



2026:AHC:146040

HIGH COURT OF JUDICATURE AT ALLAHABAD

WRIT – C No. - 26475 of 2026



.....Petitioners(s)

Versus

State of U.P. & 3 Ors.

.....Respondents(s)

Counsel for Petitioners(s) : Vinay Kumar Dwivedi, Vinod
Kumar Ojha
Counsel for Respondent(s) : C.S.C. Pratik Chandra

Court No. -38

A.F.R.

HON'BLE VINOD DIWAKAR, J.

1. Heard Shri Vinod Kumar Ojha, learned counsel for the petitioner, and Shri Pratik Chandra, learned counsel appearing for respondent nos. 2 and 3.
2. The present writ petition has been filed seeking issuance of a writ of mandamus directing respondent nos. 2 and 3 to re-examine the petitioner's answer book of the subject "*Bio-Diversity Protection Law*" (Course Code No. [REDACTED]) of the B.A. LL.B., IX Semester Examination 2025–26, having Roll No. [REDACTED], and to award marks in accordance with the answers written by the petitioner, and thereafter issue a revised statement of marks.
3. The case of the petitioner, in brief, is that he is a student of the five-year B.A. LL.B. course at Prayag Vidhi Mahavidyalaya, Muvaiya, Naini, Prayagraj, an institution affiliated to Prof. Rajendra Singh (Rajju Bhaiya) University, Prayagraj, a State University established under the provisions of the Uttar Pradesh State Universities Act, 1973. It is stated

that the petitioner had successfully cleared the examinations from Semester I to Semester VIII and thereafter appeared in the B.A. LL.B. IX Semester Examination 2025–26, including the subject "*Bio-Diversity Protection Law*". The result was declared on 18.03.2026, and petitioner was awarded 'zero marks' in all the attempted questions.

4. Learned counsel for the petitioner submits that upon receiving the statement of marks, the petitioner was surprised to find that he has been awarded 'zero marks' in the aforesaid subject despite having attempted the all the questions, and he was expecting to secure more than 50 marks. It is contended that the petitioner thereafter obtained a copy of his answer book under the Right to Information Act, 2005, and found that no marks has been awarded to any of the answers attempted by him. It is further submitted that despite representations made to the University seeking re-evaluation of the answer sheet, no action was taken. It has also been stated that the petitioner has qualified the LL.M. Entrance Examination and is awaiting admission through the counseling process. On these premises, it is urged that the action of the respondent-University is arbitrary and unsustainable in law.

5. On the previous date of hearing, this Court directed the respondent-University to produce the question paper as well as the original answer sheet of the petitioner of "Bio-Diversity Protection Law" subject.

6. In compliance with the aforesaid order, the question paper and the original answer sheet have been produced before this Court and have been carefully examined.

7. During the course of hearing, this Court directed Shri Vaibhav Tripathi, learned Standing Counsel present in Court to read the answer written by the petitioner to Question No. 3-C. For illustration, the question no. 3-C and answer given by the petitioner has been reproduced below:

"Section-C

Question 3(c): Describe National Laws in India related with biodiversity conservation.

Answer: 3(c) :The procedure of involvement in the National level of monitoring a good seeker in the trustee of God as per the transfer of property lacking behind the role of movement for seeking a trust in the currently appointed and further it should be eligible for the on going process in which the house and conditional prompted suited on the basis of maternity of grudges and condition bailing of lift and originates in the seeker of terminology for the unwanted and must be allowed.

The law related to Nation law in with a biodiversity of neutral and appointed law makers that deals with grudges of meaningful appearance as the felicitation of discovery is equivalent to the loading of trustee that guranted such willful attention for worth of its advantages as well as disadvantages these law are being protected.

By both the provision of inactive mode of surrounded and willful abstention for the allowed provision and conditional willful is equivalent to the position of factors that may seek proper attention as well as knowledge of mind full appearance it is very normal favours brings hardened with such a discovery that is meant to be applied in any of such cases.

After the observation of natural wildlife sanctuary it is point less to seek acknowledgment of any such informative to dehanalise and marginalise this could be degraded with any of such position as it cannot be afforded in the name of trusted personal in the both the scenario it can be considered on the following provision of law that are crafted to nullified and protected the integrity and sovereignty of biodiversity conversation protection Act it must be enhanced in the provision of such law:

(i) Wildlife Protection Act 1973

(ii) Biodiversity Origin and Regulation Act 1996

These are the module of crating to protest the saviour and origin of such law it could be helpful for the seeker as well as protector on the masterious outcome of enormous as well as described render the policy of such laws that gathered no trustee in the name of premium and extension of such law that could with draw on the galaxies of welfare community and must seek knowledge it could be helpful as it adjusted the modesty in term of finalization and extensive mode of fabrication to discriminate and may be

highlighted to get the knowledge to judge its community of being find by such Act it reflexes and get by the compulsory culturic that suggest just being to evolve the maternal and internal integrity that found no suggestion to affix it with the undue such policy.

