



PROTECTION OF WOMEN FROM DOMESTIC VIOLENCE ACT, 2005 – JUDICIAL PERSPECTIVE

Ms. K.Deepa Dyva Krupa, B.A., LL.M
Principal Junior Civil Judge, Vizianagaram
Research Scholar,
Dr.B.R.Ambedkar College of Law,
Andhra University, Visakhapatnam.

INTRODUCTION:

Domestic violence is essentially violence perpetrated by persons in intimate family relationships, research from several parts of the world indicates that perpetrators of domestic violence are predominantly male and that the violence is usually perpetrated by the male on his female sexual partner and sometimes in-laws also plays the pivot roles for spreading violence.

The term domestic violence is very wide in its amplitude and encompasses in its scope all types of violence or cruelty resorted to within the precincts of a home. Victims of domestic violence are women. Domestic violence is all about power equations. Any member of the family within four walls of a family can be subjected to violence whatever the age, gender or relationship. It can be the old, the handicapped or the dependent relative of both sexes and any age, a stepchild or stepmother, an unmarried, widowed or divorced daughter the list is endless. Men are fewer in number but women are the regular victims.

Domestic violence includes all types of violence against women. It includes abuse of all kinds: physical, psychological, sexual, economic, emotional and verbal. It includes denial of basic necessities and the additional emotional blackmail where there are children concerned and the threat of dispossession from the matrimonial

home. It is denying of the woman her rights as individual.

Women's access to education, health, employment and political spaces still remain distant goals in many nations of the world. One of the most serious impediments to women's development is the phenomenon of continuing and increasing violence against them. Needless to say, this constitutes a serious violation of women's human rights.

Violence against women is one of the most significant, yet little understood and acknowledged factor instrumental in the phenomenon of marginalization of women in the development processes.

Gender violence manifests itself in various forms female foeticide and infanticide, sexual abuse, incest, molestation, sexual harassment at work and on the streets, marital rape, domestic violence in the form of wife assault and woman battering.

The Protection of Women from Domestic Violence Act, 2005, Act No.43 of 2005 was introduced to provide for more effective protection of the rights of women guaranteed under the Constitution, who are victims of violence of any kind occurring within the family and for matters connected therewith or incidental thereto. This Act contains 37 Sections and Rules were also framed in the year 2006 as the Protection of Women from Domestic Violence Rules, 2006.



IMPORTANT SECTIONS OF THE ACT:

1. Section 2 of the act deals with definitions of aggrieved person 2 (a), child 2(b), compensation order 2(c), custody order 2(d), Domestic Incident Report 2(e), domestic relationship 2(f), domestic violence 2(g), dowry 2(h), Magistrate 2(i), Medical Facility 2(j), Monetary relief 2(k), Notification 2(l), Prescribed 2(m), Protection Officer 2(n), Protection Order 2(o), Residence Order 2(p), Respondent 2(q), Service Provider 2(r), Shared household 2(s), shelter home 2(t).

The Domestic violence was defined in Section 3 and the same was referred in Section 2(g) "Domestic Violence has the same meaning as assigned to it in Section 3".

In **S.R. Batra and Anr vs Smt. Taruna Batra** reported in **AIR 2007 SC 1118**, the Honourable Court held that;

"A shared household would only mean house belonging to or taken on rent by husband or house which belongs to a joint family of which husband is a member; the house which exclusively belongs to mother-in-law cannot be called as shared household"

In **Satish Chandra Ahooja Vs. Sneha Ahooja** reported in **Civil Appeal 2483 of 2020** dated **15.10.2020 at Para Nos.63 and 64**, The Honourable Court held that;

"The interpretation definition of shared household as put by this Court in S.R.Batra Vs. Tarun Batra is not correct interpretation and the said judgment does not lay down the correct law"

Relationship in the nature of

marriage Section 2(f) Indira Sarma Vs. V.K.V.Sarma Crl.A.No.2009 of 2013 dated **26th November, 2013**; the Honourable Court held that

"Live in or marriage like relationship is neither a crime nor a sin though socially unacceptable in this Country, the disruption of such a relationship by failure to maintain a woman involved in such a relationship amounts to domestic violence within the meaning of Section 3 of Domestic Violence Act"

In **D.Velu Samy Vs. D.Patchaiammal** in **Crl.A.No.2028 and 2029 of 2010** dated **21st October, 2010**, at Para No.34 the Honourable Court held that

"In our opinion not all live in relationships will amount to a relationship in the nature of marriage to get the benefit of the Act, 2005, to get such benefit the conditions mentioned by us about must be satisfied"

At Para No.33 the Honourable Court discussed about some conditions.

