Every human being is born free, but women's freedom had always been negated in the name of religion, honour, family welfare, and social prestige for centuries together. Now the old social structures are fast crumbling and a new social order, rational, human and liberal, is emerging on the global scene. The question of women has acquired great importance among all the communities throughout the world.

Though the Indian women have more or less the common socio-economic problems, irrespective of caste, creed and community, but Muslim women are facing some specific problems too, that primarily revolve around the issue of identity. The question of reform in the Muslim Personal Law vis-à-vis the probability of a uniform Civil Code is one of these identified problems, that needs sympathetic and sincere understanding. The object of the following presentation is an effort in the same direction.

The solid resistance of the Muslim community in general, against the Supreme Court's judgement in Shah Bano's case was basically a reflection of the community's urge for identity rather than the judgement itself.

"Though Muslim community of India has its peculiarities, its urge for identity is a part of a more universal
phenomenon. For it is now widely recognised that process of modernisation sharpens all ethnic and communal identities. Development, education, knowledge of history, media explosion, political participation and reaction against alienation, caused by industrialisation are some of the factors that increase the need for and means of self-awareness and a sense of belonging to a community, while faster mobility and better material facilities shorten geographical distances and thus improve contacts between scattered members of a community and thus its coherence.\(^1\)

Each identity has its symbols, chosen without any conscious effort and rationality. Their emergence is imperceptible and is the result of a complex interplay of various factors. Religion has acquired a great deal of importance in the country during the recent past. The privileged sections of society, now threatened and alarmed by the popular upsurge of the weaker sections are using religion with vengeance. The aggressive nationalist forces have not been able to realise that plurality of identities cutting across one another, is a guarantee for national integrity; the only debatable question is the legitimate and specific areas of the autonomy of these identities. In this backdrop the Muslim Personal Law in a way becomes a test case, argues Malrajpur.

It is often maintained that Muslims are resistant to social reforms, due to religious rigidity, unable to admit any change in their belief system. But an honest assessment will clarify that its framework leaves enough social spaces to accommodate change and reform. I begin the assessment with the most urgent national
problem of family planning in the context of Muslim community.

**FAMILY PLANNING**

The percentage of 11.7 of acceptance of family planning among Muslims has been comparatively quite low. They are not only behind the Hindus, but also far behind the other minorities (Christians 27.8, Sikhs 29.4, Jains 31.23). It is often wrongly presumed by non-Muslims and to a great extent by Muslims too, that Islamic tenets are opposed to family planning. But there are overwhelming evidences to indicate that "Islam emphasises birth spacing, health of the mother and rights of the children for healthy upbringing, that Prophet Mohammad (PBUH) allowed his companions to practice Al-AZL (coitus interrupts) to ward off social, economic hardship and risk to the health of mother and child."  

In order to understand whether Islam permits or prohibits birth control certain basic concepts based on the Holy Qur'an and the sunna of the prophet must be clearly understood. The concept of population control based on the Malthusian theory is against the Muslim belief. "For God is He who gives (all) sustenance-Lord of power-Stead fast (forever)." Further, the Qur'an declares; "Verily, All things have we created in proportion and measure." However many interpretations suggest that the Holy Qur'an has opposed only irreversible methods, such as sterilisation operation of vasectomy in the man and tubal legation in the woman. But it allows reversible methods, which include coitus interrupts rythm method, intra-uterine devices condom or diaphragm, oral contraceptive pills and locally acting spermicidal jellies.
The practice of Al-AZL was quite common among Arabs even before Islam; the Prophet permitted it to his Companions with the permission of their wives. One of the Companions Abu Sa'id Khudri recalled: "A Jew told me that AZL amounts to burying alive on a smaller scale (wad Khafif). I then came to the holy Prophet (PBUH) and told him what the Jew said. The Prophet then said twice: the Jew lied, the Jew lied". Imam Gazzali supports Al-AZL on the grounds—preservation of wife's beauty and charm, protection of her life and health, shielding her from hardship on account of child birth as well as financial difficulties.

