The study made in the previous chapters throws light on special contribution made by Nārada to Vyavahāra, which includes judicial procedure, civil law and criminal law. It is necessary to look at Nāradasmṛti as a whole unit and again examine it from close quarters.

Nāradasmṛti as a whole makes a complete digest of law. There are a few points which make Nāradasmṛti an outstanding work on law and which make it far different from other works on law.

A very special plus point of Nārada is that he defines the topic or title of law in case of all the titles, and even during the discussion of the subject, if he feels it necessary. His definitions, as we have seen in the previous chapters, are descriptive, to the point and it shows his clarity and logicality of thought.

Nārada treats 'title of law' as per its meaning and uses the term 'Vyavahārapada' for the same. Whereas Yājñavalkya uses the term Prakarana i.e., chapter. Each title of Nārada starts with definition, and it includes rules and punishments on the violation of those rules.
Nārada's thought, expression and use of language is meticulously clear and leaves no doubt in the reader's mind regarding the meaning. Even in his concepts we find no ambiguity.

Nāradasmṛti's first part i.e., Nāradīya-Mātṛkā, which Dr. Jolly translates as introduction, includes three sub-chapters, viz., Vicāradarsana (legal procedure), Vyavahāra-mātṛkā (plaint) and Sabhālaksanam (courts of justice). This part makes Nāradasmṛti a complete digest of law, because for a student, only partial knowledge of civil law or criminal law is not sufficient. To put that knowledge into practice he will need the knowledge of judicial procedure to understand the working of legal machinery. In this part Nārada gives basic details like, what is a law suit, what is legal procedure and what it's different parts, how the plaint is registered, how a plaint is written. For the understanding of law Nārada describes one hundred thirty two divisions of eighteen principal titles of law.

In this regard it is to be noted that Manu gives the list of eighteen titles, but does not give it's sub-divisions. Yājñavalkya does not give the list.

Nārada's 'judicial procedure' is an excellent guide for novices as well as assessors of the court, the king
and the Prādvivāka. For them, rules regarding, conducting the trial, reopening of cases, determining the case and the title of law are given.

The king is expected to consult law books and consider the opinion of the chief judge, dictates of prudence and the sacred law. Narada gives a very subtle suggestion to the king regarding administration of ordeals. It is that even ordeals are rendered nugatory by artful men. So, mistake should not be committed about the place, time, quantity and other aspects. Regarding, deciding the disputes, Narada suggests that, between usage and sacred law both should be considered thoughtfully and whichever is the most appropriate, should be applied.

Another important rule in the judicial procedure is that, the relation of the case in hand and the entire legal system should be examined and the title of law under which case can be entered, should be determined before the trial starts.

Rules regarding plaintiff are put forth only by Narada. Similarly, the complete procedure of a law suit is described and explained step-by-step by Narada.

Narada gives eight blemishes of plaint, which lead to the rejection of the plaint. Topic of blemishes of the plaint does not seem to be discussed by Manu or Yājñavalkya.
This is a special contribution, which shows the professional accuracy and legal sense of Narada.

Proceedings of trial is a very modern theory introduced by Narada. This is not discussed by Manu or Yajñavalkya.

The rule introduced by Narada which is unique in itself and his own contribution to the legal procedure is, 'when the verdict is declared, then the victorious party in the law suit shall get a document recording his victory, record of the plaint and answer and arguments and the judgement'.

Narada's very specific contribution to legal procedure is that he gives seven advantages resulting from just decision, for the king. This concept stresses more of the just administration of law. Another specific concept introduced by Narada is four and five losers of the law suit, i.e., four kind of Avasannas and five kind of Hinas.

Regarding the plaint, only Narada gives two bases of the plaint, i.e. (i) founded on suspicion, and (ii) founded on the facts.

Regarding the courts of justice, it is found that Manu and Yajñavalkya do not seem to discuss separately and in detail about it. Only Narada has treated this topic with due importance.
Though Manu and Yājñāvalkya recognize the importance of learned councillors and mention it, it is Nārada who actually describes the procedure of selection of the assessors of the court of law and their desired qualifications for their responsible job. Nārada does not give exact number of assessors or judges, nor their exact position in the court of law. In the 'Sabhālakṣaṇam' part, Nārada has discussed the following four topics, which speak about contemporary thought on the system of justice, i.e. (1) procedure of selection of the assessors of the court of law, (2) formation of the court of law, (3) code of conduct in the court of law, and (4) the duties of the assessors. No other smṛtikāra seems to have dealt with these topics as clearly and as elaborately as Nārada has done.

