

Foreign Marriage

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Abstract

The paper deals with the procedure of marriage under the FM Act and mostly with NRI marriages. The intent of this paper is to understand the issues which arise with the NRI marriage, the conflict for matrimonial relief, procedure and the complexity that arises at the time of the dissolution of marriage, and the complexity that arises due to lack of private international law. The paper further analyses the complexity that arises due to a foreign judgment, ex parte decree of divorce in foreign court and the law relating to dissolution of marriage in India as well abroad and the validity of foreign decree in an Indian court.

Keywords: Foreign Marriage Act, Conflict, Matrimonial Relief, Dissolution, Complexity.

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INTRODUCTION

Foreign Marriages in India are governed by the, “*The Foreign Marriage Act 1969 [Hereinafter FM Act]*”. The FM Act was enacted to fill the gaps present in the Special Marriage act, 1954. The main target behind the enactment of FM Act was to regulate marriages which are performed outside India, where at least one parties should be the citizen of India. As Special Marriage Act also deals with the marriage which happen on foreign soil but in that case both parties should be citizens of India.

In cases of foreign marriages, whatever be the scenario, the victim are always women. Though, the FM Act explicitly states that it solemnized the marriage that happens in foreign land. However, the disputed consequence after the marriage of NRI and marriage solemnized under this FM are similar. Also, the problem of Indian courts is that Indian courts still follow archaic English Law, which perpetuate patriarchy. According to English law, “*the domicile of wife followed the domicile of the husband although she may not have lived with him there even for a day*”. Due to this, the wife has to face lots of problems as husbands file the case in foreign soil which always seem to be bias in justice; as in the most of case it was found that foreign court had given ex parte divorce decree.

FOREIGN MARRIAGE ACT

Marriage is considered to be one of the crucial events of one’s life. The United Nations recognized the importance of marriage and suggested for its civil registration. Indeed, the registration of marriage is also important to enable the married women to secure their right to live in the matrimonial house and the right to maintenance. Also, it helps in the establishment of healthy marital life. [1]

Registration of the marriage gains even more importance where different jurisdictions are involved and where one party may not be bound by India’s municipal law. For the solemnization of marriage under the FM Act, both the parties should have to fulfill the condition that is mentioned in Section 4 of Act. After that, parties shall have to give notice for marriage to the Marriage officer [2] of the district. If there will be no objection from anyone for the marriage of parties, then after the thirty days marriage will be solemnized by the FM Act, before the Marriage officer at the official house of the Marriage Officer. The certificate for marriage will be provided after the marriage solemnized through FM Act by the Marriage Officer, under section 14 of the FM act. Section 11 of FM Act clearly stipulates that the marriage officer is to perform the marriage of two persons at least one of whom is a citizen of

India living abroad, but provides that the marriage of person can't be solemnized if the intended marriage is prohibited by the law of country where it is to be performed. Also, the same section says that the solemnization of marriage will be refused if the marriage would be inconsistent with international law. Part III of FM Act deals with the registration of foreign marriage. Section 17 explicitly says that, registration of marriage under FM Act, will be completed whenever the marriage is solemnized under this Act. Further, the marriage should not be inconsistent with the law of country where the marriage is solemnized, and at least one of the parties should be an Indian citizen. If these conditions are satisfied, the marriage officer shall verify it was conducted as per the laws of that country and the marriage satisfies the condition provided in section 4 of the Foreign Marriage Act 1969. [3]

Indeed, FM act provided a legal path for solemnization of a marriage that happens abroad. This act also eliminates the lacunae of Special Marriage act. The Act still suffers from its own problems. There is still conflict for the matrimonial relief in the marriage which is registered under this Act. Due to cross-jurisdictional marriages, the complication is much more and also due to lack of strong Private International law in India the people have to faces much more difficulties.

The *lex loci celebrationis*, prevail over the FM Act, in most of the scenarios as per private international law. If the marriage conducted between an Indian citizen and a foreigner is solemnized abroad in accordance with the law of the nation of residence, then the marriage will be governed by the law of residing nation. If the two citizens of India get married abroad outside the territory of India in accordance with the personal law of India, then FM Act won't be applied to such marriage. The FM Act only applies to those marriages which are solemnized under its provision as well either of parties is at least citizen of India. The validity of marriages governed by this Act is not extended within the territory of India rather it also valid outside the court of India.

