



2026:TSHC:11355
[3257]

**IN THE HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD
(Special Original Jurisdiction)**

**WEDNESDAY, THE TWENTY FOURTH DAY OF JUNE
TWO THOUSAND AND TWENTY SIX**

PRESENT

THE HONOURABLE SMT JUSTICE JUVVADI SRIDEVI

WRIT PETITION NO: 28421 OF 2024

Between:

P.Sheela, d/o P.M Mahesh Aged 36 years, Occ student H.No. 1-75 /3,
Srinivas nagar, Boduppal Municipality, Mandal, Medchal-Malkajgiri District.

...PETITIONER

AND

1. The State of Telangana, rep. by its principal Secretary, Higher Education Department, Secretariat, Hyderabad.
2. The Osmania University, Rep by its Registrar, O.U.Campus, Hyderabad

...RESPONDENTS

Petition under Article 226 of the Constitution of India praying that in the circumstances stated in the affidavit filed therewith, the High Court may be pleased to pass an order, or issue any directions or issue any appropriate writ more particularly in the nature of WRIT OF MANDAMUS declaring the action of the 2nd respondent in rejecting the petitioner's representation dated 25.04.2022 through vide MR.No. 117/PR/Acad/F/OU/2022 dated 30.06.2022, which was submitted in compliance with the directions of this Hon'ble Court in its order dated 18.04.2022 in WP No. 16934 of 2022, as illegal. This rejection has resulted in the cancellation of the petitioner's PhD admission, effectively nullifying her 8 1/2 years of effort due to circumstances beyond her control, such as the COVID-19 pandemic and the discontinuation of her supervisor due to health issues. The petitioner had sought a one-year extension to submit her PhD thesis, which was unjustly denied. This rejection is unlawful, arbitrary, discriminatory, and contrary to the principles of natural justice, as well as violative of Articles 14 and 21 of the Constitution of India. Consequently, set aside the impugned Speaking Order issued under MR.No.



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117/PR/Acad/F/OU/2022 dated 30.06.2022, and direct the 2nd respondent to appoint a new supervisor to enable the petitioner to complete her remaining PhD thesis work, and further extend the deadline for submitting the petitioner's PhD thesis by at least one year from the date of assigning the new supervisor

I.A. NO: 1 OF 2024

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to suspend the impugned Speaking Order issued under MR.No. 117/PR/Acad/F/OU/2022 dated 30.06.2022

I.A. NO: 2 OF 2024

Petition under Section 151 CPC praying that in the circumstances stated in the affidavit filed in support of the petition, the High Court may be pleased to direct the 2nd respondent to appoint a new supervisor to enable the petitioner to complete her remaining PhD thesis work, and further extend the deadline for submitting the petitioner's PhD thesis by at least one year from the date of assigning the new supervisor

Counsel for the Petitioner: SRI. RAMESH CHILLA

**Counsel for the Respondent No. 1: SRI M. VAMSHI KIRAN,
GP FOR EDUCATION**

**Counsel for the Respondent No.2: SRI MALIPEDDI SRINIVAS REDDY,
SC FOR OU**

The Court made the following: ORDER



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IN THE HIGH COURT FOR THE STATE OF TELANGANA
AT HYDERABAD

THE HONOURABLE SMT. JUSTICE JUVVADI SRIDEVI

WRIT PETITION No.28421 of 2024

DATED: 24th JUNE, 2026

Between:

P.Sheela

...Petitioner

AND

The State of Telangana, rep. by its Principal Secretary, Higher
Education Department, Secretariat, Hyderabad and another

...Respondents

ORDER:

This Writ Petition is filed by the petitioner seeking the
following relief:

*"...to pass an order or issue any directions or
issue any appropriate writ more particularly in the
nature of WRIT OF MANDAMUS declaring the
action of the 2nd respondent in rejecting the
petitioners representation dated 25.04.2022
through vide MR No.117/PR/Acad/F/OU/2022
dated 30.06.2022 which was submitted in
compliance with the directions of this Honble
Court in its order dated 18.04.2022 in
W.P.No.16934 of 2022 as illegal This rejection
has resulted in the cancellation of the petitioners
PhD admission effectively nullifying her 8 1/2
years of effort due to circumstances beyond her
control such as the COVID19 pandemic and the*



discontinuation of her supervisor due to health issues The petitioner had sought a oneyear extension to submit her PhD thesis which was unjustly denied This rejection is unlawful arbitrary discriminatory and contrary to the principles of natural justice as well as violative of Articles 14 and 21 of the Constitution of India Consequently set aside the impugned Speaking Order issued under MR No 117/PR/Acad/F/OU/2022 dated 30 06 2022 and direct the 2nd respondent to appoint a new supervisor to enable the petitioner to complete her remaining PhD thesis work and further extend the deadline for submitting the petitioners PhD thesis by at least one year from the date of assigning the new supervisor and pass..."

02. Heard Mr. Ramesh Chilla, learned counsel for the petitioner, Sri Vamshi Kiran.M, learned Assistant Government Pleader appearing for respondent No.1, and Sri Malipeddi Srinivas Reddy, learned Standing Counsel appearing for respondent No.2. Perused the record.

03(a). Aggrieved by the action of the 2nd respondent in rejecting the representation dated 25.04.2022 submitted by the petitioner pursuant to the directions issued by this Court in W.P. No.16934 of 2022, vide order dated 18.04.2022, and the consequential cancellation of her Ph.D. admission, thereby



rendering futile her academic efforts spanning more than eight and a half years, the petitioner has filed the present writ petition.

03(b). Learned counsel for the petitioner submits that the petitioner was admitted to the Ph.D. Programme in the Department of Genetics, Osmania University, on 06.02.2013 pursuant to proceedings dated 30.01.2013. It is contended that the petitioner diligently pursued her research under the supervision of Professor A. Jyothi and successfully completed the substantial portion of her research work, besides complying with all academic and procedural requirements prescribed by the University.

03(c). Learned counsel further submits that during the course of her doctoral research, the petitioner and her family members were severely affected by the COVID-19 pandemic. Owing to the resultant health complications, particularly the post-COVID ailments suffered by the petitioner, she was unable to complete and submit her thesis within the period of six months' extension granted by the University to research scholars admitted prior to the year 2016. Thereafter, the University extended the deadline for submission of theses up to 31.01.2022. According to the learned counsel, after recovering from her health issues, the



petitioner resumed her efforts to complete the thesis and was entitled to avail the benefit of a further extension up to 31.03.2022, which was granted as a one-time measure in view of the extraordinary circumstances arising from the pandemic.

03(d). It is further contended that, at a crucial stage of the research programme, the petitioner's Supervisor, Professor A. Jyothi, who herself was facing serious health issues, expressed her inability to continue as Supervisor and advised the petitioner to seek a change of supervision. Accordingly, on 27.02.2022, the Supervisor issued a No Objection Certificate (NOC) consenting to the transfer of supervision. The said communication was received by the petitioner just one day prior to her scheduled Research Progress Seminar on 28.02.2022.

03(e). Learned counsel submits that the petitioner, being left without a Supervisor, immediately submitted a representation dated 15.03.2022 to the Vice-Chancellor seeking appointment of a new Supervisor and grant of extension of time for completion of her Ph.D. programme. However, no action was taken by the University on the said representation, thereby compelling the petitioner to approach this Court by filing W.P. No 16934 of 2022.



03(f). It is further submitted that the University Grants Commission (UGC), through its Public Notice dated 01.12.2021, extended the last date for submission of theses by terminal M.Phil./Ph.D. students up to 30.06.2022 in view of the disruptions caused by the COVID-19 pandemic. Despite the said relaxation, the University failed to extend the benefit thereof to the petitioner. Learned counsel contends that closure of laboratories and restrictions imposed during the pandemic had severely hampered the progress of the petitioner's research work, thereby preventing her from completing the thesis within the stipulated time.