The law of evidence, when studied from Manu down to Nārada, seems to reach it's fully developed shape and maturity. Nārada discusses fully all the three modes of human evidence and seven types of ordeals, while Manu has emphasized mainly on witnesses. Nārada's treatment is highly advanced and far more systematic than in Manu and Yājñāvalkya.

Nārada gives eleven types of witnesses, seven ordeals against Manu and Yājñāvalkya's five ordeals and gives two kinds of documents. This can be said to be an important and main development and advance on Manu and Yājñāvalkya by Nārada.
Regarding documentary evidence, Narada has left out two important points which are discussed by Yajñavalkya, i.e. (1) after repayment of debt in full or instalments either debtor should note it on the back of the bond or creditor should give receipt to the debtor, and (2) the bond should be destroyed after the repayment of debt or creditor should give another document as evidence of debtor's acquittance from the debt. Narada has discussed at length regarding valid and invalid documents of course.

Narada expects the judge to examine the documents brought before him with regards to Āgama (title), Sambandha (connexion) and Hetu and to confirm the genuineness of it.

Narada discusses two types of documents, i.e., (1) written by plaintiff, which does not need any attestation, and (2) document which is written by some other person or scribe on the request of the party which needs witness and attestation.

Narada is very clear about the concept of documentary evidence. This can be seen when he says that, "writing solves all the doubts which may have arisen in regard to place, time, profit, matter, quantity or stipulated period."
Nārada has treated proof by possession at length. He propound two new views, viz. (1) possession becomes lawful or legal when held for three generations\textsuperscript{15}, and (2) mere possession cannot prove ownership without title\textsuperscript{15}.

According to Nārada, in the cases of woman's property and the king's property, even if it is in the stranger's possession for more than three generations, it does not prove ownership for him, i.e., it is never lost to its true owner\textsuperscript{17}. This is a very important provision.

Nārada gives five kind of witnesses, which are appointed and six kind of witnesses which are not appointed\textsuperscript{18}. Nārada has listed eighty seven\textsuperscript{19} kinds of incompetent witnesses, which shows his subtle thinking and the earnestness to find out the truth.

Nārada's development of the divine proof, which was propogated by Manu and Yājñavalkya has taken full shape. Manu merely mentions five ordeals in two verses\textsuperscript{20}, and Yājñavalkya\textsuperscript{21} has devoted only seventeen verses for five ordeals including general rules of procedure about ordeals. Nārada has devoted one hundred and two verses\textsuperscript{22} for the full development of ordeals. Moreover, Nārada adds two more ordeals, i.e., Rice ordeal and the ordeal of the hot piece of gold, making ordeals come to a total seven ordeals. Each ordeal is treated as a separate topic.
and in details. Narada discusses proper season of each ordeal, manner in which it should be administered, quantity (of poison), persons who are exempted from ordeals, persons who can undergo the ordeals, and the most important part is, in which circumstances ordeals can be administered. Each ordeal is not supposed to be fitting for all offenders and defendants. Narada has specified in the course of discussion of each ordeal as to for whom the ordeal is meant and for whom it is not.

Portrayal of king depicted by Manu is of one who has supreme power and with the aura of divinity around his head. Unlike Manu, Narada does not consider the king as supreme ruler or one to be worshipped. Narada has tried to cut the supreme figure which can and is to be bound by the rules and duties. The king is head of justice, but he is not above the sacred law; he has to consider sacred law, dictates of prudence, law texts before he decides the trial. The king is expected to hunt the truth while deciding law suits like a hunter who finds the deer by the trace of blood-drops in the thicket. The king has right to punish the assessors of the court for wrong judgement. In the eighteenth title of law, Narada intends to discuss the law suits which are excluded in the previous titles and the law suits which are to be decided by the king. In this title, Narada has quoted and followed many of
Manu's views by which one gets the feeling that Narada wants to reinstate the image of the king portrayed by Manu and king's divine qualities are described.

Narada has discussed marriage as a social institution, its moral implications, its relation to society through an individual and safeguarding human interests through law. He is very clear about the aim of this title of law, i.e., "legal rules for men and women regarding marriage and other mutual relations".

A very peculiar thing about Narada is that he has placed full stress on the girl's choice of her husband. This view is certainly very bold compared to the then contemporary society when women were more of a commodity than a human being and were treated constantly as inferior to men. Manu speaks only about man's choice and similar is the view of Yajñavalkya.

Regarding Anuloma and Pratiloma marriages, Narada follows the traditional views and does not permit pratiloma marriages. Narada has recognized the legitimacy of marriage union between a Brāhmaṇa man and Śudra woman.