By the rule of Private International Law, domicile and citizenship are the two elements which enter into a discussion of the validity of the foreign marriage. According to Private International Law, the country where the marriage took place which applies (*Lex Loci celebrationis*) in regard to the form of marriage; but in a matter relating to capacity and essential validity, it is the law of the domicile of the parties which applies (*Lex domicile*).

FM Act was enacted to facilitate the solemnization of civil marriages by Indian citizens in foreign countries. According to section 3 of the FM Act, the marriage officer is to be appointed by the Central Government. A notable aspect of this act is that Indian citizens may marry either an Indian citizen or a foreign national under this Act. Most of the part of the FM Act is inspired by the Special Marriage Act. For instance, the provisions available for procedure and registration of marriage in Special Marriage Act and the FM Act are similar. There must be the amendment of FM Act 1969, to terminate the conflicted issue and to provide the all the Diplomatic Mission of India in abroad in all countries to send record of marriage happen within their authority to the Ministry of Foreign Affairs in Delhi to stop bigamy. [4]

NRI MARRIAGE

There are lots of issues arising in relation to NRI marriages. NRI is a person who is has an Indian passport and has temporarily immigrated to another nation for a certain period. The NRI marriage is commonly solemnized as a marriage between an Indian woman and an Indian man who is residing in another country, either as an Indian citizen or as a citizen of that country (as a PIO-person of Indian Origin). The notable point is that the law of the nation, where the couple resides, may apply to marriage, divorce and all other sorts of disputes. [5]

Marrying with an NRI in Indian society is taken as a sign of prestige and high value in society. The parents don't want to miss such a lucrative marriage offer, for which families even ignore the minor cautions that are

observed in traditional matchmaking. The aggravated risk in such marriage is the woman being isolated in a foreign land, facing communication problems and unaware of local criminal justice, law, legal system. [6]

Common Issue in NRI Marriages are as most of the women married to NRI was abandoned even before being taken by her husband to the foreign country of his residence. In most of the cases, women are brutally battered, assaulted, abused both mentally and physically by husband in other countries and are either forced to flee or are forcibly sent back to India even without their children. Also, it was also found that women who reached the foreign country learned after reaching there that the husband is already married with another woman there or in a live-in relationship. Even parents of the bride are held to pay huge amount of money as a dowry. Finally, husband takes advantage of lenient divorce grounds in another legal system by obtaining an *ex-parte* decree of divorce in the foreign country through fraudulent representation and/or behind her back, without her knowledge; after she was back or forced to go back to India or even while she was still here. [7]

In the large scope, NRI marriage leading to the fragmentation of marriage institution by entailing into the high incidence of desertion of wives by NRI husbands, child abduction cases, matrimonial disputes etc. The notable point in NRI marriage, which make the issues of marriage more complicated is that NRI marriage is not governed rigidly either by Indian laws or law of residing foreign country. In most of the case, there always arises a conflict between law.

There are certain legal Issues which also involved directly in the nature of NRI marriage, like Private International Law (Conflict of Laws). In most cases, for matrimonial relief, there is always a conflict for the choice of law for validity as for whether the Indian law would apply or law of husband's country of residence would apply. This also raises the issue of jurisdiction, i.e. whether the Indian courts or courts of the country of residency of the husband should

have jurisdiction to deal with the issue of matrimonial relief as well child custody. Similar issues arise for the validity of foreign court decree and the power of Indian courts, since most of the foreign courts do not accept Indian court orders as binding. [8]

Also, since NRI marriage is an issue of inter-country marriages, a crucial problem arises with respect to the legal validity of marriage as well the jurisdiction for law which ought to be applied in case of dispute or matrimonial relief. The strongest principle which deals with the validity of an inter-country marriage is *lex loci celebrationis*, i.e. law of the place where the marriage takes place, this is also known as substantial validity. Due to lack of legislative law in compared to "Private International Law or Conflict of Law" and also due to the different legislative law for different religions, the legal system of India has found itself inadequate to cope with the NRI marital issues. Due to lack of strong law which may deal about the jurisdiction boundaries, variation in the legal system of different nations and the physical distance between the victims native country and the matrimonial home. [9]

