

SOME NEW LIGHTS ON THE COMMENTARIES
OF THE *DAYABHAGA* BY JIMŪTAVĀHANA

Hindu law in its initial stages was studied by the European jurists with a very critical eye. Some of them have become extra-critical by announcing that there is nothing like Hindu Law. As early as in 1877, J. H. Nelson of the Madras Civil Service has raised the question: « Has such a thing as Hindu Law at any time existed in the world? Or is it that Hindu Law is a mere phantom of the brain, imagined by the Sanskritists without law and lawyers without Sanskrit¹? ».

There are others headed by Mayne who speak in eulogistic terms about the worth of the Hindu Law. He rightly observes that Hindu Law has the oldest pedigree of any known system of jurisprudence. According to him, no time or trouble can be wasted, which is spent in investigating the origin, development and the cause of its influence. It cannot be denied that India has not only been productive in deep thinkers, eminent founders of world-religion and gifted poets, but she has brought forth a system of law which after spreading over the whole of the vast continent of India, has penetrated at an early period into Burma and Siam and has become the foundation of written law in these two countries².

Jolly in his *Outlines of an History of the Hindu Law* (Calcutta, 1885) pertinently observes: « For all researches into the early history of institutions, India is the very country. Moreover, inspite of its generally archaic character Indian legislation in some respects has early reached a degree of perfection equal or superior to anything to be met with in the contemporaneous law-codes of Europe » (p. 3).

For Hindu law it is to be noted that theoretically the *Srutis* or the

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1. This has been refuted by Mayne in his article « Hindu Law in Madras ». Vide, R. B. PAL, *The History of Hindu Law*, T.L.L., 1930, Calcutta, 1958, p. 2.

2. There are several important contributions on this point and of the important ones the following may be referred to: J. JOLLY, *Hindu Law and custom*, pp. 89-95; R. LINGAT, *Buddhist Manu or the propagation of Hindu Law in Hinayānist Indo-China*, in A.B.O.R.I., Vol. XXX, pp. 284-297.

Vedas are to be regarded as the primary authority on all questions relating to the proper conduct of a man, including questions falling within the sphere of positive law, wherever any guidance may be obtained from them with reference to such questions. The *Śrutis* contain very little of lawyer's law. There are no doubt a few passages containing incidental allusion to a rule of law or giving an instance from which a rule of law may be inferred. For all practical purposes we are to refer to the *Smṛtis* or *Dharmaśāstras*, the authority of which is derivative in character. Not containing a direct record of the revelation, it is advanced that they embody the purport of the Vedic text as recollected by the sages and it is contended that even where the Vedic texts corresponding to the precepts contained in the *Smṛtis* are not expressly found, it must be inferred that they did exist but have now been lost owing to the frailty of human memory or some other cause of a similar nature.

Jaimini therefore declares that the *Smṛtis* having been compiled by the sages who were also the repositories of the revelation, there arises the interference that they are founded on the *Śruti* and should therefore be regarded as authoritative³.

There was controversy regarding the exact number of writers on *Dharmaśāstra* and it is quite likely that conflict will arise in the directives contained in different *Smṛtis* and in this respect the decision of Bṛhaspati on the point is to be regarded as the guiding factor. What he says is that the superiority of Manu is to be recognised in view of the fact that his text embodies the true implication of the *Vedas* and as such any text opposed to that of Manu is not to be approved:

*Vedārthopanbandhrtvāt prādhānyam hi manoh smṛtam /
Manvarthaviparītā yā sā smṛtir na praśasyate // Bṛhaspati. Saṁ, 13.*

The commentators often take upon themselves the task of reconciling apparently conflicting texts after harmonising them into one consistent whole. Sometimes the texts are turned and twisted in interpretation so that they may be brought to a position where they may stand together without contradiction. These ingenious devices often render these texts going far away from the original texts they were commenting on. The *Bhāṣyas* specially often are having a tendency of working too long on mere threadwork so much so that the original link remains lost and the work suffers from the burden of useless and unnecessary commentatorial accretion.