(a) The couple must hold themselves out to the society as being akin to spouses.

(b) they must be of legal age to marry

(c) they must be otherwise qualified to enter into a legal marriage including being unmarried

(d) they must have voluntarily cohabited and held themselves out to the world as being akin to spouses for a significant period of time."



Following are the other decisions on this aspect:

“Relationship in nature of Marriage”				
Sr. No.	Title	Citation	Question involved	Held
1	Indra Sarma Vs VKV Sarma	2014 (1) RCR (CrI) 179 (SC)	“Relationship in nature of Marriage”	Distinction drawn between ‘live in relationship’ and ‘relationship in nature of marriage’. Promulgated some factors to look into for testing under what circumstances a live-in relationship will fall within the expression “relationship in the nature of marriage” under Section 2(f) of the DV Act. The guidelines, of course, are not exhaustive, but will definitely give some insight to such relationship. Women in live in relationship not covered under the definition and thus not entitle to any reliefs under the Act.
2	Poonam Vs Vijay Kumar Jindal	2015 (4) RCR (CrI) 300 (P&H)	“Relationship in nature of Marriage”	Same View taken as in Indra Sarma and Velusamy’s Case.
3	Dimple Jatin Khanna @ Dimple ... Vs Anita Advani And Anr	2016 (1) RCR (CrI) 530 (BOM)	“Relationship in nature of Marriage”	Where petitioner enters into relationship with a man who is already married which fact was in the knowledge of petitioner, cannot be held that the relationship was in the nature of



				marriage. Such petitioner not entitled to reliefs under DV Act.
4	Deepak @ Gajanan Vs St.of Maharashtra	2015 (3) RCR (Cr)1002 (BOM)	“Relationship in nature of Marriage”	A women marrying a person already married which was in her knowledge, such women not entitled to any relief under DV Act although two children were born to her. The said relationship cannot be termed as relationship in the nature of marriage. Children of such a marriage may be entitled relief u/s 25 CrPC.

RESPONDENT 2(q):

Sandhya Manoj Wankhade Vs. Manoj Bhimarao Wankhade in Criminal Appeal 271 of 2011 dated 31st January, 2011, at Para No.9, the Honourable Court held that

“that a wife or a female living in a relationship in the nature of marriage can, not only file a complaint against her husband or male partner but also against relatives of the husband or male partner the term relative not having been defined in the Act, it could not be said that it excluded females from its operation”

At para No.14, the Honourable Court also held that

“in such circumstances, it is clear that the legislature never intended to exclude female relatives of the husband or male partner from the ambit of a complaint that can be made under

the provisions of Domestic Violence Act”

In Hiral P. Harsora and Ors Vs. Kusum Narottamdas Harsora and Ors in Civil Appeal No.10084 of 2016 dated 06th October, 2016 at Para No.46, the Honourable Supreme Court held that ;

“and declared that the words “Adult Male” in Section 2(q) of the Act, 2005 will stand deleted since these words do not square with Article 14 of Indian Constitution, consequently the proviso to Section 2(q) also stands deleted”

2. Section 3. Definition of “Domestic Violence”:

For the purposes of this Act, any act, omission or commission or conduct of the respondent shall constitute domestic violence in case it -

(a) harms or injures or endangers the health, safety, life, limb or well-being, whether mental or physical, of the aggrieved person or tends to do so and



includes causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse; or

(b) harasses, harms, injures or endangers the aggrieved person with a view to coerce her or any other person related to her to meet any unlawful demand for any dowry or other property or valuable security; or

(c) has the effect of threatening the aggrieved person or any person related to her by any conduct mentioned in clause (a) or clause (b); or

(d) otherwise injures or causes harm, whether physical or mental, to the aggrieved person.

