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# EVALUATING MANDATORY ATTENDANCE IN LAW UNIVERSITIES THROUGH RECENT COURT ORDERS

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## I. ABSTRACT

*This paper explores the contentious issue of mandatory attendance in law universities in India. Its focus is on the historical background of the litigation arising from the tragic suicide of a law student and the subsequent judicial scrutiny of attendance norms in legal education. The central research issue concerns the legal challenge to rigid attendance requirements prescribed under the Bar Council of India framework. The paper examines the decision of the High Court of Delhi, its directions to the Bar Council of India, and the further development of the matter before the Supreme Court. In its judgment dated November 3, 2025, the High Court of Delhi departed from a strict attendance-based approach and compared the existing rules with the National Education Policy, 2020 and the relevant UGC framework, both of which contemplate greater flexibility. The Court observed that mandatory attendance may adversely affect practical legal training through moot courts, internships, seminars, court visits, and academic competitions. It directed the BCI to reconsider its regulations and proposed interim safeguards against detention. Subsequently, on May 26, 2026, paragraph 249 was stayed in Supreme Court proceedings arising from NMIMS's SLP (Crl.) No. 9450/2026, while BCI's separate petition was heard as a connected matter. By order dated July 21, 2026, the Supreme Court granted one-time relief to students whose academic sessions were ongoing when the High Court judgment was delivered. The matter listed on August 25, 2026 was not taken up and was further listed for September 8, 2026. The paper finally recommends a balanced attendance framework that recognises classroom learning, practical training, and student welfare.*

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## II. KEYWORDS

Mandatory Attendance, Legal Education, Bar Council of India (BCI), Law Student Detention, Student Mental Health.

## III. INTRODUCTION

Law universities in India differ significantly in their admission processes, institutional structures, fee requirements, and academic environments. Some institutions admit students through competitive entrance examinations such as the Common Law Admission Test, while others follow separate admission procedures and may involve substantial financial commitments for students and their families. Despite these institutional differences, one requirement remains common across Bar Council of India-recognised law institutions: compliance with prescribed minimum attendance norms.

The debate on mandatory attendance becomes particularly significant in the later years of legal education, when students increasingly engage with internships, moot courts, court visits, legal-aid activities, research work, and other forms of practical training. While classroom teaching remains an essential component of legal education, professional exposure outside the classroom also plays a crucial role in developing legal skills. This paper is motivated by the observation that rigid attendance requirements may, in some circumstances, create tension between classroom attendance and experiential learning.

Against this background, the paper examines the legal controversy surrounding mandatory attendance in law universities, the findings of the Delhi High Court, the subsequent Supreme Court proceedings, and the present legal position on whether shortage of attendance may operate as a ground for detention or denial of examination opportunity. The paper further analyses whether the existing attendance framework adequately accommodates practical legal training, student welfare, and the need for proportionate academic regulation.

### **A. Research Objectives**

The primary objective of this paper is to examine the evolution of judicial oversight over mandatory attendance norms in Indian law universities. The paper seeks to analyse the legal basis of the challenge to rigid attendance requirements prescribed under the Bar Council of India framework and to assess how the Delhi High Court approached the issue in light of practical legal training, student welfare, and contemporary educational policy.

It further aims to trace the procedural development of the matter before the Supreme Court, including the interim stay of paragraph 249 and the one-time relief granted to affected students. The paper also seeks to evaluate whether the present attendance framework adequately balances classroom learning, professional training, institutional discipline, and student mental health.

### **B. Research Questions**

This paper addresses the following research questions:

1. Whether mandatory attendance requirements in law universities sufficiently accommodate practical legal training, including internships, moot courts, seminars, court visits, legal-aid work, and academic competitions?
2. Whether detention or denial of examination opportunity solely on the ground of attendance shortage is a proportionate academic consequence?
3. How did the Delhi High Court interpret the relationship between attendance norms, student welfare, and flexibility in legal education?
4. What is the legal effect of the Supreme Court's interim orders on students whose academic sessions were ongoing when the Delhi High Court judgment was delivered?
5. What reforms may be required to create a balanced attendance framework for Indian legal education?

### C. Research Methodology

This paper adopts a doctrinal legal research methodology. It is based primarily on the analysis of judicial decisions, statutory provisions, regulatory rules, and official orders concerning attendance requirements in law universities. The principal materials examined include Rule 12 of the Bar Council of India Rules of Legal Education, 2008, the Delhi High Court decision in *Courts on its Own Motion in Re: Suicide Committed by Sushant Rohilla, Law Student of I.P. University*, and the subsequent Supreme Court proceedings in *Prakruthi Jain v. Bar Council of India* and connected matters. The paper follows a case-law-based approach to examine the reasoning of the courts and its implications for legal education policy. Secondary materials, including legal commentaries and policy materials such as the National Education Policy, 2020 and the relevant UGC framework, are used only to support the doctrinal analysis.

