

**AN ANALYSIS ON THE LESSER KNOWN FACET OF CRUELTY AGAINST  
HUSBANDS BY WIVES**

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**ABSTRACT**

*When we talk about “Cruelty”, the first thing that stirs the minds of the people is that a female has been harassed by a male thus portraying the female, as the victim and the male, as the abuser. This stereotype of an oppressed woman as a victim and an aggressive man as an abuser hides the ultimate taboo of men facing the cruelty. Cruelty refers to the mental agony, torture or distress committed between the parties due to the conduct of one of the spouses. It may be difficult for most of us to realize and accept that women assault men on a scale similar to men assault women. Research reports reveal the fact that the impact of cruelty upon men is of a greater extent as compared to the female victims due to the lack of support, both legally and socially. The most important obstacle faced by the men is to prove and make the society as well as the judicial system realise that he is a victim of the cruelty committed. In the above backdrop, the research paper is trying to analyse the concept of cruelty which may lead a husband to the shelter of the court with the reference of case laws & the effects and challenges of such violence on the victimised men. The paper studies about the hidden abusers and their victims. It also deals with whether there is an ample amount of scope and support from the judicial system for the male victims of abuse. Finally, the paper concludes with certain remedies and suggestions.*

Keywords: [Violence, Cruelty, Mental Agony, Physical or Mental Distress, Case laws etc.]

**INTRODUCTION**

The term “Cruelty” is derived from the English law and constitutes the meaning of “the Intentional and malicious infliction of physical suffering upon living creatures, particularly human beings; or, as applied to the latter, the wanton, malicious, and unnecessary infliction of pain upon the body, or the feelings and emotions; abusive treatment; inhumanity; outrage.”<sup>3</sup>

The Hon’ble High Court of Allahabad in the case of ‘*Smt. Kalpana Srivastava v.*

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<sup>3</sup><https://thelawdictionary.org/cruelty/>; Definition as per Black Law Dictionary

*SurendraNath Srivastava*<sup>1</sup>, held that Cruelty includes both physical as well as mental cruelty and thus, the entire evidence on record and the totality of the circumstances must be taken into consideration in order to consider cruelty against a spouse.

Therefore, cruelty is a matrimonial wrong which might be committed by a husband against his wife or by a wife against her husband. It is an inhuman conduct or treatment that causes mental sufferings and thus, act as a threat to the life and health of the other individual. Though it is the pre-occupied notion created among the minds of the people that women are always subjected to torture and harassment by the husband and relatives. It is considered as one of the important grounds for seeking divorce in the court of law as defined under “Sec 13(1)(i-a)’ of The Hindu Marriage Act, 1955” with reference to the case of '*Maya Devi v. Jagdish Prasad*<sup>2</sup> and the party who is filing the case of cruelty has the onus to prove and satisfy the Hon’ble Court to believe that there is a deterioration in the relationship of the parties to such an extreme extent which has made it impossible to carry on the matrimonial obligations without any mental torture or agony.

#### **MEANING, CONCEPT AND SCOPE OF CRUELTY:**

The concept of cruelty has evolved and amended by the way of legal riddle and thus, it has a wider scope. The legislature has kept the meaning open and provided the onus to the courts to interpret the term “cruelty” in any kind, may it be physical or mental cruelty, as the case may be. The term “cruelty” as understood in a matrimonial dispute doesn’t merely convey the idea of physical harm to a spouse by the other. Any act which causes mental agony, distress and torture comes under the ambit and scope of cruelty.

The term Cruelty can be defined as an act which causes sufferings and thus, act as a threat to the life and health of the person. Cruelty are of two types:

1. Mental sufferings
2. Physical sufferings.

Section 13(1)(i-a) of the Hindu Marriage Act specifically talks about the petitioner being treated with cruelty. It depicts the idea of ill-treatment to the body or mind whether purposefully or apprehensively to render a harmful effect in the cohabitation of the parties.

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<sup>1</sup>AIR 1985 All 2753

<sup>2</sup>AIR 2007 SC 1426

In the case of *Balbir Kaur v. Dhir Das*<sup>1</sup>, the Hon'ble Court had held that the acts that 'might even cause mental agony or distress' falls under the scope and ambit of cruelty. Similarly, the Hon'ble High Court of Calcutta in the case of *SulekhaBairagi v. Kamala KantaBairagi*<sup>2</sup> held that the term 'cruelty' need not be used to determine a physical harm to the life, limb or health rather it should be amis-conduct which has made it impossible for the petitioner to cohabit with the other party.

