

PARADIGM SHIFT IN THE RIGHTS OF WOMEN UNDER MUSLIM PERSONAL LAW IN INDIA

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ABSTRACT

Women's right under the Muslim personal law is a topic of controversy among women, the women have been fighting for their rights and gender equality within society. The Muslim personal laws are both positive and negative towards women and their rights, the security women get after they dissolve the marriage as compared to that of men could be considered as an act of protection of women under the law which is recognized under the Muslim personal laws and not in the other personal laws. As it is the protection the personal laws available are discriminating be it due to the moral or legal aspects but the women in the society are oppressed especially over the rights of inheritance, maintenance, and divorce. The research paper has dealt with the introduction and background of the Muslim personal law and has observed the changes Uniform Civil Code would have brought to the Muslim Personal laws if it is interpreted and the gradual change in the rights of the women under the laws.

INTRODUCTION

India is considered to be a secular and democratic country with different religions, cultures, or beliefs. Personal rights and the freedom of practicing religion are guaranteed to every individual in the country accordingly. The Islamic law or the Muslim law is an uncodified set of rules in India and is considered to have derived or have originated from the Holy Quran[1] and an individual can be considered to be termed as a Muslim when a person believes in the oneness of God i.e., the person is considered to be a Muslim when he/she believes that there is only one God and that Mohammad is their Prophet or simply could be stated that the Islam or the Muslim is a person who believes in the will of submission to the God, Allah. As observed the origination of laws under the Muslim law or the personal laws are divine and not man-made laws or are not passed or interpreted by the lawmakers based on the principles of the modern system of law [2].

The term Sharia is an Arabic word which is observed to have derived from the principles laid down by Prophet Mohammed and other Muslim scholars interpreting from the teachings of Prophet Mohammed, which implies the totality of God's commands which helps in guiding believers in the path of achieving eternal salvation and in regulating of human conduct or simply it is 'the way' which would help a person in leading for the salvation or is a way which a person should act based on his/her conduct[3]. Considering the case of *Narantakath Avullah v. Parakkal Mammu*[4] is a case which lays down the two basics or important aspects highlighting the beliefs of an individual claiming to be a Muslim, the first being the belief of oneness of God or the existence of only one God, Allah, the second being the belief in Mohammed being the Prophet and the truth in Prophet's mission[5].

The Muslims in India are guaranteed rights under the Muslim Personal Law (Shariat) Application Act of 1937 dealing with marriage, succession, succession, or inheritance and other such provisions which protect the Muslim individuals against the discriminating rights or the customary personal rights. As the main source of interpretation of the laws was based on relying on Quran, Hadith, or other sources of Muslim laws, and not on the statutory provisions as that of the Hindu law or the other laws which are codified which would result in dilution or negation of the texts of the religion.

The objective of the research is to understand the rights of women under the Muslim personal law and to lay an emphasis on the moral and legal aspects of the issue or of the situation by analysing the aspects such as the position of women or the shift in the rights of women in current day scenario as compared to that of the traditional laws such as the divorce (talaq) laws or the rights of women for dissolving a marriage, by referring to various sources such as books, articles, journals written by various authors over the issue consolidating them in a systematic format for better understanding of the study and the topic is analysed from the existing traditional sources such as the legal doctrines, sections, constitutional provisions, case laws, etc., Hence, the methodology adopted in the research or the study is doctrinal and qualitative as the information is collected from secondary data from online sources.

The research further analysis the topic further in detail by covering the aspects of questions such as, what is the position of Muslim law in India? Which provides an overview of all the aspects covering the origin and introduction to the Muslim law. The paper further emphasis the question such as, what is the role and rights of women under Muslim law? And what are the changes in the rights of women as compared to both present-day and traditional representation of laws? Under which the role and rights available to the women under the Muslim law are being put forth along with the moral as well as legal aspects of women's rights. The question as to, what is the role of UCC (Uniform Civil Code) concerning the personal laws in India? Which would observe whether the role of the code would affect the development of the conditions of women in society.