As Narada has placed great stress on the girl's choice of her husband, he suggests medical test of the virility of the bridegroom. This is a very bold step in male dominated society. Neither Manu nor Yajñavalkya has
expressed such views. Narada describes fourteen types of Klības or impotent men and their physical and psychological cure. Manu and Yājñavalkya do not seem to discuss much about 'Klības'. A very modern view is put forth by Narada that on the grounds of impotency, marital separation can be obtained.

Narada has bestowed the right of giving away a daughter in marriage on the mothers, in default of father or brother. This suggests two possibilities, i.e. (1) Narada approves of women's right of performing rites without having initiation, or (2) Maidens might be undergoing initiation at tender age which empowered them to perform rites. Such bold views are not found in Narada's predecessors.

According to Narada Betrothal cannot be broken easily, certain procedure has to be followed.

Narada recognizes first four forms of marriage as legal forms and specifically stresses that those who are married by the first four legal rites (Aṛṣa, Brāhma, Daiva and Prājāpatya rites) of marriage are only eligible to inherit wife's property (in default of progeny). Narada strictly prohibits the last three rites, while Manu recognizes first six forms of marriage as lawful for Brāhmaṇa.
Nārada discusses about three types of 'Punarbhu' or 'remarried' women and four types of 'Swairini' or wanton women. Manu gives only two types of 'Punarbhu' women and does not mention any 'Swairini' women.

Nārada describes twenty kinds of women whom a man must not approach. Nārada's passiveness can be felt towards women. Nārada gives the category of women who, when unprotected, can be approached. Manu stops saying only about the women who are not approachable. Nārada seems to allow men to enjoy unguarded women, instead of making some provisions to protect them.

Nārada prescribes remarriage in clear terms for women, whose husbands are gone abroad and not heard of for certain lapse of time. Manu prescribes the waiting period but, he does not say what they should do after the waiting period.

Nārada allows Niyoga, while Manu strongly condemns it. Judicial separation of husband and wife is consented to by Nārada, which Manu does not approve.

Nārada's contribution to the law of inheritance is not less, though this title is smaller and compact compared to Manu's inheritance.
Nārada's concept of dividing property by the father in his lifetime is not explicitly stated by Manu.

Inheritance of a childless wife's property by her husband is possible only if they are married by the first four legal marriage rites, otherwise her property goes to her parents, while Manu allows such property to be inherited by husband if they were married by the first five rites of marriage, wherein he includes Gândharva form of marriage.

Unmarried sister's share is equal to that of her middlemost brother, whereas Manu does not seem specifically to spare separate share for unmarried sisters.

Regarding the topic of strīdhana, Nārada follows Yājñāvalkya and not Manu. Nārada, like Yājñāvalkya, seems to want to control over marriage practices through the law of inheritance, as in the case of property of childless woman.

There are certain questions for which Nārada or other smṛtikārās do not seem to have any answer - (1) does strīdhana include immovable property, such as house, land etc., and if she has such property, then does she have the right of full ownership over it?, and (2) are unmarried sisters full owners of their share?
Regarding the division of father's property in his life time, Nārada puts certain restrictions. If father is in the state of mental imbalance, occasioned by anger, passion, disease etc., and in such a state if he divides property, then such division is not deemed legal. Such division can be challenged in a court of law by any claimant concerned.

Nārada's two other concepts render the father legally powerless to distribute property. The are 'Anyathāśāstrakārī' and 'Viṣayāśaktamānasah', i.e., 'one who acts against the law' and 'one absorbed in sinful worldly interests' respectively.

If the father, while he is in his normal state of mind, he distributes the property, he can keep two parts of the property for his livelihood.

In the absence of son, daughter shall inherit the property, since daughter continues the lineage of the father just like a son. This view of Nārada is not only unique but sounds revolutionary also. Other schools of law restrict the daughter's right to succession.

Does a childless widow inherit the property of her deceased husband? Nārada has answered this question partly. In this case, Yājñavalkya is very clear, that 'widow can be heir to her husband's property'. Nārada does not seem to recognize the right of inheritance of husband's property by a widow.
Allotting share to unmarried sisters in the father's property, Nārada has added a little dignity to women. He has made them independent to a certain extent. They are not under obligation of their brothers for their marriage expenses.

In the opinion of some scholars, there is no clear-cut distinction between self-acquired wealth and ancestral property in the ancient law texts. However, a thorough study of Manu, Yājñavalkya and specially Nārada has revealed very clear concepts of self-acquired property.

