

IN THE HIGH COURT OF KARNATAKA AT BENGALURU

DATED THIS THE 23RD DAY OF SEPTEMBER, 2025

BEFORE

THE HON'BLE MR. JUSTICE R. DEVDAS

WRIT PETITION NO.21783 OF 2024 (EDN-RES)

BETWEEN

MS. NEIL BRUCE
(PARTY-IN-PERSON)
AGED 21 YEARS
D/O. LATE. RASHMI MUGERU
R/O. 16/17, 3RD MAIN,
8TH CROSS, JAI MARUTHI NAGAR,
NANDINI LAYOUT BANGALORE 560096
MOBILE 91-9620053024
EMAIL: neilbruce03@gmail.com

...PETITIONER

(BY MS.NEIL BRUCE., PETITIONER/ PARTY-IN-PERSON)

AND

- 1 . THE STATE GOVERNMENT OF KARNATAKA
GOVERNMENT OF KARNATAKA
BANGALORE, KARNATAKA 560 001
REPRESENTED BY ITS CHIEF SECRETARY
- 2 . NATIONAL LAW SCHOOL INDIA UNIVERSITY,
GNANA BHARATHI MAIN ROAD,
OPP NAAC, TEACHERS COLONY,
NAAGARABHAAVI BENGALURU,
KARNATAKA 560 072
VC@nls.ac.in, 080 23010646
REPRESENTED BY ITS VICE CHANCELLOR
AND REGISTRAR
- 3 . BAR COUNCIL OF INDIA
21, ROUSE AVENUE INSTITUTIONAL AREA,

NEAR BAL BHAWAN,
NEW DELHI - 110 002
bciinfo21@gmail.com, 011-4922 5000
REPRESENTED BY ITS AUTHORIZED PERSON

- 4 . NATIONAL INSTITUTE OF MENTAL HEALTH
AND NEURO SCIENCE (NIMHANS)
HOSUR ROAD/MARIGOWDA ROAD
(LAKKASANDRA WILSON GARDEN)
BANGALORE, KARNTAKA -560029
Dirstaff@nimhans.ac.in, 080-26995001/26995002
Ms@nimhans.ac.in, 080-26995201/5202
REP BY ITS AUTHORIZED PERSON

.....RESPONDENTS

(BY SMT. B.P.RADHA., AGA FOR R1
SRI. ADITYA NARAYAN, ADVOCATE FOR R2
SMT. ANUBHA SRIVASTAVA, ADVOCATE FOR R3
SMT. ANUSHA ASUNDI, ADVOCATE FOR
SRI. A.MADHUSUDHANA RAO, ADVOCATE FOR R4)

THIS WRIT PETITION IS FILED UNDER ARTICLES 226 & 227
OF THE CONSTITUTION OF INDIA PRAYING TO QUASH THE
REQUEST OF THE R-2 ASKING FOR A FRESH SPECIFIC LEARNING
DISABILITY CERTIFICATE FROM A QUALIFIED MENTAL HEALTH
PROFESSIONAL AND UPHOLDING THE PREVIOUSLY ISSUED
ORIGINAL SPECIFIC LEARNING DISABILITY CERTIFICATE
AND DIRECT R-2 AND 3 TO PROVIDE AN ALTERNATE SUBJECT IN
PLACE OF ECONOMICS OR EXEMPTION FROM THE SUBJECT OF
ECONOMICS TO THE PETITIONER AND ETC.

THIS WRIT PETITION HAVING BEEN HEARD AND RESERVED
ON 04.09.2025 AND COMING ON FOR PRONOUNCEMENT OF
ORDERS, THIS DAY, THIS COURT MADE THE FOLLOWING:

CORAM: HON'BLE MR JUSTICE R DEVDAS

CAV ORDER

(PER: HON'BLE MR JUSTICE R DEVDAS)

The petitioner, a student of the second respondent-National Law School of India University (hereinafter referred to as 'NLSIU' for the sake of brevity), Bengaluru, is before this Court seeking a writ of mandamus to direct NLSIU to provide an alternate subject in place of Economics or exempt from the subject of Economics insofar as the petitioner is concerned, while also seeking to quash Annexures 'B' and 'C' communications made by NLSIU. The petitioner is also seeking a direction to the respondents to create policy and learning resources, having regard to disabilities faced by certain students.

2. The petitioner was admitted to the 5 years B.A., LL.B (Hons.) programme during July 2024. The petitioner, party-in-person contends that she is suffering from specific learning disability known as 'Dyscalculia' resulting in difficulty in learning or comprehending Arithmetics, difficulty in understanding numbers, difficulty learning how to manipulate

numbers, to perform mathematical calculations and difficulty in applying and analyzing such applications in/of Mathematics. It is contended that having recognized this learning disability, the School where the petitioner studied viz., Indian Air Force School, Hebbal, Bengaluru, gave the petitioner special privilege of substitute alternate subject- Retail Management and extra time after Grade VI. It is contended that the petitioner studied at the National Institute of Open School for Grade X (Secondary) and Grade XII (Senior Secondary), where the petitioner did not have any subject that required mathematical calculations or factual understanding of mathematics in any form or factor.

