

Women's Right to Residence in Live-In Relationships: Interpreting the Shared Household Under the Protection of Women from Domestic Violence Act, 2005

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DOI: <https://doi.org/10.51583/IJLTEMAS.2026.150900068>

Received: 16 September 2026; Accepted: 21 September 2026; Published: 12 October 2026

ABSTRACT

The legal protection of women who cohabit outside marriage presents a difficult question at the intersection of domestic-violence law, property law and constitutional liberty. The Protection of Women from Domestic Violence Act, 2005 (PWDVA) deliberately extends the concept of domestic relationship beyond marriage, but the protection available to a woman in a live-in relationship remains conditional upon the relationship qualifying as a “relationship in the nature of marriage” and upon the residence satisfying the statutory conception of a “shared household”. This article revisits that structure through a doctrinal analysis of Sections 2(a), 2(f), 2(s), 3, 17, 19, 20 and 22 of the PWDVA and the principal Supreme Court decisions from Badri Prasad and Lata Singh to D. Velusamy, Indra Sarma, Satish Chander Ahuja and Prabha Tyagi. It argues that the central problem is not simply whether live-in relationships are legally recognised, but how the law should allocate the evidentiary and residential consequences of relationship status.

The article identifies a gap in existing discussion: the jurisprudence is often analysed either through the “relationship in the nature of marriage” test or through the “shared household” doctrine, while their interaction and the consequences of that interaction for housing security receive comparatively less systematic treatment. To address that gap, the article develops a relationship–residence framework that separates three questions: whether a qualifying domestic relationship exists, whether the premises constitute a shared household, and what form of residence relief is proportionate to the competing rights of the respondent and third-party owners. The analysis also engages with the limits of judicial protection, including the caution in Indra Sarma, and compares the Indian approach with developments in South Africa and Ireland. It concludes that the PWDVA should be interpreted as a protective remedial statute without converting residence protection into an ownership claim. A structured, fact-sensitive approach can protect women from homelessness while preserving legitimate property interests and reducing uncertainty in cases involving non-marital cohabitation.

Keywords: Live-in relationships; shared household; right to residence; Protection of Women from Domestic Violence Act, 2005; relationship in the nature of marriage; housing security; gender justice; constitutional liberty.

INTRODUCTION

Indian family law has historically organised many legal consequences of intimate relationships around the institution of marriage. Residence, maintenance, succession, legitimacy and household status were therefore commonly articulated through marital status or personal law. The growth of non-marital cohabitation has exposed the limits of a purely status-based model. The legal question is no longer only whether adults may choose to live together, but what remedial protection should follow when a woman in such a relationship faces violence, economic abuse or the loss of a home.

The Protection of Women from Domestic Violence Act, 2005 was a significant statutory intervention. Section 2(f) recognises a “domestic relationship” that may arise not only from marriage or consanguinity but also from a “relationship in the nature of marriage”. Section 17 then confers a right to reside in the “shared household”, expressly stating that the right exists irrespective of the woman’s right, title or beneficial interest in the premises. Section 19 enables the Magistrate to grant residence orders, while Sections 20 and 22 provide monetary relief and compensation. The statutory design therefore distinguishes the remedial right of residence from proprietary ownership.

Yet the apparent breadth of Section 17 does not mean that every cohabiting woman automatically obtains a residence right against every property owner. The statutory sequence matters. The claimant must fall within the definition of an “aggrieved person”; there must be a domestic relationship; where the relationship is non-marital, it must ordinarily satisfy the judicially developed concept of a relationship “in the nature of marriage”; and the premises must satisfy Section 2(s). Even after those thresholds are crossed, the nature of the relief must be determined in light of Section 19 and the rights of persons who own or possess the property.

The Supreme Court’s jurisprudence has moved through distinct phases. *S.R. Batra v. Taruna Batra* adopted a restrictive understanding of “shared household” centred on the husband’s ownership or tenancy. *Satish Chander Ahuja v. Sneha Ahuja* subsequently rejected that narrow construction and restored the statutory emphasis on the household in which the woman lived or had lived in a domestic relationship. *Prabha Tyagi v. Kamlesh Devi* later clarified that the protective scheme cannot always be reduced to present physical residence and that a past domestic relationship may remain relevant to relief. These developments are important, but they do not eliminate the separate threshold question of whether a particular non-marital relationship is legally within Section 2(f).

