



2026:CGHC:24531

NAFR

HIGH COURT OF CHHATTISGARH AT BILASPUR

Order Reserved on : 24.04.2026

Order Delivered on : 18.06.2026

WPC No. 6422 of 2024

Kiran Meshram W/o Avindra Meshram, Aged About 52 Years, Caste Mahar, R/o Ward No. 09 Sanjay Nagar Dongargarh, Tahsil- Dongargarh District- Rajnandgaon (C.G.)

... Petitioner

versus

- 1** - State Of Chhattisgarh Through Its Secretary, Department Of Tribal Welfare, Mahanadi Bhawan, Nawa Raipur, Chhattisgarh.
- 2** - The Sub Divisional Officer (Revenue) Dongargarh, Tah, Dongargarh, District- Rajnandgaon Chhattisgarh.

--- Respondents

(Cause-title taken from Case Information System)

For Petitioner	:	Mr. Love Kumar Ramteke, Advocate
For Respondents/State	:	Mr. Abhishek Gupta, Panel Lawyer

Hon'ble Shri Amitendra Kishore Prasad, Judge

CAV Order

- 1.** The petitioner has filed the present petition challenging the inaction of the competent authority in not issuing a permanent

social status certificate, as well as assailing the communication/order dated 16.08.2024 (Annexure-P/1), whereby the petitioner's claim has not been duly considered and granted.

The petitioner has prayed for following relief(s):-

"10.1 That, this Hon'ble Court may kindly be pleased to call the entire records from the respondents.

10.2 That, this Hon'ble Court may kindly issue a writ in the nature of Mandamus directing the respondent authority to issue Permanent Social Status Certificate (Caste Certificate).

10.3 That, this Hon'ble Court may issue a writ in the nature of mandamus to the respondent no.2, who has not issuing Permanent Social Status Certificate till date only to harass the petitioner. Therefore, order to take action against respondent no.2 should be passed."

2. The brief facts of the case are that the petitioner belongs to the Scheduled Caste "Mahar" and seeks issuance of a permanent social status/caste certificate in order to avail the benefits admissible under the law in the State of Chhattisgarh. In this regard, the petitioner submitted an online application bearing No. 0704011912013679 on 14.11.2019 before the competent authority i.e., the S.D.O. (Revenue), Dongargarh, District Rajnandgaon, along with relevant documents, affidavit, and Inability Memo.
3. It is the case of the petitioner that despite submission of complete documents, the competent authority repeatedly directed the

petitioner to appear with original records and ultimately refused to issue the caste certificate. Aggrieved thereby, the petitioner approached this Court in W.P.(C) No. 168/2020, wherein directions were issued for consideration of the application in accordance with law. However, the application was rejected vide order dated 10.08.2020.

4. Thereafter, in W.P.(C) No. 2102/2020, this Court again issued necessary directions. The petitioner further preferred an appeal under Section 5 of the Chhattisgarh Scheduled Castes, Scheduled Tribes and Other Backward Classes (Regulation of Social Status Certification) Act, 2013 (for short, 'Act, 2013'), which was partly allowed on 26.07.2021. However, the competent authority failed to comply with the appellate order and reiterated its earlier stand vide order dated 12.08.2022.
5. Subsequently, in W.P.(C) No. 1812/2023, this Court directed the petitioner to avail statutory remedy, pursuant to which the petitioner again preferred appeal dated 19.05.2023, which was rejected on 09.02.2024. In W.P.(C) No. 2006/2024, this Court quashed the orders dated 09.02.2024 and 12.08.2022 and remanded the matter for fresh consideration.
6. Despite remand, the S.D.O. (Revenue), Dongargarh again sought documents stating non-availability of online records, issued a temporary social status certificate, and thereafter ultimately refused to issue the caste certificate on the ground of lack of

jurisdiction vide impugned communication/order dated 16.08.2024 (Annexure-P/1), which is under challenge in the present petition.