Abortion in Islam is a prohibited sphere, but under certain circumstances it may be permissible. In Sura Mu'minum, the Qur'an states, "Man We did create from a quintessence (of clay); then We placed him as (a drop of) sperm in a place of rest, firmly fixed. Then we made the sperm into a clot of congealed blood. Then of that blood We made a (fetus) lump. Then We made out of that lump, bones and clothed the bones with flesh. Then we developed out of it another creature so blessed be God, the best of creators".

"Based on this, Muslim jurists have deduced that the first four months of gestation is the critical time period. After this the fetus is regarded as being alive, therefore an abortion may be performed, prior to the first four months of gestation period, if a valid and legitimate reason exists."

However, if the pregnancy constitutes a serious threat to the life of the mother, then an abortion is permissible irrespective of the period of gestation. In Sura Al-Asra the Qur'an warns: Kill not your children for fear of want". "Imam Raghib, interpreting 17:31 verse
of Qur'an syas that it is not only the physical killing of children which is prohibited in Islam but also killing them spiritually and intellectually. Denial of access to education, for example, amounts to killing them intellectually. "Those few (qalil)" postulates Hadith, "who are virtuous are superior to those many who are undesirable". It implies that the number of children should be restricted to the capacity of parents to make them virtuous. Similarly, the Imam Ghazzali, a Sufi of great eminence, mentions a tradition from the Prophet: Smallness of a family (qillat al'ayal) is a facility (yusur) and its largeness (Kathrat) results in indigence (faqr)". A number of Fatwas of the renowned theologians from the various countries, as well as the practice of family planning in several Muslim countries support that Islam does not oppose family planning. On the contrary "Islam was, in a way, the forerunner of family planning concept". Another myth deliberately propagated by some communal organisations is "four wives, and twenty four children" as Muslims are a polygamous community. Even if taken as a hypothesis it could not lead to high birth rate, since the number of polygamous men would leave an equal number of men unmarried. Among Muslims, where the female ratio is 922 against 1000 males according to the last Census. The Committee on the equal Status of Women has, however, noted that polygamy is widespread among Hindus.

In short the main factor behind the low rate of acceptance of family planning among Muslims is their educational and economic backwardness. After this clarification I come back to the main issue, i.e., gender equality under the changed social perspective and the probability of a uniform civil code. I classify the problem under two broad heads:
A) Theoretical aspect,

B) Practical difficulties.

So far as the first aspect is concerned let me assert that "Muslim Personal Law in India is awfully distorted and misinterpreted, because of misinterpretation of case-laws, mistranslated law-books, faulty text books, role of ill-educated Maulavies, apathy of intellectuals and distortion by the film world". 10

Qur'an was the first Scripture to have conceded right to women, which may said to be revolutionary in nature, and that too in a period when they were most oppressed in the major civilisations, i.e. Byzantine, Sassanide and the Vedic etc. The Qur'an made a serious bid for ameliorating the lot of women by according them an individuality of their own. Hazrat Aeysha remains Binte-Abu Bakar, even after her marriage to the Prophet and Hazrat Fatima remains Binte-Mohammad, even after marrying Hazrat Ali.

The Qur'an sternly warns the Arab parents addicted to female infanticide: "And when a daughter is announced to one of them, his face becomes dark and he is full of wrath. He hides himself from the people, because of that which is announced to him. Shall he keep it with disgrace or bury it (alive) in dust? Now surely evil is what they judge". 11 The Qur'an promulgated the - - - - -.
doctrine of equality, including sex equality. It declares that all human beings whatever their sex, spring from a single soul. "O people! Be careful of (your duty to) your Lord, who created you from a single soul and created its mate of the same (kind) and spread from these two, many men and women." 12 In the spiritual and metaphysical sense complete equality is accorded to both men and women, and there are no limits to the moral progress of a woman as that of a man.

The principle of sex equality is also involved in equal educational opportunities. The Prophet encouraged women in the spirit of understanding and enquiry. His wife, Aeysha was herself a very learned woman and is still considered a great authority on Islamic jurisprudence.