The paper provides a detailed analysis of the rights of women under Muslim law, especially for dissolution of marriage including the talaq, zihar, ıla, khula, lian and mubaraat, maintenance and custody, etc., along with respective case laws and enactments.

BACKGROUND OF THE MUSLIM LAW

The Muslim law is also known as Islamic or the Sharia law is believed to have been derived from the divine origin, where the divine (Allah) himself has communicated the laws or the principles to Prophet Muhammed through Archangel Gabriel, after which the revelations were

enunciated in the Holy Quran [6]. The Quran or the Holy Quran is considered to be the direct words of God himself to regulate human conduct [7], whereas the Hadith is considered to be the indirect words of God [8]. The Muslim Law was observed to be established or developed after the death of Prophet Mohammed [9]. The Muslim Family Law in India is observed to be codified and uncodified i.e., a part of the Muslim Family Law is uncodified laws such as polygamy, Mehr, adoption, restrictions on men's right to oral unilateral divorce, custody of children, the other part of the law consisting of the codified laws which consist of the laws related to women's right to divorce from her husband (1939) and the laws relating to the women's right to seek maintenance after her divorce (1989). Thus, the laws which are not uncodified or are codified could be interpreted as the case may be by the courts, lawyers, qazis, judges, muftis, etc. from the case laws or the unwritten Sharia or Muslim Law based on the case or the matter concerned [10].

A person born as a Muslim shall continue to be Muslim until he renounces his religion [11], and the person who is a Muslim should acknowledge that there is one God and Muhammed is his Prophet or is the messenger of God (Rasool) [12] wherein Arabic Islam stands for the 'Submission to the will of God [13]. In the case *Narantakath v. Parakkal* [14], it was observed by the court that the basic and important beliefs for a person to be Muslim are based on the belief of a person in the oneness and existence of God (Allah) and to believe in the truth of Prophet's mission, and the person who believes and both principles than he/she is considered to be a Muslim.

ROLE OF UNIFORM CIVIL CODE

The implementation of the enactment of the Uniform Civil Code is considered to be the most controversial and debated issue in the country. It is provided under the Constitution of India as "States shall endeavour to provide for its citizens a uniform civil code (UCC) throughout the territory of India" [15]. The objective of the provided endeavour is to harmonize culturally diverse practices among individuals and to minimize the discrimination against the vulnerable groups in the society [16]. The code has put forth a set of common laws which govern all the

personal matters about inheritance, adoption, marriage, and divorce for all the individuals or the citizens of India [17]. The demand for the Uniform Civil Code was first put forth by the All-India Women Congress at the beginning of the 20th century to safeguard women's equality, rights, and secularism; the demand of the activists was supported by Jawaharlal Nehru [18].

The UCC has both advantages and disadvantages towards society. The enactment or the implementation of common laws would help the vulnerable for the groups or individuals such as the SC/ST's, women and their rights in the society to have equal rights legally and its implementation would also create chaos with the society. Considering *Sarla Mudugal v. Union of India* [19] is a case of Bigamous marriage by a Hindu man after he has converted into Islam before the Supreme Court, where Justice Kuldeep has mentioned and pointed out that the Uniform Civil Code is required for the nation, but for the nation to have the common laws or it is important to have the environment required for it to be enacted for which the individuals or the nation have to bring in social changes [20].

As observed the judgment in the above case has emphasized the role of UCC being important but for the code to be operational or to enact it is important for bringing in social and moral changes within the society and among the people, there are judgments or views about the role and importance of the Uniform Civil Code in the country [21].