### **CRUELTY IN THE INDIAN LEGAL SYSTEM:**

#### **Cruelty in IPC**

According to Section 498A of IPC—Whoever, being the husband or the relative of the husband of a woman, subjects such woman to cruelty shall be punished with imprisonment for a term which may extend to three years and shall also be liable to fine.<sup>3</sup>

1. Any wilful conduct which is likely to drive the woman to commit suicide or to cause any grave injury or danger to life, limb, or mental or physical health of the woman
2. Harassment of the woman with a view to coerce her or her relatives to meet unlawful demand for any property or valuable security.<sup>4</sup>

This section was inserted to IPC by the Criminal Law (Second Amendment) Act, 1983 with a view to curb the practices of coercing dowry, torture and harassment which were carried out by the husbands and his relatives on the wife. Before this act, when a wife was harassed by her husband and in-laws, the general provisions of IPC governed the same but were not adequate to keep in check.

The evil practices of bride burning and alarming violence against women specifically dealing with young and newly married women were on a continuous growth and acted as a threat to the life of the women.

More often it was also difficult to prosecute the accused and prove the guilt because of two reasons-

1. Earlier the women used to bear their sufferings in silence

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<sup>1</sup>AIR 1979, P & H, 162

<sup>2</sup> 1981 (1) D.M.C. 217

<sup>3</sup> <https://indiankanoon.org/doc/538436/>

<sup>4</sup> Ibid; <https://indiankanoon.org/doc/538436/>

2. In most cases the sufferings inflicted were within the four walls of the house, therefore, it was difficult to produce/get an eyewitness of such offence.

Furthermore, the sufferings inflicted may not be a physical assault to the woman but a mental torture in subtle and discreet form which would be equally tormenting and many a times leading to suicide by the woman. Thus, the Parliament felt the need to make comprehensive legislative changes and introduced the Section 498A to the Indian Penal Code, 1860.

However, the law which was made to protect the rights of the women are now being used by them in a fallacious manner. Gone are those days of presumptions of women being subjected to cruelty by their husbands and relatives. In the present scenario, the whole concept and belief have undergone a drastic change. It is quite evident from the facts and circumstances that the harassment caused to the male society are growing in a rapid scale due to the freedom of education and economic independence. The laws made in the common interest of the women are now being used as a strong instrument of causing perturbation and cruelty against husbands.

Now, the women use it as tools for harassing their husband and relatives to satisfy their hatred. This is evident from the fact that the number of cases relating to harassment in the form of cruelty in relation to Section 498A are piling up in the courts and every now and then, a new petition under section 498A is being filed.

On the following grounds, the petitioner challenged the constitutional validity of Section 498 A in the case of *Sushil Kumar Sharma v Union of India*<sup>1</sup>:

1. That, it has been grossly abused by married women to harass their husbands, in-laws and relatives by instituting frivolous and unfounded criminal proceedings,<sup>2</sup>
2. That, it has become an easy tool in the hands of the Police and other agencies to hound the persons with the threat of arrest,<sup>3</sup>
3. That, the investigating agencies and the courts start with the presumptions that the accused persons are guilty,<sup>4</sup>

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<sup>1</sup> AIR 2005 SC 3100

<sup>2</sup> Ibid

<sup>3</sup> Ibid

<sup>4</sup> Ibid

4. That, it is a clear exploitation by the women and their relatives and thus, a misuse of law against the men.<sup>1</sup>

On the contrary, the Supreme Court rejected his contentions, stating that the mere possibility of abuse of a statutory provision doesn't *per se* make a provision of law *ultra vires* to the Constitution. Vulnerability in such a case is on action and not in section. The court also opined that it must be presumed, unless contrary is proved, that the administration and application of a provision of law is not done with an evil eye and unequal hand.<sup>2</sup>

### **Cruelty in Family Law**

Neither the concept of cruelty in legal sense nor the amount or degree of cruelty has been defined in any Statute of Indian Legislature relating to marriage and divorce. However, cruelty can be considered as an act which is committed with a malafide intention to cause sufferings to the other spouse. Suffering can be a mental or physical one. Before the amendment of Hindu Marriage Act, 1955, cruelty was considered as one of the grounds for getting judicial separation and after its amendment, it is considered as the ground for getting both judicial separation and divorce.

