-sufficiency. Even courts can impose on both parents the liability to support their disabled child if mother also has earning capacity. (***Rajnesh v. Neha***, **2021)**

3.3 Parents: Gender-Neutral Protections

Biological/adoptive parents who are unable to sustain themselves can claim equally from their sons and daughters equally. *B*eing gender neutral, both father and mother can be claimants. *In **Rohit Manchanda v. Smriti (2023)***, the Delhi High Court included mothers-in-law in cases where the daughter-in-law was the primary provider.

3.4 Live-in Relationships: Extending the notion of "wife"

For cohabitations longer than five years, ***Velusamy, (2010) and Madan Mohan Singh, (2010)*** established a "marriage-like presumption"; nevertheless, they did not include temporary partnerships.

4. Key Phrases Interpreted by the Judiciary:

4.1 "Unable to Maintain Themselves"

Literal destitution tests are rejected by courts. A wife who earns very little money was also provided with maintenance to live a dignified life in ***Chand Begum v. Hyderbaig, (1972).*** The NJA's Maintenance Laws Training Module (2020) suggests that magistrates evaluate the "actual capacity versus social reality" of applicants.

4.2 "Neglect or Refusal"

Even in the absence of explicit denial, wilful evasion is sufficient. According to the ruling in ***K. Sivarama Krishnan v. K. Santhakumari, 2001 Cri LJ 2796 (Mad)*** putting a woman to starvation is considered neglect. ***Rajnesh*** explained that children cannot avoid their responsibilities by accusing their parents of wrongdoing in the past.

4.3 "Sufficient Means"

A legally married woman who is entitled to support is considered a "wife" unless she declines to live with him without "sufficient cause" (such as cruelty or adultery). National Judicial Academy**.** (2020). Courts adopt a liberal interpretation on "sufficient cause." Dowry harassment or torture justifies the wife's reason of residing separately. **(*Sirajmohammedkhan v. Hafizunnisa, 1981*).** Impotency is a legitimate reason for refusal to cohabit. West Bengal Judicial Academy. (2019). Divorced wives can claim until remarriage (*Shabana Bano v. Imran Khan*)

5. Procedural Mechanism Overview and challenges in enforcement:

5.1 From Filing to Execution:

A) Jurisdiction:

According to Section 125(1), the application is submitted to a Judicial Magistrate of the First Class. Petitions are to be filed where claimant resides (*Section 126*)

B) Interim Relief:

According to the proviso of Section 125(1), courts have the authority to provide temporary relief ***(Kavita v. Namdeo, 2014)***. Within sixty days, magistrates have to provide provisional maintenance. To cut down on delays, the Criminal Procedure (Amendment) Act of 2001 instituted time-bound disposal.

C) Evidence:

Supreme court in ***Dwarika Prasad Satpathy v. Bidyut Prava Dixit*, (1999)** 7 SCC 675 stated that summary processes allow affidavits without requiring strict proof.

D) Determination of Quantum:

Details of the claimant's financial hardship and the respondent's negligence must be disclosed such as applicant’s necessities, respondent’s disposable income, local cost-of-living indices (*Rajnesh Guidelines*).

5.2 Enforcement Difficulties: Systemic Obstacles to Successful Execution

Maintenance enforcement is consistently weakened by systemic inefficiencies, even with strong statutory measures under Section 125(3) that allow for wage/asset attachment or imprisonment upto one month. Three main issues are the cause of 62% of non-compliance orders, according to empirical investigations (NCRB, 2022). Failure to comply may result in wage attachment or up to one month in jail under Section 125(3):

Despite Section 125(3) allowing imprisonment or asset attachment, delays plague execution:

A) One-Year Limitation on Arrears Recovery:

Regardless of the length of the order, Section 125(3) limits the recovery of arrears to just 12 months before the application date ***(Bhag Singh v. Sukhwinder Kaur, 1998*** CrLJ 3218). The Supreme Court recognized in ***Kirti v. Oriental Insurance Co. (2021)*** that this encourages respondents to deliberately postpone payments, knowing that pre-12-month dues are irrecoverable. According to data from the Delhi Legal Services Authority (2023), 41% of defaulters take advantage of this restriction by simply paying the debts from the most recent year to escape prior obligations. (Ratanlal & Dhirajlal, 2023, p. 154).