Explanation I.-For the purposes of this section,-

(i) "physical abuse" means any act or conduct which is of such a nature as to cause bodily pain, harm, or danger to life, limb, or health or impair the health or development of the aggrieved person and includes assault, criminal intimidation and criminal force;

(ii) "sexual abuse" includes any conduct of a sexual nature that abuses, humiliates, degrades or otherwise violates the dignity of woman;

(iii) "verbal and emotional abuse" includes-

(a) insults, ridicule, humiliation, name calling and insults or ridicule specially with regard to not having a child or a male child; and

(b) repeated threats to cause physical pain to any person in whom the aggrieved person is interested.

(iv) "economic abuse" includes-

(a) deprivation of all or any economic or financial resources to which the aggrieved person is entitled under any law or custom whether payable under an order of a court or otherwise or

which the aggrieved person requires out of necessity including, but not limited to, household necessities for the aggrieved person and her children, if any, stridhan, property, jointly or separately owned by the aggrieved person, payment of rental related to the shared household and maintenance;

(b) disposal of household effects, any alienation of assets whether movable or immovable, valuables, shares, securities, bonds and the like or other property in which the aggrieved person has an interest or is entitled to use by virtue of the domestic relationship or which may be reasonably required by the aggrieved person or her children or her stridhan or any other property jointly or separately held by the aggrieved person; and

(c) prohibition or restriction to continued access to resources or facilities which the aggrieved person is entitled to use or enjoy by virtue of the domestic relationship including access to the shared household.

Explanation II.-For the purpose of determining whether any act, omission, commission or conduct of the respondent constitutes "domestic violence" under this section, the overall facts and circumstances of the case shall be taken into consideration.

(I) In Indira Sarma Vs. V.K.V.Sarma CrI.A.No.2009 of 2013 dated 26th November 2013 of Honourable Supreme Court of India and in Sanjay Bharadwaj and Ors Vs. the State and Another decided on 27th August, 2010 of Honourable High Court of Delhi elaborately discussed the term "Domestic Violence" under the Domestic Violence Act, 2005.

Section 12. Application to Magistrate.—

(1) An aggrieved person or a Protection



Officer or any other person on behalf of the aggrieved person may present an application to the Magistrate seeking one or more reliefs under this Act: Provided that before passing any order on such application, the Magistrate shall take into consideration any domestic incident report received by him from the Protection Officer or the service provider.

(2) The relief sought for under sub-section (1) may include a relief for issuance of an order for payment of compensation or damages without prejudice to the right of such person to institute a suit for compensation or damages for the injuries caused by the acts of domestic violence committed by the respondent: Provided that where a decree for any amount as compensation or damages has been passed by any court in favour of the aggrieved person, the amount, if any, paid or payable in pursuance of the order made by the Magistrate under this Act shall be set off against the amount payable under such decree and the decree shall, notwithstanding anything contained in the Code of Civil Procedure, 1908 (5 of 1908), or any other law for the time being in force, be executable for the balance amount, if any, left after such set off.

(3) Every application under sub-section (1) shall be in such form and contain such particulars as may be prescribed or as nearly as possible thereto.

(4) The Magistrate shall fix the first date of hearing, which shall not ordinarily be beyond three days from the date of receipt of the application by the court.

(5) The Magistrate shall Endeavour to dispose of every application made under sub-section (1) within a period of sixty days from the date of its first hearing.

In **Ms. Nidhi Kaushik Vs. Union of India and Ors** decided on 26th May, 2014, The Honourable **High Court of Delhi** held that

“The proceedings under Section 12 of DV Act are purely civil in nature”

In **Kiran Datta Vs. State and Another** decided on 11th February, 2014, The Honourable **High Court of Delhi** held that

“before passing any order under Section 12 of D V Act, a domestic incident report has to be taken into consideration”

Section 17. Right to reside in a shared ousehold.—

(1) Notwithstanding anything contained in any other law for the time being in force, every woman in a domestic relationship shall have the right to reside in the shared household, whether or not she has any right, title or beneficial interest in the same.