In the case of *Shobha Rani v. MadhukarReddi*<sup>3</sup>, the Hon'ble Supreme Court held that the connotation of the term 'cruelty' can be used with relation to a human conduct or human behaviour and this conduct might be in respect of fulfilment of matrimonial obligations and duties. It can also depict the adverse effect of the human behaviour on the other party. In case of mental cruelty, firstly, the nature of the cruel treatment is examined and taken into consideration. Secondly, whether the impact of such behaviour caused any reasonable apprehension of fear in the mind of the spouse regarding the cohabitation with each other. The meaning of the term cruelty can also be inferred from the type of life to which the parties are accustomed to. In the case of *Sheldon v. Sheldon*<sup>4</sup>, Lord Denning was of the opinion that each case of cruelty would be different from each other as it deals with a variety of human beings who are not similar to each other. Cruelty can be determined from the intensity and persistency of the harsh conduct of the spouse towards the other which make either of them impossible to inhabit.

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<sup>1</sup> Ibid

<sup>2</sup> Ibid

<sup>3</sup> AIR 1988 SC 121

<sup>4</sup> (1966) 2 All ER 257

In the case of *Parihar v. Parihar*<sup>1</sup>, the Hon'ble Court observed and considered the letters written by the wife to the Air Force authorities. It was found that these irresponsible accusations and allegations in the form of letters could cause a harm to the reputation of the husband. The Hon'ble Court held that cruelty has been committed by the wife against the husband and was satisfied that the marriage should be dissolved on the ground of cruelty, thus, the wife's appeal was dismissed in the court of law.

Therefore, Cruelty can only be considered when there is a gross misconduct which has made the cohabitation un-durable and impossible. The cumulative conduct has to be thoroughly examined taking into consideration the conducts and circumstances and the effect it has left on the parties so as to make it impossible for either of them to continue their matrimonial obligations and duties. The onus of proof lies on the petitioner in order to prove that he was treated cruelly by the other party.

### **Mental Cruelty**

When it becomes impossible for the parties to live with each other due to the conduct inflicted upon them such as mental pain and suffering constitutes to Mental Cruelty.<sup>2</sup>

Prior to the amendment of the Hindu Marriage Act, 1955, which was brought in 1976, the meaning of the word cruelty was vague and rigid. However, in the case of *Dastane v. Dastane*<sup>3</sup>, which came into picture before the amendment, the Supreme Court gave a radical idea about the concept of cruelty. In this case, it was observed that cruelty can be ascertained from the conduct which should create reasonable apprehension of fear in the mind of the petitioner to live with the respondent.

There are many cases wherein the husbands are humiliated and insulted by their wives and are treated cruelly in the most inhuman way, insulted and harassed in numerous ways, for instances in front of their friends and relatives, and taunting the husband's physical incapability, denying him access to physical relationship, extra marital affairs, removing of mangalsutra by wife, etc. All these acts don't amount to physical cruelty but influence the health of the husbands in a negative way.

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<sup>1</sup> AIR 1973 Raj. 140

<sup>2</sup>V. Bhagat v. D. Bhagat, AIR 1994 SC 710: (1994) 1 SCC 337: 1994 AIR SCW 45: (1994), 1 BLJR 1: (1994) 1 PLR 603: (1994) 1 Andh LT 14.

<sup>3</sup>N.G. Dastane (Dr.) v. S. Dastane, AIR 1975 SC 1534: (1975) 2 SCC 326: (1975) 3 SCR 967

Mental cruelty must be of such nature and impact that the wrong doer cannot be asked to put up with the conduct and exploit the other party as was clearly held in the case of *S.Hanumantha Rao v. S.Ramani*<sup>1</sup>.