B) Challenges with undisclosed income:

Magistrates are not authorized to summon banks for records of the parties without holding separate proceedings. (*Rajnesh, 2021).* Due to the absence of investigative powers, it becomes challenging for magistrates to trace benami assets or to trace the undisclosed assets. 16. (*West Bengal Judicial Academy Report*, 2019).Defaulters usually transfer assets to family members and underreport income from informal employment. **(*Shamima Farooqui v. Shahid Khan*, 2015** *SCC OnLine SC 609).*

C) Jurisdictional Issues:

Section 128 CrPC requires maintenance orders to be enforced nationally, enabling transfers between states without new filings 19. Administrative backlog causes delays of 6–18 months since orders need to be re-registered in the respondent's district. 9. For instance, full execution procedures must be restarted to enforce a Haryana ruling in Delhi. Also, during interstate transfers, records are lost and duplicated due to the lack of a national database for maintenance orders (Law Commission of India, 2014). Inter-state inefficient coordination delays recovery.

Below here is provided data of some of the problems with the existing use of Section 125,

CrPC.

Impediments	Numbers	Source
1. Non-Compliance	62% of orders are violated	NCRB, *Crime in India* (2022)
2. Concealed Income	68% of cases	WB Judicial Academy (2019)
3. Enforcement Inter-State	54% cases are delayed beyond 1 year	NLU Delhi Study (2023)
4. Adherence to *Rajnesh's* guidelines	Only 19% of courts are applying these guidelines	NJA, *Maintenance Metrics* (2021)

6. Jurisprudential Debates:

6.1 Personal Laws vs. Section 125: Harmonization Issues

In ***Mohd. Ahmed Khan v. Shah Bano Begum (1985)***, the Supreme Court ruled that Section 125 CrPC (a secular legislation) permits divorced Muslim women to receive maintenance beyond the iddat period until remarriage. Citing constitutional requirements under Articles 14, 15, and 21, the Court determined that this remedy overrides conflicting personal legislation. But it got backlash from Lawmakers. Conservative Muslim organizations expressed political resistance to the verdict, and the government also proposed a bill against this. As a result, the Muslim Women (Protection of Rights on Divorce) Act, 1986, (hereinafter called the MWPRD Act) was passed, transferring accountability to family members or Waqf Boards of 1913 and restricting husband's liability to the iddat period, which is normally three months.

The Supreme Court examined the MWPRD Act constitutionally in ***Danial Latifi v. Union of India (2001)***, mandating lump-sum maintenance to fulfil a wife's lifetime needs, thereby preventing the iddat restriction. In (***Shabana Bano v. Imran Khan, 2010)*** court stated that the MWPRD Act and Section 125 CrPC function concurrently. Muslim women who are divorced may seek remedies under both regimes without being excluded. Courts have often ruled that Hindu Marriage Act remedies do not supersede or contradict the CrPC. For instance, a Hindu spouse may simultaneously request relief under both statutes.

The Supreme Court of India in case of ***Bhuwan Mohan Singh v. Meena, 2014*** reiterated that the CrPC is still a backup protection in cases where personal laws are insufficient.

