

CONCEPT OF STRIDHANA: THE ROOT OF HINDU WOMEN'S PROPRIETARY RIGHT IN INDIA

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Abstract: Economic independence of each individual of a society is very much important for the smooth functioning of a social structure. Accordingly, the proprietary right of every individual of society are of special importance in regulating the social activities. In respect of proprietary right of women, the Hindu dharmasastras granted limited rights.^[1] Relating to law of inheritance, a daughter could inherit her father's property only after the son and the widow.^[2] A sister had no share in the patrimony, if she had a brother. A married daughter did not have any kind of share in the father's property. The estate a woman inherited was usually limited. She could utilise its full income in any way she liked but could not touch its corpus^[3].

It is submitted here that, though a Hindu woman in ancient India was enjoying limited proprietary right, yet there was some items of property where a woman has got absolute power over its possession and disposition. To that effect the text of Manu states "a righteous king to punish as thieves such relatives who appropriate the property of women during their lifetime."^{[4][5]} Neither the husband, nor the son, nor the father, nor the brother have authority over Stridhana to take it or to give it away. This injunction is almost in the nature of a warning to male members to lay their hands off the women's property.^[6] Such a practice continued till British period. During British rule some legislations have been passed in respect of women's property right. After independence, the Hindu Succession Act, 1956 was passed that gave recognition to the proprietary rights to the Hindu Women of Independent India.

Meaning of Stridhana: The word *Stridhana* is derived from *Stri*, i.e. woman, and *Dhana* i.e. property. It means, literally women's property^[7]. In modern Hindu Law, the term *Stridhana*, denotes not only the specific kind of property enumerated in the smritis but also other species of property assigned or owned by a woman over which she has absolute control, and she forms the stock of descent in respect of such property, which accordingly devolves on her own heirs. Property gifted to girl before the marriage, at the time of marriage or at the time of giving farewell or thereafter are her *stridhana* properties. It is her absolute property with all rights to dispose at her own pleasure. Husband or other members of her family have no control over the *stridhana* property. Husband may use it during the time of his distress but nevertheless he has a moral obligation to restore the same or its value to his wife^[8].

Concept of Stridhana in Ancient Law: The concept of *Stridhana* is as old as the *Rigveda*, the oldest one of three Vedas. In the *Rigveda* it has been categorically stated that, the Hindu women of Vedic society can hold separate property having exclusive power over its utilization^[9]. She had a right to dispose it off according to her own will. Even a childless widow had a right to claim for wealth^[10]. In the verses of *Rigveda*, there are some items of property which have been recognized as Women's property or *Stridhana* which have been given to her by her relations as gifts at the time of marriage.

1. Gifts from parents and brothers^[11],
2. Gifts before the nuptial fire^[12].
3. Gifts in the bridal procession^[13].
4. Earning by Mechanical Arts^[14].

The Taittiriya Samhita of *Yajur Veda* also reveals the proprietary right of woman over the gift made by her father at the time of her marriage. It had been recognized that these gifts were her own property and she had an absolute dominion over such property unfettered by her husband even after her marriage^[15]. In *Atharva Veda* also it has been clearly stated about the gift of father and brother to the woman at the time of marriage in the form of dowry^[16].

The Prescription made in the *Smritis* and *Dharmasastras* are treated as the law of ancient India. During the early period, there was no distinction between religion, law and morality. They were commulatively referred to as *Dharma*. The three sources of *dharma* are *Shruti* (the divine revelation or utterances, primarily the *Vedas*) *Smriti* (the memorized word – the *dharmasutras* and the *dharmashastras*) and *Sadachara* (good custom)^[17]. Although the *Vedas* were treated as the fountain head of Hindu law by Jurists, they do not contain positive law (or lawyer's law)^[18]. Hence, the codified laws governing Hindu marriage and family relationships derive their roots from the *Smritis* and *Nibandhas* (Commentaries and digests)^[19]. The interpretation made in the *Smritis* and *dharmasastras* are very much clear over the concept of *Stridhana* or women's property. The first mention of the term *Stridhana* found in the *Goutaa dharmasutra*. He provided not only for the separate women's property but also distinct and separate rules for its succession^[20]. From this period, to the next millennium, the scope of *Stridhana* was gradually expanded to include almost every category of property. Manu, the father of Hindu law defines *Stridhana* as "what was given before the

