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W.P. No. 6313/2026

**IN THE HIGH COURT OF MADHYA PRADESH
AT INDORE**

BEFORE

HON'BLE SHRI JUSTICE JAI KUMAR PILLAI

WRIT PETITION No. 6313 of 2026

PARTH SINGH RAJAWAT

Versus

THE STATE OF MADHYA PRADESH AND OTHERS

Appearance:

Shri Ashish Choubey - Advocate for the petitioner

*Shri Kushagra Singh – Deputy Government Advocate for the
respondents State.*

*Shri Vivek Sharan – Senior Counsel with Shri Rahul
Maheshwari – Advocate for the respondent No.2.*

Reserved on : 12/03/2026

Post on :17 /03/2026

ORDER



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This writ petition under Article 226 of the Constitution of India has been instituted by the petitioner seeking a writ in the nature of Certiorari to quash the impugned communication dated 30.01.2026 (Annexure-P/7) issued by Respondent No. 2, whereby the petitioner has been placed under the “YD” (Year Down) category. The petitioner further seeks a writ in the nature of Mandamus to direct the respondents to permit him to continue his studies in the Second Year (Fourth Semester) of the Bachelor of Business Administration (Banking, Financial Services and Insurance Management) programme.

Facts of the Case

2. The factual matrix of the case, as pleaded, is that the petitioner was admitted to Respondent No. 2 – Symbiosis University of Applied Science, Indore, an institution established under the Madhya Pradesh Niji Vishwavidyalaya Adhiniyam, 2007, for the academic session commencing in 2024. The petitioner successfully qualified the First Year examinations, securing a Semester Grade Point Average (SGPA) of 6.875.



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3. During the third semester, the petitioner's attendance fell below 30%. Taking note of this, the Respondent University, vide communication dated 08.09.2025, granted the petitioner an opportunity to attend remedial classes for two weeks to make good the academic deficiency. The petitioner attended the said classes and subsequently appeared in the First Unit Test.

4. Thereafter, the Respondent University issued a communication dated 14.11.2025, cancelling the petitioner's admission for the Academic Year 2025-2026 on the premise that the petitioner remained absent in the Unit Tests and his overall attendance fell below the minimum prescribed requirement. The petitioner submitted a detailed representation on 24.11.2025 against the said cancellation, which remained undecided.

5. Aggrieved by the inaction, the petitioner approached this Court by filing W.P. No. 46548/2025. Vide order dated 14.12.2025, this Court disposed of the said petition by taking into account a proposal given by the Pro-Chancellor of the University, directing the management to permit the petitioner to appear in the III Semester Examination commencing from 15.12.2025.



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6. In compliance with the aforesaid judicial direction, the petitioner appeared in the Examination. However, without declaring the result of the said examination, respondent No. 2 issued the impugned communication dated 30.01.2026, categorizing the petitioner as "YD" (Year Down).

Contentions of the Petitioner

7. It is contended on behalf of the petitioner that the impugned action is ex facie contrary to Clause 3.6 of the Student Handbook issued by the University itself. The petitioner asserts that the "YD" categorization implies a failure to satisfy prescribed criteria, which cannot be lawfully determined without first declaring the Examination results. Furthermore, it is contended that since the University itself proposed permitting the petitioner to appear in the Examination, the subsequent arbitrary categorization is hit by the doctrine of legitimate expectation and promissory estoppel.

Contentions of the Respondents

8. *Per contra*, the stand emerging from the respondents is that the petition is opposed in its entirety. It is the case of the respondents that the actions taken by the University, including the issuance of



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the impugned communication, are strictly in accordance with the governing academic Rules, and the petitioner is not entitled to any relief.

Analysis and Conclusion

9. Heard the rival contentions and perused the record. The core controversy in the present petition revolves around the justification and legality of the respondent University's action in placing the petitioner in the "YD" (Year Down) category vide the impugned communication dated 30.01.2026.