The remedies available against cruelty can be bifurcated into three types:

1. Civil Remedies
2. Criminal Remedies
3. Constitutional Remedies

The nature of the act is taken into consideration in order to ascertain the type of remedy. The Constitution of India ensures equal status, rights and constitutional remedies to every citizen of the country. The aggrieved party may file a suit in the court of law for compensation or a suit for injunction in the civil court against the wrong doer under the civil remedies. Similarly, an aggrieved spouse has the right to criminal remedy and thus, can file a complaint against the spouse who has committed a wrong under the penal laws. The aggrieved person can also have an access to the precautionary measures which are present before the Executive Magistrates under the Code of Criminal Procedure. Constitutional Remedies can be accessed if any fundamental right of the spouse is violated by the other spouse. The aggrieved spouse can approach the Supreme Court or the High Court under Article 32 or Article 226 of the Indian Constitution in the case of violation of his/her fundamental rights. He can also approach the High Court under Article 226 in case of a violation of his legal rights

**Acts amounting to Cruelty against Husbands:**

1. Insulting, assaulting and ill – treatment of the husband or relatives of husband by wife
2. False charges of immorality on husband
3. Threats
4. Desertion by wife
5. Adultery by the wife

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<sup>1</sup>AIR 1999 SC 1318

**1) Insulting, assaulting and ill – treatment of the husband or relatives of husband by wife**

If the husband or any of his relatives is abused or falsely accused by the wife in the presence of their friends or of others, or uses defamatory words that lowers the reputation of the husband or their relatives amounts to cruelty. Deliberately causing harm to injure and deteriorate the health of the husband and humiliating or assaulting the husband through any other mode also results in cruelty. In the case of *Smt. Krishna Banerjee vs Bhanu Bikash Bandyopadhyay*<sup>1</sup>, the wife behaved abnormally and her temperament towards the husband was unacceptable, thus, the Hon'ble Court was of the opinion of dissolving the marriage on the ground of cruelty. Moreover, she was absolutely indifferent towards the needs of the husband and possessed a selfish and self-centred attitude. Her ill-treatment towards her mother-in-law and other in-laws had also added up to the mental agony of her husband. She didn't carry out the household duties such as preparation of breakfast for which her husband used to leave for work without having breakfasts or had to prepare one for himself. She didn't let her husband sleep in the day when he used to return from night duty. Thus, the above-mentioned acts and unacceptable behaviour of the wife towards her husband resulted in mental distress and torture and the petitioner was hospitalised due to the same. From the facts and circumstances, the Hon'ble court observed that the ill-treatment by wife against her husband resulted in mental cruelty and thus, considered it as a ground for dissolution of the marriage.

In the case of *Sudhakrishna Halder v. Jyostna*<sup>2</sup>, the husband was physically assaulted by his wife and son, thrice. It was held by the Hon'ble Court that the sole evidence of the husband was enough to cruelty. Hence, the decree of divorce was granted and cruelty was proved.

**2) False charges of immorality by wife**

Wife making unfounded allegation of immorality on the husband such as drunkard, womaniser, etc, results in cruelty. If serious allegations are imposed by wife about the husband having illicit relationship with another woman and is not proven by the evidence, it shall result in cruelty against husband by wife. Acts of moral turpitude generally result in cruelty.

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<sup>1</sup>AIR 2001 Cal 154

<sup>2</sup>AIR 2009 (NOC) 2948 (Cal)

In the case of *Kamini Gupta v. Mukesh Kumar*<sup>1</sup>, the wife alleged the husband as a womaniser and drunkard. These allegations of the wife couldn't be proved in the court of law and the Hon'ble Court held that the charges and allegations by the wife against the husband were reckless and baseless and have definitely created an apprehension of mental agony and distress in the mind of the husband and thus, caused mental injury to the petitioner. The court was also of the opinion that accusations and imputations result in more pain and injury than physical harm and thus, act as irreplaceable injuries in the minds of the people.

In the case of *Raj Kishore Prasad v. Raj Kumari Devi*<sup>2</sup>, the wife had alleged the husband under Section 494 of the Indian Penal Code which talks about bigamy. The Hon'ble Court held that this particular accusation amounts to mental cruelty and can have a serious repercussion on the carrier of the husband as being a government servant.

