



RAJASTHAN HIGH COURT

**HIGH COURT OF JUDICATURE FOR RAJASTHAN
BENCH AT JAIPUR**

सत्यमेव जयते

S.B. Civil Writ Petition No. 2675/2026
CNR: RJHC020123712026 | URN: CW / 5790U / 2026



-----Petitioner

Versus

- 1
- Consortium Of National Law Universities, Through Its President, P.o. Bag 7201, Nagarbhavi, Bangalore-560 072 Karnataka, India.
- 2
- National Law University, Jodhpur, Through Its Registrar, Nh-62, Nagour Road, Mandore, Jodhpur 342304 (Raj.)
- 3
-
- 4
-

-----Respondents

For Petitioner(s)

:

Mr. Abhishek Sharma

For Respondent(s)

:

Mr. Rishabh Khandelwal
Mr. Shivangshu Naval with
Ms. Kriti Kasera &
Ms. Aayushi Jain

HON'BLE MR. JUSTICE MANEESH SHARMA

Order

1.	Date of conclusion of Arguments	03.09.2026
2.	Date on which the order was reserved	03.09.2026
3.	Whether the full order or only operative part is pronounced	Full
4.	Date of pronouncement	10.09.2026

1. This matter has been listed on an application (I.A. No. 1 of 2026) filed by the respondents seeking vacation of the interim order dated 11.02.2026.

(D.B. SAW/1150/2026 has been filed in this matter. Please refer the same for further orders)

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2. With the consent of learned counsel for the parties, and rather than confining the hearing to the said application, the writ petition itself has been taken up for final disposal on merits.

3. The petitioner has invoked the writ jurisdiction of this Court to assail the e-mail/order dated 08.01.2026 issued by the respondents, whereby her request to change her reservation category from "Unreserved - Women" to "General Category - Rajasthan Domicile (GC-RJ)" was declined.

4. The petitioner has sought the following reliefs:

"It is, therefore, most humbly prayed that this Hon'ble Court by way of appropriate writ, order or direction may kindly be pleased to accept and allow this writ petition, call for the entire record of the case and;

- (i) That the Hon'ble Court may kindly quash and set aside the e-mail/order 08.01.2026 passed by the respondents denying the petitioner to change the reservation category for GC-RJ as domicile of State of Rajasthan.*
- (ii) That the Hon'ble Court may kindly direct the respondents to consider the candidature of the petitioner under GC-RJ Category and direct the respondents to extend admission in 5 years law course (BBA, LL.B. (Hons.)) at NLU, Jodhpur as per her All India Rank.*
- (iii) Any other appropriate relief which this Hon'ble Court deems fit in the interest of justice in the facts and circumstances of the case in favor of the petitioner may kindly be passed.*
- (iv) The cost of the Writ Petition may kindly be awarded in favor of the Petitioner."*

A. FACTUAL MATRIX

5. Shorn of unnecessary details, the facts giving rise to the present writ petition are that the petitioner, having passed her Senior Secondary Examination (CBSE) in the year 2025, applied to appear in the Common Law Admission Test (CLAT) 2026, conducted by the Consortium of National Law Universities for admission to the five-year integrated undergraduate law course.





6. While filling up the online application form, the petitioner applied under the Unreserved (General) Category and claimed reservation under the 'Women' category. She did not, however, claim reservation under the General Category - Rajasthan Domicile (GC-RJ) category in her original application form.

7. The petitioner appeared in the CLAT-2026 examination held on 07.12.2025. On declaration of the result, she secured 94.25 marks, an All India Rank (AIR) of 649 in the General Category and a category rank of 309 in the Women category. She thereafter participated in the admission counselling process.

8. After the first round of counselling, the respondents published a provisional list in which the last candidate selected against the GC-RJ category for NLU, Jodhpur had secured AIR 562. On realising that her candidature was not being considered under the State domicile category, the petitioner addressed an e-mail dated 08.01.2026 to respondent No. 1, attributing the omission to an inadvertent error/technical glitch, enclosing her domicile certificate, and requesting that her candidature be considered under the GC-RJ category and that a domicile rank be assigned to her.

9. By reply e-mail of even date, i.e. 08.01.2026, respondent No. 1 declined the request, clarifying that since the petitioner had not applied under the Rajasthan Domicile category in her original application form, her reservation category could not be altered at a belated stage, after expiry of the stipulated deadline, in terms of the governing circulars and guidelines.