It is only Nārada, who has described white, spotted and black wealth which is further sub-divided into twenty-one types. Manu and Yājñavalkya do not go into details.

In the law of debt dealt by Nārada, one can see many developments over Manu and Yājñavalkya. The great details regarding the debt found in Nārada, i.e., who should repay the debt, who should not, who can contract debt, who cannot, the period of liability of debt and the responsibilities emerging thereof, are not found in Manu and Yājñavalkya.

Certain new views of Nārada are as follows: (1) The amount of principal with interest is allowed to increase up to one hundred crores. (2) If the debtor goes abroad, his heirs are not bound to repay the debt for
twenty years. (3) If a woman goes to another man, her debts should be repaid by that person. (4) A man, who enjoins a widow, should pay debts of her deceased husband. (5) Possession held without title for three generations becomes lawful. (6) Narada gives four types of interest, i.e., periodical, stipulated, Kayika and compound against Manu's three types of interest.

According to Narada a pledge is not to be sold before the stipulated time has lapsed. (2) Narada does not elaborate the conditions of four types of pledges. (3) Creditor loses interest if the pledge is not kept safely or if it is damaged due to carelessness of the depository. Dr. Betti observes that, "the treatment of a pledge is more complicated and elaborated in Yajñavalkya-smrti. It is more technical, while in Manu and in Narada, it is simpler and less technical."  

Manu and Yajñavalkya described only pure wealth of four orders whereas Narada gives detailed description of the black, white and spotted wealth and it's 21 divisions alongwith the pure wealth of each order which is extraordinary in itself.

Among the rules about, usury, sureties and pledges, Manu does not seem to give much thought for usury and sureties, while Narada has laid down detailed rules developing his own views. In this respect he seems to agree with Yajñavalkya.
Regarding the financial dealings of women, Nārada has touched almost all grades of society. The detailed treatment given by Nārada in the case of women’s responsibility regarding repayment of debt is not found either in Manu or in Yājñavalkya.

Manu does not seem to give much thought to valid and invalid transactions. Yājñavalkya also does not discuss it except at one or two places, Nārada goes into detailed law making. This development from Manu to Nārada is worth noticing.

The tenth title of Nārada, transgression of compact is concerned, Manu just mentions it in one verse. It is Yājñavalkya and Nārada who have given due importance to this title.

Nārada has adopted a very modern approach and secularistic attitude and tolerance about other religions, their customs and practices. According to Nārada each smallest section of the society deserves state protection, a modern approach indeed.

Nārada refers to the rules of Pāśanda which Dr. Jolly\textsuperscript{71} has interpreted as Jaina or Bauddha mendicants or non-believers in vedās. Their rules must be made to apply to them\textsuperscript{72}.
Nārada brings under this title not only the rules of these groups but also their duties, rules of attendance, livelihood etc., which the king is asked to approve of. Nārada rightly adds that it is not obligatory on the part of the king to allow the usage and customs if they go against the interests of the king or the state 73.

Those selfish persons who try to create dissension among the members of the association are to be severely punished, according to Nārada 74. These views are not found in Manu or in Yājñavalkya. Unity and compactness of society is rightly a concern of Nārada.

Regarding the deposits, Nārada follows Manu almost word to word in this title except for a few new developments. Nārada, as per his speciality gives definition of the deposits. Manu 75 has described two types of deposits and Yājñavalkya 76 describes five types of deposits. Nārada's 77 development is that he describes six types of deposits, and explains each deposit clearly.

Manu is little liberal. If the deposit is lost or destroyed along with the property of the depository because of the calamity, then depository is not compelled to restore the deposit 78. Nārada however stresses that in spite of calamity, depository will have to restore the deposit 79. This title has assumed its fully legal character with Nārada.
In Breach of contract of service - (Vth title), Narada has discussed 'student-teacher' problems also in this title, in two parts. Manu has mentioned seven types of slaves, while Narada gives fifteen types of slaves, and four types of hired servants. Yājñāvalkya does not give any type of slave. Yājñāvalkya starts with the topic as to how a slave is released from slavedom. Vijnāneswara (Mitāksara) has written a long introduction to Yājñāvalkya's chapter, mainly quoting Narada on this subject. A commentator like him considers Narada's views as an authority on the subject. This is a later view but a full credit to Narada.

The status of education and labour system can be read in the lines of Narada.