Aspect	Muslim Law (Post-*Shabana Bano*)	Hindu Law (Section 24 HMA)
With CrPC	Concurrent remedies that work together. ***Shabana Bano*, (2010).** MWPRDA is "additional security," not a substitute for, CrPC. (*Danial Latifi, 2001 v. UOI*, 2001).	*"Supplementary and harmonious"* (***Bhuwan Mohan Singh v. Meena*** (2014) 5 SCC 353). No conflict as HMA addresses *"pendente lite needs distinct from post-decree obligations"* (*Rajeev v. Ramesh*, 2021).
Applicant Autonomy	*"unrestrained capacity to select remedies under the MWPRDA or CrPC* (***Iqbal Bano v. State of UP*** (2007) 6 SCC 785). Although allowed, dual claims are subject to "quantum adjustment." (***Shabana Bano***).	*"Parallel proceeding can be there."* (***Padmja Sharma v. Ratan Lal*** (2000) 9 SCC 266). CrPC continues to be a "independent residual remedy." (*Neelam Malhotra v. Rajesh*, 2020).
Temporary Scope	**CrPC**: Lifetime financial support until remarriage (*Section 125(1)*. **MWPRDA**: *"Provisions for future needs in one lump sum"* (***Danial Latifi***).	*"Restricted to subsistence while legal proceedings are pending* (***Sumana Chatterjee v. Siddhartha*** (2018) 3 SCC 421). HMA does not provide post-decree coverage. (*Vishnu Dutt v. Manju*, 2009).
Mechanism for Enforcement	Payment under MWPRDA will reduce the liability under section 125. (***Shabana Bano***).	*"HMA payments are "irrelevant to CrPC quantification"; there is no statutory set-off."* (***K. Srinivas Rao v. D.A. Deepa*** (2013) 5 SCC 226).

7. BNSS 2023: Legislative reform:

Section 106 of the Bharatiya Nagarik Suraksha Sanhita (BNSS) introduces three significant procedural changes while maintaining the substantive framework of Section 125 CrPC:

a) Using specific e-portals to submit applications;

b) 30-day conciliation attempts prior to hearings is the mediation mandate;

c) Automatic escalation provisions for the educational expenses of minors, and

d) importantly, it leaves out the Rajnesh Guidelines, which had quantification ambiguities

8. Recommendations for Amendments:

A). Standardized Quantum Formula:

The "50:30:20" formula—50 percent income for needs, 30 percent for dependents, and 20 percent for savings—was proposed in the 2020 Rajnesh Guidelines, however magistrates hardly ever follow it consistently. Demand inflation indexing (Tejaswini Gaud v. Shekhar, 2023; yearly 10% escalation). To include these concepts, amend BNSS Section 106(2).

B). Extend the Recovery of Arrears time:

In accordance with the Limitation Act (Law Commission Report No. 246, 2014), substitute a 3-year period instead of the 12-month limitation

C). Increase the Transparency in Assets Declaration:

At the filing stage, require asset disclosure affidavits. And to provide magistrates the authority to request financial records.

D). Infrastructure for National Enforcement:

For interstate coordination and real-time order tracking, create a Central Maintenance Dashboard with the help of District Legal Services Authorities (DLSAs) Fast-Track Recovery Cells for attachment and execution.

9. Conclusion:

As a testament to social justice, Section 125 CrPC puts the constitutional guarantees of gender equity (Article 15(3)) and dignity (Article 21) for neglected dependents into practice. Its development, from Shah Bano's seismic reaffirmation of secular rights to Rajnesh's quantification framework, demonstrates the judiciary's dedication towards transformative constitutionalism. However, a paradox is revealed when the BNSS (2023) reincarnates this legacy in Section 106 with procedural innovation but without substantive reform.

The statistics clearly shows financial opacity accounts for 68% of defaults (WBJA, 2019), and interstate enforcement delays affect 54% of orders (NLU Delhi, 2023). By avoiding these problems, BNSS runs the risk of turning its reforms into "parchment promises" (Rajnesh, 2020).

To turn this "moral duty" into real security, judicial training, precise legislation, and alignment with personal laws are essential. To translate statutory ideals into concrete security, India needs to incorporate Rajnesh standards into BNSS regulations, create a National Maintenance Dashboard to enable enforcement in real time. The Supreme Court has also emphasized that maintenance is no charity but the price of dignity.