10. The petitioner's further grievance arises from the provisional second list issued in the second round of counselling, in which the last candidate selected against the GC-RJ category had secured AIR 654, that is, a rank lower in merit than the petitioner's AIR of 649.

11. Aggrieved, the petitioner has preferred the present writ petition.

12. It is also relevant to note that a Co-ordinate Bench of this Court, by order dated 11.02.2026, passed the following interim direction:

"Till next date of hearing, one seat be kept vacant for admission to the petitioner in BBA LL.B. (Hons.) course in National Law University at Jodhpur if any candidate lower in merit to the petitioner has been accorded admission or the seat is lying vacant."

B. SUBMISSIONS ON BEHALF OF THE PETITIONER

13. Learned counsel for the petitioner submits that the petitioner's candidature under the GC-RJ (Rajasthan Domicile) category has been denied arbitrarily, even though she is a bona fide resident of the State of Rajasthan and holds a domicile certificate to that effect. He submits that, despite securing AIR 649, she has been excluded from consideration for admission to NLU, Jodhpur, whereas the last candidate considered for that University had secured a lower rank, namely AIR 654. He further submits that, in terms of Clause 1.5.1.4 of the Notification dated 17.12.2025, a candidate may update her preferences for the desired University any number of times until the closure of counselling registration. He lastly submits that, pursuant to the interim order dated 11.02.2026, NLU, Jodhpur has, by its





communication dated 07.08.2026, kept one seat vacant, and that the petitioner may accordingly be granted admission against that seat. He therefore prays that the writ petition be allowed.

13.1. In order to buttress his submissions, he places reliance upon the judgments passed by Division Benches of this Court at Principal Seat, Jodhpur, in the matters of **Indra Vs. Union of India & Ors.**¹ and **Reena Choudhary Vs. State of Rajasthan & Ors.**².

C. SUBMISSIONS ON BEHALF OF THE RESPONDENTS

14. Learned counsel for the respondents submits that the refusal to alter the petitioner's category is consistent with the policy applied uniformly to all candidates. He submits that the petitioner's application form makes it clear that she applied under the General category and claimed reservation only under the 'Women' category. He further submits that, by press release dated 20.07.2025, 31.10.2025 was notified as the last date for submission of applications, and that, by notification dated 05.11.2025, 09.11.2025 was notified as the last date for corrections to the application form. Admittedly, the petitioner did not correct her reservation category on or before the cut-off date of 09.11.2025, and she cannot be permitted to change her category at a belated stage, that is, after declaration of the result. He accordingly prays that the writ petition be dismissed.

15. Learned counsel for respondent No. 4 has adopted the same submissions and has likewise prayed for dismissal of the writ petition.

1 D.B. Civil Writ Petition No.15529 of 2025, dated 16.09.2025
2 D.B. Special Appeal Writ No.1175 of 2024, dated 02.01.2025





16. In order to buttress their submissions, learned counsel for the respondents places reliance upon the judgments passed by the High Court of Delhi in ***Sharanya Kaja Vs. Directorate General of Health Services & Ors.***³, ***Ms. Aadya Yadav Vs. Union of India & Anr.***⁴, the judgment passed by the High Court of Kerala at Ernakulam in ***Govardhan S. Vs. CLAT Consortium of NLU***⁵ & ***Anr.***, and the judgment passed by a Division Bench of this Court at Principal Seat, Jodhpur, in ***Piyush Kaviya & Ors. Vs. The Rajasthan Public Service Commission & Ors.***⁶.

17. Heard learned counsel for the parties and perused the material available on record.

D. ANALYSIS AND FINDINGS

18. The core controversy in the present matter is whether the petitioner may be permitted to change her reservation category to General Category – Rajasthan Domicile (GC-RJ) after expiry of the stipulated deadline for correction of the application form and after declaration of the result. It is an admitted position that, in her original online application form, the petitioner opted only for the Unreserved (General) Category and reservation under the 'Women' category, and did not claim reservation under the GC-RJ category.