Narada's peculiarity is that he has treated the topics regarding the students, their learning and about teachers, and the topics regarding education etc., discussed in the Vyavahāra, that too under the title 'Breach of contract of service'. He made laws for the student's conduct. He gave legal outfit to the feelings like, respect towards the teacher, obedience, servitude and humility. This sort of legalization of education is not found either in Manu or in Yājñāvalkya. Yājñāvalkya mentions only one apprentice who learns a professional craft for the stipulated fee. Manu speaks about slaves and labourers in 'Vyavahāra' and
does not discuss about education in 'Vyavahāra'. For Manu learning was far sacred an occupation. This perhaps shows the decline of morality in the society, looseness which compelled Narada to include it in the Vyavahāra.

Narada divides the law of gift into four sections which are further sub-divided into thirty-two.

In the extant code of Manu, it is not clear what the valid and invalid gifts are. Yajñavalkya does not give any clear definition and explanation for the understanding of this title. But in Mitaksara, it is explained by quoting Narada only.

Gifts which cannot be given are of eight kinds. Valid gifts are of seven kinds, and invalid gifts are of eight kinds.

Compared to Manu and Yajñavalkya, Narada is more systematic and logically clear. Narada explains the concept of valid and invalid gifts in an exhaustive manner. Narada's detailed treatment is very much helpful in determining the nature of offence and punishments.

Manu and Yajñavalkya have substantial discussion on the Boundary disputes. The valuable additions made by Narada are that, if the herdsman dies while on duty and the cattle enter in the field, there shall be no fine. 83.
Similarly, if elephants and horses trespass in the field, there attendant is not fined, because they are protectors of the subject.

Nārada enumerates five types of landed property in respect of which disputes arise and there Nārada includes bridge and waste land, which are not enumerated by Manu and Yājñavalkya. Nārada arranges the order of witnesses better when he seems to combine both Manu and Yājñavalkya in the matter. According to him, the order of witnesses is neighbours, inhabitants of the same village, other members of the same community, elders of the district, persons living on the outskirts of village, herdsmen, bird-catchers, hunters and foresters.

If fruit-yielding trees grow on the boundary, they belong to both. Nārada states that under no circumstances should the land lie waste, and even if the owner fails to till the land, others should do it for him and get their due share. Indirectly Nārada thus expresses his opposition to keep lands waste. He knows that waste lands must be brought to fertility, particularly in an agricultural country like India.

Another important rule stated by Nārada is that a cross road (where four roads meet), a sanctuary of a deity, a street and a public road must not be obstructed by
a place for ordure, a terrace, a pit, an aqueduct, the age of the thatch and the like. This rule reveals the system of social administration in the contemporary society and throws light on neatness of the architecture of streets and public roads, wells and the like. Nārada's view perfectly brings out the picture of legal aspect behind such neatness.

Non-payment of wages—is a very positive development by Nārada is that he made it obligatory on part of the masters to pay proper wages in the proper manner as agreed before.

If a merchant does not take the cart after ordering, then the merchant should pay one-fourth of the wages to the cartman.

Herdsmen are paid in the form of milk and a heifer a year, or cash, i.e., payment in cash and kind both.

Rules are made regarding the wages of prostitutes. The way they cannot deny a customer after taking fee, just same way customers cannot cheat or trouble them. Legal protection is given to them by Nārada. This is an important legal provision showing how law has spread its net wide and how the forsaken also have legal protection, of course along with responsibility.

Mamu's treatment to this title is very brief.
Yājñavalkya's law of 'non-payment of wages' does not include herdsmen and prostitutes' wages and rules. Narada has unified these and completed the lacunae left by Manu and Yājñavalkya.

Narada's approach and this development are constructive. Wherever wages are paid for hiring labour, herdsmen, vehicles, beasts of burden, public women, land, commodities, carrier and the like, rules regarding all these are put together at one place for the sake of easy reference of the similar rules. This unification of rules is a special feature of Narada.

Partnership - this title of law can be said to be an expansion of Manu and Yājñavalkya's 'Partnership'. Manu discusses about the partnership of officiating priests and their wages. Narada deals with other aspects like toll, duty, fines for the priests forsaking the sacrifice, fine for evading duty, rules of inheritance in connexion with partnership. All these topics are dealt with by Manu, not at one place, the topics are scattered at different places. Yājñavalkya's treatment is very brief.

Narada's definition discusses about the traders in whose case contribution of funds towards the common stock of association forms the basis.
If a partner dies accidentally, i.e., without making will of his part in the partnership, then his heir or one of the partners shall replace him. This will naturally give an option to the partners to accept the new one or relieve him.\textsuperscript{92}

The king does not charge a learned Brāhmaṇa on the household property, but he should definitely charge him on the wares which are for trade.\textsuperscript{93}

Nārada also respects physical labour by exempting from taxation, what one carries on one's back.\textsuperscript{94} This also indicates roughly the quantity of wares which can go tax free. Property of the stage players is also exempted from taxation. In this rule taxation is supposed to be for carrying goods for trade from one town to an other. This rule means collection of toll. Wares of the personal and household use are not taxable.