7. Mr. Love Kumar Ramteke, learned counsel appearing for the petitioner, submits that the petitioner has been compelled to run from pillar to post since the year 2019 for issuance of a Permanent Social Status Certificate recognizing her Scheduled Caste "Mahar" status, despite being fully eligible and having submitted all requisite documents along with the online application bearing No. 0704011912013679 dated 14.11.2019 before the competent authority i.e., S.D.O. (Revenue), Dongargarh, District Rajnandgaon. It is submitted that along with the application, the petitioner furnished all relevant supporting documents, including affidavit and Inability Memo in terms of Rule 6 of the Chhattisgarh Scheduled Castes, Scheduled Tribes and Other Backward Classes (Regulation of Social Status Certification) Rules, 2013 (for short, 'Rules, 2013'). However, instead of deciding the application in accordance with law, the authorities repeatedly issued directions requiring production of original records, which the petitioner duly complied with.
8. It is further submitted that despite clear directions issued by this \ Court in W.P.(C) No. 168/2020 vide order dated 16.01.2020, the petitioner's application was arbitrarily rejected on 10.08.2020 on the vague ground that caste certificate cannot be issued. Thereafter, in W.P.(C) No. 2102/2020, this Court again intervened

in the matter. Subsequently, even the appellate proceedings under Section 5 of the Act, 2013 culminated in partial relief in favour of the petitioner on 26.07.2021. However, it is contended that the competent authority failed to comply with the appellate order and instead reiterated its earlier rejected view vide order dated 12.08.2022. When the matter was again carried before this Court in W.P.(C) No. 1812/2023, the petitioner was relegated to statutory remedy, and accordingly, fresh appeal was preferred, which was rejected on 09.02.2024. Thereafter, in W.P.(C) No. 2006/2024, this Court quashed the orders dated 09.02.2024 and 12.08.2022 and remanded the matter for fresh consideration in accordance with law.

9. Learned counsel submits that even after remand, the S.D.O. (Revenue), Dongargarh again sought production of documents on the ground that online records were not available, and though a provisional certificate was issued on 24.07.2024 by the Nayab Tehsildar, the final decision was once again adverse to the petitioner. Ultimately, by the impugned communication dated 16.08.2024 (Annexure-P/1), the application has been rejected on the purported ground of lack of jurisdiction and inability of the petitioner to produce documents prior to 1950 showing ancestral residence within the territorial jurisdiction of Dongargarh. It is strongly contended that the rejection on such ground is ex facie illegal, arbitrary and contrary to the statutory scheme. Learned counsel submits that there is no legal requirement mandating

production of pre-1950 documents for issuance of caste certificate, particularly when sufficient contemporaneous documents, including school records, transfer certificates, family tree, and earlier caste certificate dated 01.09.1993, clearly establish the petitioner's caste status. It is further submitted that the petitioner's father has been shown to be a resident of the region and has educational records indicating admission and study in institutions during 1952–1953, which further corroborate the family's social status. Therefore, the insistence on pre-1950 records is wholly misconceived and dehors the Rules, 2013.

10. Attention is also drawn to Rule 5 of the Rules, 2013, which mandates that deficiencies, if any, must be pointed out within seven days of receipt of application. However, in the present case, the issue of jurisdiction has been raised after nearly five years, which renders the entire process arbitrary, unjust and violative of statutory mandate. It is further submitted that the S.D.O. (Revenue) is the competent authority as per the relevant circular dated 24.09.2013, and therefore, the plea of lack of jurisdiction is wholly unsustainable in law. The belated objection regarding territorial jurisdiction is only an afterthought to defeat the petitioner's rightful claim. He also submits that it is well settled that once a competent authority issues or processes a caste certificate, the same cannot be invalidated merely on technical or territorial objections, and the scope of inquiry under the Act is limited only to verification of genuineness and prevention of fraud,

not repeated harassment of genuine applicants.