By awarding dower to bride, the Prophet established the women's right to property and gave them a legal personality, - 'capable of acquiring property and disposing it off.' The daughters were given the right of inheritance; a great service Islam did for women. It also declared, 'unto men is allotted what they earn and unto women what they earn'. 18

MARRIAGE:

According to Islamic Sharia'h a woman is as free as a man to choose or repudiate her partner. For conjugal fidelity there is no difference between the two sexes. Asserting the dignity of women, the Qur'an declares, "They are an apparel for you and you are an apparel to them." 14 As Qur'an regards men and women complementary to each other, it declares in plain and unambiguous terms: "And they (women) have rights, similar to those against them, in a just manner." 15.
According to the Islamic concept marriage is neither wholly sacramental nor exclusively contractual, but an explicit agreement between the partners of a quasi-permanent nature, with provision for its annulment or dissolution. Though divorce is allowed in cases of absolute necessity, checks and balances have also been designed.

In short, the whole spirit of the Qur'an is to hold women in high esteem. The Qur'an and the Prophet tried to pave the way for better social status of women which with unfolding of time could have led to equality between them. "The ideals of Islam could not be achieved as the ideals of other revolutions have not been. The Islamic society became feudalised soon after the death of the Prophet and end of Caliphate and woman came to be subjected more and more." 16

The pace set by the Qur'an was throttled by the early jurists of Islam, because of the socio-political compulsions of time.

In the Indian context certain other factors contributed towards the deteriorating status of Muslim women in society e.g. "during the long and close period of contact with culture, the socio-cultural life of Indian Muslims got inevitably coloured by Hindu traditions and values. This process was also inescapable since large number of Indian Muslims were converted from Hinduism".

"As is well known, much of the early social reforms in Hindu society were directed towards the amelioration of the condition of Hindu women. But in a period in which the Hindu woman was gradually coming to life and breaking her shackles, reforms in education gave little heed to Muslim women. Thereafter, they never really caught up." 17

The Muslim Personal Law as it operates in India, particularly related to a husband's unbridled right of triple divorce, polygamy and maintenance etc., are most repressive to women and negate the total attitude of
Qur'an and the decrees and actions of the Prophet (Peace be on Him).

There are few things which have been elaborated in the Holy Qur'an and the Procedure of divorce is one of them, which is most rational as well as highly scientific. It introduces several stages for final separation, so that the married couple may reconsider their position before taking a final decision. Divorce is to be pronounced thrice after each menstrual period called "Tuhrs". Repudiation must not take place during menstruation.

The entire procedure is an emphasis that divorce should not be a hasty decision and an impulsive act. Sufficient time is given to both parties to consider reconciliation before they finally decide to part, it provides time to relatives from both the parties to intervene, counsel and protect the interests of the wife and the children. Justice Krishna Iyer remarks that "a deep study of the system reveals a surprisingly rational, human, and modern law of divorce".18

KHULA:

When divorce is initiated by the wife and the husband consents to it, divorce is known as 'Khula'. In several Muslim countries, new laws have been framed to enforce this concession given to women. But in India 'Khula' has no legal sanction, it has been enforced through the decisions of the Supreme Court.

FASKH:

The Dissolution of Muslim Marriage Act VIII of 1939, permits Muslim women to obtain a divorce on seven grounds. But it is a known fact how expensive is the litigation and how much time it takes. "Justice delayed is justice denied"

MUBARAA OR MUBARAAAT:

It is divorce by mutual consent. 'Mubaraat' was introduced into the Special Marriage Act in 1959.
The National Perspective Plan for Women, Ministry of H.R.D., Govt. of India wrongly mentions in Chapter VI, page 140 that "there is no provision of divorce by mutual consent in Muslim Law".

