

W.P(MD)No.14351 of 2026

BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT

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DATED: 18.06.2026

CORAM

THE HONOURABLE MR.JUSTICE HEMANT CHANDANGOUDAR

Writ Petition(MD)No.14351 of 2026

R.Sangeetha

.. Petitioner

Vs

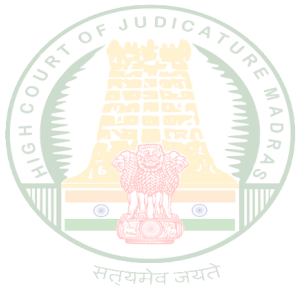
1.The Registrar,
The Tamil Nadu Dr.Ambedkar Law University,
No.5, Dr.D.G.S. Dhinakaran Salai,
Poompozhi,
Chennai - 600 028.

2.The Controller of Examination,
The Tamil Nadu Dr.Ambedkar Law University
M.G.R. Salai, Near Taramani Railway Station,
Perungudi, Chennai - 600 113.

3.The Principal
Madurai Government Law College,
Madurai 625 020.

..Respondents

Prayer: Writ Petition filed under Article 226 of the Constitution of India, praying this Court to issue a Writ of Mandamus to direct the respondents to consider the petitioner's representation dated 21.05.2026 for permit the petitioner to permit payment of LL.M Dissertation Fees and enable online portal.



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For Petitioner : Mr.Niranjan.S.Kumar for
Mr.B.Balamanikandan

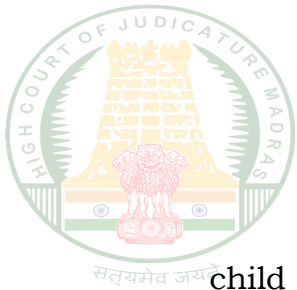
For Respondents : Mr.K.P.Krishnadas for R1 and R2
Mr.M.Mahaboob Athiff
Govt. Advocate for R3

ORDER

The petitioner has filed this writ petition seeking a direction to the respondents to consider her representation dated 21.05.2026, whereby she requested permission to remit the dissertation fee, submit her LL.M. dissertation, participate in the viva voce examination and, upon successful completion thereof, obtain the certificate evidencing completion of the LL.M. Degree Course.

2. The petitioner joined the LL.M. Degree Course during the academic year 2019–2020. Owing to shortage of attendance, she was not permitted to appear for the examinations and was consequently re-admitted during the academic year 2020–2021. Thereafter, she completed all the theory examinations in the year 2022.

3. It is the specific case of the petitioner that, though she had successfully completed all the theory papers, she could not submit the dissertation, which is a mandatory component of the course. According to her, she conceived in March 2024 and delivered a female



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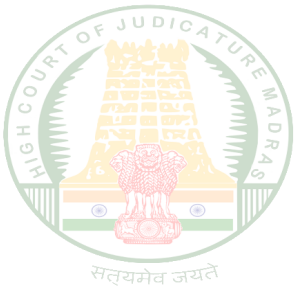
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child on 07.12.2024. Due to pregnancy, childbirth and the responsibility of caring for the newborn child, she was unable to complete and submit the dissertation within the time stipulated under the Regulations.

4. The petitioner therefore submitted a representation dated 21.05.2026 seeking permission to remit the dissertation fee and submit the dissertation. Since no favourable orders were passed, the present writ petition has been filed.

5. Heard the learned counsel appearing for the petitioner and the learned counsel appearing for the respondents. The records placed before this Court have also been carefully perused.

6. A counter affidavit has been filed by the third respondent, namely, the Principal of the Government Law College, Madurai. It is stated therein that the petitioner was governed by the “N+2” rule adopted by the respondent University pursuant to the University Grants Commission guidelines. Under the said rule, a student admitted to the LL.M. programme during the academic year 2019–2020 was required to complete the course within four years. According to the respondents, the petitioner ought to have completed all course requirements by the year 2024 and there is no provision enabling acceptance of a dissertation beyond the prescribed period.



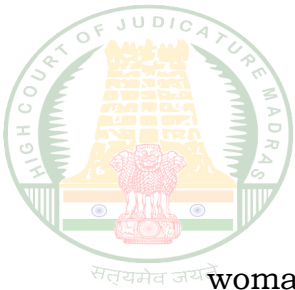
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7. There can be no dispute with regard to the power of the University to prescribe academic standards, eligibility conditions and the maximum period within which a student must complete a course. This court ordinarily refrain from interfering with academic regulations unless the action complained of is arbitrary, unreasonable or results in manifest injustice. At the same time, academic regulations cannot be applied in a manner that completely ignores exceptional circumstances, particularly those arising out of biological and social realities faced by women students.

8. The materials placed before this Court show that the petitioner had already completed all theory examinations within the normal period. The only remaining requirement for obtaining the LL.M. Degree was submission of the dissertation and participation in the viva voce examination. Thus, the petitioner is not seeking exemption from any academic requirement. She merely seeks an opportunity to complete the final component of the course.