- 11.** In view of the above, it is submitted that the petitioner is fully eligible for issuance of a Permanent Social Status Certificate (Caste Certificate) and has been unnecessarily subjected to prolonged litigation and administrative harassment since 2019. Accordingly, it is prayed that this Court may be pleased to issue an appropriate writ, particularly in the nature of mandamus, directing the respondent authorities to issue the Permanent Social Status Certificate to the petitioner forthwith in accordance with law.
- 12.** On the other hand, Mr. Abhishek Gupta, learned Panel Lawyer appearing for the State/respondents, at the outset opposes the submissions advanced by learned counsel for the petitioner and submits that the present writ petition is wholly misconceived, devoid of merit, and is liable to be dismissed at the threshold itself. It is submitted that the petitioner has approached this Court without disclosing complete and correct facts and is seeking issuance of a writ of mandamus in disregard of the statutory scheme governing issuance of social status certificates under the Act, 2013 and the Rules framed thereunder.
- 13.** It is further submitted that the issuance of social status certificate is strictly governed by the statutory framework, wherein Section 4 of the Act, 2013 provides the procedure for issuance of caste certificate, while Section 14 casts the burden upon the applicant

to establish and prove his entitlement to claim such certificate. The Rules, 2013, particularly Rule 3, clearly prescribe the mandatory documents required to be submitted by the applicant, which include proof of caste status, affidavit, family tree, and crucially, documentary evidence establishing ancestral residence within the territorial jurisdiction of the State prior to the prescribed cut-off date. It is submitted that compliance with these statutory requirements is sine qua non, and in their absence, no enforceable right accrues in favour of the petitioner.

14. Reliance has also been placed by the learned Panel Lawyer for the State/respondents on the statutory scheme governing issuance of social status certificates under the Rules, 2013, particularly Rule 3, which mandates submission of complete and verifiable documents, and is exhaustive in nature. It is further submitted that Rule 6 relating to Inability Memo does not dilute the burden of proof cast upon the applicant, but only provides a limited procedural relaxation in cases where documents are not available despite due diligence. Even in such cases, the competent authority is required to conduct a proper inquiry under Rule 8, and the ultimate burden of establishing the claim of social status continues to remain squarely upon the applicant.
15. Reliance is further placed on the settled principle of law laid down by the Hon'ble Supreme Court in ***Director of Tribal Welfare, Government of Andhra Pradesh v. Laveti Giri (1995) 4 SCC***

32, wherein it has been categorically held that the burden of proof as to social status always lies upon the person claiming such status for availing constitutional benefits, and such claim must be strictly established through cogent and reliable documentary evidence. It is submitted that in absence of the mandatory documents prescribed under Rule 3, particularly those relating to ancestral caste and residence prior to the relevant cut-off date, no caste certificate can be issued as a matter of right, as any relaxation would defeat the very object of the legislation. It is further submitted that the impugned action of the competent authority is strictly in accordance with law and based on proper appreciation of statutory requirements. The petitioner has failed to demonstrate any violation of statutory provisions, arbitrariness, or illegality warranting interference under Article 226 of the Constitution of India. Accordingly, it is submitted that the present writ petition, being devoid of merit and substance, deserves to be dismissed.

- 16.** I have heard learned counsel for the parties at length and perused the documents annexed with the writ petition.
- 17.** From perusal of the impugned order dated 16.08.2024, it appears that the application of the petitioner seeking issuance of permanent social status certificate (Mahar caste, Scheduled Caste category) has been rejected by the Office of the Sub-Divisional Officer (R.), Dongargarh, District Rajnandgaon

(Chhattisgarh), on the ground of non-compliance of the requirements under the Rules, 2013.

- 18.** It is reflected from the order that though the petitioner submitted certain documents including school records of her father showing his study at Shaheed Smarak Primary School, Raipur during the period 20.06.1952 to 03.02.1953 along with Transfer Certificate dated 04.02.1953, however, no documentary evidence was produced to establish that the petitioner's ancestors were residing within the territorial jurisdiction of Dongargarh Tehsil prior to the cut-off date of 1950, as mandated under the Rules, 2013.
- 19.** It is further recorded that the competent authority, upon scrutiny of the documents submitted, found that the records rather indicated residence and schooling of the petitioner's father outside Dongargarh Tehsil prior to 1950. It has also been observed that issuance of caste certificate under the Scheduled Caste category can be made only by the competent authority having jurisdiction over the ancestral residence prior to the Presidential notification dated 10.08.1950, and in absence of such foundational proof, the claim of the petitioner cannot be entertained.
- 20.** Accordingly, it has been concluded that since the petitioner failed to establish ancestral residence within the jurisdiction of Dongargarh Tehsil prior to the relevant cut-off date, issuance of permanent social status certificate would be contrary to the statutory provisions of the Rules, 2013. On this basis, the

application of the petitioner has been rejected vide order dated 16.08.2024.