Nārada's treatment to sales affected by a person other than the owner is brief but more exact, systematic and clear than in Yājñavalkya.

Definition of the title establishes that a deposit does not ever cease to belong to the owner and also that the buyer is not to be blamed if an undue sale has taken place publicly.\textsuperscript{95}
Clandestine sale is theft, evidently because it makes the case full of suspicion.

All treasure found in the state belongs to the king. Only Brāhmaṇa can keep the treasure found by him after giving intimation to the king and obtaining permission from him.⁹⁶

Property of a stranger belongs to the king after the lapse of the stipulated period.⁹⁷

When one's lost property is found or somebody else's lost property is found, then the king must be intimated.⁹⁸

Manu does not seem to have discussed the topic non-delivery of sold chattel at all, while Yājñavalkya and Narada have given due importance to this title of law. Narada almost follows Yājñavalkya. Narada's special contribution is that, if the vendor shows good article and sells faulty one, then the vendor is compelled to pay twice the price of article to the buyer and an equal amount of the fine to the king.⁹⁹

For the title 'Rescission of purchase', Manu devotes only two verses. Yājñavalkya has devoted four verses, while Narada has expanded and developed it into a full title of law consisting of sixteen verses. So, this complete title can be said to be a contribution of Narada to civil
law. Manu does not mention any specific commodity and specific time for the approval before purchase for different commodities. Yājñavalkya does not mention about clothes and yarn in his list of commodities. Nārada goes into detail about different commodities and different approval time for them. Nārada's list of commodities includes clothes, cattle, women, slaves, metals, precious stones, pearls, coral, all sorts of grain, woolen yarn, and even old clothes. Nārada clearly puts forth an expert opinion regarding the metals, i.e., loss of weight and value after testing or while making them in the fire or in the case of yarn, the loss of weight after weaving. All these rules are ample proof of sharp intellect of Nārada. Approval time is different for the different commodities, i.e., milch cattle for three days, animal of burden five days, precious stones, corals and pearls for seven days, slaves for fifteen days, a female for one month, grains ten days and iron and clothes for a single day.

Nārada has added one important rule i.e., rescission of purchase cannot take place if the thing is bought after proper examination and trial for the days fixed.

After purchase if the purchaser wants to return it, he loses certain part of value (that he gets back from the vendor after returning the chattel) each day till the third day, after three days he cannot return it.
Criminal law - criminal law in Narada includes four titles, i.e., heinous offences, which includes theft, abuse and assault, and games. Narada defines each title separately. The definitions are exact and complete, which are not found in Manu and Yajñavalkya.

Heinous offences of Narada include murder, robbery etc.

Narada exempts only the king and Brāhmaṇa from capital and corporeal punishment, while Manu exempts all the three upper castes from corporeal punishment. Here one can see Narada's stricter view regarding punishments.

Another main feature of Narada is that he has separated criminal offences like murder and has discussed abuse and assault as separate titles, such treatment is not seen in Manu and Yajñavalkya.

Theft is treated as part of heinous offences and the different nature of theft is explained in comparison with heinous offences. In the main body of Narada, sixteen verses are devoted for the discussion on theft. It propounds innovative theories of detection of theft, which can be said to be an extraordinary contribution of Narada. In the appendix part sixty verses are devoted to theft. These two discussions on theft form a very modern and scientific approach to the science of detection.
Unlike Manu and Yajñavalkya, Nārada discusses abuse and assault, these two titles in one chapter. Still definition of each and treatment is separate. The definition of abuse is as exact and complete as in the I.P.C.\textsuperscript{108}.

Unlike Manu, Nārada makes a positive statement that, "if two persons provoke each other simultaneously or if the insult is returned, both are to be punished\textsuperscript{109}".

One unpleasant thing about Nārada is that, 'the superiors can punish the inferiors corporeally and the king would not intervene such practices\textsuperscript{110} - not a happy provision.

Abuse and assault on the king is viewed as a grave offence and like Yajñavalkya, the severest punishment like being burnt alive is ordained\textsuperscript{111} by Nārada.

