IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CIVIL APPELLATE JURISDICTION

[1] WRIT PETITION NO.15159 OF 2026

Satish Maulyawan Patole ….Petitioner
Versus
State of Maharashtra
and others ….Respondents

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WITH

[2] WRIT PETITION NO.15160 OF 2026

Jinesh Jitendra Koli ….Petitioner
Versus
State of Maharashtra
and others ….Respondents

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Dr. Uday Warunjikar, Advocate a/w. Anirudh Rote, Jinesh J. Koli for the Petitioner in Writ Petition No.15160/2026

Mr. Satish Maulyawan Patole, the Petitioner in-person in Writ Petition No.15159/2026.

Ms. Neha Bhide, Government Pleader a/w. O.A. Chandurkar, Addl. G.P. a/w Ms.R.A.Salunke, AGP for the Respondent Nos.1 & 2 - State & MPSC in WP/15160/2026.

Ms. Neha Bhide, Government Pleader a/w. O.A. Chandurkar, Addl. G.P. a/w T.N. Bhatia AGP for the Respondent Nos.1 & 2 - State & MPSC in WP/15159/2026.

Dr. Milind Sathe, Senior Advocate a/w Rahul Nerlekar, Shailendra Kanetkar for the Respondent No.3 in both the Petitions.

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CORAM : SARANG V. KOTWAL &
RANJITSINHA RAJA BHONSALE, JJ.

DATE : 05th NOVEMBER, 2026

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JUDGMENT : [Per Sarang V. Kotwal, J.**]**

1. Both these Petitions are decided by this common order because the relief sought in both these Petitions and the legal issues raised in both these Petitions are similar. Considering the urgency, we have heard both the parties at length. Hence, Rule. Rule is made returnable forthwith with consent of the parties.

2. The Petitioner Satish Patole in Writ Petition No.15159/2026 has obtained a Degree in Law in June, 2026 and is enrolled as an Advocate with the Bar Council of Maharashtra and Goa on 20.6.2026. The Petitioner Jinesh Jitendra Koli in Writ Petition No.15160/2026 has obtained a Degree in Law in 2026 from the University of Mumbai and is enrolled as an Advocate with the Bar Council of Maharashtra and Goa on 20.6.2026.

3. The Petitioners are praying for directions to the Respondents to permit them to apply for the “Civil Judge Junior Division & Judicial Magistrate First Class Preliminary Examination-2024” as according to them they are eligible to apply and appear for the said examination which is to be held pursuant to the Advertisement No.013/2026. The Petitioner Jinesh Koli in Writ Petition No.15160/2026 has made a prayer for quashing and

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setting aside paragraph No.1 and the consequential parts of the corrigendum dated 23.10.2026 made to the said advertisement.

4. According to both the Petitioners, they are eligible to apply for the said recruitment process pursuant to the directions given by the Hon'ble Supreme Court in the case of **Bhumika Trust Vs. Union of India and others**[1](hereinafter referred to as 'Bhumika Trust case')

5. Heard Dr. Uday Warunjikar, the learned counsel for the Petitioner in Writ Petition No.15160/2026, Mr. Satish Patole, the Petitioner in-person in Writ Petition No.15159/2026, Ms. Neha Bhide, Government Pleader along with Mr. O.A. Chandurkar, Addl. G.P. for the Respondent Nos.1 & 2-State & MPSC and Dr. Milind Sathe, the learned Senior Advocate along with Mr.Rahul Nerlekar, for the Respondent No.3 in both the Petitions.

6. The said corrigendum dated 23.10.2026 refers to the advertisement dated 30.4.2026 for conducting the Preliminary Examination for the post of Civil Judge Junior Division & Judicial Magistrate First Class. There is a reference to the order dated 21.8.2026 passed in the aforementioned Bhumika Trust case. It is

1 2026 SCC OnLine SC 1687

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mentioned in the corrigendum that as per the said order, all Law Graduates who have obtained the Degree in Law prior to one year from the date of the judgment dated 21.8.2026 in Bhumika Trust case shall be deemed to have completed one year of active practice; and the corrigendum further mentions that those fresh graduates in the branch of Law who have obtained their degree before 22.8.2025 were invited to submit their forms if they were eligible according to the terms mentioned in the advertisement dated 30.4.2026 and the corrigendum dated 23.10.2026. The applications were to be made between 26.10.2026 to 9.11.2026. The corrigendum further provides the minimum and maximum age limit to make the applications (however the age criteria is not the subject matter of these Petitions.)