## IV. THE INCEPTION

The controversy began when a friend of Mr. Sushant Rohilla, who died by suicide while pursuing the five-year B.A. LL.B. programme at Amity Law School, a private law institution in the Delhi-NCR region, posted a letter dated 20 August 2016. The letter expressed concern and alleged that the deceased had been subjected to mental torture and harassment by a particular teacher at the law school. The broader concern raised in the letter was that an inquiry should be conducted into the unfortunate death of Mr. Sushant Rohilla, along with the wider issues of student mental health and mandatory attendance requirements in universities.

The PIL Committee of the Supreme Court accepted that this issue should be registered as a writ petition. On 6 March 2017, the writ petition entertained by the Supreme Court was transferred to the Delhi High Court.<sup>2</sup>

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<sup>2</sup> *Courts on its Own Motion in Re Suicide Committed by Sushant Rohilla, Law Student of I.P. University*, 2025 SCC OnLine Del 7920, ¶ 3-7.

Along with this, criminal proceedings were initiated under Section 306 of Indian Penal Code<sup>3</sup>, which is regarding abatement of suicide.<sup>4</sup> We will not look into that in detail, as the main objective of this paper is to deal with the matter of attendance. The court was of the opinion that there was no mens rea and that the deceased was not the only student who was detained; in total, 19 students were detained.<sup>5</sup>

On September 9, 2024, the court directed the counsel for the Respondent to be willing to make ex gratia compensation. Eventually, on November 14, 2024, an out-of-court settlement was reached between the parties, with the agreement that all pending cases would be closed and no further proceedings would continue in the matter. The protest petition filed by the sister was withdrawn. Finally, a settlement was signed by the family of the deceased and the law university.<sup>6</sup>

The matter went through a lengthy process, various universities and stakeholders had to file various documents and evidence at different points of the proceedings, and finally, the Delhi High Court came to a conclusion regarding the mandatory attendance issues.

## **V. DELHI HIGH COURT'S FINDING ON MANDATORY ATTENDANCE**

The judiciary has strongly condemned the Bar Council of India's (BCI) inflexible ruling regarding mandatory attendance of 70%<sup>7</sup>, contrasting it with the approach of the National Education Policy (NEP) 2020 and the UGC. The court has rightly pointed out that quality education cannot simply rely on classroom lectures but must also involve practical training outside the classroom.

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<sup>3</sup> Indian Penal Code 1860 § 306.

<sup>4</sup> Courts on its Own Motion, 2025 SCC OnLine Del 7920, ¶ 8.

<sup>5</sup> Id. at ¶ 11-12.

<sup>6</sup> Id. at ¶ 19-21.

<sup>7</sup> Bar Council of India Rules of Legal Education 2008 rule 12.

The court has also pointed out that the current situation inhibits students from gaining good experiences in legal practice, such as organizing academic contests, attending moot courts, or drafting various legal documents during internships. Thus, by forcing people to maintain attendance, the system actually prevents law students from gaining the necessary practical training and developing holistically.

The Court's reasoning also carries a constitutional dimension. The issue was not treated merely as a dispute over regulatory compliance with Bar Council of India attendance rules. Rather, the Court connected rigid attendance enforcement with broader concerns of fairness, dignity, student welfare, and mental health under Articles 21 and 14 of the Constitution of India.

From this perspective, attendance rules may be valid as academic standards, but their mechanical enforcement through detention or denial of examination opportunity can become disproportionate where universities fail to provide remedial mechanisms or fail to consider recognised forms of practical legal training. This constitutional framing strengthens the judgment because it elevates the dispute from an internal academic regulation issue to a matter concerning fairness and welfare within educational institutions.

The court underscored that there exists a structural inconsistency in the education field in that students unjustly pay the price for administrative mishaps. In particular, when universities fail to meet the legal minimum number of required teaching hours, students must attend the remaining classes practically at all times to obtain a 70% attendance mark. The court also expressed serious concerns about the Bar Council of India's attempt to enforce attendance through biometric data tracking and CCTV observance.<sup>8</sup>

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<sup>8</sup> Bar Council of India, Implementation of Criminal Background Check System, Declaration Regarding Simultaneous Degree and / or regular Academic Programs, Employment status, Attendance Compliance, and Biometric Attendance, & Installation of CCTV cameras, in all Centers of Legal Education, BCI:D:5186/2024 (LE Circular No. 13/2024) (Sept. 24, 2024).