The question when it is about the code or common set of laws within the country which was and is a controversy or ongoing debate, is that whether the UCC is the only way to attain equality and to minimize discrimination? No, as there are other Directive Principles under the Indian Constitution where the change could have been made, or if the UCC is to be implemented and the citizens of the country are to be abided by the same common rules it may not end all the discrimination a woman faces, an SC or an ST for that case faces in the society. Considering the Domestic Violence Act for instance of 2005 enacted by the government, which has not considerably worked within the country to minimize domestic violence, many such acts have not minimized the discrimination or oppression respectively.

UNIFORM CIVIL CODE IN CONTRAST WITH THE MUSLIM PERSONAL LAWS

When observing the Muslim personal laws in contrast with the Uniform Civil Code and the changes which should be undergone if the UCC is implemented within the country, considering the Triple Talaq under the Muslim personal laws which are of primary concern, where there were protests and uproar against the practice of triple talaq as for it to be the unjust practice against the principle of equality among the Indian Muslims which is a custom practiced under the Muslim law. The practice gives the right to the Muslim man to divorce his wife by uttering the Arabic word 'talaq' which means "releasing or undoing from a knot" [22], which has resulted in the increase of divorce cases among Muslims leading to a significant concern. The custom is considered to be immoral and against the legal principles or the constitution of the country. With the implementation of UCC, the practice of triple talaq would be abolished and the divorce cases would be brought before the court.

- Polygamy is considered to be a widespread practice under Muslim Personal law, polygamy is a practice to marry more than one women at the same time is a practice that is not a well-recognized practice or custom in India, and the abolition of the custom would a boon to the society on an extent though the main purpose of the polygamy during the ancient days among the individuals is to protect and provide for the widowed wives and their children who are orphaned or parentless along with their property at the time of war with equal care and support by the man marrying the widow as that of his other wives[23].
- Adoption is the major issue within the personal laws of other religions except for Hindu law, as a law or statutory provision Muslim personal law does not recognize adoption or adopting a child by the married couple as a custom, the couple cannot claim to be the parents of the adoptive child legally as that of the Hindu laws. The procedure and provisions related to adoption under the Hindu law are governed by the Hindu Adoption Maintenance Act of 1956 and implementing the UCC would lead to a drastic change in the customs under the Muslim personal law and would also create a lot of chaos within [24].

- The implementation of UCC would be a boon in the case of maintenance under the Muslim personal law, the Muslim women under the Muslim laws can claim for maintenance under the Muslim Women Protection Act of 1986. But when considering the case of *Shah Bano Begum v. Union of India* [25] the question of whether the Muslim women claim maintenance under CrPC (Code of Criminal Procedure)? Was considered by referring to the case, it was held by the Supreme court that the women who are divorced by her husband are to be entitled to get maintenance from her husband i.e. the divorced women not only can claim the maintenance amount during the iddat period [26] but also after the completion of the said period under section 125 of the Code of Criminal Procedure.
- The implementation of the Uniform Civil Code would bring in drastic changes in the laws of Inheritance and Succession, i.e., the implementation of UCC would result in putting forth a codified and a defined structure of laws, and the enactment would change the adoption laws along with enforcing the laws of succession and inheritance by providing a share of the father's property to the adoptive or the illegitimate child respectively.

CHANGES IN THE RIGHTS OF WOMEN – A NOTE ON THE PRESENT AND TRADITIONAL LAWS AND THE RIGHTS OF MUSLIM WOMEN UNDER MUSLIM PERSONAL LAW

Women and their rights or status in society is an ongoing issue which was not observed to have fully settled, the statutes of women are something which would differ from one society to the other in the world or within a country, be it an underdeveloped, developing and developed country. India is a secular and democratic country with diverse cultures, religions, beliefs, and practices, the position of women on whole was considerably less chaotic than in history i.e., the women were considered to be properties or objects during the ancient days, whereas now they are considered to be a gender opposite to that of the men who are fighting for the rights or to be specific equal rights to that of the men in the society.