But the commentaries of the *Dharmaśāstra* in the form of *Nibandhas* present a new technique of harmonisation. Not being directly affiliated to any particular text as in the case of the *Tīkākāras* and the *Bhāṣyakāras*, the writers on digest enjoy much more freedom of discus-

3. *Api vā kartṛsāmānyāt pramāṇam anumānam syāt. Mīmāṃsādarśana, 1.3.2.*

sion in comparison. They attempt to collect identical directives from different *Dharmaśāstras* and what they do is in the form of systematising the whole affair after removing the contradictions and differences of opinion. There is of course no hard and fast rule to demarcate a commentary from a digest and in fact the commentary by Aparārka on the *Yājñavalkyasamhitā* is a digest in the real sense of the term. The same may be stated in respect of the commentary of Vijñāneśvara and that of Nanda on the *Viṣṇusmṛti*. The following observations about the commentaries and the digests deserve attention: « The truth is that commentaries and digests, like the *Mitākṣarā* and *Vīramitrodaya* owe their binding force not to their promulgation by any sovereign authority but to the respect due to their authors and still more to the fact of their being in accordance with prevailing popular sentiment and practice. Their doctrines may often have moulded the usage, still more frequently they have themselves been moulded according to prevailing usage of which they are only the recorded expression »⁴.

In this context one may refer to the commentary of Kullūkabhaṭṭa as the representative *Ṭīkā*, where he often by way of criticising others makes it a point to find out the meaning of the verse on which he comments. Thus the concluding lines of the commentary are interesting:

Sārāsārappapañcavidhau Medhātithes cāturi
Stokaṃ vastu nigūḍhaṃ alpavacanād Govindarājo jagau /
Granthes'min Dharaṇīdharasya bahuśaḥ svātantryam etāvataḥ
Spaṣṭam mānavam arthatattvam akhilaṃ vaktuṃ kṛto'yaṃ śramaḥ //

He is critical of Dharaṇīdhara thus:

Paramparīyam āmnāyaṃ hitvā vidvadbhir ādrtam /
Pāṭhāntaram vyaracayan mudheha Dharaṇīdharas //

Self-aggrandisement and vanity often are marked features in such compositions as we find there:

Prāyaścitte bahumunimatālocanād yaṃ mayoktam
Sadvyākhyānaṃ khalu munigirāṃ tad bhajadhvaṃ guṇajñāḥ /
Naitān Medhātithir abhidadhe nāpi Govindarājo
Vyākhyātāro na jagur aparepy anyato durlabhaṃ vaḥ //

(Com. on the last verse of Chap. XI)

The *Bhāṣya* of Medhātithi may similarly be stated to be representative of the *Bhāṣya* type of commentaries. Here by working on the thread of the text of the original *Dharmaśāstra* the writer introduces many points, some times some of which are not relevant to the context,

4. Jogdamba Koer v Secretary of State for India in Council (1889) 16 Cal, 367, 375; Maharaja of Kolpur v Sundaram (1925) 48 Mad. 1.65.

Ref. Mayne's Treatise on Hindu Law and Usage, 11th Edition, Madras, 1925, p. 2, f.n.c.

but which are of immense help for understanding social and legal condition of that period.

The *Nibandhakāras*, as already pointed out, try in their own way to collect the available points of similar nature, and to remove the apparent contradictions involved therein, but in no case they are ready to be critical of the directives of the original *Dharmaśāstra*-writers^{4a}. In that respect they are of more interest than the commentaries.

Broadly the subjectmatter of the *Dharmaśāstra* is classified under three heads, namely, *Ācāra*, *Vyavahāra* and *Prāyaścitta*. Parāsara, it may be pointed out here, though claiming himself as specialist in respect of formulating laws for the *Kali* age, has dealt with two topics out of three, namely, *Ācāra* and *Prāyaścitta*.