Dismissing the arguments in favor of technological transparency provided by the Bar Council of India, the judiciary predicted that constant visual and biometric surveillance will represent an intrusive measure that infringes the human rights of students without solving the problem.

## **VI. INSTITUTIONAL REFORM AND STUDENT-WELFARE DIRECTIONS**

The Delhi High Court's judgment was not limited to the attendance and detention issue. The Court also treated the controversy as part of a larger institutional failure concerning student welfare, grievance redressal, and mental-health support within universities. In this regard, the Court directed that all educational institutions and universities must constitute Grievance Redressal Committees in accordance with the University Grants Commission (Redressal of Grievances of Students) Regulations, 2023. The Court further emphasised that such committees should not exist merely on paper, but must provide students with a genuine, accessible, and responsive mechanism for raising grievances against faculty members, administrative staff, or any other institutional authority.

The Court also issued directions concerning student counselling and mental-health infrastructure. It required universities to inspect whether affiliated colleges had constituted proper Grievance Redressal Committees with student representation and whether they had adequate counsellors, psychologists, or psychiatrists to respond to student distress. The Court also noted that counselling rooms should be located and maintained in a manner that allows students to seek help discreetly. These directions were intended to create an institutional atmosphere in which students feel assured that their university will promptly address grievances and provide support in moments of distress.

This reasoning is also relevant for institutional reform. Instead of relying on surveillance-based enforcement, law universities should adopt transparent and student-supportive systems. These may include weekly attendance updates, prior warnings before shortage

becomes irreversible, remedial classes, assignments, certified legal-aid work, and structured recognition of internships or academic competitions. Such a model would preserve the importance of attendance while ensuring that the regulatory framework does not punish students who are engaged in meaningful professional training outside the classroom.

The Article 21 dimension is particularly significant. The Court relied on the settled understanding that the right to life includes dignity, mental health, and conditions that allow meaningful personal development. In this context, detention from examinations on the sole ground of attendance shortage was considered capable of producing disproportionate consequences, especially where a student may have been engaged in internships, moot courts, court visits, legal-aid work, academic competitions, or other forms of practical legal training.

The Court's emphasis on counselling, grievance redressal, student participation, and mental-health support demonstrates that educational institutions are expected to protect student welfare, not merely enforce attendance mechanically. Rather than relegating students to the end of semester exams with detention as a punishment, the court encouraged the use of methods aimed at improving situations for students. The court suggested introducing proactive measures, such as transparent attendance checks on a weekly basis, additional classes that students must attend, and supplementary tests. In addition, it is possible to impose academic penalties, such as a percentage reduction from the CGPA.

This constitutional grounding increases the doctrinal significance of the judgment. If the case were understood only as a critique of BCI attendance rules, its relevance would remain largely confined to regulatory reform in legal education. However, by linking rigid attendance enforcement with Articles 21 and 14, the Court elevated the issue to one of constitutional governance within educational institutions. Future attendance-related litigation may therefore rely on this reasoning to argue that academic regulations must be applied with proportionality, transparency, student support, and reasonable

accommodation, particularly where the consequence is denial of examination opportunity or academic progression.<sup>9</sup>

The Article 14 aspect arises from the requirement that institutional action must be fair, reasonable, and non-arbitrary. A uniform rule that automatically debars students from examinations, without considering the number of classes actually held, the reason for shortage, the availability of make-up mechanisms, or the student's participation in recognised academic and professional activities, risks operating in an arbitrary manner. The High Court's suggested alternatives weekly attendance notification, remedial classes, assignments, recognition of practical work, and limited academic penalties reflect an attempt to replace automatic exclusion with proportionate regulation.

### **A. Directions Issued**

The following paragraphs are the verbatim guidelines issued by the Delhi High Court to the Bar Council of India (BCI), which they had to consider regarding the problem of mandatory attendance; this judgement came on November 3, 2025.

*"249. In view of the above discussion in respect of attendance norms, the following directions are issued:*

*(1) The Bar Council of India shall undertake a re-evaluation of the mandatory attendance norms for the 3-year and 5-year LLB courses in India in line with the above observations as also in line with the NEP, 2020 and also the 2003 UGC Regulations which contemplate flexibility in attendance requirements. As part of this process, the BCI shall also incorporate modification of attendance norms to enable giving credit to moot courts, seminars, model parliament, debates, attending court hearings etc. In addition, ameliorative measures as contained below shall also be discussed and incorporated. BCI shall undertake a stakeholder consultation including students, student bodies, parents, teachers etc., for this purpose in an expeditious manner.*

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<sup>9</sup> Courts on its Own Motion in Re Suicide Committed by Sushant Rohilla, Law Student of I.P. University, 2025 SCC OnLine Del 7920, ¶ 164-248.