7. In paragraph No.3 of the said corrigendum it is mentioned that the Law Graduates mentioned in the first paragraph of the corrigendum and the other eligible candidates who have not completed three years of actual Law practice would be deemed to have completed one year of active practice.

8. The corrigendum is based on the directions and conclusion mentioned in Part VII of the said judgment of the

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Hon'ble Supreme Court in Bhumika Trust case. The arguments were extensively made in respect of those directions and, therefore, it would be advantageous to reproduce those directions mentioned in Paragraph Nos.73, 74 and 75 of the said judgment, which are as under :

> **"73.** In light of the above discussion, we consider it appropriate to issue the following directions, which would apply to all recruitment notification/advertisement(s) issued to the post of Civil Judge (Junior Division) in the transitional period, i.e., notification/advertisement(s) issued after the Judgment under Review up to 31.03.2027:
>
> (i) All law graduates shall be eligible to apply, notwithstanding the three-year practice requirement. Having regard to the fact that more than one year has elapsed since the Judgment under Review was pronounced, such candidates shall, for the purposes of their applications, be deemed to have completed one year of active practice. They shall not be required to furnish a separate Certificate of Practice in support of the said deemed period;
>
> (ii) Candidates selected pursuant to the aforesaid recruitment shall, upon appointment, be designated as "Trainee Judicial Officers" and shall undergo a compulsory period of one year of intensive training at the concerned State Judicial Academy. This period shall be treated as equivalent to one year of practice at the Bar for the purposes of the three-year

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requirement;

(iii) During the period of such training, the Trainee Judicial Officers shall be paid a fixed emolument equivalent to one-half of the remuneration payable to a Judicial Magistrate First Class in the concerned State. They shall, in addition, be entitled to the facilities and other benefits ordinarily made available to trainees at the concerned State Judicial Academy;

(iv) Upon successful completion of the aforesaid training, the Trainee Judicial Officers shall undergo a further period of one year of structured Law Clerkship. The first six months shall be spent as a Law Clerk under the supervision of the Principal District/District and Sessions Judges or Members of the Higher Judicial Services, and the remaining six months under the supervision of a sitting Judge of the concerned High Court;

(v) The aforesaid one-year period of Law Clerkship shall also be treated as equivalent to one year of practice at the Bar for the purposes of satisfying the three-year requirement;

(vi) During the period of Law Clerkship, the Trainee Judicial Officer shall be paid same emoluments as admissible during their training in State Judicial Academies, with no further allowance, etc.; and

(vii) Upon completion of the Law Clerkship, the sitting Judge of the High Court under whose supervision the Trainee Judicial Officer has served shall submit a reasoned evaluation report concerning the performance and suitability of the trainee. Upon such

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evaluation being found satisfactory, the Trainee Judicial Officer shall be appointed to the regular post in the field and shall thereafter be entitled to the regular pay scale and other service benefits attached to the post.

74. We further direct that for the period following the transition period, i.e., notification/advertisement(s) issued on or after 01.04.2027, the following directions shall govern the recruitment to the post of Civil Judge (Junior Division):

(i) Every candidate seeking to appear for the examination for appointment as Civil Judge (Junior Division) shall possess at least one year of actual practice from the source and certification as laid down in direction (vii) and (viii) of the Judgment under Review for now and thereafter as laid down hereinafter. Such practice shall be subject to verification through issuance of a Certificate of Practice, which shall not be issued unless the candidate's presence and participation in effective judicial proceedings, whether along with a senior member of the Bar with at least 10 years practice or otherwise, have been duly recorded in accordance with the mechanism to be prescribed by the High Courts;