Due to lacunae present in Indian marital law, it's easy in NRI marriage to exploit the marital trust or commit outright fraud on vulnerable families. Even the state doesn't take any strict steps in such matters and even no nay legislative action taken by government. Government itself takes such marital cases as a private-life affair, leaving the victims with only the route of Court remedies, without proposing strong legislation. It was also found that in NRI marriages there is an issue of limping, i.e. marriages which are *valid marriages in India, but the couple is divorced or separated in accordance with the foreign law*. The case of limping marriage and runaway husbands in NRI marriages has become a serious concern in India. [10] But, Sections 3 and 4 of the Indian Penal Code come as a savior in cases where an NRI husband or wife is harassed by spouse or in-laws in a foreign land. Section 3 gives criminal jurisdiction to the court even over the person who may have committed an offense beyond

the boundary of India, provided such person is subject to Indian Laws. [11]

The residing place of the party also plays a vital role. If the party gets married in India, but is residing abroad, then if the parties seek a divorce, and if the residing country approves the divorce of the party on a reasonable ground, then that divorce will be valid in India too. [12]

The most conspicuous and disturbing trend is that the foreign courts appears to grant divorce even when solemnization took place according to the Indian law. In most of the cases, the foreign court declares the divorce *ex parte*, without knowing the roots of the problem. This precludes the Indian courts from having any jurisdiction to act against such decision of the court. There is no comprehensive and special law to govern the jurisdictional issues involved in deciding matrimonial cases. [13] But there are certain cases in which the Supreme Court has given judgment in matrimonial relief which is against the decree of the foreign court. Like, in the *Sheenam Raheja v Amit Wadhwa* [14], the court declared that Indian court will not recognize the decree of the foreign court in matrimonial cases. Thus, it can be inferred that, the sole authority for dissolution of marriage have only near the law by which marriage solemnized and that is the fundamental law. Therefore, if a marriage is annulled under foreign jurisdiction then the proceeding would become void *ab initio* and the divorce decree would have no value. Similarly, in the case, *Narasimha Rao v Venkata Lakshmi*, the Supreme Court explained the implication of each clause of Section 13 of the Code of Civil Procedure, 1908. The Supreme Court stated that by virtue of clause (a) of Section 13, the foreign judgment shall not be recognized in India if the judgment wasn't declared by a court of competent jurisdiction. Any other court lacking competent jurisdiction can only declare the decision if both the parties give consent voluntarily. Similarly, clause (b) of section 13, of the Code of Civil Procedure, states that "*if a foreign judgment has not been given on the merits of the case, the courts in this country will not recognize such judgment.*

Also, clause (c) of section 13, states that, where the judgment is founded on a refusal to recognize the law of this country in cases in which such law is applicable, the judgment will not be recognized by the courts in this country". So, it is clear from this section that, in the case of matrimonial dispute, only that law would be applied by which the parties married. So, if the foreign court decides the cases which are not within the periphery of the law by which parties get married then that decision wouldn't be enforceable in India.

In this case, *Neerja Saraph v Jayant v. Saraph* [15], the husband before marriage was residing in the USA and the wife in India. Both get married in India, and after a few weeks of marriage, husband again returned back to the USA. After a month, the husband sent the envelopes through his brother. The envelope contained a petition for annulment of marriage in a USA court. The appellant wife file a case in the High Court, which was then taken to the Supreme Court. The Supreme court, in this case, suggested certain provisions which could be incorporated in a legislation safeguarding the interest of women:

1. "*No marriage between an NRI and an Indian woman which has taken place in India may be annulled by a foreign court*";
2. "*Provision may be made for adequate alimony to the wife in the property of the husbands in India and abroad*";
3. "*The decree granted by Indian Courts may be made executable in foreign courts both on principle of comity and by entering into reciprocal agreements like Section 44-A of the Civil Procedure Code which makes a foreign decree executable as it would have been a decree passed by the court*".