- 21.** At this stage, it is apposite to refer to the statutory scheme governing issuance of social status certificates under the Chhattisgarh Scheduled Castes, Scheduled Tribes and Other Backward Classes (Regulation of Social Status Certification) Act, 2013, and the Rules framed thereunder, namely the Chhattisgarh Scheduled Castes, Scheduled Tribes and Other Backward Classes (Regulation of Social Status Certification) Rules, 2013.
- 22.** In exercise of the powers conferred under Section 9 of the Act, 2013, the Rules, 2013 have been enacted. Chapter II thereof specifically deals with issuance of social status certificates. Rule 3 of the Rules, 2013 lays down the procedure for submission and consideration of application for issuance of certificate on permanent basis. The said Rule 3 of Rules, 2013 reads as follows for easy reference :-

“3. Application for issuance of Certificate.-

(1) The applicant in order to obtain Certificate on permanent basis, shall submit an application to the Competent Authority in FORM-1A.

(2) Applicant shall submit his application to the Competent Authority in person or through post or Choice Centre or a Common Service Centre.

(3) Applicant shall submit along with application following documents, namely :-

“(a) An Affidavit in FORM-2A, in original;

(b) Family tree of the applicant starting from last three generations, duly issued by the Halka Patwari;

(c) Document or self-attested copy of the document verifying that his ancestors were residing in the geographical limits of the State of Chhattisgarh on or before the date of Presidential Notification or the relevant cut-off date;
(d) In cases where applicant is an officer/employee allocated to Chhattisgarh State Cadre or their children, in compliance, of Section 67 of Madhya Pradesh Reorganisation Act, 2000 (No. 28 of 2000), principles laid down in Para (1) and (2) of the Notification dated 23-9-2007 of State Reorganization Cell. Such document or duly attested copies of documents, verifying that-

(i) ancestors of the applicant were residing in the geographical limits of the then State of Madhya Pradesh before or on the Date of Presidential Notification or Notification Date relating to Other Backward Classes, as the case may be;

(ii) they have been allotted to Chhattisgarh State Cadre under Section 67 of the Madhya Pradesh Reorganisation Act, 2000 (No. 28 of 2000).

(e). Any of the following document or self attested copy showing caste of the

applicant's father or ancestor, namely :-

(I) Revenue document of ancestors (case, file);

(II) Jama-Bandi (Survey) or Girdawari;

(III) State Settlement;

(IV) Document of Rights (1954);

(V) Census (1931);

(VI) Survey of Forest Department;

(VII) National Register of Citizens (1949);

(VIII) Register of Birth or Death;

(IX) Admission Register (Dakhil/Kharij), in case father or ancestors were literate;

(X) Caste Certificate, issued earlier to Father, Ancestor or a relative;

(XI) Resolution passed by the Gram-Sabha regarding caste of the applicant where no documentary evidence in proof of caste is available;

(f) Income certificate of preceding year of applicant's father in case of Other Backward Class Applicant;

(g) Envelope having appropriate postage stamp and legible address.