We are concerned here with the *Vyavahāra* portion and therein also with the most important constituent of the same, namely, inheritance (*dāya*). Of the important *Nibandhas* dealing with *Dāya*, the following deserve mention:

- Kṛtyakalpataru* by Lakṣmīdhara (1100-1150)
- Dāyabhāga* as part of *Dharmaratna* by Jīmūtavāhana (1100-1150)
- Smṛticandrikā* by Devaṇabhaṭṭa (1200-1225)
- Vyavahāranirṇaya* of Varadarāja (1200-1300)
- Vivādaratnākara* of Caṇḍeśvara (1290-1370)
- Vyavahāra*-portion of the *Mādhavabhāṣya* prepared independent of the *Bhāṣya* on the *Parāśarasmr̥ti*, which does not discuss *Vyavahāra* (1300-1380)
- Madanapārijāta*, compiled under king Madanapāla (1360-1390)
- Vivādacandra* of Misarumiśra (1400-1450)
- Madanaratna* of Madanasimha (1425-1450)
- Vyavahārasāra* of Dalapati, a part of *Nṛsiṃhaprasāda* (1490-1512)
- Sarasvatīvilāsa* compiled under patronage of Pratāparudradeva (1500-1525)
- Vivādacintāmaṇi* by Vācaspatimiśra (1500-1550)
- Dāyatattva* by Raghunandana (1520-1575)
- Vivādatāṇḍava* by Kamalākaraḥṭṭa (1610-1640)
- Vyavahāramayūkha* by Nilakaṇṭhabhaṭṭa (1615-1645)
- Vīramitrodaya* (*Vyavahāraprakāśa*) by Mitramiśra (1615-1645)
- Vivādarṇavasetu*, compiled by eleven traditional scholars under British patronage (1773)
- Vivādabhaṅgārṇava* by Jagannātha (1792-94)
- Dāyakramasaṃgraha* by Śrīkṛṣṇa Tarkālaṃkāra.

Jīmūtavāhana is the leader of the Bengal school specially in respect of inheritance (*dāya*) and his contribution in this respect is contained

4a. Pratāparudra in his *Sarasvatīvilāsa* makes distinction between *Ṭikākāra* and *Nibandhakāra* in the following lines: ...*ṭikākāraiḥ vijñānayogiprabhṛtibhiḥ nibandhakāraiḥ kulārkalakṣmīdharaprabhṛtibhiḥ*..., p. 14 (Ed. R. Shama Sastry, Mysore, 1927).

in the portion *Dāyabhāga* which is a part of his greater treatise entitled *Dharmaratna*. Thus we have the colophon:

Iti pāribhadriya-mahāmahopādhyāya-śrī-Jimūtavāhanakṛtau Dharmaratne Dāyabhāgaḥ samāptaḥ.

His other work, namely, *Vyavahāramāṭṛkā*, a treatise on general procedures of *Vyavahāra*⁵, is also designated as *Nyāyamāṭṛkā*.

*(Pāribhadrakulodbhūtaḥ Śrīmān Jimūtavāhanah /
Viduṣaṃ paritoṣāya nirmame nyāyamāṭṛkāṃ //*

Last but one verse of the text).

The colophon does not contain any positive information whether this text was also a part of the bigger text *Dharmaratna* or not:

*Iti pāribhadra-mahāmahopādhyāya-śrī-Jimūtavāhanakṛtā
Vyavahāramāṭṛkā samāptā.*

His other treatise *Kālaviveka*, dealing with different months (*māsāder nirṇayaḥ*), intercalary month (*adhimāsa*), the rites and rituals to be performed in those months and the like, has also been stated in the colophon to be a part of the *Dharmaratna*:

*Iti pāribhadriya-mahāmahopādhyāya-jimūtavāhanakṛtau
Dharmaratne Kālavivekaḥ samāptaḥ.*

Interesting is the remark of the author in the concluding lines:
*Karatalagatāmalakam iva kalam bālo'pi vikṣate yena /
Jimūtavāhanakṛtaḥ paraṃ jayati //* (p. 380).