In this case, *Satya v Teja Singh* [16], the appellant, Satya, the wife was married to Respondent, Teja according to Hindu rites in India. Both the parties were a citizen of India and both the parties had their residence in India at the time of marriage. Two children were born before the Respondent went to the USA for his further studies. After completing his studies, the respondent got a job in the

USA and settled there. The respondent didn't return to India but filled a petition for divorce in the court of the State of Nevada in the USA which was granted to him. After all this, the Appellant filed a suit against the respondent for maintenance in the trial court. The matter was carried up to the Supreme court which said that, due to lack of jurisdiction, the decree of the Nevada Courts cannot receive recognition in India courts.

In this case, *Narasimha Rao Y. v Venkata Lakshmi Y.* [17] the appellant-husband filed the petition for dissolution of marriage in the trial court of his district. While proceeding, in the trial court, at the same time, husband files the petition for dissolution of marriage in a foreign court where he was residing at that time. The foreign court in the absence of wife passed a decree of dissolution. After that, the appellant filed an application in trial court in India for dismissing of his application, thus dismissed. The respondent, wife filed a criminal petition against the appellant for bigamy. The Supreme Court, in this case, declares that, the divorce obtained from the foreign court will be invalid in India if the decision is against the Indian divorce law as well the decree obtained on fraudulently. In the same case, Supreme Court also interpreted section 13 of Code of Civil Procedure and said that, foreign court decree will only be valid if the decision is in accordance with the matrimonial law under which the marriage of parties solemnized; where exception are; "(I) where the matrimonial action is filed in the forum where the respondent is domiciled or habitually and permanently resides and the relief is granted on a ground available in the matrimonial law under which the parties are married; (ii) where the respondent voluntarily and effectively submits to the jurisdiction of the forum and contests the claim which is based on a ground available under the matrimonial law under which the parties are married; (iii) where the respondent consents to the grant of the relief although the jurisdiction of the forum is not in accordance with the provisions of the matrimonial law of the parties".

In the case, *Veena Kalia v Jatinder Nath Kalia* [18], respondent husband, went to the USA for further study and he didn't return back to

India. The respondent and appellant wife have already two children before respondent left for the USA. The appellant filed the petition to get maintenance as well to make a foreign decree of divorce invalid in India, which is ex parte divorce. The issue, in this case, is that, will the judgment of the foreign court which is not declared on the ground of Indian law could operate as res judicata; as in the present case, the husband obtained the decree of divorce from the Court of Canada which is not according to the Indian law. The Supreme Court declares that the judgment of the foreign court which are against the Indian law will not be binding and hence could not operate as res judicata.

In the case, *Shilpa Sachdev v Anand Sachdev* [19], both the party's wedlock in India and after marriage both the parties moved to Dubai, where they had two children. After having a second child, the appellate return back to native home, Mumbai with her two children. Consequently, the respondent husband filed a petition for divorce in Dubai. The Dubai Court grant the divorce in ex parte on the ground of desertion by the wife. The appellate wife filed a petition for divorce and maintenance for herself as well for her children. The court noted that the validity of a foreign judgment in a civil proceeding is governed by the section 13 of the Code of Civil Proceeding. The court said that, "There can be no dispute that the Court in Dubai would have no jurisdiction to entertain the petition in accordance with the provisions of the Hindu Marriage Act, 1955 unless the case was covered by any of the three exceptions carved out by the Apex Court in *Y. NarasimhaRao*." This court also declared that the decision declared by Dubai Court failed to consider the aspect of *animus deserendi* before granting a divorce on the ground of desertion. Lastly, the court said that the judgment of Dubai court is not binding and enforceable in India.

In the NRI marriage, due to the interplay of Private International Law, the scenario becomes more complicated, due to the conflict of law in different countries. In the International law, the doctrine of Renvoi is

used to settle down the dispute of private international law. The doctrine of Renvoi, states that, “*the law of the country of celebration will be taken as a reference to the whole of that law (including its choice of law rules) and not merely to its domestic law*”. This principle suggests that, in the case of conflict, the law of the nation will apply where the action took place. The main application of renvoi doctrine is to promote greater uniformity of status and also it prevents a marriage limping between the country of celebration and native residing of parties. [20]