The present article therefore treats “relationship in the nature of marriage” and “shared household” as connected but analytically distinct concepts. The first is primarily a relational-status inquiry; the second is a residence-and-premises inquiry. Collapsing them risks either under-protecting women because of property formalism or overextending the Act by treating every cohabitation arrangement as equivalent to marriage. The article proposes a structured framework that seeks to avoid both extremes.

Research Gap and Original Contribution

The existing literature and case commentary have generated substantial discussion of live-in relationships, domestic violence and the shared household doctrine. The identifiable gap is not an absence of scholarship on the subject, but the limited integration of the two principal judicial inquiries. Commentary frequently treats *D. Velusamy* and *Indra Sarma* as authorities on the status of live-in relationships and *S.R. Batra* and *Satish Chander Ahuja* as authorities on shared household. The resulting discussion can obscure a practical question faced by courts: what follows when a woman establishes a marriage-like domestic relationship but the premises are owned, occupied or controlled by someone other than the respondent? A second gap concerns the transition from recognition to remedy. Recognition of a relationship does not itself answer whether the appropriate remedy is continued residence, alternate accommodation, rent, monetary relief or another protective order.

This article contributes a doctrinal model based on three sequential inquiries: (1) relational qualification under Sections 2(a) and 2(f); (2) residential qualification under Section 2(s); and (3) remedial proportionality under Sections 17 and 19. The model preserves the protective purpose of the PWDVA while acknowledging that a statutory right of residence is not a proprietary right. It also uses comparative material not to transplant foreign rules into India, but to identify alternative legislative techniques for recognising vulnerability arising from cohabitation.

Research Questions

1. How have Indian courts interpreted “relationship in the nature of marriage” and “shared household” under the PWDVA?
2. Does the post-Ahuja interpretation of “shared household” resolve the principal residence-related uncertainty faced by women in live-in relationships?
3. How should courts reconcile the woman’s statutory residence interest with the proprietary and possessory interests of third parties?
4. What doctrinal and legislative framework can reduce uncertainty without equating live-in relationships with marriage for all legal purposes?

Methodology and Scope

The study adopts a doctrinal and comparative legal methodology. Primary materials comprise the PWDVA, constitutional provisions and reported Supreme Court decisions, with emphasis on the development of Sections 2(f), 2(s), 17 and 19. Secondary materials are used to contextualise housing vulnerability, domestic violence and comparative cohabitation law. The comparative discussion is limited to South Africa and Ireland because both jurisdictions illustrate different legislative and constitutional responses to the legal consequences of cohabitation. The article does not claim that live-in relationships create a general status equivalent to marriage, nor does it examine succession, legitimacy or maintenance in their entirety except where those subjects illuminate the residence question.

Live-In Relationships and the Legal Threshold of A “Relationship in the Nature of Marriage”

“Live-in relationship” is not a single statutory category. It describes a factual mode of cohabitation rather than a uniform legal status. The PWDVA uses the narrower expression “relationship in the nature of marriage”, which requires courts to distinguish between ordinary cohabitation and a relationship that bears sufficient characteristics of a marital partnership to attract the Act’s protective scheme.

Badri Prasad v. Deputy Director of Consolidation is an early illustration of judicial willingness to recognise long and continuous cohabitation through a presumption in favour of marriage. The decision concerned a relationship of approximately fifty years and arose in a property and consolidation context. Its importance for present purposes is limited: it demonstrates evidentiary recognition of long cohabitation, but it does not create a general statutory right of residence for every unmarried cohabitant.

Lata Singh v. State of Uttar Pradesh and later Nandakumar v. State of Kerala establish a different proposition: adult choice to cohabit cannot be treated as unlawful merely because the parties have not married. These decisions support personal liberty and the freedom of adults to choose their intimate associations. Khushboo v. Kanniammal similarly rejected the use of criminal law to punish consensual sexual conduct merely because it is regarded as socially immoral. The constitutional permissibility of cohabitation, however, should not be confused with an automatic entitlement to every statutory consequence attached to marriage.

D. Velusamy v. D. Patchaiammal supplied an influential set of indicators for determining whether a relationship is “in the nature of marriage”. The Court referred to factors including the parties’ legal capacity to marry, the duration of the relationship, voluntary cohabitation and the parties’ presentation to society as spouses. The indicators are evidentiary rather than a statutory checklist. They should therefore be applied cumulatively and contextually rather than mechanically.