nuptial fire (adhyagni), what was given at the bridal procession while the bride is being led from her natal residence to her husband house (adhyavahanika), what was given in token of love by father-in-law and mother-in-law (dattam-pritikarmani) and what was received as gift from a father, a mother or a brother, are considered as the six fold property of woman^[21]. The *Smriti* of Yagnavalkya prescribes that, "What was given to a woman by the father, brother, mother or her husband or received by her at the nuptial fire or presented on her supersession (Adhivedanika) and the like (adi), is denominated women's property that which is given to the bride by bandhus, sulka, Anavadheyaka, then her kinsmen (bandhavas) take if she dies without issues"^[22].

The definition of *Stridhana* as given by Vijaneshwara in Mitakshara is as follows:

"That was given by the father, by the mother, by the husband or by a brother and that which was presented by the maternal uncles and the rest at the time of wedding before the nuptial fire and a gift on a second marriage or gratuity on account of supersession and as indicated by the word *adya* (and rest) property obtained by:

1. Inheritance
2. Purchase
3. Partition
4. Seizure, e.g. adverse possession, and
5. findings

and this is *stridhana* according to Manu and the rest^[23]. Jimutavahana, the authority of Dayabhaga School of Law states that "The property alone is *stridhana* which she (a woman) has power to give, sell or use independently of her husband's control".

The results, it may be said:

1. affirmatively all gifts from relations constitute *stridhana*, except a gift of immovable property made by the husband and that gifts from strangers also constitute *stridhana* if made before the nuptial fire or at the bridal procession;
2. Negatively, that the following properties are not *stridhana*, namely -
 - i. Property inherited by a woman.
 - ii. Property obtained by her on partition.
 - iii. Gifts from strangers, except those made before the nuptial fire or at the bridal procession, and
 - iv. Property acquired by her by mechanical art^[24].

It is submitted here that the Hindu woman has been enjoying proprietary right in India since vedic period. She has been treated as the absolute owners of the property which are coming under the gamut of *stridhana*. In other words we can say that the term *Stridhana* is the base on which the edifice of women's proprietary right has been built up.

Position in British Period: After the commentary period woman's property right was in a position of challenge in the absence of legislative enactments.

During the British period the Privy Council was acting as the court for the interpretation of legal matter. In number of cases like *Bhagwan Deen Vrs. Mayna Bai*^[25], *Shiv Shankar Vrs. Devi Sahai*^[26], *Debi Mangal Prasad Vrs. Mahadev Prasad*^[27]. The position of woman's property rights were not clear. The restricted rights were still allowed in favour of woman. In order to overcome the ambiguous position of women's property right, the Hindu women's Right to property Act., 1937 was passed by the British Administration in India.

1. The Act introduced numbers of important changes in respect of the law of succession. It opened a new chapter in the history of women's proprietary rights. The very purpose of this act was to give better rights to women by recognizing their claim for a fair and equitable treatment in the matters of succession though in a limited sphere. In *Dagdu Vrs. Namdeo*^[28] the Hon'ble court observed that the purpose of the Act. Of 1937 was to redress disabilities and to give better rights to women. It was ameliorative in character and enacted to carry out important social reforms but in a very limited sense as the Act. did not confer ownership to her on such estate. The main content of the act are as follows: In case of separate property:

1. The widow along with sons was entitled to equal share with that of the son.

2. A pre-deceased son's widow inherited in like manner as the son, if there was no son surviving of such pre-deceased son, and in like manner as a son's son if there is surviving son or son's son of such pre-deceased son.