19. It is not disputed by the petitioner that, by press release dated 20.07.2025, the last date for submission of applications was notified as 31.10.2025, and that she did not apply under the GC-RJ category within that period. It is equally undisputed that, by

3 W.P. (C) 1189/2022, dated 04.02.2022

4 W.P. (C) 496/2021, dated 13.01.2021

5 W.P. (C) No.290/2023, dated 22.06.2023

6 D.B. Special Appeal Writ No.198/2018, dated 10.04.2018





Notification dated 05.11.2025, candidates appearing in CLAT-2026 were afforded an opportunity to correct their application forms on or before 11:59 p.m. on 09.11.2025. The relevant portions of the press release dated 20.07.2025 and the Notification dated 05.11.2025 read as under:

PRESS RELEASE DATED 20.07.2025:

*"The Executive Committee and the Governing Body of the Consortium of National Law Universities (the "Consortium") at their Meetings held on July 20th, 2025 decided that the **Common Law Admission Test (CLAT) 2026 shall be conducted on Sunday, December 7th 2025, from 2 PM-4 PM.***

*The portal for applying for the CLAT 2026 will become functional from the **1st of August 2025 and will remain so until 31st October 2025**, the last date of application for **CLAT 2026.***

Further details regarding the syllabus, application and counselling process shall be released shortly."

NOTIFICATION DATED 05.11.2025

*"CLAT 2026 candidates have been provided an opportunity to edit their test location preferences indicated in the application form on or before **11.59 P.M. on November 09, 2025.** Subsequent requests for a change of test location will not be accepted.*

xxxxxx

*No requests for changes to information provided in the CLAT 2026 Application Form will be entertained after **11:59 P.M. on November 09, 2025.**"*

20. The record further reveals that the first round of counselling commenced on 07.01.2026 and that it was only thereafter, on realising her error, that the petitioner sent the e-mail dated 08.01.2026 seeking correction of her application form so as to claim reservation under the GC-RJ category. Such a post-facto correction, sought nearly two months after the last date for correction of applications, is plainly an afterthought and cannot be permitted.





21. In **Piyush Kaviya & Ors.** (supra), a Division Bench of this Court at Principal Seat, Jodhpur held as under:

"29. It needs to be highlighted that seeking public employment the number of applicants swell into thousands for every appointment offered. The cumbersome process of processing the applications manually and at each stage of the selection process manual intervention being time consuming, aid of technology is being taken. On-line applications are being received. Opportunities to correct mistakes in the on-line application forms are provided by opening a window period. When the window period closes, the forms, applications etc. as amended are processed. The computer generates the admit cards. The results of the examination are fed in the computer for various categories of posts and in the instant case, the number being 30, select list based on merits and categories are generated by the computer. The candidates need to be vigilant and specially when, as in the instant advertisement, they were cautioned time and again to check their particulars and a window period within which corrections could be made was made available to the candidates.

30. Whilst it may be true that every endeavour should be made to induct meritorious candidates but at the same time administrative inconvenience caused by permitting applicants to correct errors committed by them has to be kept in mind. It serves public interest that appointments to civil posts are made as early as possible.

31. Thus, the conflict between merit and public interest subserved by timely filling up of public posts has to be balanced. The balance is stuck in the instant case by giving a window period to the candidates to correct the on-line application forms. The balance was stuck by prohibiting any application to be submitted after last date notified.

32. The writ petitioners were negligent. They never disclosed in the on-line application forms submitted that they were non-gazetted Government employees. Thus, it was too late in the day for them to seek change in the category in which they had applied after the admit cards were issued by informing the Commission that they were non-gazetted Government employees."

22. Similarly, in **Ms. Aadya Yadav** (supra), the Delhi High Court held as under:

"10. The consistent view of this Court has therefore been that changes in the category of a candidate can be made only during the period permitted by the testing agency. The petitioner had several opportunities to correct her inadvertent error. If candidates are permitted to change their in this case, after the results have been category at a belated stage declared it would wreak unforeseen consequences on other candidates and would disrupt the entire admission schedule. The present petition is squarely covered by the aforesaid authorities."





23. Furthermore, in the matter of **Govardhan S.** (supra), the High Court of Kerela has held as under:

"7. Smt. Tushara, on instructions from the 2nd respondent, submits that, by notification dated 14.06.2023, the 2nd respondent had called for expression of interest in prescribed proforma from candidates who have appeared for the CLAT 2023 and whose names are included in the CLAT 2023 results uploaded in the website of the CLAT Consortium against admission to the vacant seats that may arise under different categories. Learned counsel for the 2nd respondent has handed over a copy of the notification dated 14.06.2023 wherein it is stated that the norms for reservation as notified in the CLAT / University website shall be followed and the claims under various reserved categories will be considered only if the candidate had claimed the same in the CLAT 2023 online application. Since the petitioner has not applied under SEBC-ETB in the CLAT 2023, he cannot be included in the reserved category of SEBC-ETB for admission against vacant seats that may arise in NUALS.