03(g). Learned counsel further submits that the petitioner had already completed more than 80% of her research work and had invested over eight and a half years in pursuit of her doctoral programme. However, due to circumstances beyond her control, namely the pandemic-induced disruptions and the sudden relinquishment of supervision by her Guide, she was unable to submit the thesis within the prescribed period. It is contended that the absence of a Supervisor effectively prevented the petitioner from proceeding with the remaining academic formalities, including presentation of the requisite seminar and final submission of the thesis.



03(h). It is further submitted that this Court, while disposing of W.P. No.16934 of 2022, directed the University to consider the petitioner's request for appointment of a new Supervisor and grant of extension of time. Pursuant thereto, the petitioner submitted a detailed representation dated 26.04.2022. In the meanwhile, the UGC issued a notification dated 01.02.2021 and subsequently passed a Resolution dated 06.05.2022 authorising Universities and Higher Educational Institutions to grant further extensions to research scholars on a case-to-case basis in view of the pandemic situation. However, according to the learned counsel, the respondents failed to consider the petitioner's case in the light of the aforesaid UGC guidelines and the directions issued by this Court and instead proceeded to reject her representation by relying upon outdated regulations.

03(i). Learned counsel contends that the 2nd respondent failed to appoint a new Supervisor despite the No Objection Certificate issued by the erstwhile Supervisor and notwithstanding the specific directions issued by this Court. Such inaction on the part of the University deprived the petitioner of the opportunity to complete the remaining academic requirements and continue her research work. Consequently, the petitioner has been unjustly



denied the opportunity to complete her Ph.D. programme despite having made substantial progress in her research.

03(j). It is also contended that the action of the respondents is arbitrary and discriminatory inasmuch as, while seeking to cancel the petitioner's admission after a period of eight and a half years, the University had allegedly permitted several other research scholars to submit their theses after considerably longer periods ranging between 20 and 29 years. According to the learned counsel, such differential treatment is violative of Article 14 of the Constitution of India and cannot be sustained in law. Hence, according to the learned counsel for the petitioner, the petitioner is entitled to a further extension of one year for submission of her Ph.D. thesis and completion of the doctoral programme. It is therefore prayed to set aside the impugned proceedings rejecting the petitioner's representation and direct the respondents to appoint a new Supervisor and grant reasonable extension of time to enable the petitioner to complete and submit her Ph.D. thesis.

04(a). Respondent No.2 has filed a counter affidavit opposing the writ petition and contending that the relief sought by



the petitioner is contrary to the Ph.D. Rules and Regulations of Osmania University. It is stated that, pursuant to the interim order dated 18.04.2022 passed by this Court in W.P.No.16934 of 2022, the representation submitted by the petitioner seeking extension of the duration of her Ph.D. registration by one year was duly considered by the competent authorities. However, the same could not be acceded to in view of the statutory provisions governing Ph.D. admissions and registrations.

04(b). It is contended that, under Rule 12(2) of the Ph.D. Rules and Regulations of Osmania University, upon the recommendations of the Supervisor(s), the Chairperson and the Head of the Department, the Dean may grant extension of the Ph.D. registration of a candidate for a period not exceeding one year at a time, subject to an overall maximum extension of four (4) years in the case of full-time research scholars and three (3) years in the case of part-time research scholars. The said Rule further stipulates that the registration of a research scholar, whether full-time or part-time, shall automatically stand cancelled upon expiry of the maximum permissible period of eight (8) years.



04(c). Respondent No.2 further submits that, after the expiry of the maximum period of eight years, the Ph.D. thesis of a candidate cannot be accepted under any circumstances. It is stated that a candidate whose registration stands automatically cancelled upon completion of the prescribed maximum period may seek fresh admission into the Ph.D. programme by undergoing the admission process afresh, including attendance of Ph.D. course work and completion of the prescribed course work examination. Such a candidate, however, forfeits any claim to hostel accommodation.