The same provision applied *mutadis-mutandis* to the widow of a pre-deceased son of a pre-deceased son.

3. In case of Mitakshra joint family, the widow took the place of her husband.

The Act conferred some new rights on the widow. It put the widow of a member of the joint family in the place of her deceased husband and the husband's interest in the joint family property under the Mitakshara, though unidentified, vested immediately upon his death in the widow and did not devolve by survivorship. The legislation framed by the British administration in India allowed woman a limited estate which on her death reverted to her reversioners. She was allowed to maintain her station of life from that estate and no more.

Position after Independence:

I. Constitutional Provision:

The founding father of the Indian Constitution have visualized for establishment of an egalitarian society where in a perfect equality of sex can be established. Accordingly, they have incorporated numerous provisions in the constitution of India in the chapters of Preamble, Fundamental Rights and Directive principles of State Policy. It guarantees equality

between Man and Woman in all sphere of life as far as possible. The Preamble contains the ideals and aspiration of the people of India. It secures to all citizens of India equality of status and dignity of the individual^[29]. The equality clause expressly prohibits discrimination on the basis of race, religion, caste, sex and place of birth and guarantees equality before the law and equal protection of laws irrespective of race, religion, caste, sex etc. It also guarantees certain freedoms such as freedom of speech, protection of life and personal liberty. While these may be termed as positive rights, the negative rights are the prohibition of discrimination or denial of equal protection^[30]. Thus, the Indian Constitution has ensured equal status to all i.e. not only between men and men, women and women, but also between men and women^[31]. To achieve the objective of social and economic justice, in order to bring equality of status, certain Directive Principles have been provided in Part-IV of the Constitution of India. Though those principles are 'non-justiciable' yet they are constitutional direction which the state is supposed to abide and implement in the opinion of Mathew J. "the moral rights embodied in part-IV of the Constitution are equally on essential feature of it, the only difference being that the moral rights embodied in part-IV are not specially enforceable as against the state by citizen in a court of law in case state fails to implement its duty but nevertheless, they are fundamental in the governance of the country and all the organs of the state, including the judiciary are bound to enforce those directives^[32]".

The relevant provisions made in the Constitution of India, the verbatim of which are mentioned below:

The Preamble:We the people of India having solemnly resolved to constitute India into a *SOVEREIGN SOCIALIST SECULAR DEMOCRATIC REPUBLIC* and to secure to all its citizens:

JUSTICE, Social, economic and political
LIBERTY, of thought, expression, belief, faith and worship.

EQUALITY, of status and of opportunity, and to promote among them all.

FRATERNITY, assuming the dignity of the individual and the unity and integrity of the Nation.

In our Constituent Assembly the twenty sixth day of November, 1949 do hereby adopt enact and give to ourselves this constitution.

Art Article 14 of the Constitution guarantees equality before the law. It provides that the state shall not deny to any person equality before law or the equal protection of law.

Art Article 15(1):The state shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth or any of them.

Art Article 15(2):No citizen shall, on grounds only of religion race, caste, sex, place of birth or any of them

be subject to any disability, liability, restriction or condition with regard to

Access of shops, public restaurants, hotels and place of public entertainment, or

The use of well, tanks, bathing ghats, roads and place of public resort maintained wholly or partly out of State's funds or dedicated to the use of general public.

Art Article 15(3): Nothing in this article shall prevent the state from making any special provision for women and children. Accordingly, Article 15(3) enables the state to make special provisions for women.

Art Article 16(2): No citizen shall, on grounds only of religion, race, caste, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect of any employment or office under the state.

Though the discrimination of women is explicitly prohibited in Article 15 and 16 of the Constitution of India, this type of prohibition of discrimination of sex is mingled with the prohibition of other discrimination in the ground of religion, race, caste, place of birth. In all other fundamental rights, the word 'citizen', 'person' means both male person and female person. Hence women are equally entitled for the protection of all fundamental rights along with men. There is no discrimination of women relating to the fundamental rights guaranteed in constitution^[33].