Indra Sarma v. V.K.V. Sarma illustrates the limiting side of the doctrine. The appellant had lived for a substantial period with a man whom she knew to be married. The Supreme Court held that the relationship did not satisfy the statutory concept of a relationship in the nature of marriage on the facts before it. The

judgment also discussed factors such as duration, shared household, pooling of resources, public representation, sexual relationship, children and the parties' intention. The case is significant because it demonstrates that long duration alone is insufficient.

The Evidentiary Problem

The principal difficulty is that the PWDVA protects a relationship while the evidence available to prove that relationship is often informal. Marriage produces documentary evidence; cohabitation may produce rent receipts, utility bills, photographs, correspondence, joint purchases, medical records, school records, bank transactions or testimony from neighbours and relatives, but none is necessarily conclusive. A rigid documentary threshold would therefore disadvantage the very group that the remedial statute seeks to protect. At the same time, an entirely subjective test could expose the statutory scheme to claims based on brief or casual associations.

A better approach is to treat the Velusamy–Indra Sarma factors as a contextual evidentiary matrix. Courts should ask whether the parties functioned as a domestic unit, whether there was continuity and mutual commitment, how expenses and household responsibilities were organised, whether the relationship was represented to others as a committed partnership, and whether the claimant experienced economic or residential dependence. No single factor should ordinarily be treated as decisive. The purpose is not to manufacture a marriage, but to identify whether the relationship possesses the degree of domestic commitment contemplated by Section 2(f).

Statutory Architecture of Residence Rights

The residence question cannot be answered by Section 17 alone. The relevant provisions operate as a connected remedial scheme:

Provision	Function	Relevance to live-in relationships
Section 2(a)	Defines “aggrieved person”.	The woman must be or have been in a domestic relationship and allege domestic violence.
Section 2(f)	Defines “domestic relationship”.	Includes a relationship in the nature of marriage.
Section 2(s)	Defines “shared household”.	Connects residence protection to the household in which the woman lives or has lived in the relevant domestic relationship.
Section 3	Defines domestic violence.	Includes physical, sexual, verbal/emotional and economic abuse.
Section 17	Right to reside in shared household.	Residence right exists irrespective of title or beneficial interest.
Section 19	Residence orders.	Permits exclusion-related and alternative-residence directions, subject to statutory conditions.
Sections 20 & 22	Monetary relief and compensation.	Can address economic consequences where continued residence is unsuitable or unavailable.

The architecture reveals an important distinction: Section 17 creates a statutory residence right, while Section 19 supplies mechanisms through which that right can be protected. Neither provision converts the

claimant into an owner. The remedial order must therefore identify the residential interest protected by the Act without rewriting property law.

The phrase “shared household” is particularly important because Section 2(s) expressly refers to a household where the aggrieved person lives or at any stage has lived in a domestic relationship. The definition also includes a jointly owned or tenanted household, a household owned or tenanted by either party, and a joint-family household of which the respondent is a member. The statutory text therefore contains a broader relational concept than a simple rule based on title.

Evolution of the Shared Household Doctrine

The judicial development may be understood through three phases: a restrictive property-centred phase, a corrective phase, and a relationship-centred phase.

S.R. Batra v. Taruna Batra: Property-Centred Interpretation

S.R. Batra v. Taruna Batra ((2007) 3 SCC 169)

Facts. The wife sought residence in a house owned by her mother-in-law after matrimonial discord. The husband did not own the premises.

Issue. Whether the premises could constitute a “shared household” merely because the woman had lived there as part of the matrimonial household.

Held. The Supreme Court adopted a narrow construction and stated that the expression ordinarily referred to the household belonging to or taken on rent by the husband. The decision thereby restricted residence claims in premises owned by the husband’s relatives.

Critical significance. The significance of Batra is doctrinal rather than merely factual. It treated the statutory expression through a property-based lens, even though Section 17 expressly separated the residence right from title. Its weakness became particularly visible in households where women reside with the husband’s family but have no proprietary or tenancy documents. The decision also generated uncertainty about whether the statutory phrase “joint family” and the protection of non-owner residence could be reconciled with the narrow definition.