### **3)Adultery by wife**

The phrase “Adultery by wife” refers to a circumstances where a wife is leading an immoral life, having extra-marital affairs or voluntarily having sexual or illicit relationship with other person apart from the husband during the existence of the marriage. Adultery being of civil nature can be proved by preponderance of probabilities. Thus, proof beyond reasonable doubt is not required. A single act of adultery by wife is enough to grant the decree of divorce. In the case of *Smt. VimlaLadkani v.Dr. Chandra Prakash Ladkani*<sup>3</sup>, it was alleged by the husband that his wife was having illicit relation with another person namely, Mohan Sindhi who had a bad reputation and evil eye for his wife. Mohan Sindhi used to pay a visit to his mother in-laws place during the night, daily. He also used to be in contact over calls with the wife of the petitioner. Even after forbidding her, the lady used to visit him. It was also alleged that there were continuous threats to life by Mohan Sindhi towards the petitioner which in result was causing mental pain and agony. The Hon’ble Court after taking the facts and circumstances into consideration, held that the conduct of the wife has resulted in mental cruelty and thus, the decree of divorce was granted to the husband.

### **4) False FIR or Complaint by wife**

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<sup>1</sup> AIR 1984 Delhi 368

<sup>2</sup>AIR 1986 Pat 362

<sup>3</sup> AIR 1996 MP 86, I (1996) DMC 142, 1995 (0) MPLJ 975

If the wife with a malicious intention lodges a false FIR or complaint against husband or relatives of the husband with sole purpose to harass and humiliate or for any other purpose, it will amount to cruelty. Thus, acts of commission, filing false criminal case against husband and his relatives by wife, the consequence of which has landed the husband in distress in jail, shall also amount to cruelty.

In the case of *Ashok Kumar v. Vijay Laxmi*<sup>1</sup>, false allegation of ablazing the wife in kerosene oil was set aside by the court of law and was held that such false allegation would amount in mental agony and distress which in turn would amount to grave cruelty and thus, can be considered as a ground for divorce.

In the case of *P.S Kher v. Kamal Kaur*<sup>2</sup>, the wife alleged that the husband was having illicit relation with a rich widow of 40 years of age. The widow was none other than the real sister of appellant's mother having eldest child of the age of 38 years. It cannot be easily accepted that the wife did not know about relationship of this widow with the husband. However, the wife not only showed ignorance about their relationship, but also asserted that the widow was in no way related to her husband. It was held by the court that the wife falsely accused her husband having illicit and shady relation with his aunt, and thus, amounted in mental cruelty.

Similarly, in the case of *Pawna Devi v. Chuni Lal*<sup>3</sup>, the Hon'ble court held that a false and unproved allegation regarding the second marriage of the husband amounts to cruelty.

#### **5) Threats given by wife**

When threats are given by wife to leave home or to commit suicide in order to make the husband or relative fulfil some unlawful demand or personal interest, amounts to cruelty.

In the case of *Rajani v. Shanti Lal*<sup>4</sup>, the husband had made allegation regarding the abnormal mental condition and un fulfilment of the matrimonial duties by the wife. The husband had also alleged about the threats with regard to the commission of suicide and refusal of cohabitation by the wife. In response the wife denied all the above mentioned allegations made by the husband in the application for divorce but could not produce any evidence in

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<sup>1</sup> AIR 1992 Del 182: II (1993) DMC 64

<sup>2</sup> D.M.C 1982 (2), 23, P & h

<sup>3</sup> II (1998) DMC 1

<sup>4</sup> 1992 (1) DMC 409 (M.P).

support of her reply for which the Hon'ble High Court of Madhya Pradesh allowed the appeal and granted the decree of divorce to the husband.

#### **6) Desertion by wife**

The term "Desertion" as given under Section 13(1)(i-b) is permanently abandoning or forsaking one spouse by the other against his/her wish without any reasonable ground. The desertion is a matter of inference which is to be drawn from the fact of each case. Two essentials conditions for desertion are: 1) Factum of separation 2) Intention to bring cohabitation permanently to an end. Thus, desertion by wife occurs when wife intentionally lives separately and thus, bringing cohabitation permanently to an end without any reasonable cause or excuse results in cruelty.