(4) The applicant shall submit original certificates and documents, at the time of verification or whenever required, before the Competent Authority. District level Certificate

*Verification Committee or Scrutiny Committee,
as the case may be.”*

- 23.** From perusal of the aforesaid Rule 3 of the Rules, 2013, it is quite clear that issuance of a Permanent Social Status Certificate is not an automatic or routine exercise, but is a strictly regulated statutory process, contingent upon the applicant satisfying the mandatory requirements prescribed therein. The Rule, in clear and unambiguous terms, casts an obligation upon the applicant to submit a complete application in FORM-1A along with specific foundational documents, which include, inter alia, an affidavit in FORM-2A, family tree verified by the competent revenue authority, and crucially, documentary proof establishing that the ancestors of the applicant were residing within the geographical limits of the State of Chhattisgarh on or before the relevant cut-off date prescribed under the Presidential Notification.
- 24.** A conjoint reading of Rule 3(3)(c) and Rule 3(3)(e) makes it further evident that the legislature has consciously insisted upon production of historical and contemporaneous records such as revenue records, settlement records, census of 1931, birth or death registers, admission registers, earlier caste certificates, and other public documents of unimpeachable authenticity, so as to ensure that the claim of social status is not founded on mere assertion but is duly substantiated by credible documentary evidence tracing the origin of caste status and ancestral residence. The scheme of the Rule thus clearly demonstrates that

the requirement of proving ancestral linkage prior to the cut-off date is not merely procedural but goes to the root of eligibility for issuance of such certificate.

- 25.** Rule 3(4) further reinforces this position by mandating production of original documents at the stage of verification before the competent authority or the Scrutiny Committee, thereby emphasizing the seriousness and evidentiary rigor attached to the process. The statutory framework, therefore, leaves no manner of doubt that the burden squarely lies upon the applicant to establish, through cogent and verifiable material, the foundational facts necessary for recognition of social status under the Act of 2013.
- 26.** Viewed in this light, it becomes manifest that compliance with Rule 3 is a condition precedent for consideration and grant of a permanent social status certificate, and in absence of satisfaction of these statutory requirements, no indefeasible right accrues in favour of the applicant.
- 27.** Rule 6 of the Rules, 2013 provides for submission of an “Inability Memo” in cases where, despite due diligence, the applicant is unable to procure the documents prescribed under Rule 3(3). In such circumstances, the applicant may furnish an affidavit in the prescribed Form-3C, explaining the reasons for non-availability of documents, upon which the competent authority is required to proceed with the inquiry under Rule 8. However, the said

provision does not dilute or absolve the applicant from the substantive burden of establishing his claim of social status in accordance with law. Rule 6 of the Rules, 2013 reads as under:-

“6. Inability Memo.—(1) An applicant belonging to Scheduled Castes or Scheduled Tribes, who has applied for obtaining certificate, in spite of adequate efforts could not get the required document under sub-rule (3) of Rule 3, may give an affidavit about his inability to submit such document in prescribed Form-3C, printed on the back of Return Memo.

(2) On receipt of Inability Memo, the competent authority shall not demand for the required document or documents under sub-rule (3) of Rule 3 and shall proceed to inquire the claim of the applicant under Rule 8:

Provided that the applicant shall present himself during such inquiry before the competent authority or before the inquiry officer and shall extend full cooperation to prove his claim of social status.”

- 28.** A careful reading of Rule 6 makes it manifest that the provision does not dispense with the burden of proof cast upon the applicant. It only provides a limited procedural relaxation in cases where, despite due diligence, certain documents under Rule 3 cannot be procured. Even in such cases, the statutory mandate requires the competent authority to conduct a detailed inquiry under Rule 8, during which the applicant is required to

substantiate his claim by participating in the inquiry and extending full cooperation. Thus, Rule 6 read with Section 14 of the Act, 2013 makes it abundantly clear that the burden of establishing social status is squarely upon the applicant seeking such certificate, and the filing of an Inability Memo does not, in any manner, absolve the applicant from discharging the said burden. The statutory framework, therefore, maintains a clear distinction between procedural relaxation and substantive proof, and the latter continues to remain an essential precondition for issuance of a permanent social status certificate.