This is going to be a big myth that the appointment and the duty of the favours getting by citizens and touched by it just to enhance and manage the advance capability as he could survive and get the major consequences to accelerate its judgment for the fabrication and touched by such other souls. It could be atleast postponed and is more appearance just to avoid the nullifying material and it is adjusted by the knowledge of trusted forceful and pivotal role of applying to huge success of maternity and to adjust if it can manage as just at it could in scheduled put verification on to it and attempt atleast it is distinguished in the selfmade of it provinces just to minimise its though process and can be calculated on the ongoing and recreate the materialistic and socialistic information from any side as it deems fit on any of such condition if we are going to intolerate and calculate the minimising and traditional publicity it is going to be heartfelt and mere appearance could enhance its term however it is possible as such law is is rooted and guranttred by other."

8. Shri Vaibhav Tripathi, after reading the answer, fairly stated that he is unable to comprehend the purport of the answer or discern any coherent reasoning, factual narration or legal proposition relatable either to the question asked or to the subject of "*Bio-Diversity Protection Law*". This Court has examined the answer book and arrives at the same conclusion. The answer to Question No. 3-C does not disclose any legal understanding of the subject. Consequently, no fault can be found with the evaluation undertaken by the examiner in awarding zero marks for the said answer. Similar is the position with the remaining answers contained in the answer book.

9. It is well settled that the scope of judicial review in matters relating to academic evaluation is extremely limited. Unless arbitrariness, *mala fides*, violation of statutory provisions, or a patent error in the process of evaluation is demonstrated. Upon examination of the original record, this Court finds no material to suggest that the

petitioner has suffered any prejudice on account of evaluation or that the examiner has acted arbitrarily in awarding zero marks.

10. While examining the record, this Court cannot remain oblivious to the larger issue that it reflects. The petitioner is pursuing a professional degree in law, a course intended to prepare students for entry into the legal profession. The quality of the answers contained in the answer book gives rise to serious concern regarding the academic standards maintained at the institution where the petitioner has been receiving the legal education. Legal education constitutes the foundation of the justice delivery system. Any substantial decline in academic standards at the institutional level affects not merely the legal profession, but the administration of justice itself. One further aspect deserves mention. This is not a solitary instance; matters of this nature have come before this Court with disquieting frequency.

11. It is not unlikely that, had the student been properly counselled before the examination, had a suitable orientation programme been provided, and had he been adequately taught, supervised and apprised of what is expected of an examinee, the answers in question would not have been written in the manner they were. The deficiency, if any, lies as much in the institution's failure to discharge its responsibility of imparting quality education as in the answers produced by the student.

12. In view thereof, this Court considers it appropriate that the Bar Council of India, being the statutory regulator entrusted under the Advocates Act, 1961 with the maintenance of standards of legal education, may examine whether the institution concerned continues to satisfy the academic and infrastructural standards prescribed under the applicable Rules and Regulations. It shall be open to the Bar Council of India to undertake such inspection or inquiry as it may deem appropriate, in accordance with law, and after affording the institution an opportunity of being heard.

13. Likewise, the Law Commission of India may consider examining the broader questions relating to the standards of legal education in the

country, and may prepare a report thereon should it consider such a course appropriate. It is clarified that the observations made hereinabove are intended only to invite the attention of the aforesaid bodies to a matter of general concern, and shall not be construed as a finding against the institution concerned, or against any teacher or examiner thereof, none of whom is before this Court.

14. For the reasons recorded above, no ground for interference under Article 226 of the Constitution of India is made out. The writ petition is, accordingly, *dismissed*.

15. The original question paper and the original evaluated answer book shall be returned to respondent no. 4, who shall preserve the same in safe custody for any future requirement.

16. Based on the aforesaid deliberations, the Registrar (Compliance) is directed to transmit a copy of this order to the Principal Secretary, Bar Council of India, together with a photocopy of Question Paper No. [REDACTED] for the B.A. LL.B. (Ninth Semester) Examination, 2025–26, Paper III(B) — Biodiversity Protection Law, Course Code [REDACTED] and a photocopy of the answer book of the petitioner (with the particulars identifying the petitioner redacted- petitioner's name, roll number, enrollment number, and any other identifying particulars should be blacked out or masked on the photocopy), for such consideration as the Bar Council of India may deem fit, including consideration of whether the standards of legal education presently maintained are commensurate with the object for which they are prescribed, and whether the existing mechanism for the grant of approval of affiliation to, and the periodic inspection of, institutions imparting legal education requires strengthening to compete with globally competitive legal education standards.

17. A copy of the said question paper and answer book (similarly redacted) shall also be sent to the Member Secretary¹, Law Commission of India, for examination and, after such preparatory work as may be

¹ Reference Function of Department, June 7, 2022 under Chapter how does the Law Commission Function and its Methodology

considered necessary, for being placed before the Hon'ble Chairman of the Commission for consideration and for the formulation of such proposals for reform in legal education as the Commission may deem appropriate, consistent with the objects for which it has been constituted.

July 17, 2026
Shafique

(Vinod Diwakar, J.)