There is hardly any text, specially a *Nibandha*, other than Jimūtavāhana's *Dāyabhāga* which has earned the unique distinction of being commented on by a very good number of commentators. The *Catalogus Catalogorum* records as many as fifteen commentaries on the *Dāyabhāga*: by Śrīkrṣṇa, Acyutānanda, Umāsaṃkara, Gaṅgādhara, Gaṅgārāma, Nīlakaṇṭha, Maheśvara, Raghunandana, Rāmabhadra, Śrīnātha, Sadāśiva, Haridīkṣita, Vaidyanātha and Rāmanātha⁶.

The text has been published several times and in most cases with the commentary of Śrīkrṣṇa Tarkālaṃkāra. One edited by Lakṣmīnārāyaṇa Śarmā was published as early as in 1829 (Calcutta). The edition of *Dāyabhāga* by Bharata Candra Śiromaṇi Bhaṭṭācārya (Calcutta, 1863), contains six commentaries, namely, of Śrīnātha, Rāmabhadra, Acyutānanda, Maheśvara, Raghunandana and Śrīkrṣṇa Tarkālaṃkāra. The texts

5. Ed. by Sir Ashutosh Mukherjee in the Memoirs of the Asiatic Society of Bengal, Vol. III, No. 5, pp. 277-353, 1912.

6. P. V. KANE in his *History of Dharmaśāstra*, Vol. I, pt. II, Revised edition, Poona, 1975, pp. 1044-45, more or less has the same list.

as well as the commentaries are printed in Bengali characters. Because of the special importance of the view of Jīmūtavāhana relating to the *Upamasvatvavāda* (i.e. the sons become entitled to the property of the father after his demise only) as opposed to the *Janmasvatvavāda* (the view that just on birth the sons get the right to inheritance in the ancestral estate — *lokaprasiddham eva svatvam. Loke ca putrādīnām janmanaiva svatvam prasiddhataram nāpahnavam arhati. ... utpattyaivārthasvāmitvam labhetety ācāryāḥ iti gautamavacanāc ca. ... Tasmāt Paitṛke paitāmahe ca dravye janmanaiva svatvam, tathāpi pitur āvaśyikeṣu dharma-kṛtyeṣu vācanikeṣu prasādādānakuṭumbabharaṇāpadvimokṣādiṣu ca sthāvaravyatiriktadravyaviniyoge svātantryam iti sthitam. Sthāvare tu svārjite pitrādiprāpte ca putrādipāratantryam eva.* on *Yāj. II.114*. In his commentary on *Yāj. II.121* Vijñāneśvara elaborates the point further thus: *Tathā sarajaskāyām mātari sasprhe ca pitari vibhāgam anicchaty api putrecchayā paitāmahadravyavibhāgo bhavati. Tathāvibhaktena pitrā paitāmahe dravye dīyamāne vikriyamāne vā pautrasya niṣedhe'py adhi-kāraḥ, pitrarjite tu na niṣedhādhikāraḥ tataparatantrativāt. Anumatis tu kartavyā*) as advocated by Vijñāneśvara, whose view is accepted throughout India except Benagl, where the view of *Dāyabhāga* is in vogue; this text (*Dāyabhāga*) has received attention of the commentators; all from Bengal. It is further interesting to note that of all the commentaries on the text, that from the pen of Śrīkṛṣṇa Tarkālaṃkāra has been regarded as the standard commentary. Some sub-commentaries (*Ṭippanīs*) have been composed on this commentary and that shows the importance of the commentary.

The earliest commentary on the text is by Śrīnātha, son of Śrīkara⁷.