V.D. Bhanot v. Savita Bhanot: Remedial Continuity

V.D. Bhanot v. Savita Bhanot ((2012) 3 SCC 183)

Facts. The parties had lived together before the PWDVA came into force. The wife subsequently sought relief arising from the domestic relationship.

Issue. Whether conduct predating the commencement of the Act could be considered for proceedings under the PWDVA.

Held. The Supreme Court held that the Act could be applied to proceedings instituted after its commencement even where the alleged acts occurred earlier, subject to the statutory framework.

Critical significance. The decision supports a remedial reading of the Act. It is important to distinguish this from a proposition that every historical cohabitation creates an unlimited present residence right. The relevance of past conduct depends on the nature of the relief sought and the statutory requirements.

Satish Chander Ahuja v. Sneha Ahuja: Doctrinal Correction

Satish Chander Ahuja v. Sneha Ahuja ((2021) 1 SCC 414)

Facts. The dispute concerned a daughter-in-law's residence in a house owned by her father-in-law. The earlier restrictive understanding of shared household was directly in issue.

Issue. Whether ownership or tenancy by the husband is a necessary condition for a premises to be a shared household under Section 2(s).

Held. The Supreme Court rejected the restrictive interpretation in *Batra*. It held that the shared household is the household where the aggrieved person lives or has lived in a domestic relationship, and ownership by the respondent is not a necessary condition.

Critical significance. *Ahuja* is the doctrinal turning point of the residence jurisprudence. It restored the relational language of Section 2(s) and recognised that residence protection cannot be reduced to a title inquiry. At the same time, *Ahuja* should not be read as eliminating every property-law limitation. The Court's reasoning concerns the existence of a statutory residence interest; the form of relief remains governed by the Act and the facts, including the position of third-party owners.

Prabha Tyagi v. Kamlesh Devi: Past Residence, Right to Live and Continuity

Prabha Tyagi v. Kamlesh Devi ((2022) 8 SCC 90)

Facts. The case concerned a woman's right to residence in the context of a domestic relationship and the interpretation of the statutory expressions "live" and "have at any point of time lived".

Issue. Whether actual physical residence at the time of filing, or prior physical residence, is indispensable to invoke the protective scheme, and whether the domestic relationship must still be subsisting when proceedings are initiated.

Held. The Supreme Court adopted a broad remedial interpretation. It held that a woman may invoke the Act even where the domestic relationship is no longer subsisting, provided the alleged domestic violence is connected with the domestic relationship, and it treated the right to live as relevant to the statutory scheme.

Critical significance. The decision is important because it prevents the residence right from becoming illusory through strategic eviction or the mere passage of time. Its reasoning should, however, be applied with care in live-in cases: the broader understanding of residence does not remove the need to establish the underlying domestic relationship where the claim depends upon Section 2(f).

A Critical Framework: From Relationship Status To Residential Remedy

The post-*Ahuja* position resolves one major question but leaves another. Ownership is no longer the sole determinant of "shared household", yet courts still need a principled method for deciding when a live-in partner has crossed the statutory threshold and what relief should follow. The central analytical mistake is to treat these as one question.

Stage One: Establishing the Domestic Relationship

At the first stage, the court should determine whether the claimant falls within Section 2(f). For a non-marital relationship, the inquiry should focus on the substantive characteristics of the relationship rather than labels chosen by either party. Relevant evidence may include duration and continuity, shared residence, financial interdependence, domestic responsibilities, social presentation, mutual commitment, arrangements concerning children, and the circumstances in which the relationship ended. The presence of one factor should not automatically determine the result.

Stage Two: Identifying the Shared Household

Once the domestic relationship is established, the court should separately determine whether the premises

constitute the shared household contemplated by Section 2(s). After Ahuja, ownership by the respondent is not a prerequisite. The focus should instead be on actual or legally relevant residence within the domestic relationship and the statutory connection between the household and the parties. Where the property belongs to a third party, the court should identify the respondent's relationship to that property and the nature of the claimant's occupation before framing relief.

Stage Three: Selecting Proportionate Residence Relief

The third stage is remedial. A right to reside does not necessarily mean an unconditional right to occupy a particular room or remain indefinitely in a third party's property. Section 19 gives the Magistrate a range of tools, including restraining dispossession, directing alternative accommodation or rent in appropriate cases, and protecting the aggrieved person from further domestic violence. The remedy should be tailored to the protective purpose of the Act while avoiding an unnecessary transformation of a personal remedial right into a proprietary estate.