- 29.** From perusal of the statutory scheme, it is evident that issuance of social status certificate is strictly governed by the Act, 2013 and the Rules framed thereunder. Rule 3 of the Rules, 2013 mandates the applicant to furnish specific and foundational documents, inter alia, affidavit in Form-2A, family tree issued by the Halka Patwari, and crucially, documentary proof establishing that the ancestors of the applicant were residing within the territorial limits of the State of Chhattisgarh prior to the relevant cut-off date. The requirement of such documents is not directory but mandatory in nature, forming the very basis for determination of social status.
- 30.** It further appears that Rule 6 of the Rules, 2013 provides for an “Inability Memo”, which enables an applicant, who despite due diligence is unable to procure certain documents prescribed under Rule 3, to submit an affidavit explaining such inability. However,

the said provision does not, in any manner, dilute the substantive burden cast upon the applicant to prove his social status. Even in such cases, the competent authority is required to conduct an inquiry under Rule 8, during which the applicant must fully cooperate and establish his claim by cogent material. Thus, Rule 6 only provides a procedural relaxation and not a substantive exemption from proof.

- 31.** It is further relevant to note that Section 14 of the Act, 2013 places the burden of proof squarely upon the person claiming the benefit of social status certificate, thereby reinforcing the settled legal principle that such constitutional benefit must be strictly established by the claimant through reliable and verifiable documentary evidence. In the absence of such foundational proof, particularly with regard to ancestral residence prior to the cut-off date, the competent authority is under no obligation to issue the certificate.
- 32.** From perusal of the record in the present case, it appears that the principal and sole ground on which the petitioner's claim has been rejected is the failure to produce any documentary evidence establishing that the petitioner's ancestors were residing within the territorial jurisdiction of the State of Chhattisgarh, particularly Dongargarh Tehsil, prior to the year 1950, which is the relevant cut-off period prescribed under the statutory framework. The impugned order records that the documents produced, including

school records pertaining to the petitioner's father for the period 1952–1953, only establish subsequent residence outside the concerned jurisdiction and do not satisfy the foundational requirement under Rule 3 of Rules, 2013.

- 33.** It is also the case of the respondents that in absence of any pre-1950 documentary proof indicating ancestral residence within the territorial limits of the State, the claim of the petitioner cannot be verified in accordance with the statutory mandate. The competent authority, therefore, has proceeded to reject the application on the ground of non-fulfilment of mandatory requirements under the Rules, 2013.
- 34.** However, learned counsel for the petitioner submits that certain additional documents, including a document issued by the Union of India dated 10.06.1924 and other supporting records, were placed before the authority, which have not been properly appreciated. It is further contended that reliance placed by the authority on the absence of pre-1950 documents is hyper-technical, particularly when contemporaneous and secondary evidence sufficiently establishes the caste status of the petitioner's family lineage.
- 35.** Having considered the rival submissions advanced at the Bar and upon careful perusal of the entire material available on record, including the pleadings of the parties, the documents annexed with the writ petition, and the impugned order dated 16.08.2024

(Annexure-P/1), this Court finds that the core issue arising for consideration is whether the petitioner is entitled, in law, to issuance of a Permanent Social Status Certificate (Scheduled Caste – “Mahar”) in the facts and circumstances of the present case, and whether the rejection of the petitioner’s claim suffers from any perversity, illegality or arbitrariness warranting interference under Article 226 of the Constitution of India.

- 36.** It is not in dispute that the petitioner has been prosecuting her claim since the year 2019 for issuance of caste certificate and has approached this Court on multiple occasions. It is also evident that despite repeated rounds of litigation, including earlier writ petitions wherein directions were issued for reconsideration of her claim, the competent authority has consistently examined the matter within the framework of the Act, 2013 and the Rules framed thereunder. The record further reveals that even after remand by this Court in W.P.(C) No. 2006/2024, the authority has reconsidered the matter and passed the impugned order dated 16.08.2024, rejecting the claim principally on the ground of non-compliance of Rule 3 of the Rules, 2013 and failure to establish ancestral residence prior to the relevant cut-off date within the jurisdictional limits.
- 37.** The statutory scheme under the Act, 2013, particularly Section 4 read with Section 14, clearly places the burden upon the applicant to establish his/her claim of social status by producing cogent

documentary evidence. Rule 3 of the Rules, 2013 is exhaustive in nature and mandates submission of specific foundational documents, including proof of caste, family genealogy, affidavit, and most importantly, documentary evidence establishing ancestral residence within the State prior to the relevant cut-off date prescribed under law. The requirement is not procedural in nature but goes to the root of entitlement itself.