9. The medical records produced before this Court establish that the petitioner conceived in March 2024 before expiry of the Normal period and delivered a child on 07.12.2024. The period immediately preceding childbirth and the post-natal period are matters of undeniable physical, medical and emotional significance. A



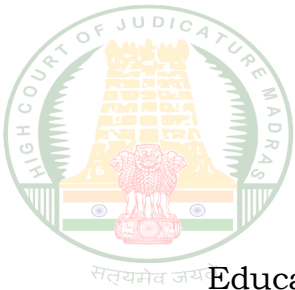
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woman undergoing pregnancy and thereafter caring for a newborn child cannot be placed on the same footing as an ordinary student for the purpose of strict application of academic timelines.

10. Significant reliance has been placed by the petitioner on the communication issued by the University Grants Commission dated 14.12.2021. The said communication recognises the need to extend maternity and child-care benefits to women students and calls upon Higher Educational Institutions to frame appropriate norms granting relaxations and exemptions, including extension of timelines wherever necessary. Though the said communication may not, by itself, create an enforceable statutory right in every case, it reflects an important public policy that educational opportunities should not be denied to women merely on account of pregnancy and motherhood.

11.This Court is also guided by the principle recognised by the Allahabad High Court in Writ-C No.20885 of 2021, wherein it was held that circumstances arising out of pregnancy and childbirth constitute a valid and reasonable ground for granting appropriate academic relief. The said decision emphasises that pregnancy and motherhood are natural and significant phases in a woman's life, which may temporarily affect her ability to attend classes, examinations, internships, or other academic requirements.



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Educational institutions, therefore, cannot adopt a rigid or mechanical approach while dealing with such cases. Instead, they are expected to act with compassion, fairness, and sensitivity, and to provide reasonable accommodation wherever possible so that a woman student is not deprived of her educational opportunities solely on account of pregnancy, childbirth, or post-natal responsibilities. The underlying principle is that academic regulations should be applied in a manner that balances institutional requirements with the genuine difficulties faced by women students during this period, thereby ensuring that motherhood does not become an obstacle to the pursuit and completion of education.

12. The present case stands on a particularly equitable footing. The petitioner had already completed all theory examinations. She became pregnant before the expiry of the extended period prescribed under the Regulations. The delay in submitting the dissertation within the extended period is directly attributable not only to the petitioner but also due to pregnancy, childbirth and post-natal responsibilities. Denial of an opportunity to submit the dissertation at this stage would effectively render several years of academic effort futile and result in disproportionate hardship.

13. Equally important, permitting the petitioner to submit the



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dissertation does not dilute academic standards in any manner. The petitioner will still be required to submit the dissertation, undergo evaluation, participate in the viva voce examination and satisfy all academic requirements prescribed for the award of the degree. The respondents therefore suffer no prejudice by granting a limited extension in the peculiar circumstances of the case.

14. Having regard to the totality of the circumstances, this Court is of the considered view that a narrow and technical application of the Regulations would defeat the ends of justice. A balanced approach requires that the petitioner be afforded one final opportunity to complete the remaining academic requirement while preserving the academic standards prescribed by the University.

15. Accordingly, this writ petition is disposed of with the following directions:

- (i) The second and third respondents shall permit the petitioner to remit the dissertation fee in physical/offline mode, without insisting upon payment through the online portal;
- (ii) Upon such payment, the respondents shall receive and accept the dissertation submitted by the petitioner;
- (iii) The respondents shall evaluate the dissertation in



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accordance with the applicable Regulations and permit the petitioner to participate in the viva voce examination in June 2026;

(iv) In the event of the petitioner successfully completing all academic requirements, the respondents shall issue the necessary certificate evidencing completion of the LL.M. Degree Course;

(v) The above exercise shall be completed as expeditiously as possible and, in any event, within a reasonable period from the date of receipt of a copy of this order.

16.It is made clear that this order has been passed in the peculiar facts and circumstances of the present case, particularly having regard to the fact that the petitioner had successfully completed all the theory examinations within the normal period and her subsequent pregnancy, childbirth and post-natal responsibilities. This order shall not be treated as a precedent in cases where such exceptional circumstances are not established.

17.There shall be no order as to costs.

18.06.2026

NCC : Yes/No

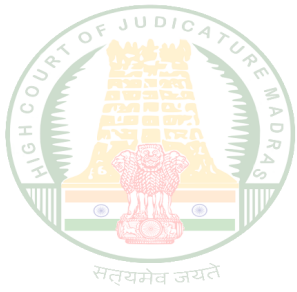
Index : Yes/No

Internet:Yes

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Note : Issue order copy on 19.06.2026

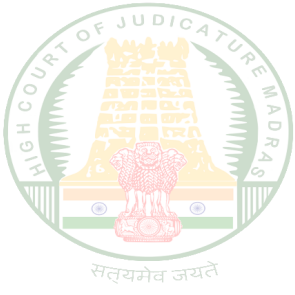
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- 1.The Principal
Madurai Government Law College,
Madurai 625 020.



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HEMANT CHANDANGOUDAR, J.

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