04(d). It is further stated that, in view of the extraordinary circumstances arising out of the COVID-19 pandemic and pursuant to the UGC Public Notice bearing F.No.1-10/2020 (CPP-II), dated 16.03.2021, the University had extended the last date for submission of M.Phil./Ph.D. theses vide proceedings dated 31.12.2021 in respect of all candidates who were eligible to submit their theses by 31.12.2020 and thereafter, subject to compliance with the applicable Rules and Regulations governing their respective batches.



04(e). Respondent No.2 further submits that, in the interest of research scholars, the University issued proceedings dated 28.11.2021 extending the last date for submission of Ph.D. theses by one month, i.e., up to 31.01.2022, by way of a grace period. Thereafter, vide proceedings dated 28.01.2022, the said deadline was further extended from 31.01.2022 to 31.03.2022 as a "one-time chance" in view of the continuing effects of the COVID-19 pandemic.

04(f). It is contended that, despite the University granting sufficient opportunities and extensions for submission of the thesis, the petitioner failed to submit her thesis within the stipulated time. Therefore, having failed to comply with the prescribed time limits, the petitioner cannot claim any further extension as a matter of right. Respondent No.2 further relies upon the remarks furnished by Professor A. Jyothi, the Research Supervisor of the petitioner. According to the said remarks, the petitioner had not been attending the Institute since December, 2018. It is stated that the petitioner had presented her Research Design Seminar in March, 2015; however, she did not present the subsequent seminar as her research work had not been completed within the prescribed time frame.



04(g). It is further contended that the petitioner remained absent for nearly three years without informing her Research Supervisor. Thereafter, after a considerable lapse of time, she reappeared and expressed her intention to submit the thesis solely on account of the deadline fixed by the University authorities. The Research Supervisor also informed the Dean that, in the circumstances, it was not feasible to scrutinize, verify and make necessary corrections to the thesis within a period of two weeks. Hence, the petitioner failed to comply with the mandatory requirements of the Ph.D. programme and the applicable Rules and Regulations governing thesis submission. It is therefore submitted that no illegality or arbitrariness can be attributed to the action of the University in rejecting the petitioner's request for extension and that the writ petition is devoid of merit. Accordingly, he prayed for dismissal of the writ petition.

05. Having considered the submissions made by the learned counsel on either side and upon perusal of the material available on record, the undisputed facts reveal that the petitioner was admitted into the Ph.D. programme in the Department of Genetics, Osmania University, pursuant to proceedings dated



30.01.2013. As per Rule 12(2) of the Ph.D. Rules and Regulations of Osmania University, the registration of a research scholar automatically stands cancelled upon expiry of the maximum permissible period of eight years and, thereafter, submission of a Ph.D. thesis cannot be accepted under any circumstances. The said Rule further provides that a candidate whose registration stands cancelled may seek fresh admission by complying with the prescribed requirements.

06. It is not in dispute that the petitioner completed eight years from the date of registration during the year 2021. However, in view of the extraordinary situation arising out of the COVID-19 pandemic, the University granted relaxation and extended the last date for submission of Ph.D. thesis from time to time. Initially, the benefit of the UGC Public Notice dated 16.03.2021 was extended to eligible candidates. Thereafter, the University granted a grace period up to 31.01.2022 and subsequently by Order dated 28.01.2022 extended the last date for submission of thesis up to 31.03.2022 as a "One Time Chance". For proving her contention that she was affected by COVID-19, the petitioner relied upon a medical certificate issued by Shraddha Hospital. However, a perusal of the said certificate



reveals that she was merely advised to take bed rest for a period of one week. Therefore, the certificate, by itself, is insufficient to establish that the petitioner was incapacitated for such a prolonged period as to prevent her from completing and submitting her Ph.D. thesis within the extended time granted by the University.