The women presently in India are observed to be taking an active part in their rights both legally as well as morally. Most of the human societies on whole are male-dominated, the women are the passive parts of the society whereas the male in the society is comparatively active parts, it considerably from many years the Muslim women of the society are observed to have been struggling for their rights and gender equality in the Islamic law in the matters related to the succession and inheritance, marriage, divorce under the Muslim personal law.

It was observed from the historic sources that Prophet Muhammad weighed women opinion, women have played a major role in the connotation of the Holy Quran, a woman has contributed in correcting the authoritative Caliph Umar on the insights related to dowry, considering the rights of the women during the period they were allowed to offer prayers in the mosques without being segregated from the men, they were engaging in the commercial transactions, they were also given a right to seek knowledge and some women were both pupils and instructors in the early Islamic period. Aishah, Prophet Muhammad's last wife was well-recognized for her authority in rhetoric, history, and the field of medicine. Also, Caliph Umar has appointed women to serve as the officials in the market of Medina.

Though there were no women in history who held religious titles under Islam, there were many women in the history who held joint political power alongside their husbands and few of the other women independently. The statutes of Muslim women in general during the pre-modern Islam era have confirmed the patriarchal cultural norms which were prevailing during the time as compared to the modern era where the status and rights of women conflict. During the mid-19th century, the social and legal restrictions of the women in the society were in question especially regarding their seclusion, education, polygamy, and the strict rules of veiling and slavery resulting in many protests, movements, and publication of works advocating reforms in the society fighting for their rights and freedom by the women [27]. Therefore, it could be stated that Islam and its culture by Prophet Muhammad are not patriarchal or oppressive to that of the women in the society during the time but the interpretations and the enactments of family law and the everyday living of the individuals have affected the rights of the women in the society, the society rather now is patriarchal comparatively.

PROPERTY RIGHTS OF WOMEN UNDER MUSLIM PERSONAL LAW

The Islamic principles of Succession according to Prophet Muhammad during the time are:

- Both the wife and husband being equal are entitled to be inherited by each other.
- The cognates or the close relations of the female are enumerated or recognized as the heirs of the concerned property.
- The ascendants and parents of the female are considered as the heirs of the property even on the availability of the descendants in the case.
- The property is shared among the customary rights and the newly created heirs [28].

The women during the early modern era in India i.e. under the Mughal reign were observed to have property rights over the share of their ancestral property along with the rights of the property which is inherited after their marriage from their husband [29].

According to the law of inheritance under the Muslim personal law, there is no preferential treatment that is imparted on the part of both men and women. However, the property share of the son is double the share of the daughter or women, it is based on the understanding that women after her being married would receive Mehr or dower [30], and she (the women or daughter) is maintained by her husband, where the man is to depend on the property share given as an ancestral right. The Mahr or dower as mentioned is a sum of money or other property which the wife is entitled to receive from in consideration of the marriage [31], this is considered to be a mark of respect on the part of the husband towards his wife [32].

DIVORCE AND POLYGAMY UNDER MUSLIM PERSONAL LAW

Polygamy under the Muslim was and is practiced under the concerning authority of Chapter IV, Verse 3 of the Holy Quran [33], which reads as “And if you fear that you will not be fair in dealing with the orphans, then marry as many of women as may be agreeable to you, two, or three, or four; and if you fear you will not deal justly, then marry only one or what your right hand possesses. That is the nearest way for you to avoid injustice” [34]. The Polygamy as observed under Islam was considered to be an act of kindness and compassion towards that of the women and her children who are orphan or are neglected and does not have support i.e. the man who has multiple wives should be in a position to treat all the four wives of his equally, if not he must marry only one who he can support.

Polygamy is considered to be an offense under the Indian Penal Code (IPC) of 1860, also under the Hindu Marriage Act, 1955 which declared any marriage which is solemnized when the first wife is living to be void under the act and punishable under IPC. However, polygamy is allowed under the Muslim personal law up to the limit of marrying four wives at a time by the man and provide all the wives equally. This practice is an advantage on the part of women with no support during the time and now in some cases but also is discriminatory towards the women in the society [35].