3. The petitioner therefore made a request to NLSIU and its Vice Chancellor to take up the matter with Academic Review Committee of the University to make some exception or exemption in the case of the petitioner, since the petitioner is unable to read and understand Economics or Economic concepts. In response to such request, the Academic Administration of NLSIU made an e-mail

communication dated 09.07.2024 to the petitioner as follows:

"Under the reasonable accommodation practice that University has followed in terms of applicable Academic and Examination Regulation, the University does not provide a substitute subject in place of any of the core subjects. In the past, the students with learning disabilities like dyscalculia or dysgraphia have been provided alternate questions which do not test their mathematical calculation ability. The same may be provided to you on submission of an appropriate supporting document."

4. The petitioner shared an exemption letter which the petitioner received from National Institute of Mental Health And Neuro Sciences, Bengaluru, (NIMHANS) recommending exemption of the subject Mathematics. In response to further communications made by the petitioner, the Academic Administration of NLSIU made another e-mail communication dated 16.07.2024 which reads as follows:

"The reasonable accommodation measures envisaged under Regulation 11.3 of AER 2022 are not limited to students with benchmark disability

and those who are admitted under the PWD category. Instead, the Regulation applies to any "person with disability" as defined in the RPWD Act to "mean a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others."

However, such measures are extended only on the production of adequate supporting documentation showing that the student has a long-term impairment – physical, mental, intellectual or sensory – that requires "reasonable accommodation" in the nature of the measures requested by the student.

In order to extend such reasonable accommodation to a student, the institution has to make an informed decision based on the current and authentic certificate/assessment of disability of the candidate. However, the certificate that you have submitted dates back to 2016 in this light, you are requested to furnish a current certificate of his disability.

Therefore, you are requested to submit a recent certificate issued by a competent medical/mental health professional treating you which certifies

that your condition constitutes a long-term physical, mental, intellectual or sensory impairment and that it hinders your ability to write exams/complete academic evaluation components that involve mathematical calculations and requires reasonable accommodation in the terms of the Rights of Persons with Disabilities, Act, 2016.”

5. During the course of these proceedings, the petitioner furnished a fresh certificate issued by NIMHANS on 28.06.2025. With the leave of this Court, NLSIU was permitted to reconsider the request made by the petitioner having regard to the fresh certificate issued by NIMHANS and having regard to Regulation 11.3 of the National Law School of India University Academic and Examination Regulations, 2022 (hereinafter referred to as ‘the Regulations 2022’ for short). However, since the second respondent-NLSIU was not in a position to accede to the representation given by the petitioner along with the fresh certificate, the parties were directed to address their arguments.

6. The petitioner/party-in-person pointed out to Regulation 11.3 of the Regulations 2022, which provide for reasonable accommodations for Persons with Disabilities; such a student may request the Academic Administration for reasonable accommodations which includes accessible course materials, assignments etc., and 'any other reasonable accommodation' that may be considered necessary for such students to have an equal opportunity to participate in their academic programme. Further, attention of this Court is drawn to Schedule-II of the Bar Council of India, Rules of Legal Education, 2008, more particularly, Clause-3 which reads as follows:

3. Total subjects in Liberal discipline in integrated stream: *In integrated stream of Arts & Law, Science & Law, Management & Law, Commerce & Law, etc as the case may be, one has to take one major subject and two minor subjects or such number of compulsory paper/subject and such optional with or without Honours in Law, as the case may be, from the specified area in addition to English, as may be prescribed by the University concerned..*

The syllabus has to be comparable to the syllabus prescribed by leading Universities in India in three year Bachelor degree program in BA, B.Sc, B.Com, BBA etc taking into account the standard prescribed by the UGC/AICTE or any other respective authority for any stream of education.

It is also pointed out that as prescribed in proviso to Clause-3 of Schedule-II, the syllabus prescribed by NLSIU has to be comparable to the syllabus prescribed by leading Universities in India, taking into account the standard prescribed by the UGC/AICTE or 'any other respective authority'. It is pointed out that the Bar Council of India which is the apex body for legal studies, has submitted a report of 'The Curriculum Development Committee' (CDC) on 15.02.2010, which is the first report of the CDC constituted for the purpose of facilitating and universities and Institutions to formulate the course design in various courses in Law, Social Sciences, English Education, Science, Management and Commerce courses for both unitary (3 years course) and Double Degree Integrated (not less than 5 years course).