In the case of *DurgaPrasannaTripathy v. Arundhati Tripathy*<sup>1</sup>, the petition for divorce was filed by the husband on the grounds of cruelty and desertion. The wife wanted to move to Bhubaneswar with her husband which was her place of service and parental home but the husband refused the proposal as a result, dispute arose between the party. She also misbehaved and insulted the mother in-law who went to get her back on the occasion of marriage ceremony of the younger brother and didn't even visit the house to give company to her husband when her father in-law expired. The family court by taking into consideration all the facts and circumstance granted the decree of divorce.

#### **LACUNAS IN THE INDIAN LEGAL SYSTEM**

Section- 498 A is considered as a "Legal Terrorism" as held in the landmark case of *Sushil Kumar Sharma v. Union of India*<sup>2</sup>. It is a clear extortion scam and a cognizable, non-bailable and non-compoundable offence. It has repeatedly failed to punish the real accused and provide justice to the actual victims of the torture and harassment. From the facts and circumstances of different cases, it can be clearly observed that it is a mere violation of Article 14 and 15 and considers men to be the abusers and women to be the affected and victimised section of the society. The involvement of un-regulated courts and corrupt officials

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<sup>1</sup> AIR 2005 SC 3297; (2005) 7 SCC 353

<sup>2</sup>Writ Petition (civil) 141 of 2005; <https://indiankanoon.org/doc/1172674/>

have contributed to the extortion scam of Section 498 A.

The Protection of Women from Domestic Violence Act, 2005 (PWDVA) was incorporated in order to ensure protection of women and provide them with special privileges in order to curb the offences against them. The major flaw in this particular act is that it has a women-centric view which allows women to misuse this particular act by filing false cases in the court of law.

### **CONCLUSION AND RECOMMENDATIONS:**

According to Indian society, marriage is a divine concept which includes a social institution and a union between a man and a woman and thus, get the social status of husband and wife. In the passive growth of liberalization, modernisation and women empowerment, some privileges are provided in the hands of women in order to come to the equal footing with male. The concept of cruelty with regards to protection of women has been introduced which is treated as a serious offence under Indian Penal Code, 1860 keeping in mind the patriarchal society and the offences being committed in isolated places. With the advancements in the field of law, the women are misusing these particular laws to achieve their personal interest unlawfully. Freedom of education and economic independence have also added up the offences related to cruelty.

In the landmark case of *Sushil Kumar Sharma vs. Union of India*<sup>1</sup>, the Hon'ble bench consisting of ArijitPasayat and H.K. Sema indicated Section 498A as 'Legal Terrorism' and noted, "The provision is intended to be use as a shield and not assassins' weapon.<sup>2</sup> If cry of 'wolf' is made too often as prank, assistance and protection may not be available when the actual 'wolf' appears"<sup>3</sup>. However, the instances of cruelty against husbands by the wives are increasing day by day with a dynamic approach. The Apex Court while delivering the judgment with relation to Section 498 A of the Indian Penal Code observed that the majority of the cases registered under Section 498 A were false allegations as recorded in the 2013 report of National Crimes Record Bureau data. The glaring reality can't be overlooked that the appalling pattern of false ramifications in a view to irritate and cause mental distress to the husband and his relatives is rapidly increasing day by day. Strict laws should be put in

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<sup>1</sup>Writ Petition (civil) 141 of 2005

<sup>2</sup> Ibid; <https://indiankanoon.org/doc/1172674/>

<sup>3</sup>Sushil Kumar Sharma v. Union of India; Writ Petition (civil) 141 of 2005

place by the Parliament with special reference to marriage so that women don't misuse the law that have been made for their protection and thus, put a stop to the documentation of false reports just to make the life of men hopeless and provide a ray of hope to the men in order to access equality. It is time to take up the issues seriously related to cruelty by wives against husbands and in-laws and implementation of legal frameworks and effective measures by the Government must be taken into consideration for curbing the issues in the present scenario. There is a dire need for setting up of special commission for men in order to look after such matters. Strong legal actions must be taken against the misuse of legal provisions by women. A proper investigation must be conducted in order to ensure fairness before arresting any individual under Section 498 A of IPC. Special provisions should be formulated against the officials and police in case of violation of proper procedure of law. The courts should distinguish between the avoidable and unavoidable cases and strict laws should be formulated specifically dealing with the issues of men in order to maintain peace and equality. The present idea of assumptions and lawful arrangements ought to be changed reasonably to keep amicability and to maintain gender equality.

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