The dissolution of marriage under Muslim law is of two types i.e. the Divorce and talaq, the provisions of the Dissolution of Muslim Marriage Act, 1939 governs divorce it was prevalent during pre-Islamic Arabia whereas talaq is governed under the Muslim personal laws, talaq means “freeing from the knot” is considered to be a controversial topic among the Muslim women in the society, under which the Muslim husband has an unrestricted right of divorcing his wife without any particular reason. The Muslim wife can acquire a divorce from her husband on two grounds recognized under the Muslim Personal Law (Shariat) Act 1937 i.e. 1) Ila and 2) Zihar, the divorced wife is entitled to get the maintenance from her ex-husband up till she observes iddat period which is different for different circumstances [36].

However, there were changes observed concerning the triple talaq, the triple talaq bill also called the Muslim Women Bill in 2019 where the triple talaq was considered to be invalid and

minimize the oppression and inequality faced by the women in the society, though there was chaos after the bill was passed among the men. It was observed in the previous judgment of the Shah Bano case, which created turmoil, and the Supreme Court upon observing has overturned the judgment, whereas now after the bill and the chaos, the government emphasizes stating that it does not intend to overturn its decision respectively [37].

MAINTENANCE UNDER MUSLIM PERSONAL LAW

The Dissolution of Muslim Marriage Act of 1939 and the Muslim Women (Protection of right on Divorce) Act of 1936 governs the rights to maintenance to that of the Muslim women. The husband under the Muslim law is of a duty to maintain his wife, maintenance under Islam is referred to as 'Nafqah' which includes the lodging, food, raiment, and other essentials of the livelihood.

The change in the laws of maintenance as compared to that of the older laws was that the husband was to maintain his wife during the iddat period which was followed by the dissolution of their marriage. The issue arose from the claim of Muslim women who deserves maintenance even after the 3 menstrual cycles or 3-month period, and the maintenance was sought by her and claimed under section 125 of the Code of Criminal Procedure by claiming that it was governed to the Muslim women as well and it is also stretched to and after the iddat period and the claim of the women has led to judgments and enactment of laws concerning the same [38].

Therefore, the changes and aftermath of the enactment and judgment have created a new path for the Muslim women in the society where the maintenance was available to them even after the iddat period as compared to before where the maintenance was claimable only during her iddat period.

CONCLUSION

The position of Muslim women as compared to that of the pre-modern era to the current day has comparatively improved due to the women and their fight throughout to have equality in the moral as well as legal aspects of society, they fought for justice and equality and have achieved to an extent. Considering the triple talaq and maintenance for instance though it was an inequality towards men especially concerning the issue of maintenance is still a mandate on their part. When considering the position of women in Islam, Prophet Muhammad has considerably influenced the development and equality of Muslim women. It was nowhere in Quran mentioned for the men of the society to treat women separately and different as compared to that of the men in the society, observing the last sermon or Khutabul Wada of Prophet Muhammad has put an emphasis on the equality of both women and men, not only women but every Muslim is to be treated equally irrespective of their color or gender [39]. It is the interpretations and conclusions brought in by individuals themselves which have affected society.

SUGGESTIONS

- It is important to understand the purpose of the laws and the interpretations made of the laws, the inequality though has changed to an extent in the society concerning Muslim women legally but it did not bring in moral changes at least not in the areas of poor development in the country. Therefore, the mindset especially of the people who are of the superstitions and beliefs of following or adhering to the laws followed by their ancestors, they should get a notion of equality, to believe that every individual in the society is to be given rights and the rights equal to the men in the society.
- It is noted that not many people are aware of the change in the interpretations and laws in the society, people who access the sources are known of the same but the others are not fully developed with the laws, it is to be made accessible to the people of the knowledge of changes made to the laws.

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