A few steps should be adopted to solve the problem which arises in the context of NRI marriages. The first and foremost step is to termination of dowry while marrying the NRI. The aggrieved party shall have to approach the nearest Indian Embassy for assistance as soon as possible, have to file a complaint in nearer police office to about the harassment, abandonment, ill-treatment; as Indian courts are legally competent to such pleas, so aggrieved party shouldn't have to afraid of legal issues while filing the case. Also, the notable point is that as NRI holding Indian citizenship too, so they have right under section 498A or other provision of IPC to file the cases. [21]

The government should have also need to provide for the adequate mechanism for the simple and quick procedure for deserted women to issue the visa through foreign missions in India to contest the proceedings filled by NRI/ PIO husband in a foreign land. The statute should be amended to not recognize *ex-parte* divorce by foreign courts in the case marriage solemnized in India as per Indian Law. The mechanisms should develop which quickly track the NRIs/PIOs in case of desertion. [22] State have to play an important role for sensitization, have to designate nodal officers/department for dealing with NRI issues, sensitization of police and authorities for registration of FIR and other NRI issue. The mechanism for regular interaction/consultation with NGOs working overseas and in India. [23] New NRI legislation, Registration of NRI Marriage, International Conventions and Bilateral

Treaties, amending of the existing legislature, Information Disclosure by Foreign Authorities, Amendment of Indian Law of Maintenance; should be done as soon as possible. [24] The Central Government should have to take initiation for bilateral agreement mostly with the nation where there are more Indian people residing. The agreement must be made to enable the law which recognizes and enforces the foreign divorce decrees, maintenance orders, child custody, etc. There should be mandatory registration of NRI marriage. The strong matrimonial law should be constituted which must include abandonment, divorce and maintenance and child custody.

Similarly, the family and aggrieved also should be more sensitive before wedlock. The parent of the bride must check the NRI groom's personal information, like; marital status, employment status, Immigration status, scrutiny of all information and soon. The decision for wedlock shouldn't have to be taken in haste and the bride shouldn't have to remain quiet. If faced with desertion or any other cruelty by husband whether in India or abroad and should have to approach the respective authorities. [25]

The government should have to take the concrete legal proposal to Act as immediate deterrents, such as fast-track court with a simple procedure for dissolution of NRI marriages. Recently, the Indian government has taken an appreciable step. The Ministry of Women and Child Development decided for mandatory registration of NRI marriage within the seven days of the solemnization of marriage. To control the issues related to NRI marriage, the ministry also proposed to hold the properties of NRI offenders in escrow in case they abscond abandoning their spouse. [26] The ministries also suggested that, if NRI husband doesn't own any property then the abandoned wife will get a share from the parental property. They also suggested to amend the criminal procedure code. They also proposed for the mandatory registration of their marital status on their passport and proper amendment in Passport Act. The current practice is that when the women once

lodges a complaint, the police send a summon to the Indian embassies but that seems futile as such summons hardly get served as the NRI usually moves to a new place or provides an incorrect address. [27]

CONCLUSION

The foundation of the argument forwarded in this paper is that though there is the Foreign Marriage Act, still, there is certain lacuna exists, which should be eliminated as soon as possible by amending the FM act. As the time changes, the demand of society too changes and the law must be in accordance with the present situation of society. The Indian Legal System also lacks strong Private International Law, due to which there is more complexity arises in NRI marriage as well marriage solemnized by Foreign Marriage Act.

Further, various cases were found in NRI marriage or Marriage Solemnized under FM Act where lots of issue arises relating matrimonial relief as well dissolution of marriage. The issue of ex parte divorce decree by Foreign Court also arises. The Indian court has to face lots of complexions while dealing with such cases which already had ex parte divorce decree by a foreign court. The complexion is only due to lack of strong private international law as well lacuna present in the FM Act. To terminate the issue of NRI marriage, the Government have to amend the FM Act 1969 and have to present strong legislature for the private international law.

Thus, the present of statue is not a big deal rather the implication as well jurisdiction of statue matters. Though, having FM Act, 1969, it seem futile some time as it's unable to deal with the some of vital issue due to lack of appropriate provision. Parliaments have to amend the present FM act 1969, in accordance with the need of present scenario which may create a deterrent effect.

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