07. It is the case of the petitioner that she was unable to submit the thesis on account of the COVID-19 pandemic, health complications suffered by her and her family members, closure of laboratories, and the inability of her Supervisor, Professor A. Jyothi, to continue supervision on medical grounds. However, the material placed on record does not establish that the petitioner was diligently pursuing her research work throughout the relevant period. On the contrary, the counter affidavit discloses that, as per the remarks of the Research Supervisor, the petitioner had not attended the Institute since December, 2018. It is further stated that the petitioner had presented her Research Design Seminar in March, 2015 and thereafter did not present the subsequent seminar on the ground that her research work was not completed. The Supervisor specifically recorded that the petitioner remained absent for nearly three years without



informing the Supervisor and, after a considerable lapse of time, sought to submit the thesis only when the University had prescribed a final deadline. These factual assertions have not been effectively controverted by the petitioner.

08. Further, the record discloses that the petitioner sought change of Supervisor only at the fag end of the extended period granted by the University. The inability of the existing Supervisor to continue guidance at such a belated stage cannot confer upon the petitioner any vested right to seek an indefinite extension of her registration contrary to the statutory Rules and Regulations governing the Ph.D. programme. Therefore, the contention of the petitioner that she was prevented from submitting her thesis solely because her Supervisor issued a No Objection Certificate on 27.02.2022, has no water.

09. The communications issued by the UGC merely enabled Universities to consider grant of extension of time in appropriate cases. They neither mandated grant of extension as a matter of right nor overrode the statutory Ph.D. Rules and Regulations framed by the University. The question as to whether



a particular candidate is entitled to extension of time squarely falls within the academic domain of the University authorities.

10. It is a settled principle of law that Courts exercising jurisdiction under Article 226 of the Constitution of India ordinarily refrain from interfering with academic decisions unless such decisions are shown to be arbitrary, mala fide, irrational, or in violation of any statutory provision. In the present case, the impugned proceedings dated 30.06.2022 disclose that the representation submitted by the petitioner was duly considered by the competent authorities in the light of the applicable Rules and Regulations. The request was rejected primarily on the ground that the maximum permissible period prescribed under the Ph.D. Regulations had already expired and that no further extension could be granted under the governing Regulations.

11. It is also pertinent to note that the petitioner had earlier initiated contempt proceedings in C.C.No.829 of 2022 alleging deliberate violation and wilful disobedience of the order dated 18.04.2022 passed in W.P.No.16934 of 2022. The said contempt case was subsequently closed by order dated 12.10.2022. This fact further demonstrates that the grievance



regarding non-consideration of her representation had already been agitated before the appropriate forum.

12. In view of the above discussion, this Court is of the considered opinion that the petitioner has failed to establish any illegality, arbitrariness, mala fides or violation of principles of natural justice in the impugned proceedings dated 30.06.2022 warranting interference under Article 226 of the Constitution of India.

13. Accordingly, this Writ Petition is dismissed. There shall be no order as to costs.

As a sequel, pending miscellaneous applications, if any, shall stand closed.

SD/- A.H.S.GOWRI SHANKAR
ASSISTANT REGISTRAR

//TRUE COPY//

SECTION OFFICER

To,

1. One CC to SRI. RAMESH CHILLA Advocate [OPUC]
2. Two CCs to GP FOR EDUCATION High Court for the State of Telangana, at Hyderabad [OUT]
3. One CC to SRI. MALIPEDD SRINIVAS REDDY. SC FOR OU [OPUC]
4. Two CD Copies

BM
TKS



2026:TSHC:11355

CC TODAY

HIGH COURT

DATED: 24/06/2026

ORDER

WP.No.28421 of 2024



DISMISSING THE WRIT PETITION WITHOUT COSTS

(7) (SPS)
2/8/26