Manu condemns gambling outright\textsuperscript{112}, while Nārada allows it under state control and as a source of revenue. This is part of criminal law. Nārada prescribes certain code of conduct for gamblers. Gambler has to take the king's permission for gambling\textsuperscript{113}. Gambler is not supposed to go to another gambling house without clearing debt at the first house\textsuperscript{114}. If a gambler does not take the king's permission for gambling, he should pay a share to the king and play openly in public\textsuperscript{115}.
It is already discussed that Nārada follows Manu in many respects and also differs in certain essential matters. In nomenclature and arrangement of titles of law itself he differs from Manu. Some of the titles are differently named by Nārada. Manu uses the word 'Nikṣepa' while Nārada speaks of 'Upanidhi'. Nārada seems to have included Manu's 'Svāmipālavivāda' in 'Vetanasya anāpākarma'. Nārada makes the title of 'Dyūta' and 'Saṁāhvaya' and adds three titles viz., 'abhyupetāśuśrūṣa', 'Vikriyāsampradāna' and 'Prakīrṇaka'. Manu only casually mentions the ordeals of fire and water, while Nārada enumerates five kinds of ordeals, describes them at length and adds two more, viz., 'Tandulabhaksanam' and 'Taptamāsa'.

Nārada allows 'Niyoga' while Manu strongly condemns it though tolerates it as a social practice. Nārada allows remarriage, while Manu is personally against it. Manu mentions seven kinds of slaves, while Nārada raises their number to fifteen. Manu condemns gambling outright, while Nārada allows it under state control and as a source of revenue. Nāradasmṛti is far more systematic than Manu and is full of divisions and sub-divisions, e.g., Nārada divides property into three kinds, each of which is again sub-divided into seven types. Nārada divides 'law of Gifts' into four sections which are further subdivided into thirty-two and he subdivides eighteen principal titles into one hundred
thirty two sub-divisions. There are a few points which
are peculiar to Nārada, such as fourteen kinds of impotent
persons, three kinds of pumarbhūs and four kinds of svairinīs.
He also differs from Yājñāvalkya in many matters.

Yājñāvalkya mentions five kinds of ordeal while
Nārada mentions seven and the former's treatment of them
is not as exhaustive as that in Nārada. The rules of
judicial procedure in Nārada are more systematic and
exhaustive than those of Yājñāvalkya. Nārada cites more
definitions than Yājñāvalkya.

Nārada regards sexual intercourse with female ascetic
as a mortal sin, while both Manu and Yājñāvalkya treat it
lightly.