This three-stage model improves doctrinal clarity because it prevents property ownership from being used to answer a relational question, and prevents relational recognition from being used to answer a remedial question. It also reduces the tendency to describe Ahuja as creating an unrestricted right to remain in any property associated with the relationship.

Married Women And Women In Live-In Relationships: Similar Protection, Different Thresholds

The PWDVA is gender-specific but not marriage-specific. A married woman ordinarily establishes a domestic relationship through the fact of marriage and the statutory definition. A woman in a live-in relationship must ordinarily establish that the relationship falls within the statutory expression "relationship in the nature of marriage". This creates a genuine difference in evidentiary burden.

That difference does not necessarily amount to unconstitutional discrimination. Marriage is a legally constituted status that carries independently defined rights and duties, whereas live-in relationships vary considerably in duration, commitment and economic organisation. The constitutional question is therefore not whether married and unmarried women must be treated identically in every respect, but whether the statutory distinctions remain rationally connected to the protective purpose of the Act and whether women in vulnerable non-marital relationships receive meaningful remedies.

At the same time, the distinction creates a practical risk. A woman may experience economic dependence and domestic violence in a relationship that was private, unregistered and socially stigmatised. Requiring proof that the parties publicly presented themselves as spouses can therefore become difficult precisely where the relationship was intentionally private. Courts should avoid turning "public representation" into an absolute requirement. The overall evidentiary picture should remain decisive.

Constitutional Dimensions: Liberty, Dignity and Substantive Equality

The constitutional basis for protecting adult cohabitation is distinct from the statutory basis for granting residence relief. Lata Singh and Nandakumar support the proposition that consenting adults are not rendered unlawful merely because they choose to live together without marriage. *K.S. Puttaswamy v. Union of India* (2017) recognised privacy as a constitutionally protected interest connected with dignity, autonomy and personal choice. *Navtej Singh Johar v. Union of India* (2018) further situated intimate choice within the constitutional guarantees of liberty, dignity and equality, although that case concerned sexual orientation rather than residence rights.

These cases should not be read as creating a free-standing constitutional right to occupy another person's property. The stronger constitutional argument is narrower: the State should not treat non-marital intimacy as a reason to deny legal protection against violence, coercion or homelessness where Parliament has otherwise created a protective statutory regime. The PWDVA is the immediate source of the residence remedy; constitutional values guide its interpretation.

Article 15(3) permits special provisions for women and children, while Article 21 protects life and personal liberty. The Supreme Court's domestic-violence jurisprudence can therefore be read as pursuing substantive equality: formal property ownership does not exhaust the legal interests at stake where eviction is used as part of domestic abuse. The constitutional contribution is strongest when used to interpret an existing statutory right, rather than to create property rights not found in the statute.

Third-Party Ownership And The Limits Of Residence Protection

Third-party ownership presents the hardest remedial problem. Suppose a woman establishes a relationship in the nature of marriage with the respondent but the premises belong to the respondent's parent, sibling or another person. A purely title-based approach may leave the woman vulnerable to immediate homelessness; an unlimited residence order may unfairly burden an owner who was not part of the domestic relationship.

Ahuja supplies the necessary starting point: ownership by the respondent is not a mandatory ingredient of a shared household. But the judgment does not abolish the distinction between the existence of a residence right and the scope of a residence order. The court must therefore identify whether the premises were genuinely used as the domestic home, the respondent's connection with the premises, the duration and nature of the claimant's occupation, the involvement of the third-party owner, and whether alternative accommodation can provide effective protection without unnecessarily burdening a person who is not the alleged perpetrator.

This approach is preferable to a categorical rule either for or against third-party owners. It also gives practical meaning to Section 19. The Act is remedial, and the court should select an order capable of preventing displacement and further abuse while respecting legally protected interests. A residence order should not become a disguised declaration of title, tenancy or ownership.

Recent Judicial Developments And The Continuing Uncertainty

Prabha Tyagi is particularly relevant to the present analysis because it clarifies that the PWDVA is not limited to cases in which the woman remains physically present in the shared household at the moment proceedings are filed. The Court emphasised the statutory language "live or have at any point of time, lived" and recognised the relevance of a past domestic relationship. This reduces the possibility that an alleged perpetrator can defeat statutory protection merely by ending cohabitation before proceedings are initiated.