(ii) The application of a candidate for recruitment to the judicial service from the aforesaid recruitment cycle shall be entertained only upon submission of the requisite certificate evidencing completion of one year of actual practice in the District Courts; and

(iii) Candidates selected pursuant to such recruitment shall, notwithstanding their one year of prior practice,

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undergo the same one-year period of intensive training at the State Judicial Academy followed by 6 months of Law Clerkship under the Principal District/District and Sessions Judges or Members of the Higher Judicial Services and thereafter another 6 months of Law Clerkship under a sitting Judge of the concerned High Court, in terms of directions (ii) to (vii) of Paragraph 73.

75. For abundant caution, we reiterate that all notification/advertisement(s) issued already after the Judgment under Review was pronounced, as well as all notification/advertisement(s) to be issued hereafter, for recruitment to the post of Civil Judge (Junior Division) shall conform to and will be governed by the aforesaid directions."

9. Dr. Uday Warunjikar, the learned Counsel as well as Mr. Satish Patole, the Petitioner appearing in person made submissions. The main submissions were advanced by Dr. Warunjikar, which were adopted by the Petitioner appearing in person. The submissions are as follows:

i. Dr. Warunjikar submitted that in paragraph No.73 of the said judgment, referred to hereinabove, the directions issued by the Hon'ble Supreme Court apply to all Law Graduates; whereas paragraph No.74 applies to all candidates.

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Paragraph No.74 refers to the candidates who, in future, would participate in the selection process based on the advertisement issued on or after 1.4.2027.

ii. The Respondent Maharashtra Public Service Commission [MPSC] has not correctly interpreted Paragraph No.73 of the said judgment. The term 'Law Graduates' is different from those who have enrolled themselves with the Bar Council after obtaining Degree in Law. Since Paragraph No.73 specifically refers to the Law Graduates, permission to apply is given to all Law Graduates including the fresh Graduates who have obtained their degree even after 22.8.2025. The interpretation by MPSC of the said direction is not correct; and hence, the corrigendum erroneously creates an artificial separate class for Law Graduates who have obtained their Degree before 22.8.2025 and after that date.

iii. Dr. Warunjikar submitted that the Hon'ble Supreme Court had exercised their powers under Article 142 and issued those directions, which were binding on the MPSC, and that the MPSC had no power to interpret the directions given by the Hon'ble Supreme Court differently.

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iv. Dr. Warunjikar submitted that the High Court of Manipur has already taken a view that all the fresh Law Graduates would be permitted to participate in the selection process.

10. Dr. Milind Sathe, the learned Senior Counsel appearing for the High Court administration opposed these submissions. His arguments were adopted by the learned counsel appearing for the MPSC.

11. Dr. Sathe invited our attention to the observations made by the Hon'ble Supreme Court in the case of **All India Judges Association and others Vs. Union of India and others**[2]. He submitted that the said judgment was under review in Bhumika Trust case.

12. Dr. Sathe invited our attention to various paragraphs in both these judgments. He submitted that the basic principles and guidelines issued in the All India Judges Association's case were not set aside or reversed in the Bhumika Trust case. He relied on various paragraphs from both these judgments. He contended that the corrigendum is properly issued as per the directions issued in Bhumika Trust case.

2 2025(11) SCC 233

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REASONS AND CONCLUSION :

13. We have considered these submissions. Before referring to the directions issued by the Hon'ble Supreme Court in Bhumika Trust case, a brief reference can be made to the earlier decision which led to passing of the Judgment in Bhumika Trust case. The question, whether the Advocates entering Judicial Service through appointment as C.J.J.D. & J.M.F.C. need to have some experience or not was considered by the Hon'ble Supreme Court in different cases. In the Judgment dated 24.08.1993 passed in ***All India Judges Association and others Vs. Union of India and others***[3] (hereinafter referred to as '2nd AIJA case as it is referred as such in the Judgment of the Hon'ble Supreme Court.) Vide that Judgment, the Hon'ble Supreme Court directed that all the States shall take immediate steps to prescribe three year's practice as a lawyer as one of the essential qualifications for requirement as a Judicial Officer.