Part-IV of the constitution contains the Directive Principles of the State policy. It incorporates many directives to the state to improve the status of women and for protection of their rights. The relevant provision under the Directive Principles of State policy relating to the rights and status of women are as follows:

Art Article 38: The State shall strive to promote the welfare of the people by securing and protecting as effectively as it may a social order in which justice social, economic and political, shall inform all the institutions of the National life.

Art Article 39: The state in particular direct its policy towards securing that the citizens, men and women equally have the right to an adequate means of livelihood, that there is equal pay for equal work for both men and women. that the health and strength of workers, men and women and the tender age of children are not abused and that citizen are not forced by economic necessity to enter avocations unsuited to their age and strength.

Legal Provision:The Hindu succession Act., 1956 brought out revolutionary changes in property right of women. It was the first enactment passed after the independence relating to proprietary rights of Hindu women. It applies to the people of both the school of law i.e. Mitakshara and Dayabhaga. In addition to that, the people of certain parts of South India who

were previously governed by certain matriarchal systems of Hindu Law such as Marumakkatayam, Aliyasantana and Nambudri systems.

The main feature of the Hindu succession Act., 1956 are as follows:

1. The hitherto limited estate given to women was converted to absolute one.
2. Female heirs other than the widow were recognized while the widows position was strengthened.
3. The principle of simultaneous succession of heirs or a certain class was introduced.
4. In the case of the Mitakshara coparcenaries, the principle of survivorship continues to apply but if there is a female in the line, the principle of testamentary succession is applied so as to not exclude her.
5. Remarriage, conversion and unchastity are no longer held as grounds for disability to inherit.
6. Even the unborn child, son or daughter, has a right if she was in the womb at the time of the intestate, if born subsequently^[34].

Section 14 of the Act of 1956 confers absolute rights to the female in any property possessed by Hindu female. The rights are of full nature including unfettered rights of disposal of property.

The property covered under the section 14 of the Hindu Succession Act is both movable and immovable, which is acquired by inheritance, demise, partition, in lieu of maintenance, arrears of maintenance, gift property acquired by her own skills, purchase, and prescription or in any other manner of also *stridhana*. This absolute rights operates retrospectively, since the section 14 refers to the properties acquired before or after the commencement of the Act.

Another area which was improved upon is coparceners property. Coparceners property is a Hindu undivided family property. The member of Hindu undivided property is called coparcener who attains the right in the property by birth. They are all related to the head of the family. This coparceners include relatives within four degrees including Karta. Earlier, females were not members of coparceners, hence were denied succession to the ancestral property. Some of the discrimination that existed in Section 23 and 4(2) have been omitted by the Hindu Succession (Amendment) Act. 2005. By deleting section 23 of 1956 Act., the Amendment Act., 2005 removed the last remnants of discrimination against women.

It is submitted here that the Hindu Succession Act., 1956 is a revolutionary legal provision framed by the legislature of independent India. They had observed the discriminatory approach adopted by the people towards the interest of women. The women were relegated to the position of slave during the British

period without having the adequate property right. Definitely the Hindu Succession Act., 1956 is a relief on the part of the contemporary women class.

Conclusion and Suggestion:After analysing the position of women in respect of proprietary right since vedic period to the passing of Hindu Succession Act., 1956, it can be inferred that the Hindu woman was enjoying enormous power over the property acquired by her in course of time^[35]. In the *Rigveda* period women enjoyed social equality and freedom and granted them equal powers as their male counterparts^[36]. It is evident that women could take part even in wars which constituted an important economic activity in the vedic tribal milieu^[37]. In the period of the later *Vedas* and *Dharmasastras*, women gradually withdrew from public life and economic production. They became dependent on male kinsmen. Supporting this view, Sukumari Bhattacharji has pointed out that in the period before 1200 AD even upper caste women were equated with *Sudras*^[38]. In a nutshell it can be said that the 19th century witnessed the most complete and degrading subjugation of women in the history of mankind^[39]. Even the legislation passed during the British period in India was inadequate and simply gave her a limited estate which on her death reverted to her reversioners.