The development, however, should not be overstated. Prabha Tyagi primarily clarifies the temporal dimension of the domestic relationship and the right to residence. It does not replace the substantive requirement that a claimant relying on Section 2(f) establish the relevant kind of relationship. In live-in cases, the distinction remains essential: the end of a qualifying relationship may not erase a statutory remedy, but the absence of a qualifying relationship cannot be cured merely by showing that the parties once shared accommodation.

Contemporary litigation also demonstrates that the Ahuja interpretation continues to shape High Court reasoning. The doctrinal direction is therefore clearer than it was under Batra, but factual uncertainty remains. The unresolved questions concern evidence, third-party property, the duration and intensity of cohabitation, and the appropriate form of alternative residence. These are precisely the areas where a structured judicial methodology is needed.

PROPOSED DOCTRINAL AND LEGISLATIVE FRAMEWORK

Judicial Framework

1. Relational threshold: Determine whether the parties' relationship has the characteristics contemplated by Section 2(f), using a cumulative and fact-sensitive assessment rather than a single-factor test.

2. Household connection: Identify whether the premises were used as the household in which the parties lived in that domestic relationship. Ownership should not be treated as the decisive criterion after Ahuja.
3. Temporal continuity: Apply Prabha Tyagi so that the end of cohabitation does not, by itself, extinguish remedies for violence connected with the domestic relationship.
4. Remedial tailoring: Distinguish the statutory right to reside from ownership, tenancy and title. Select the least restrictive remedy that still provides effective protection against homelessness and further violence.
5. Third-party balance: Where a non-party owner is affected, expressly record the nature of that person's property interest and why the particular residence order is necessary and proportionate.
6. Evidence: Give weight to the totality of circumstances, including shared finances, household responsibilities, duration, continuity, social presentation, children, correspondence, residence records and evidence of dependence or control.

Legislative Reform

Parliament could reduce uncertainty by adding an illustrative statutory explanation of “relationship in the nature of marriage”. Such an explanation should not convert cohabitation into marriage, but could identify factors such as duration, shared residence, financial interdependence, mutual commitment, domestic responsibilities and treatment of the relationship by the parties. The statute could also clarify that no single factor is conclusive.

A second reform could require courts, while making residence orders involving third-party property, to distinguish between continued occupation and alternative accommodation. A structured order would reduce conflict between the woman's protective interest and the owner's proprietary interest. A third reform would be to strengthen access to emergency and alternative accommodation through coordinated implementation by Protection Officers, service providers and State authorities. Residence protection is difficult to realise when the formal remedy exists but safe housing is unavailable.

These reforms should be understood as strengthening the existing remedial framework rather than creating a general property right for cohabitants. The central policy objective is housing security in the context of domestic violence, not the equalisation of every legal consequence of marriage and cohabitation.

CONCLUSION

The development of women's residence rights under the PWDVA demonstrates a broader movement from formal property status towards recognition of lived domestic relationships. The transition from S.R. Batra to Satish Chander Ahuja is especially significant because it rejects the assumption that the person who owns a house necessarily determines whether that house can constitute a shared household. Prabha Tyagi further demonstrates that the protective purpose of the Act cannot be defeated simply because the relationship or physical residence has ended before proceedings are initiated.

The jurisprudence nevertheless remains incomplete. The removal of the ownership barrier does not answer whether every form of cohabitation constitutes a domestic relationship, nor does recognition of a domestic relationship determine the exact remedy. The unresolved problem is therefore one of doctrinal sequencing. A court should first identify the relationship protected by Section 2(f), then determine whether the premises satisfy Section 2(s), and finally fashion a proportionate order under Sections 17 and 19. This approach gives effect to the welfare purpose of the PWDVA without converting residence protection into ownership.

The principal contribution of this article is to place the relational and residential inquiries within one framework. Such an approach acknowledges the vulnerability created by housing dependence while

preserving the distinction between personal protection and proprietary entitlement. It also avoids two competing errors: treating marriage as the exclusive gateway to legal protection, and treating any period of cohabitation as automatically equivalent to marriage. The future development of Indian law should focus on clearer evidentiary standards, consistent treatment of third-party property and accessible alternative accommodation. A coherent residence doctrine should protect women from violence and homelessness while remaining faithful to the statutory text and to the constitutional commitment to dignity, liberty and equality.

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