The second commentary of the text comes from the pen of the son of Śrīnātha. He is Rāmabhadra who in his introductory remarks speaks of his identity thus:

*Ālocya tātanirmitanibandham ārādhya viśveśvaram /
Āryācāryas tanute vivṛtim imām dāyabhāgasya //*

The colophon derserves mention:

*Iti Śrīmahāmahopādhyāya-śrīnāthācārya-cūdāmaṇitanuja-śrī- Rāma-
bhadra-nyāyālaṃkārabhaṭṭācāryaviracitā Dāyabhāgaṭīkā samāptā.*

7. The text starts with the verse of introduction:

*Śrīkarācāryaputreṇa prācīratnena dhīmatā /
Ṭippanī dāyabhāgasya śrīnāthena vidhiyate //*

Śrīkṛṣṇa constantly copies from this very commentary by Śrīnātha and often cites the opinions of Cūdāmaṇi to correct or confute them. For details regarding the contribution of Śrīnātha vide the most informative paper, « Śrīnātha Ācārya-Cūdāmaṇi, a *Smṛti-writer* », by Dr. R. C. Hazra, in the *Annals of Bhandarkar Oriental Research Institute*, Vol. XXXII, Parts, I-IV, 1951, pp. 34-52.

He follows generally the line of approach of his father Śrīnātha and on occasions comes forward to resist any attempt of attack on his father's view⁸.

An incomplete commentary by another Rāmabhadra has been unearthed by me from amongst the unsorted and unsystematised papers of the Government Sanskrit College, Calcutta, and now numbered as Smṛti. 8/90. (Seven Folio, size: 17 x 3; 8 lines in a page). This was edited by me in *Our Heritage*, Vol. VI. part. 1, January-June, 1958, pp. 43-54. Kane unfortunately confuses this with the commentary by Rāmabhadra, son of Śrīnātha⁹.

This commentator often criticises the view of Rāmabhadra, son of Śrīnātha:

... *iti Cūḍāmaṇibālakotaṃ bālakoktam eva. Again: Cūḍāmaṇisutena tu...*

He is often critical regarding the views of Śrīkrṣṇa, Acyuta Cakravartī and others. Unfortunately the commentary in its incomplete form has been available up to the discussion on *Vibhāga* only. Let us wait for the day when the missing portions will be traced.

The commentary by Maheśvara Bhaṭṭācārya is also not complete. It covers upto the 11th Chapter, Section 1, dealing with the right of the wife to succession (*patnyadadhikāra*). Bharata Candra in his printed text has the following comments:

Itaḥ paraṃ Maheśvara-bhaṭṭācārya-praṇīta-ṭīkāyāḥ ādarśasyātyantā-bhāvavaśataḥ mudrāṅkanam na jātam. Anumīyate granthakāraḥ pratyūhavyūhopaśamanāsamartha evābhilaṣitasandarbhāsamāpanāvakāśaṃ na lebhe iti.

This commentary is posterior to those of Cūḍāmaṇi and of Acyuta, both of which are cited in it and is probably anterior to that of Śrīkrṣṇa, or at least nearly of the same date. Colebrooke observes — « They differ greatly in their expositions of the text both as to meaning and as to the manner of deducing the sense, but neither of them affords any indication of his having seen the other's work ».

The *Dāyabhāgasiddhāntakumudacandrikā* by Acyuta Cakravartī is anterior to that of Śrīkrṣṇa but subsequent to Cūḍāmaṇi's. He often refutes the view of Cūḍāmaṇi (... *ity ācārya-cūḍāmaṇi-mataṃ pratyuktaṃ*). He refers to his own commentary on the *Śrāddhāviveka* of Śūla-

8. His other work is *Smṛtitattvavinirṇaya* or *Vyavasthā-saṃgraha*, a collection of rules on various matters relating to *Dharmaśāstra*, namely, *Tithi*, *Dāna*, *Śrāddha*, *Prāyaścitta*, *Suddhi* and *Udvāha*. In the colophon he speaks of himself as Navadvīpanīvāsī. He should be distinguished from Rāmabhadra Nyāyālaṃkāra, author of the *Kārikā* on *Suddhitattva*. For details vide the article of M. M. Chakravorty, in J.R.A.S., vol. XI, No. 9, New Series, 1915, pp. 349-51.