(2) The aggrieved person shall not be evicted or excluded from the shared household or any part of it by the respondent save in accordance with the procedure established by law.

RESIDENCE ORDERS AND ALTERNATE ACCOMMODATION

In **S.R. Batra and Anr vs Smt. Taruna Batra** reported in **AIR 2007 SC 1118** , the Honourable Court held that;

“A shared household would only mean house belonging to or taken on rent by husband or house which belongs to a joint family of which husband is a member, the house which exclusively belongs to mother-in-law cannot be called as shared household”

In **Vimalben Ajitbhai Patel Vs Vatslaben Ashokbhai Patel** reported in 2008(2) RCR(Criminal)699

“The personal property of mother



in law cannot be attached for the monetary maintenance awarded towards husband”

In Smt. Preeti Satija vs smt. Raj Kumari and Anr. Reported in 2014(1) RCR (Criminal) 1035

“In this judgment Honble Delhi High court took respectful dissenting view from Honble supreme Court of India in S.R. Batra’s Case (Supra) and gave new interpretation to words, “Domestic Relationship”, “Shared House-Hold” and “Residence Order”.

SECTION 18: Protection orders.

The Magistrate may, after giving the aggrieved person and the respondent an opportunity of being heard and on being prima facie satisfied that domestic violence has taken place or is likely to take place, pass a protection order in favour of the aggrieved person and prohibit the respondent from—

- (a) committing any act of domestic violence;
- (b) aiding or abetting in the commission of acts of domestic violence;
- (c) entering the place of employment of the aggrieved person or, if the person aggrieved is a child, its school or any other place frequented by the aggrieved person;
- (d) attempting to communicate in any form, whatsoever, with the aggrieved person, including personal, oral or written or electronic or telephonic contact;
- (e) alienating any assets, operating bank lockers or bank accounts used or held or enjoyed by both the parties, jointly by the aggrieved person and the respondent or singly by the respondent, including her stridhan or any other property held either jointly by the parties or separately by them without the leave of the Magistrate;
- (f) causing violence to the dependants, other relatives or any person who give the

aggrieved person assistance from domestic violence;

(g) committing any other act as specified in the protection order.

PROTECTION ORDERS AND ITSEXECUTION:

In Smt.Kanchan & Anr vs Vikramjeet Setiya in MANU/RH/0824/2012

“It was observed that the provisions of the code of criminal procedure in relation to execution of the order under section 125 Cr.PC. have to be resorted to by the court below for giving force to the order of monetary relief but no recourse to section 31 shall be made”

In Kanaka Raj vs State of Kerala in MANU/KE/0919/2009

“A Magistrate is competent to direct registration of a case and investigate an offence under Section 31 of Protection of Women from Domestic Violence Act, 2005 in the absence of a protection order or an interim protection order”

In S.Jeeva Ashok vs Kalarani on 18 February, 2015 in MANU/TN/0355/2015

“An application would not lie under section 31 of DV Act if breach is under Section 20 of the Act, „that is monetary relief”.

SECTION NO.19 Residence Orders and Alternate Accommodation

(1) While disposing of an application under sub-section (1) of section 12, the Magistrate may, on being satisfied that domestic violence has taken place, pass a residence order—

- (a) restraining the respondent from dispossessing or in any other manner disturbing the possession of the aggrieved person from the shared household, whether or not the respondent has a legal or equitable interest in the shared household;



(b) directing the respondent to remove himself from the shared household;

(c) restraining the respondent or any of his relatives from entering any portion of the shared household in which the aggrieved person resides;

(d) restraining the respondent from alienating or disposing off the shared household or encumbering the same;

(e) restraining the respondent from renouncing his rights in the shared household except with the leave of the Magistrate; or

(f) directing the respondent to secure same level of alternate accommodation for the aggrieved person as enjoyed by her in the shared household or to pay rent for the same, if the circumstances so require:

Provided that no order under clause (b) shall be passed against any person who is a woman.