14. This issue was again considered subsequently by the Hon'ble Supreme Court in the case of ***All India Judges Association (3) Versus Union of India***[4] (hereinafter referred to as '3rd AIJA case'). The requirement of having minimum three year's practice for appearing

3 (1993) 4 Supreme Court Cases 288
4 (2002) 4 SCC 247

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in the examination of C.J.J.D. was done away by the Hon'ble Supreme Court in 3rd AIJA case. The issue again was considered by the Hon'ble Supreme Court in the the cases of All India Judges Association and others Versus Union of India and others, as referred to herein above. The said case was decided vide the Judgment and order dated 20.05.2025. The Hon'ble Supreme Court considered the recommendations of various High Courts and in paragraph Nos.85 and 86 observed thus:-

> **"85.** The Judges from the very day on which they assume office have to deal with the questions of life, liberty, property and reputation of litigants. As rightly observed, neither knowledge derived from books nor pre-service training can be an adequate substitute for the first-hand experience of the working of the court system and the administration of justice. This is possible only when a candidate is exposed to the atmosphere in the court by assisting the seniors and observing how the lawyers and the Judges function in the court. The candidate should be equipped to understand the intricacies of the functions of a Judge. The experience of various High Courts has also shown that such fresh law graduates, upon their entry in judicial service, begin to show behavioural and temperament problems.
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> **86.** We are therefore in agreement with the views expressed by most of the High Courts that the requirement of

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reintroduction of a certain number of years of practice would be necessary."

15. In paragraph Nos.91.7 and 91.8 the following directions were issued:-

> **"91.7.** All the High Courts and the State Governments in the country shall amend the relevant service rules to the effect that candidates desirous of appearing in the examination for the post of Civil Judge (Junior Division) must have practised for a minimum period of 3 years to be eligible for the said examination. To fulfil the said requirement, the Rules shall mandate that the candidate produces a certificate to that effect duly certified either by the Principal Judicial Officer of that court or by an advocate of that court having a minimum standing of 10 years duly endorsed by the Principal Judicial Officer of such a district or a Principal Judicial Officer at such a station. Insofar as the candidates who are practising before the High Courts or this Court, they shall be certified by an advocate who has a minimum standing of 10 years duly endorsed by an officer designated by that High Court or this Court. We further direct that the experience of the candidates which they have gained while working as Law Clerks with any of the Judges or Judicial Officers in the country should also be considered while calculating their total number of years of practice. The Rules shall also mandate that the candidates who are appointed to the post of Civil Judge (Junior Division) pursuant to their selection through the examination must compulsorily undergo at least 1 year of training before

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presiding in a court;

91.8. It is directed that the number of years of practice completed by a candidate desirous of appearing in the examination for the post of Civil Judge (Junior Division) be calculated from the date of their provisional enrolment/registration with the State Bar Council concerned;"

16. Subsequently, the Hon'ble Supreme Court granted permission to file review petition in respect of the said Judgment and order dated 20.05.2025. The directions given in the said Judgment of Bhumika Trust case formed basis of the corrigendum and the submissions were advanced before us in respect of the said corrigendum with reference to the directions given in Bhumika Trust case.

17. While analysing the issue, the Hon'ble Supreme Court in Bhumika Trust case, very clearly observed in paragraph No.43 that, at the outset, the Hon'ble Supreme Court was not persuaded that the Judgment under Review required to be reconsidered on the fundamental question whether some prior exposure to the working of courts is desirable for a person seeking entry into the judicial service. The reasons postulated by the Hon'ble Supreme

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Court in restoring the requirement retained considerable force.