9. History of *Dharmaśāstra*, Rev. Ed. 1-II, p. 711.

pāṇi (*Anyad asmatkṛta-śrāddhāviveka-ṭippanyām anusandheyam*, p. 44, in the Edn. of Bharatacandra). It is more closely followed by Śrīkṛṣṇa, but mostly without mentioning the author. Maheśvara refers to the view of this commentator.

Raghunandana, the celebrated author of the twentyeight *Tattvas* (*Aṣṭāvīṃśatitattva* also called *Smṛtitattva*) has also to his credit a commentary on the *Dāyabhāga*:

*Snigdhaḥjīmūtasāṅkāśaṃ natvā nārāyaṇaṃ vibhum /
Vyākhyānaṃ dāyabhāgasya kurute Raghunandanaḥ //*

Colebrooke in his introduction to the translation of *Dāyabhāga* has doubted the genuineness of the commentary, but in the colophon we have the same introductory observations as we find in other texts:

*Iti Śrī-vandyaghaṭṭiya-hariharabhaṭṭācāryātmaṇi-Raghunandana-bhaṭṭācāryakṛtā dāyabhāgaṭīkā samāptā*¹⁰.

The best commentary on the *Dāyabhāga* is by Śrīkṛṣṇa Tarkālaṃkāra. Colebrooke speaks of Śrīkṛṣṇa and his work as: « This is the most celebrated of the glosses on the text. It is the work of a very acute logician, who interprets his author and reasons on his arguments, with great accuracy and precision; and who always illustrates the text, generally confirms its positions, but not unfrequently modifies or amends them ».

(The Sanskrit College Library, Calcutta has a manuscript of the commentary by Śrīkṛṣṇa in Telugu character. No. Smṛti. 334).

It is being stated for information that Kṛṣṇacandra Tarkālaṃkāra (1864) composed a Bengali translation of the commentary of Śrīkṛṣṇa. It is yet unpublished¹¹.

We have another commentary on the text by Kṛṣṇakānta Vidyāvāḡśa-bhaṭṭācārya. The colophon states that he was an inhabitant of Navadvīpa (*navadvīpanīvāsī*). This was published after necessary correction by Bharata Candra Śiromaṇi in Calcutta in 1866. This covers the portion dealing with the succession of the sons of the brothers. The author explains the reason as to why other portions have been left uncommented:

Itaḥ śeṣasyātisugamatayā vicārāsambalitatayā ca tadarthāvagamo na ṭīkāṃ apekṣate iti ṭīkā mayā na kṛtā.

10. The text along with English translation was published by G. C. Sarkar, Calcutta, 1904. Besides the article by M. M. Chakravarty in J.R.A.S., Dr. R. C. Hazra has an illuminating article published in the *Bhāratīya Vidyā*, Vol. XI, Nos. 3 and 4, 1950, under the title « A note on Smārta Raghunandana's works and time ».

11. For reference vide, HEM CHANDRA BHATTACHARYA, *Vaṅgīya Mahāmahopādhyāya-jīvanī*, Calcutta, Pauṣa, 1879, p. 101.

This commentary is highly scholastic and the author in a very good number of cases criticises the views of Śrīkrṣṇa.

The best sub-commentary (*Ṭippanī*) on the *Dāyabhāgaprabodhinī* of Śrīkrṣṇa Tarkālaṃkāra is by Kṛṣṇanātha Nyāyapañcānana (published in Bengali character in Calcutta, Śakābda, 1813). It is unique exposition of the scholastic commentary of Śrīkrṣṇa. The author introduces himself thus:

*Navadvīpāsannabhūmau śrīmadbhāgīrathītate /
Grāmaṃ pūrvasthalīm nāma viddhi vāsasthalīm mama //*

The author was born in 1775. He is the ninth descendant of Arjuna Miśra of Mithilā, the great commentator of the *Mahābhārata*. He is author of several commentaries and of the digest, *Smṛtisiddhānta*, Vols 1-3¹².