This study reveals that as far as the ancient Indian
law is concerned, no one can deny Nārada's place as a first
rank law maker and sociologist. This is first work on law
where law has been put forth in its real sense. Nārada
is original and independent law maker.
<table>
<thead>
<tr>
<th></th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Nr. Matr. I. 30.</td>
</tr>
<tr>
<td>2</td>
<td>Nr. Matr. I. 42.</td>
</tr>
<tr>
<td>3</td>
<td>Nr. Matr. I. 36.</td>
</tr>
<tr>
<td>4</td>
<td>Nr. Matr. I.</td>
</tr>
<tr>
<td>5</td>
<td>Nr. Matr. II. 8.</td>
</tr>
<tr>
<td>6</td>
<td>Nr. Matr. II. 43.</td>
</tr>
<tr>
<td>8</td>
<td>Nr. Matr. II. 32, 33.</td>
</tr>
<tr>
<td>9</td>
<td>Nr. Matr. I. 27.</td>
</tr>
<tr>
<td>10</td>
<td>Nr. Matr. III. 4-6.</td>
</tr>
<tr>
<td>11</td>
<td>Yāj. II. 93, 94.</td>
</tr>
<tr>
<td>12</td>
<td>Nr. I. 144.</td>
</tr>
<tr>
<td>13</td>
<td>Nr. I. 35.</td>
</tr>
<tr>
<td>14</td>
<td>Nr. I. 71.</td>
</tr>
<tr>
<td>15</td>
<td>Nr. I. 91.</td>
</tr>
<tr>
<td>16</td>
<td>Nr. I. 86.</td>
</tr>
<tr>
<td>17</td>
<td>Nr. I. 83.</td>
</tr>
<tr>
<td>18</td>
<td>Nr. I. 149.</td>
</tr>
<tr>
<td>19</td>
<td>Nr. I. 177-187.</td>
</tr>
<tr>
<td>20</td>
<td>Manu, VIII, 114-115.</td>
</tr>
<tr>
<td>21</td>
<td>Yāj. II. 97-113.</td>
</tr>
<tr>
<td>22</td>
<td>Nr. I. 247-348.</td>
</tr>
<tr>
<td>24</td>
<td>Nr. Matr. I. 38.</td>
</tr>
<tr>
<td>25</td>
<td>Nr. XVIII. 18-34.</td>
</tr>
<tr>
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</tr>
<tr>
<td>27.</td>
<td>Nr. XII. 8-10.</td>
</tr>
<tr>
<td>30.</td>
<td>Nr. XII. 13,16.</td>
</tr>
<tr>
<td>32.</td>
<td>Nr. XII. 30-32.</td>
</tr>
<tr>
<td>33.</td>
<td>Nr. XII. 44.</td>
</tr>
<tr>
<td>34.</td>
<td>Nr. XII. 9.</td>
</tr>
<tr>
<td>35.</td>
<td>Manu III. 23.</td>
</tr>
<tr>
<td>37.</td>
<td>Nr. XII. 49-52.</td>
</tr>
<tr>
<td>38.</td>
<td>Manu IX. 176.</td>
</tr>
<tr>
<td>40.</td>
<td>Nr. XII. 78.</td>
</tr>
<tr>
<td>41.</td>
<td>Nr. XII. 16,18-19.</td>
</tr>
<tr>
<td>42.</td>
<td>Manu IX. 76.</td>
</tr>
<tr>
<td>43.</td>
<td>Nr. XII. 80-84.</td>
</tr>
<tr>
<td>44.</td>
<td>Manu IX. 64-66.</td>
</tr>
<tr>
<td>45.</td>
<td>Nr. XII. 97.</td>
</tr>
<tr>
<td>46.</td>
<td>Nr. XIII. 4.</td>
</tr>
<tr>
<td>47.</td>
<td>Nr. XIII. 9.</td>
</tr>
<tr>
<td>50.</td>
<td>Nr. XIII. 9.</td>
</tr>
<tr>
<td>51.</td>
<td>Nr. XIII. 16.</td>
</tr>
</tbody>
</table>
52. Nr. XIII. 16.
53. Nr. XIII. 12.
54. Nr. XIII. 50.
55. Yaj. II. 115, 123.
57. Nr. XIII. 6, 10, 11.
59. Nr. I.
60. Nr. I. 14.
63. Nr. I. 91.
64. Nr. I. 102.
65. Manu VIII, 179-191.
67. Nr. I. 125.
69. Manu I. 88-91; X. 115.
70. Yaj. I. 118-120.
71. J.J. on Nr. X.2.
72. Nr. X. 3.
73. Nr. X. 4.
74. Nr. X. 6.
75. Manu VIII, 179-191.
76. Yaj. II. 67.
77. Nr. II. 14-15.
78. Manu. VIII. 189.
79. Nr. II. 9.
80. Manu. VIII. 415.
81. Nr. V. 2.
82. Yāj. II. 184.
83. Nr. XI. 36-37.
84. Nr. XI. 32.
85. Nr. XI. 3.
86. Nr. XI. 23.
87. Nr. XI. 15.
88. Nr. VI. 2.
89. Nr. VI. 7.
90. Nr. VI. 10.
91. Nr. III. 1, 2.
92. Nr. III. 7.
94. Nr. III. 15.
95. Nr. VII. 2.
96. Nr. VII. 7.
97. Nr. III. 18.
98. Nr. VII. 8.
100. Manu. VIII. 222, 397.
101. Yāj. II. 177-180.
102. Nr. IX. 4-6.
103. Nr. IX. 7.
<table>
<thead>
<tr>
<th>No.</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>104</td>
<td>Nr. IX. 5, 6</td>
</tr>
<tr>
<td>105</td>
<td>Nr. IX. 3</td>
</tr>
<tr>
<td>106</td>
<td>Nr. IX. 3</td>
</tr>
<tr>
<td>107</td>
<td>Nr. XIV. 9</td>
</tr>
<tr>
<td>108</td>
<td>Betai, R.S., 'A Reconstruction', p. 402</td>
</tr>
<tr>
<td>109</td>
<td>Betai, R.S., 'A Reconstruction', p. 402</td>
</tr>
<tr>
<td>110</td>
<td>Nr. XV. 12, 13</td>
</tr>
<tr>
<td>111</td>
<td>Nr. XVI. 30, 31</td>
</tr>
<tr>
<td>112</td>
<td>Manu IX. 221-228</td>
</tr>
<tr>
<td>113</td>
<td>Nr. XVII. 7</td>
</tr>
<tr>
<td>114</td>
<td>Nr. XVII. 5</td>
</tr>
<tr>
<td>115</td>
<td>Nr. XVII. 8</td>
</tr>
<tr>
<td>116</td>
<td>Manu VIII. 114</td>
</tr>
</tbody>
</table>