**TALAQ-i-TAFWEEZ**

It is a delegated divorce. A woman has the right to pronounce divorce if the right is delegated to her by the husband in writing in the 'Nikah Namãâ'. Though it is accepted by both Sunni and Shia Schools of thought, in practice it is enjoyed only by a few Sulaimani Bohras, who follow the 'Nikahnamãâ', drafted by Danial Latifi. The matter is under discussion among the academic circles that a standard 'Nikahnamaa', acceptable to the Muslim Community as a whole, can solve a number of problems, related to divorce.

**POLYGAMY**

As regards polygamy, in his translation of the Holy Qur'an, Maulana Mohammad Ali writes that Islam permits polygamy under certain circumstances; it does not enjoin it nor even permit it unconditionally. "It is worthy of note that the clause in the Qur'an which contains the permission to contract four contemporaneous marriages, is immediately followed by a sentence which cuts down the significance of the preceding passage to its normal and legitimate dimensions. The passage runs thus, "You may marry two, three, or four wives, but not more". The subsequent lines declare, "but if you can not deal equitably and justly with all, you shall marry only one." 19

As the above discussion makes it clear, the Muslim Personal Law which is invogue in India is unfair to women. Inspite of the fact that family laws have been reformed in most of the Muslim countries, India has brought no significant change in this respect except the most

The Shariah Act of 1986 has clubbed the two different ideas and concepts of a "reasonable and fair provisions" (Mutt-un-Bill Maroof II : 241) and 'maintenance' (LXV 1 - 7) to be paid 'within the iddat period'. Thus limiting the period of reasonable and fair provisions 'Mataa' only up to the 'iddat' is clear violation of the concept of social justice.

Egyptian Parliament with reference to 'Matta' has approved law No. 100 after a thorough discussion with the scholars of Jamia Al-Azhar Cairo. (The Bill first introduced by Anwar Jehan Sadaat was rejected by the Egyptian Supreme Court.) Article 18 of this law makes maintenance obligatory for a minimum period of two years (with no maximum). It may be paid in instalments as fixed by the Court.

Syria has also extended the period of maintenance beyond the 'Iddat'. If we too are able to make suitable reforms in our personal law to protect the interest of a weaker section, then the question of the application of section 125 Cr PC automatically becomes redundant.

b) PRACTICAL DIFFICULTIES:

As the status accorded to women by the Qur'an is concerned, any legislation, earnestly directed towards social justice can be well adjusted within the framework of Shariah, but the crux of the problem is that (i) An ideal version of a uniform civil code has yet to be prepared. The Constitution of the country not only enjoined equal status to women, but also paid attention to certain specific disabilities and made the state responsible to rectify them through affirmative action;
consequently, serious efforts were made to ameliorate the position of Hindu women after the promulgation of the Constitution, inspite of tough resistance from the orthodox section of the community.

But unfortunately, the legislation enacted to give equal status and equal opportunities to women have not produced the desired result, partly due to the socio-economic compulsions and partly because of some serious loopholes in the laws themselves. Without under-valuing the importance of these legislations, following is the assessment of the lapses.

DOMESTIC VIOLENCE:

There is no special law to cover wife beating. It is covered under the general law for assault. Section 319 and 321 of IPC are non-cognizable offences. "Wife beating is the most under reported crime in the country".

The Committee on the status of women in India had pointed out that certain Penal provisions in the law are
definitely influenced by the established patriarchal system, the dominant position of the husband and the social and economic backwardness of women. But there can be no different opinions that during the recent past there has been an alarming acceleration of violent crimes against women, but the disquieting apathy of law makers and law enforcers remains the same.

Social stigma attached to rape, and the demand for corroborative evidence by courts were the major deterrents to women reporting rape.

The lengthy judicial process often denies the victim redressal.

DOWRY:

Though the Dowry Prohibition Act, 1961 amended in 1984 and again in 1986 makes the provisions of this law more stringent, there has been no significant reversal of the trend among the educated urban elite. Justice Bhagwati laments that "in the early Eighties when there was a sudden upsurge in dowry deaths," he had suggested that "credible and legitimate women's organisations be associated in cases of dowry violence. But my suggestion could not favour with the police."