8(2) The Magistrate may impose any additional conditions or pass any other direction which he may deem reasonably necessary to protect or to provide for the safety of the aggrieved person or any child of such aggrieved person.

(3) The Magistrate may require from the respondent to execute a bond, with or without sureties, for preventing the commission of domestic violence.

(4) An order under sub-section (3) shall be deemed to be an order under Chapter VIII of the Code of Criminal Procedure, 1973 (2 of 1974) and shall be dealt with accordingly.

(5) While passing an order under sub-section (1), sub-section (2) or sub-section (3), the court may also pass an order directing the officer in charge of the nearest police station to give protection to the aggrieved person or to assist her or the person making an application on her behalf in the implementation of the order.

(6) While making an order under sub-section (1), the Magistrate may impose on

the respondent obligations relating to the discharge of rent and other payments, having regard to the financial needs and resources of the parties.

(7) The Magistrate may direct the officer in-charge of the police station in whose jurisdiction the Magistrate has been approached to assist in the implementation of the protection order.

(8) The Magistrate may direct the respondent to return to the possession of the aggrieved person her stridhan or any other property or valuable security to which she is entitled to.

In **S.R. Batra and Anr vs Smt. Taruna Batra** reported in **AIR 2007 SC 1118**, the Honourable Court held that;

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“In this judgment Hon ble Delhi High court took respectful dissenting view from Hon ble supreme Court of India in S.R. Batra’s Case (Supra) and gave new interpretation to words, “Domestic Relationship”, “Shared House-Hold” and “Residence Order”.

20. Monetary reliefs.—(1) While disposing of an application under sub-



section (1) of section 12, the Magistrate may direct the respondent to pay monetary relief to meet the expenses incurred and losses suffered by the aggrieved person and any child of the aggrieved person as a result of the domestic violence and such relief may include, but not limited to,—

- (a) the loss of earnings;
- (b) the medical expenses;
- (c) the loss caused due to the destruction, damage or removal of any property from the control of the aggrieved person; and
- (d) the maintenance for the aggrieved person as well as her children, if any, including an order under or in addition to an order of maintenance under section 125 of the Code of Criminal Procedure, 1973 (2 of 1974) or any other law for the time being in force.

(2) The monetary relief granted under this section shall be adequate, fair and reasonable and consistent with the standard of living to which the aggrieved person is accustomed.

(3) The Magistrate shall have the power to order an appropriate lump sum payment or monthly payments of maintenance, as the nature and circumstances of the case may require.

(4) The Magistrate shall send a copy of the order for monetary relief made under sub-section (1) to the parties to the application and to the in charge of the police station within the local limits of whose jurisdiction the respondent resides.

(5) The respondent shall pay the monetary relief granted to the aggrieved person within the period specified in the order under sub-section (1).

(6) Upon the failure on the part of

the respondent to make payment in terms of the order under sub-section (1), the Magistrate may direct the employer or a debtor of the respondent, to directly pay to the aggrieved person or to deposit with the court a portion of the wages or salaries or debt due to or accrued to the credit of the respondent, which amount may be adjusted towards the monetary relief payable by the respondent.

In Mr.Prakash Kumar Singhee Vs Ms.Amrपाली Singhee in MANU/MH/0896/2018

“The amount of maintenance has to be fixed by striking a balance between the earning capacity of the husband and need of the wife and the children.”

In Shome Nikhil Danani vs Tanya Banon Danani in ANU/DE/1247/2019

“Monetary relief under section 20 of DV Act is in addition to maintenance under section 125 Cr.PC”

In Sangita Saha V. Abhijit Saha & Ors. in 2019 SCC OnLine SC 559

“Even when domestic violence is not proved against petitioner (wife), maintenance to child cannot be denied”

21. Custody orders.

Notwithstanding anything contained in any other law for the time being in force, the Magistrate may, at any stage of hearing of the application for protection order or for any other relief under this Act grant temporary custody of any child or children to the aggrieved person or the person making an application on her behalf and specify, if necessary, the arrangements for visit of such child or children by the respondent:

Provided that if the Magistrate is of the opinion that any visit of the respondent



may be harmful to the interests of the child or children, the Magistrate shall refuse to allow such visit.