Thus, the Hon'ble Supreme Court very categorically observed that the requirement of prior exposure to the working of Courts was necessary. The Hon'ble Supreme Court further elaborated in paragraph No.44 that, more precise question was whether such exposure necessarily required three years of conventional practice at the Bar and the manner in which the requirement is to be implemented as a condition precedent to even appearing for the examination. In paragraph No.45 it was further observed that the Judgment under review was justified in emphasising the peculiar nature of the responsibilities which were attached to a Judicial Officer from the very first day of service. A Civil Judge is required to deal with the questions affecting life, liberty, property and personal rights of litigants. It was for this reason, the Judgment under Review considered exposure to the atmosphere of the court, including by assisting seniors and observing the manner in which lawyers and Judges function, to be of considerable value.

18. In paragraph No.46 it was observed that minimum period of practicle exposure before assuming judicial office was,

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therefore, neither unreasonable nor inconsistent with the object of securing a competent and independent subordinate judiciary.

19. In paragraph No.47 it was further observed that, there was considerable merit in the proposition that a person who was to assume judicial office ought not to be wholly unfamiliar with the functioning of courts and the practical consequences of judicial orders. Such exposure may contribute to the development of judicial temperament, patience, empathy, courtroom discipline and an appreciation of the respective roles of the Bench and the Bar. The Hon'ble Supreme Court further observed that, they saw no reason to displace that finding.

20. The Judgment then considered as to what should be the minimum period required as practice in the courts before they were eligible for appearing in the examination.

21. In Paragraph No.60, the Hon'ble Supreme Court observed that, the discussion in their Judgment should not be understood as questioning the wisdom of prescribing three years of practice. Rather, it was an exercise in ensuring that the rule was implemented in a manner which was fair to those affected by its sudden restoration.

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22. In paragraph No.63, again it was observed that, they were not holding that three years requirement was inherently unreasonable. In paragraph Nos.65 and 66, the Hon'ble Supreme Court took into account the fact that more than a year had elapsed since the Judgment under Review restored the three year requirement and, therefore, it was safe to presume that, during the preceding one year, most law graduates would have either engaged in practice at the Bar, served as Law Clerks to Hon'ble Judges, or gained experience in law firms. As a one time measure, such experience may reasonably be treated at par with one year of practice at the Bar.

23. This observation is important in the context of the arguments advanced before us in the present petition, because the Petitioners submitted that the directions given in paragraph No.73(i) refers to all law graduates and it was not necessary to impose the condition of one year of practice.

24. In this context, in continuation, paragraph Nos.66, 67, 68, 69, 70 and 71 are important which are as under:-

> **"66.** We may safely presume that, during the preceding one year, most law graduates would have either engaged in

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practice at the Bar, served as Law Clerks to Hon'ble Judges, or gained experience in law firms. As a one-time measure, such experience may reasonably be treated at par with one year of practice at the Bar.

67. The second consideration demands us to recognise that the requirement of experience and the requirement of training are not mutually exclusive and, if anything, they can be complementary. While the initial practice at the Bar exposes a candidate to the adversarial process, judicial training prepares the candidate for the fundamentally different responsibility of adjudication. It is therefore appropriate that candidates who are permitted to enter the selection process during the transitional period should not be placed in the field immediately upon selection. Their appointment must initially be to the status of trainee judicial officers, and their independent judicial functions should follow only after they have undergone an appropriate period of institutional training.

68. A period of one year of structured training at the State Judicial Academy would, in our view, serve this purpose. It would provide a common foundation to candidates irrespective of their experiences at the Bar. More importantly, it would permit the State Judicial Academies to assess the candidate not just on legal knowledge, but also on the practical skills required of a Judge.

69. We also consider it appropriate to note that this period of institutional training would serve as equivalent, for the purposes of the three-year requirement, to a period of one-year practice at the Bar. This does not proceed upon the

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assumption that training and practice are identical. It reflects the more limited proposition that, once a candidate has been selected through a competitive judicial examination, planned and guided training specifically designed to prepare him or her for judicial office provides relevant practical exposure.