10. To adjudicate the legality of the impugned action, it is imperative to examine the exact rules governing the evaluation system and academic progression, as framed by the respondent University. The Student Handbook for the Academic Year 2025-26, which is binding upon both the Institution and the student, explicitly dictates the criteria for promotion. Clause 3.6 of the Handbook, titled "Rules for Granting Term, Term Not Granted (TNG) and Year Down (YD)", enumerates the mandatory academic requirements as follows:



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“3.6.1 Criteria 1: 100% attended for Skills and Practical and 75 % in Lecture and Tutorials.

3.6.2 Criteria 2: Completed term work of all subjects, i.e. project, skills, and practical journal, internship report and should be duly signed by the concerned subject teacher and also attending and passing all Unit Test.

3.6.3 Criteria 3: Earned at least 50 % credits of Current Academic Year (CAY) & 100 % credits of CAY-2 (E.g. all clear in First Year for Third year admission)”

11. The consequences of failing to meet the aforementioned criteria are further codified in the same clause under the specific heading of "YD", which reads verbatim as under:

“YD — A student who fails to fulfill Criteria 1 and Criteria 2 or Criteria 3 then he/she cannot be promoted to the next academic Semester/Year. Such student will not be permitted to proceed to the subsequent Semester/Year and will be required to complete the semester by taking re-admission in the next academic year with the junior batch and fulfill Criteria 2. He/she needs to appear for a backlog examination and is required to earn the necessary credits as mentioned in Criteria 3 to become eligible for next Academic Year”



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12. A plain reading of the aforesaid statutory stipulations makes it abundantly clear that the mandate of the University regulations is absolute. For a student to be promoted, they must fulfill the minimum prescribed attendance (Criteria 1) and successfully complete the continuous evaluation components, including attending and passing all Unit Tests (Criteria 2). The "YD" rule explicitly states that a failure to fulfill Criteria 1 and Criteria 2 renders the student ineligible for promotion.

13. Applying these exact rules to the admitted facts of the present case, it is an undisputed position on record that the petitioner's attendance during the third semester had fallen to below 30%, which is in gross violation of the 75% mandate prescribed under Clause 3.6.1 (Criteria 1). Furthermore, the University's communication dated 14.11.2025 categorically recorded that the petitioner remained absent in the First Unit Test as well as the Second Unit Test. Consequently, the petitioner unequivocally failed to satisfy the condition of "attending and passing all Unit Test" as rigidly required under Clause 3.6.2 (Criteria 2).

14. The petitioner's contention that the "YD" status could not be invoked without declaring the end-semester examination result is



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misconceived and runs contrary to the scheme of the Handbook. The failure to fulfill Criteria 1 (attendance) and Criteria 2 (Unit Tests) operates as a distinct and independent bar to academic progression. The rule governing "YD" is triggered by the failure to fulfill these continuous evaluation metrics, irrespective of the outcome of the end-semester examination.

15. Furthermore, the argument that the interim permission granted by this Court vide order dated 14.12.2025 in W.P. No. 46548/2025 acts as an estoppel against the University is legally untenable. An interim or ad-hoc arrangement permitting a student to merely appear in an examination does not, and cannot, operate to wash away or waive the substantive statutory academic deficiencies—namely, the drastic shortfall in attendance and the failure to appear in mandatory Unit Tests. The mandate of the Rule remains undisturbed.

16. In view of the rigorous and unambiguous phraseology of Clause 3.6 of the Student Handbook, this Court finds that the respondent University had no alternative but to classify the petitioner as "YD". The impugned order dated 30.01.2026 is,



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therefore, a natural, necessary, and lawful corollary of the petitioner's failure to satisfy Criteria 1 and Criteria 2.

17. The action of the respondents is found to be strictly in consonance with the governing academic rules. No case of arbitrariness, unreasonableness, or violation of principles of natural justice is made out to warrant interference by this Court in the exercise of its extraordinary jurisdiction under Article 226 of the Constitution of India.

18. Consequently, the writ petition, being devoid of merit, fails and is hereby **dismissed**.

Pending applications, if any, shall all stands disposed of, accordingly.

No order as to costs.

(Jai Kumar Pillai)
Judge

rashmi*PS