

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CIVIL APPELLATE JURISDICTION**

WRIT PETITION NO. 3208 OF 2026

Aditya Sisodia

...Petitioner

Versus

The State Of Maharashtra Thr Sec. Dept.
Of Higher Technical Education And Ors

...Respondents

Dr. Uday Warunjikar, a/w Adv. Hrishikesh Nabar, Adv. Sumit Kate, a/w Adv. Sakshi Inamdar, for the Petitioner.

Adv. Pooja Patil, AGP for State.

Adv. Rajendra Anbhule, for Respondent No. 2.

Adv. Shailendra S. Kanetkar, a/w Adv. R.M. Gogte, for Respondent No. 4.

**CORAM : R. I. CHAGLA AND
ADVAIT M. SETHNA, JJ.**

DATED : 17th APRIL, 2026

P.C.:-

1. Having heard the learned counsel for the parties, the urgency for moving the present writ petition has been expressed by Mr. Warunjikar, the learned counsel appearing for the Petitioner.

2. The Petitioner has completed the fourth year of the five-year B.A. LL.B. programme at Respondent No. 4 – College. While attempting to fill out the examination form for the fifth year (Semester IX) in November 2022, the Petitioner had been confronted with unforeseen technical impediment, as the website displayed a notification stating that the PRN (Permanent Registration Number) registered in the Petitioner's name had

expired.

3. The Petitioner submitted a representation to Respondent No. 2 – University on 3 October 2025 seeking issuance of the PRN. Due to the non-resolution of the PRN issue, the Petitioner has been unable to appear for the Semester IX examination of the fifth-year program. The Petitioner also addressed a further representation on 28 February 2026 to Respondent No. 2 – University seeking urgent intervention, which, according to the Petitioner, remains undecided.

4. Mr. Warunjikar submitted that the Petitioner was constrained to file the present writ petition seeking directions for issuance and validation of the PRN in the Petitioner's name, for admission to the fifth year, and for grant of liberty to fill out the examination form and appear for the examination within such period as this Court may deem fit and proper.

5. Mr. Warunjikar has drawn the Court's attention to the averments in the affidavit in reply filed by Respondent No. 2, particularly paragraph 4 thereof, wherein it is stated that the UGC guidelines provide under Clause 2(a) that the "time span = $N + 2$ years" for completion of a program, where 'N' stands for the normal or minimum duration prescribed for completion of the program. A further extension of one year may be granted in exceptional circumstances, which must be specified by the relevant statutory authority of the University. He submitted that the Respondent No. 2 – University has stated that the UGC guidelines have been made

applicable from the academic year 2016–17 vide letter dated 17 September 2019, and that the revised curriculum was amended in July 2019. He contended that, since the Petitioner was admitted to Respondent No. 4 – College in the academic year 2017–18, the UGC guidelines cannot be applied retrospectively to the Petitioner’s case. He further submitted that, from the letter dated 17 September 2019, the UGC itself recognizes completion of the program as $M = N + 2$ (where M stands for Max duration to complete the programme). He also submitted that for students who have failed examinations, the UGC has considered a ten-year time span for completion of the program.

6. Mr. Warunjikar also referred to the Revised Curriculum of Undergraduate Degree Courses in Law for 2017–18, as amended in July 2019, which under Clause 6 provides that a student of the B.A. LL.B. course, in order to become eligible for the award of the degree, must pass all subjects divided into ten semesters within a span of ten academic years, including the academic year in which he or she was admitted to the first year of the course.

7. Mr. Warunjikar submitted that, since the Petitioner was admitted to the B.A. LL.B. program at Respondent No. 4 – College in the academic year 2017–18, the ten-year span for completion of the course has not expired, and the Petitioner is entitled to complete the program by appearing for the ninth and tenth semester examinations of the fifth year.

8. Mr. Anbhule, learned counsel appearing for Respondent No. 2, opposed the grant of any ad-interim or interim relief on the ground that the UGC guidelines provide for $N + 2$ years for completion of the program and extension of one year may be granted in exceptional circumstances. This was approved at the meeting of the Academic Council of the Respondent University held on 21 January 2016. He submitted that the UGC guidelines have been made applicable from the academic year 2016–17 and are therefore applicable to the Petitioner, who secured admission in the academic year 2017–18.

9. Having taken note of the issue raised in the present petition, which concerns the applicability of the UGC guidelines and whether they can be applied retrospectively, it would be appropriate to hear the present petition at the admission stage. This issue is likely to affect a number of students who secured admission prior to the applicability of the UGC guidelines, particularly if the Petitioner's contention that the guidelines were made applicable only from the year 2019 and cannot be applied retrospectively from the academic year 2016–17 is accepted.

10. In view thereof, and considering the peculiar circumstances of the present case that the Petitioner has completed four years of the five-year B.A. LL.B. program at Respondent No. 4 – College within the time span of $M = N + 2$ as per the UGC guidelines themselves and that, according to the Petitioner, one year remains for completion of the program.

11. The Respondents are directed to validate the PRN registered in the name of the Petitioner and to allow the Petitioner to fill out the examination forms and appear for the fifth-year B.A. LL.B. examinations, subject to the outcome of the present petition and further orders, and without creating any equities in favour of the Petitioner.

12. In view of the above directions, Respondent No. 1 shall register/validate the PRN in the name of the Petitioner within a period of one week from the date of this order. Upon such registration/validation, the Petitioner shall apply for filling out the examination form within one week thereafter, and Respondent No. 2 – University shall permit the Petitioner to do so.

13. The Respondents, if they so desire, shall file an affidavit in reply to the present writ petition within a period of three weeks from today.

14. The Petitioner is at liberty to file an affidavit in rejoinder on or before 9 June 2026.

15. Place the writ petition for hearing at the admission stage on 11 June 2026.

[ADVAIT M. SETHNA, J.]

[R.I. CHAGLA, J.]