ABORTION:

Decades after infanticide was banned, a new crime against the female child in the womb, in the name of prenatal sex determination tests is being committed. Amniocentesis is not very expensive in India as compared to other countries. As a result, with the help of science and technology, sex biases have crossed all boundaries of human dignity. The Maharashtra Govt. has made these tests illegal.
A law banning sex determination tests by doctors was passed in Punjab. It became a law after obtaining the President's approval as sent on May 13, 1994. However, the Government is yet to issue notification regarding rules under which the law will operate.

A uniform Central Legislation along these lines has become an urgent necessity. Of course the women's voluntary organisations have to work as watch dogs in their respective areas.

A recent survey further strengthens the gender bias against females at every stage. "Every year approximately 15,000,000 girls are born in India. Five million of them do not survive to see their 15th birthday and a third of these deaths take place in the first year of their life, according to a recent survey conducted by UNICEF. Every sixth female child's death is due to gender discrimination, the survey said. If the pre-and post-birth deselection of females is not controlled in time, significant demographic imbalances will result."

PROPERTY:

"It is often mistakenly assumed that the Hindu Succession Act, 1956 entitled daughters to an equal share in all ancestral property. This is however not the case in regard to joint family property governed by the Mitakshara system of Hindu Law. The daughter is entitled to only a share of her father's property, while the son inherits both as co-partner as well as owner. It is to be noted that Mitakshara School is followed by the vast majority in the country. The concept of matrimonial property also needs to be incorporated in the law of Inheritance and Succession.

No doubt the avowed object of modern Hindu Law is to give equal rights to both sexes in matters of property, but the people are systematically avoiding it by willing away the property to the eldest son or other
male member of the family.

A Muslim cannot by "Will" dispose of more than a third of the surplus of his estate after payment of funeral expenses and debts. Requests in excess of the legal third cannot take effect, unless the heirs consent thereto after the death of the testator."National Plan Perspective for Women", recommends the limit of testamentary power to 25 per cent of the property.

MARRIAGE AND DIVORCE

The Child Marriage Restraint Act was passed in 1929. "This socially motivated legislation has been made relatively ineffective by stating that a marriage celebrated in violation of stipulation regarding age would nevertheless be valid. The same restrictions regarding marriageable age are found in the Hindu Marriage Act, 1955".23

A number of sex based as well as religious based discriminations are worth noting in the Hindu Code of 1955-56. The Hindu Marriage Act 1955, lays down that both the parties should be Hindus and none of them should be incapable of giving consent by reason of unsoundness of mind or mental disorder. It stops there. The Act meets the consequences of the contravention of this requirement by declaring it to be voidable.24

The Hindu Minority and Guardianship Act, 1956 does allow a mother to act as her children's natural guardian unless their father is dead or otherwise disqualified. Under the Hindu Adoptions and Maintenance Act 1956 a natural mother would not be allowed to give her child in adoption unless the father is dead or otherwise disqualified.

Under the Hindu Adoptions and Maintenance Act 1956 a married male needs his wife's consent for adoption only if she remains a Hindu; if she has changed her
religion, he need not consult her. By analogy, the
husband can perhaps also ignore his wife in the matter of
adoption if she is since the inception of a marriage
a non-Hindu (in other words, if the man has contracted
an inter-religious marriage).

In the matter of maintenance, a non-Hindu wife
can not claim it from her Hindu husband (either while
living with him or living separate) but, conversely, a
Hindu wife enjoys the right to live separate from her
non-Hindu husband, on the ground of his conversion, with-
out losing her right to be maintained by him. A widowed
daughter-in-law must be maintained by her father-in-law,
but not if she is a non-Hindu.25

While bigamy among Hindus became a criminal offence
in the 1950s, in some castes, SAPTA PADI is one of
the religious ceremonies performed for solemnisation
of marriage. In such cases performance of SAPTA PADI is an
essential and mandatory requirement of a valid marriage.
Often those who indulge polygamy do not complete the
procedure so as to evade the conviction for bigamy
under the Indian Penal Code. The Committee on the
Status of Women has pointed out that since under the
present law only an aggrieved person, (husband or
wife) can initiate proceedings for bigamy most of
these 'marriages' continue.26

Labour laws often treat the male headed family
as a unit even if the husband, wife and children are
all contributing their labour. For instance under the
Bonded Labour System (Abolition) Act, 1976, when the
Government gives relief, it is given to the 'head' of
each family.