Madhusūdana has composed a *Ṭippanī* on the commentary of Śrīkrṣṇa and the single manuscript is lying in the Library of the Sanskrit College, Calcutta, No. *Smṛti*, 1391. The author appears to be Madhusūdana Smṛtiratna, who was born in Navadvīpa in B.S. 1239. First a scholar in Nyāya, he was later dedicated to the study of *Dharmaśāstra* and has composed commentaries on the *Ekādaśītatva*, *Malamāsatatva*, *Tīthītatva*, *Prāyaścittaviveka*, *Dattakacandrikā* and the *Dattakamīmāṃsā*¹³.

Besides these commentaries, we have good discussions on Jīmūtavāhana's *Dāyabhāga* in the digest, *Vivādabhaṅgārṇava* of Jagannātha, the original text of which still remains unpublished. Colebrooke's *Digest of Hindu Law*, translation of the text of Jagannātha is a remarkable contribution deserving special mention.

Rāmanātha Vidyāvācaspati, in his *Smṛtiratnāvalī* (*Dāyabhāgaviveka*, Folio, 52) speaks of his commentary on the *Dāyabhāga* — *Sa ca matkṛta-jīmūtavāhanakṛta-dāyabhāga-ṭīkāyām anusandheyaḥ*) discusses the definition of *Dāya* as presented by Jīmūtavāhana. Though a digest, it partakes of the nature of a commentary and has been printed as Appendix C to the *Dāyabhāga* edited by me (see pp. 106-108).

In the same text he refers to *Līlāvatī* commentary, which still remains untraced (*Adhikam Līlāvatīṭīkāyām*. Folio, 52).

Colebrooke in his preface to the translation of *Dāyabhāga* states that the text attained a considerable degree of authority in some of the districts of Bengal. The manuscript is lying with the Library of the Sanskrit College, Calcutta, No. *Smṛti*, 193.

The *Dāyabhāga* of Jīmūtavāhana Vol. I. along with all the commentaries, sub-commentaries, translations in Bengali, English and Hindi and exhaustive explanatory notes in English, has already been edited by me (in Calcutta, 1978) and the text is already in the market.

12. For reference vide *Bangavāsī*, 23rd December, 1911.

13. For reference vide, *Vaṅgiya Mahāmahopādhyāya-jīvanī*, pp. 21-22.

Incidentally it may be of interest to note here that it has become my privilege to come across a good number of manuscripts which are directly connected with the concept of *Dāya* of Jīmūtavāhana. They are being processed together and it is expected that a good number of them will be published in the form of Appendix to the next part of the *Dāyabhāga*.

The texts are as follows:

1. *Dāyabhāgapravacana* by Vaidya Gaṅgādhara, Ms. No. *Smṛti*, 977, 979. Complete.
2. *Dāyabhāgapatrikā* Small treatises on certain topics on *Dāya* mainly on the definition. Nos. 2420; 2425; 2723 etc.
3. *Dāyabhāgasiddhānta* Author not known. No. *Smṛti*, 1357.
4. *Dāyabhāgavinirṇaya* by Kāmādeva. No. *Smṛti*, 195.
5. *Dāyabhāganirṇaya* by Gopāla Nyāyapañcānana, No. *Smṛti*, 1198; 1319; 1540 etc.
6. *Dāyabhāgaṭippanī* by Vrajanātha Vidyāratna. No. *Smṛti*, 1389; 2182.
7. *Dāyabhāgavyavasthā* by Sārvabhauma. No. *Smṛti*, 2227; 3079.
8. *Dāyadīpikā* by Vidyānidhi Bhaṭṭācārya
(For details vide, Journal of the Asiatic Society of Bengal, Vol. XVI, Nos. 1-IV, communication by H.N. Chatterjee, pp. 157-159, 1974) ¹⁴.

14. The numbers of the manuscripts are those of the manuscripts in the *Government Sanskrit College*, Calcutta. For other allied references vide H. CHATTERJEE, *Dāyabhāga*, vol. I (Calcutta, 1978), pp. 101-112.