7. In that view of the matter, the petitioner/party-in-person submitted that since a student is required to take one major subject and two minor subjects, the petitioner seeks to study History, Sociology and Political Science. It is submitted that the second respondent- NLSIU cannot force the petitioner to study Economics or Economy.

8. Per contra, learned Counsel for the second respondent-NLSIU submitted that the University or the Academic Administration is in no way contesting the disability of the petitioner. However, it is submitted that having regard to the Rules prescribed by the Bar Council of India, NLSIU has prepared the Programme and Course Curriculum which fulfill the requirement of Clause-6 of Schedule-II of the Rules, 2008. Attention of this Court is drawn to the words 'however in the initial years the choice of subjects may be restricted'. Accordingly, the Course Curriculum of NLSIU does not offer major or minor subjects in the first year. The Course is designed in such a way that in the first year general subjects are prescribed to enable the students to touch upon the basics such as legal methods, society,

numbers, narrative, in the first semester. In the second semester, subjects prescribed are Law of Tort, Contracts-I, Economy, Power. In the third semester, students are to study Contracts-II, Criminal Law, Property Law, History. The provision for opting major and minor subjects would commence from the second year.

9. Learned Counsel for the second respondent submitted that the petitioner has failed in 8 out of 12 subjects in the first year. According to the Regulations, 2022, the petitioner got re-admitted to the first year in AY 2025-26. It is pointed out that in the new programme proposed course curriculum for batch 2025-2030, Economics-I stands substituted with two courses i.e., Economy and Numbers.

10. On merits, it is submitted that the NLSIU has the liberty to design the curriculum and has accordingly designed the same. Nevertheless, it is submitted that having regard to the request made by the petitioner, the Academic Administration, after due deliberation and consideration of the claim for reasonable accommodation made by the

petitioner and in view of the Certificate of Disability furnished by the petitioner, it is decided that the petitioner can drop out of 'Numbers' course and can be enrolled in 'History of Economic Thought' course. This will ensure that the petitioner will have nothing to do with Numbers. It is also decided that since no exemption can be given from the Course-Economy, however, the petitioner will be provided an alternate question paper for in-class assignments and end term examination in subjects involving mathematical calculations so that the questions do not test the petitioner on calculation, but on concepts. Learned Counsel, therefore submitted that what is best possible, under the circumstances is provided for the petitioner.

11. Heard the petitioner/party-in-person, learned Counsels Sri Aditya Narayan for respondent No.2, Smt.Anubha Srivastava for respondent No.3, Smt.Anusha Asundi for Sri A.Madhusudhana Rao for respondent No.4 and perused the petition papers.

12. This Court should mention at the threshold, the petitioner/party-in-person has ably argued the matter. The

petitioner is sharp and able to understand the minutest of details and nuances of the subject matter and the discussion in the Court room. This Court cannot but notice the fact that the petitioner has got through tough competition and obtained a seat at NLSIU. Nevertheless, since the second respondent-NLSIU and its Academic Administration have clearly stated that they do not contest the disability claimed by the petitioner, this Court is required to consider the grounds raised in the writ petition and the subsequent developments, in the form of the response from the NLSIU as stated in paragraph No.10 hereinabove. The second respondent-NLSIU, in its e-mail communication dated 01.08.2025 has clearly stated that the petitioner can opt out of 'Numbers course' and take up 'History of Economic Thought course', which will not involve any mathematical calculation or concepts. Option is also given to the petitioner that in the subject-Economy, alternate question paper for in-class assignments and end term examination in subjects involving mathematical calculations will be given to the petitioner so that the questions will not test the petitioner on calculation, but it will be restricted to concepts.

13. On the merits of the matter, it is clear that even in terms of the Rules of the Bar Council of India while designing the Course Curriculum, choice of subjects is restricted in the initial years. No option for choosing major and minor subjects is available in the first year of the course. Subjects such as Political Science, Sociology, Philosophy and History are not prescribed in the first year. They form part of the Curriculum from the second year and it is from the second year that provision is made, in accordance with the Rules, 2008, for opting major and minor subjects.

14. Having regard to the above, this Court is of the considered opinion that the second respondent-NLSIU has given the best options to the petitioner, having regard to the disability of the petitioner. The petitioner may opt for such choice given by the second respondent-NLSIU.

15. The writ petition is accordingly ***disposed of***, while directing the second respondent-NLSIU to have due regard to the disability suffered by the petitioner and if the petitioner clears all the other subjects and is not able to clear the subjects Economy and/or 'History of Economic Thought', a

liberal approach shall be had to enable the petitioner to clear the first year course. Appropriate orders in that regard shall be passed by the Vice Chancellor of the second respondent-NLSIU, under such circumstances.

Ordered accordingly.

**Sd/-
(R DEVDAS)
JUDGE**

JT/-
CT: JL