70. The training period at State Judicial Academies must thereafter be followed by a further period of supervised practical engagement with the judicial process through Law Clerkship. A Law Clerkship under the direct supervision of Judges can expose a candidate to the manner in which court proceedings are to be held and decorum and attitude to be maintained towards members of the Bar and litigants. Simultaneously it will assist in preparation and analysis of cases, the evaluation of submissions, the application of procedural law and the discipline involved in preparing judicial orders.

71. We accordingly consider it appropriate that, following successful completion of the year-long institutional training, the trainee judicial officers should undergo a further year of structured Law Clerkship: first under the supervision of a Principal District/District and Sessions Judge or a Member of the Higher Judicial Services and thereafter under a sitting Judge of the concerned High Court. This period shall also be treated as equivalent to one year of practice at the Bar for the purpose of satisfying the eligibility requirement. The arrangement has the further advantage of enabling senior judicial officers to observe the performance of the trainee over a sustained period before the trainee is entrusted with independent judicial work.

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25. Thus, from the above observations of the Hon'ble Supreme Court, it is clear that, in Bhumika Trust case the Hon'ble Supreme Court did not disturb the requirement of three years of experience. However, said three years of experience at the Bar was separated as follows:

In the first year, the law graduates would have to gain experience either by engaging in practice at Bar, serving as Law Clerks to Hon'ble Judges or gain experience in law firms. Such experience is to be treated at par with one year of practice at Bar.

In addition to this one year, one more year spent at the judicial academy in structured training programme would serve that purpose. It is specifically held in paragraph No.69 that this period of institutional training would serve as equivalent for the purposes of the three year requirement to one year practice at Bar.

26. The third segment as directed would be one year period as a Law Clerkship under the direct supervision of Judges. In paragraph No.71, it is mentioned that, after a year long institutional training, the trainee judicial officers should undergo a further year of structured Law Clerkship; first under the supervision

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of a Principal District/District and Sessions Judge or a Member of the Higher Judicial Services and thereafter under a sitting Judge of the concerned High Court. That period shall also be treated as equivalent to one year of practice at the Bar for the purpose of satisfying the eligibility requirement.

27. Thus, all these three segments satisfy the requirement of three years experience as laid down in the Judgment under Review.

28. After this analysis, the final Directions and Conclusion was issued. The final conclusion and directions were noted by the Hon'ble Supreme Court in paragraph No.73 which we have already reproduced.

29. Therefore, the directions in paragraph-73(i) takes care of the fact that one year had elapsed since the judgment under Review was pronounced. Thus, those Law Graduates are deemed to have acquired one year of active practice. Direction 73(i) does not stop at mentioning all Law Graduates to become eligible. The direction has to be read as a whole. In the same direction 73(i) the Hon'ble Supreme Court has considered that one year has elapsed since the judgment under review was pronounced. In that context,

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it was observed that 'such candidates' (emphasis supplied) be deemed to have completed one year of active practice.

This satisfies first requirement of one year of practice at Bar.

30. Paragraph No.74 of Bhumika Trust case is a complete answer to the arguments advanced by the Petitioners. There it is specifically mentioned that, every candidate seeking to appear for examination for appointment as C.J.J.D. shall possess at least one year of actual practice from the source and certification as laid down in directions 7 and 8 of the Judgment under Review. We unable to accept that there could be distinction in the words 'Law Graduates' and 'candidates'. One year requirement of actual practice is held to be necessary in the Judgment of the Hon'ble Supreme Court in Bhumika Trust case.

31. The corrigendum issued under the notification, which is under challenge, therefore, requires no interference. We are satisfied that the corrigendum is issued in compliance with the directions of the Hon'ble Supreme Court given in the said Judgment. In fact, any other contrary direction would be violative of the directions issued by the Hon'ble Supreme Court.

32. As a result, we do not find any merit in these petitions.

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33. Both the petitions are dismissed and the Rule is discharged.

(RANJITSINHA RAJA BHONSALE, J.) (SARANG V. KOTWAL, J.)

Deshmane (SrPS) & Gokhale (PS)

PRADIPKUMAR PRAKASHRAO DESHMANE

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