8. In case there are vacant seats under the three categories viz; the All India General, All India OBC, and General Category of Kerala, the petitioner shall be considered for admission under these categories on the basis of his rank in CLAT 2023, eligibility and subject to any cut-off date fixed for closing admissions."

24. In the judgment of **J. & K. Public Service Commission v. Israr Ahmad**⁷, the Hon'ble Supreme Court held that a selection process constitutes an integrated continuum, and that a candidate who qualifies at the preliminary stage in the General category cannot alter that status at the stage of the main examination on the ground that the requisite certificate was obtained subsequently. The status of a candidate in a competitive selection must remain consistent throughout the process; once a candidate opts for a particular category at the threshold, that choice binds her at every subsequent stage. Permitting a mid-course change of category would undermine the principle of equal treatment among all candidates.

25. This position was reiterated by the Hon'ble Supreme Court in **Rajasthan High Court, Jodhpur and Ors. Vs. Neetu Harsh**





and Ors.⁸, wherein it was held that a candidate who fails to claim reservation at the initial stage, omits to furnish the requisite certificate and pays the General category fee cannot claim the benefit of a reserved category after selection.

26. Further, the High Court of Punjab and Haryana, in **Parwinder Singh v State of Punjab & Ors.⁹**, has similarly held that once a candidate consciously chooses a category, pays the corresponding fee and participates in the successive stages of the examination without raising a timely objection, she cannot resile from that position after declaration of the result.

27. It is thus well settled that a belated correction or modification of an application form, particularly a change of reservation category, cannot be permitted once the cut-off date stipulated by the examining authority has expired. Where a window period is provided for rectification of errors, a corresponding duty of vigilance is cast upon the candidate to ensure that her particulars are correct.

28. To permit a candidate to change her reservation category after declaration of the result, at the counselling stage and under the guise of updating preferences, would erode the sanctity of the admission process and defeat the very purpose of prescribing a strict deadline for corrections. An inadvertent error or negligence on the part of a candidate cannot be cured by invoking the extraordinary writ jurisdiction of this Court, particularly where doing so would override deadlines applied uniformly to all candidates.

8 (2021) 11 SCC 383

9 D.B. Civil Writ Petition No. 6761/2023





29. So far as the reliance placed by learned counsel for the petitioner upon Clause 1.5.1.4 of the Notification dated 17.12.2025 is concerned, a plain reading of that clause shows that the liberty granted thereunder is confined to updating a candidate's "preferences", such as the choice and order of the participating National Law Universities, during counselling registration.

30. That clause does not confer any right upon a candidate to alter, amend or modify the "category of reservation" claimed in the application form after the prescribed cut-off date for corrections has lapsed.

31. As regards the submission that a seat has been kept vacant at NLU, Jodhpur, it may be noted that the seat was kept vacant solely in compliance with the interim order dated 11.02.2026, as a protective measure for an eligible candidate under the GC-RJ (Rajasthan Domicile) category, and subject to the final adjudication of the present writ petition.

32. However, for the reasons already recorded, the petitioner, having failed to claim or correct her reservation category to GC-RJ within the stipulated time, cannot be treated as an eligible candidate under that category for the present admission cycle. An interim order directing that a seat be kept vacant does not *ipso facto* cure the fundamental defect in her application form, nor does it confer upon her any substantive right to a seat reserved for a category under which she never applied. The petitioner cannot, therefore, be granted admission against the said vacant seat.





33. The reliance placed by learned counsel for the petitioner upon **Indra** (*supra*) and **Reena Choudhary** (*supra*) is of no assistance to her. In those cases, the Division Benches of this Court were concerned with the rectification of inadvertent errors of a trivial nature. In the present case, by contrast, the petitioner seeks a belated alteration of the reservation category itself. A change of reservation category cannot be equated with a trivial or cosmetic error, since it has a direct and cascading effect on the merit list, on the displacement of other selected candidates and on the ultimate allotment of seats. The judgments relied upon are, therefore, distinguishable on facts and have no application to the controversy at hand.

E. CONCLUSION

34. In view of the foregoing discussion, this Court is of the considered opinion that the rejection of the petitioner's candidature under the GC-RJ category, and the reasons assigned therefor, suffer from no legal infirmity or perversity warranting interference in exercise of the extraordinary jurisdiction conferred by Article 226 of the Constitution of India.

35. Accordingly, the writ petition is dismissed, with no order as to costs.

36. All pending application(s), if any, shall stand disposed of.

(MANEESH SHARMA),J

Deepa