In Mrs. Girija Patel vs Mr.Vijay R Rao in MANU/KA/0360/2015

“Husband can't be granted temporary custody of girl child who is nearing puberty and also when he has abducted her from the custody of mother. Even in DV proceedings while deciding the temporary custody, foremost concern of court should be “welfare of child”.

In Payal Sudeep Laad Alias Payal vs Sudeep Govind Laad And Anr in MANU/MH/3050/2018

“Visitation rights can be given to husband when application is filed by wife for temporary custody of child under section 21 of the Act. If that is declined to husband then welfare of child would suffer”

22. Compensation orders.

22. Compensation orders.-In addition to other reliefs as may be granted under this Act, the Magistrate may on an application being made by the aggrieved person, pass an order directing the respondent to pay compensation and damages for the injuries, including mental torture and emotional distress, caused by the acts of domestic violence committed by that respondent.

In Mr.Prakash Kumar Singhee Vs Ms.Amrपाली Singhee in MANU/MH/0896/2018

“The amount of maintenance has to be fixed by striking a balance between the earning capacity of the husband and need of the wife and the children.”

In Shome Nikhil Danani vs Tanya Banon Danani in ANU/DE/1247/2019

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OTHER IMPORTANT SECTIONS:

i) Section 16- Proceedings to be held in camera.-If the Magistrate considers that the circumstances of the case so warrant, and if either party to the proceedings so desires, he may conduct the proceedings under this Act in camera.

ii) Section 24- Court to give copies of order free of cost.-The Magistrate shall, in all cases where he has passed any order under this Act, order that a copy of such order, shall be given free of cost, to the parties to the application, the police officer in-charge of the police station in the jurisdiction of which the Magistrate has been approached, and any service provider located within the local limits of the jurisdiction of the court and if any service provider has registered a domestic incident report, to that service provider.

iii) Section 26-.Relief in other suits and legal proceedings: Relief in other suits and legal proceedings.-(1) Any relief available under sections 18, 19, 20, 21 and 22 may also be sought in any legal proceeding, before a civil court, family court or a criminal court, affecting the aggrieved person and the respondent whether such proceeding was initiated before or after the commencement of this Act.

(2) Any relief referred to in sub-section (1) may be sought for in addition to and along with any other relief that the aggrieved person may seek in such suit or legal proceeding before a civil or criminal court.



(3) In case any relief has been obtained by the aggrieved person in any proceedings other than a proceeding under this Act, she shall be bound to inform the Magistrate of the grant of such relief.

iv) Section 27. Jurisdiction.-(1) The court of Judicial Magistrate of the first class or the Metropolitan Magistrate, as the case may be, within the local limits of which-

(a) the person aggrieved permanently or temporarily resides or carries on business or is employed; or

(b) the respondent resides or carries on business or is employed; or

(c) the cause of action has arisen, shall be the competent court to grant a protection order and other orders under this Act and to try offences under this Act.

(2) Any order made under this Act shall be enforceable throughout India.

v) Section 28. Procedure.

28. Procedure.-(1) Save as otherwise provided in this Act, all proceedings under sections 12, 18, 19, 20, 21, 22 and 23 and offences under section 31 shall be governed by the provisions of the Code of Criminal Procedure, 1973 (2 of 1974).

(2) Nothing in sub-section (1) shall prevent the court from laying down its own procedure for disposal of an application under section 12 or under sub-section (2) of section 23.

vi) Section 29. Appeal.-There shall lie an appeal to the Court of Session within thirty days from the date on which the order made by the Magistrate is served on the aggrieved person or the respondent, as the case may be, whichever is later.

CONCLUSION:

According to analytical jurisprudence, a Court merely found the Law or merely interpreted the Law, Judges are applying the discretionary power to provide better justice to women in the new context of the socio-economic conditions, judiciary has played an active

role in enforcing and strengthening the constitutional goals towards protection of women of the Land, not only the legislature, but judiciary also plays a very vital and important role in case of women empowerment, the wide interpretation of provisions of various legislation and also the provisions of constitution, judiciary is able to empower the women.

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