As has been stated above, Goutama the first law giver of Ancient India who recognized the property right of women. Though it was limited to *Stridhana*, gradually from this period to the next millennium the scope of *Stridhana* expanded to include almost every category of property within the gamut of women's property^[40]. The *Mitakshara* of Vijnanesvara includes inherited property under *stridhana* and hence to avoid passing family's property to outsider, he has made this condition of separation from joint family. Most of the digest writers agrees with this view^[41]. By the time of *Katyayaan*, *Stridhana* included all property whether movable or immovable obtained by women either as a maiden or at a marriage or after marriage^[42]. *Dayabhaga* enumerates, that wealth is *Stridhana* which is given to a woman by the house builder or goldsmith, etc^[43]. Vishnu adds that what obtained from Son's also belonged to *Stridhana*^[44]. The concept of *Stridhana* under the modern Hindu Law states the same acts. It states that any property possessed by a female Hindu whether acquired before or after the commencement of the Hindu Succession Act., 1956 shall be held by her as full owner thereof and not as a limited owners. In clause I of the said Act. it has been stated that "Property" includes both movable and immovable property acquired by a female Hindu by inheritance or device, or at a partition, or in lieu of maintenance or arrears or maintenance, by gift from any person whether a relative or not, before or after her marriage, or by her own skill or exertion, or by

purchase or by prescription or in any other manner whatsoever, and also any such property held by her as *stridhana* immediately before the commencement of Hindu Succession Act., 1956^[45]. To that effect Hon'ble Supreme Court in *Tulsama Vrs. Sessa Reddy*^[46] Summarised the legal position of a Hindu Female relating to property of which she becomes full owner as follows:-

"The Hindu Female's right to maintenance is not an empty formality or an illusory claim being conceded as a matter of grace of generosity, but is a tangible right against property which flows from the spiritual relationship between the husband and the wife and is recognized and enjoined by pure shastric Hindu law and has been strongly stressed even by the earlier Hindu Jurist starting from Yajnavalkya to Manu. Such a right may not be right to property but it is a right against property and the husband has a personal obligation to maintain his wife and if he or the family has property the female has the legal right to be maintained therefrom.....

Realising the need of the hour the founding fathers of the Indian Constitution have incorporated number of provision in favour of women maintenance of equality and administration of economic justice. Hon'ble Supreme Court observed that the constitution permits and even directs the state to administer what may be termed "distributive justice". The concept of distributive justice in the sphere of law making connote, *inter alia*, the removal of economic inequalities rectifying injustice resulting

from dealings and transaction between unequals in society^[47].

In addition to constitution provisions as have been stated above, a good number of legislation have been passed by the Indian Government to strengthen the economic position of women. In this context, the Hindu Succession Act., 1956 needs a specific mention. Because under the provisions of this Act, a daughter was equal sharer of her paternal property and absolute owner of *Stridhana*^[48]. It is a dynamic legislation particularly at the Indian context. It has recognized the proprietary right of women in modern India. It has made the women an absolute owner of her property of which she had been deprived of during medieval period.

In conclusion, the present author is of the opinion that, Govt. of India has framed beautiful legislation for the protection of the interest of the women. But the lacuna lies with its implementation by the law enforcing agencies. That is why the woman class of contemporary India are not free from exploitation in the hand of their best friend i.e. their husband as well as relations. The report of Govt. of India also corroborates the same view. The publication of *towards equality* has clearly revealed that what ever might have been granted to the Indian women in the constitution they had gain very little in the real life^[49]. Hence, it is suggested here that the legislation framed by the legislature for the protection of the interest of the women class be implemented properly by the law enforcing agencies true to its letter and spirit.

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