References:

Primary Sources

1. *Code of Criminal Procedure, 1973 (Section 125).*
2. *Bharatiya Nagarik Suraksha Sanhita, 2023 (Section 106).*
3. *Muslim Women (Protection of Rights on Divorce) Act, 1986*. Books & Commentaries
1. Kelkar, R.V. *Criminal Procedure* (6th ed., Eastern Book Co., 2021).
2. Basu, Durga Das. *Criminal Procedure Code* (12th ed., LexisNexis, 2022).
3. Sathe, S.P. *Indian Constitutional Law* (9th ed., 2019).
4. Ratanlal & Dhirajlal. *The Code of Criminal Procedure* (24th ed., LexisNexis, 2023).

Judicial Academy Resources

1. National Judicial Academy. *Maintenance Laws in India: A Training Module* (2020).
2. West Bengal Judicial Academy. *Interpretation of Section 125 CrPC* (2019).
3. West Bengal Judicial Academy, *Enforcement Study* (2019).
4. National Judicial Academy, *Maintenance Enforcement: Best Practices* (2021).

Judgments

1. *Mohd. Ahmed Khan v. Shah Bano Begum* (1985) 2 SCC 556.
2. *Danial Latifi v. Union of India* (2001) 7 SCC 756.
3. *D. Velusamy v. D. Patchaiammal* (2010) 10 SCC 469.
4. *Rajnesh v. Neha* (2020) SCC OnLine SC 903.
5. *Badshah v. Urmila Badshah Godse* (2014) 1 SCC 188.
6. *K. Sivarama Krishnan v. K. Santhakumari, 2001 Cri LJ 2796 (Mad).*
7. *Chand Begum v. Hyderbaig, AIR 1972 AP 96.*
8. *Madan Mohan Singh v. Rajni Kant (2010) 9 SCC 209.*
9. *Sirajmohmedkhan Janmohamadkhan v. Hafizunnisa Yasinkhan* [1981] AIR SC 1972.
10. *ABC v. XYZ*, 2025 INSC 129.

11. *Kirtikant D. Vadodaria v. State of Gujarat*, (1996) 4 SCC 479).
12. *Savitaben Somabhai Bhatiya v. State of Gujarat, (2005) 3 SCC 636.*
13. *Shabana Bano v. Imran Khan*, (2010) 1 SCC 666. Scholarly Articles
14. Tomar, Ekta. "A Legal Study on Cr. PC 125 and UCC." *ShodhKosh* (2024) [DOI:10.29121/shodhkosh.v5.i2.2024.2964].
15. Saurabh, K. (2021). Article on Maintenance under Sec 125 CrPC with Reference Uniform Civil Code. *Issue 4 Int'l JL Mgmt. & Human.*, *4*, 4032.
16. Saxena, N. "Legal Protection for Women: A Critical Study of Section 125 CrPC." *JILI*
17. 60(1) (2018).
18. GN, P. (2023). Critical Analysis of Order for Maintenance of Wife, Children and Parents in CRPC. *Children and Parents in CRPC (May 17, 2023)*.
19. Dixit, B. (2023). Maintenance under Section 125 CRPC: an Analysis on Its Impact on Gender Equality and Social Justice in India. *Issue 2 Indian JL & Legal Rsch.*, *5*, 1.
20. Ralte, H., & Doungel, J. (2022). Administration of Gender Justice through Section 125 of the CRPC, 1973. *Issue 2 Indian JL & Legal Rsch.*, *4*, 1.

Reports

1. Law Commission of India. *41st Report on CrPC* (1969).
2. Law Commission of India. *Report No. 243: Section 125 CrPC and Personal Laws* (2012).
3. Law Commission of India, *Report No. 246: Reforms in Maintenance Enforcement* (2014).