38. Rule 6 of the Rules, 2013, which provides for submission of “Inability Memo”, only relaxes the requirement of producing certain documents where the applicant, despite due diligence, is unable to procure them. However, even in such cases, the statutory obligation of the competent authority to conduct an inquiry under Rule 8 remains intact, and the ultimate burden of establishing the claim does not shift from the applicant.
39. This legal position has been consistently recognized by the Hon’ble Supreme Court in ***Laveti Giri*** (supra), wherein it has been held that the burden of proof of social status is entirely upon the claimant and must be discharged through reliable and unimpeachable evidence. Further, in ***Kumari Madhuri Patil v. Additional Commissioner, Tribal Development, (1994) 6 SCC 241***, wherein the Hon’ble Supreme Court has held that the process of issuance of caste certificates is a sensitive exercise requiring strict scrutiny, and the authorities are duty-bound to ensure that the constitutional benefits meant for reserved

categories are not misused on the basis of false or unsubstantiated claims.

- 40.** In the present case, the consistent finding recorded by the competent authority is that the petitioner has failed to produce any contemporaneous or historical document establishing that her ancestors were residing within the territorial jurisdiction of Dongargarh or within the State of Chhattisgarh prior to the cut-off date of 1950. On the contrary, the material placed on record indicates that the petitioner's father's educational records reflect his residence and schooling outside the claimed jurisdiction during the relevant period. In absence of foundational evidence satisfying Rule 3 of the Rules, 2013, the authority has concluded that the claim of the petitioner cannot be accepted.
- 41.** The argument advanced on behalf of the petitioner that insistence upon pre-1950 documents is arbitrary cannot be accepted in view of the clear statutory mandate under Section 14 of the Act, 2013 and Rule 3 of the Rules, 2013. The requirement of establishing ancestral linkage prior to the cut-off date is intrinsic to the determination of social status and cannot be diluted by invoking equity or hardship. It is trite law that where the statute prescribes a particular manner of doing an act, the same must be done in that manner alone and not otherwise.
- 42.** It is further significant to note that the impugned order dated 16.08.2024 has been passed after due consideration of earlier

judicial directions as well as the documents submitted by the petitioner. The authority has not acted mechanically but has recorded categorical findings regarding non-satisfaction of statutory requirements. No material has been placed before this Court to demonstrate that such findings are perverse, based on no evidence, or contrary to the statutory provisions.

- 43.** The scope of interference under Article 226 of the Constitution of India in matters relating to caste certification is extremely limited. Unless the decision-making process is shown to be vitiated by arbitrariness, mala fides or violation of statutory provisions, this Court would not sit in appeal over the factual findings recorded by the competent authority.
- 44.** Applying the aforesaid settled principles to the facts of the present case, this Court is of the considered view that the petitioner has failed to demonstrate any illegality or procedural irregularity in the impugned order dated 16.08.2024. The competent authority has acted strictly in accordance with the Act, 2013 and the Rules framed thereunder. The repeated failure of the petitioner to produce the mandatory foundational documents as required under Rule 3 of the Rules, 2013 disentitles her from the relief sought.
- 45.** In view of the foregoing analysis, and considering the statutory scheme, the consistent findings of the competent authority, and the settled position of law laid down by the Hon'ble Supreme Court, this Court does not find any ground to interfere with the

impugned order dated 16.08.2024 (Annexure-P/1). The writ petition, being devoid of merit, is accordingly **dismissed**.

46. There shall be no order as to costs.

Sd/-
(Amitendra Kishore Prasad)
Judge

Yogesh

The date when the judgment is reserved	The date when the judgment is pronounced	The date when the judgment is uploaded on the website	
		Operative	Full
24.04.2026	18.06.2026	-----	18.06.2026