The Maternity Benefit Act of 1961, provides for
maternity leave to women working in factories, mines
and plantations including government establishments.
The Employees State Insurance Act, 1948 also provides
for maternity leave to low paid workers, but neither in the unorganised, nor in the agricultural sectors, are there any such legal rights for women.

CITIZENSHIP:

At present only the children of an Indian father (not mother), are automatically Indian children. This requires early rectification.

But in spite of all the above mentioned loopholes in the secular legislation, there cannot be two opinions that the ground for gender equality is well prepared. What remains is the question of new adjustments.

While admitting that Islam provides for enlightened legislation on various matters pertaining to the status of women, it would be wrong to assume that, in India at least, the Shariah determines the day-to-day life of all, or most Muslim women. The Muslim community cannot live in isolation and the Muslim Personal Law as it operates in India cannot remain static, the very logic of development involves change. Even the earliest Islamic thinkers like Imam Tamiyyah opined that the laws must change with time. His renowned disciple, Imam Qayyum Ibn Jauzi held the view that justice is central to Shariah and that Shariah was not meant for creating difficulties and problems; it aims welfare of the people in the matter of this life and hereafter. Similarly Mohammad Abdur, the celebrated theological thinker of Egypt, who vigorously devoted himself for the feminist cause, maintained that "reason preceeds tradition".

But as has already been mentioned in the foregoing paragraphs that an important factor behind the solid
resistance of the Muslim community to the question of reform has been the linkage of the issue of 'uniformity' with 'reform', hence the two issues must be delinked. One has to admit that the question of reform is a highly sensitive and delicate one in a pluralistic society. A minority always suffers from a fear complex of being absorbed by a majority. Unfortunately, motivated propaganda by a few Hindu communalists for a uniform civil code has created strong apprehension in the minds of the Muslims. Complete uniformity in civil matters in a country, having different cultural settings with divergent religious beliefs and socio-economic standards is practically impossible. Even in USA with the exception of monogamy, the different states have their own family laws of marriage and divorce etc. "Unfortunately, in the wake of Babri Masjid/Ram Janam Bhoomi dispute, the Shah Bano case sparked off such a hot controversy that a purely human issue was politicised. In future also if the communal elements are allowed to exploit such issues, the human and social problems will become more complicated and issues are likely to take a communal turn. Otherwise the reactionary and communal elements from the majority community are likely to use them as a convenient stick to beat the minorities, while the same elements from the minority, will further consolidate their hold over a largely uneducated and economically backward community."  

CONCLUSION:

The ultimate object of reform is to establish an egalitarian society. It has been pointed out in the beginning that any legislation earnestly directed towards social justice can be well adjusted within the frame work of Shariah. But it would be better if the initiative comes from within the community itself. After the "Fatwa" of Ahl-e-Hadith against triple divorce a dialogue has already been started. Monogamy is accepted at least by the Muslim
bureaucracy and the restriction on child marriage is followed as a general norm among the educated classes. The percentage of accepting family planning among the higher income group is more or less matching the same classes of non-Muslims. One must admit that social changes in the beginning are always imperceptible, acceleration of the process of change is primarily linked with economic development and educational advancement. In a vast country like India diversities of law are bound to prevail. But such diversities must be channalised within a uniform value system enshrined in the constitution. At the same time modernisation should not mean Western Cultural ethos.

The fundamentalist forces from both the communities, although opposed to women's role outside the home, are using them as an instrument for political ends. Secular and liberal forces as well as women organisations have to play a vigorous role in combating these efforts and dissuade women from playing into the hands of communal forces.

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