*(2) In order to safeguard the life and mental health of students, keeping in mind the debilitating impact on students that detention or non-appearance in examinations, due to mandatory attendance requirements can have, while the consultations by the BCI are underway, it is directed in the interregnum, as under:*

*a. No student enrolled in any recognized law university, University or institution in India shall be detained from taking examination or be prevented from further academic pursuits or career progression on the ground of lack of minimum attendance;*

*b. No law university, University or institution shall be permitted to mandate attendance norms over and above the minimum percentage prescribed by the BCI under the Legal Education Rules;*

*c. Insofar as the mandatory attendance norms fixed by the BCI are concerned, all law colleges, Universities and institutions recognized which impart 3 years and 5 years LLB degree courses shall with immediate effect, implement ameliorative measures including:*

*i. Weekly notification of attendance of students through an online portal/ a mobile app including on the notice board;*

*ii. Monthly notice to parents/legal guardian/family members regarding any shortage in attendance;*

*iii. Conducting extra physical or online classes for such students, who do not fulfil the minimum attendance norms;*

*iv. Home assignments to be completed in lieu of shortage of attendance;*

*v. Stringent practical work in legal aid clinics or similar such bodies, duly certified, which can cover up the shortage of attendance during the semester itself. Such steps shall thus be taken during the semester itself.*

*vi. In terms of Rule 12 of Legal Education Rules, 2008, the attendance percentage shall be calculated on the basis of ACTUAL CLASSES HELD by the teachers.*

*vii. If at the end of a semester, a student still does not qualify the prescribed attendance norms, the university/University cannot bar the student from taking the examination. The student shall be permitted to take the semester examination, however, in the final result for the semester, the grade*

*of the student would be permitted to be reduced by a maximum of 5%, in case of marks being awarded and by 0.33% in case of the CGPA system being followed. Merely on shortage of attendance, promotion to the next Semester shall not be withheld.*

*BCI shall take into consideration the above measures as part of its consultation process while finalizing its norms for legal education.*

*(3) In terms of the assurance given by the BCI on 10th January, 2020, read with Rule 26 of Schedule III to the Legal Education Rules, the BCI shall also take steps to enable internships to be made available to all students, especially those students belonging to economically weaker background, remote areas, specially-abled students etc. who do not have resources to arrange the same. Accordingly, the list of senior advocates, advocates, law firms, regulatory bodies, government organizations, etc. who are willing to provide internships to students, shall be published by the BCI and the State Bar Councils on their respective websites within three months. The said list shall be periodically updated and published city wise by the BCI and State Bar Councils so that the students can apply for and obtain internships.*

*(4) The Circular No. BCI:D:5186/2024 dated 24th September, 2024 issued by the Bar Council of India in respect of Biometric attendance, installation of CCTV cameras etc. in all centres of legal education across India, shall not be given effect to.”<sup>10</sup>*

## **VII. SPECIAL LEAVE PETITION IN THE ATTENDANCE ISSUE**

The procedural history before the Supreme Court requires a distinction between the connected proceedings. The attendance-related directions in paragraph 249 of the Delhi High Court judgment were first taken up in SLP (Crl.) No. 9450/2026, preferred by SVKMS Narsee Monjee Institute of Management Studies against the Bar Council of India and others. By interim order dated May 26, 2026, the Supreme Court stayed the effect and operation of paragraph 249 prospectively, while clarifying that High Courts where similar attendance matters were pending could decide them on merits.

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<sup>10</sup> Id. at ¶ 249.

Separately, the Bar Council of India's petition, SLP (Crl.) No. 10717/2026 / Diary No. 29604/2026, was also listed and tagged with W.P.(C) No. 31/2025, *Prakruthi Jain v. Bar Council of India*, and connected matters. Therefore, the litigation should be described as a set of connected institutional, regulatory, and student-led proceedings, rather than as a single BCI-initiated challenge.<sup>11</sup>

#### **A. Next Hearing on July 21, 2026**

After staying, the issue was again discussed by the Supreme Court on July 21, 2026, with the main focus on the directions issued in paragraph no. 249 and forbade the detention of any student on the ground of lack of minimum attendance. As recorded in the order, the Bar Council of India had issued a letter stating that no student should be detained from appearing in examinations or prevented from progressing to the next semester during the ongoing period, until re-evaluation was completed pursuant to the Delhi High Court judgment.<sup>12</sup>

Relying on the Delhi High Court judgment, many students stopped attending classes on a regular basis with a bona fide belief that attendance could not operate as a bar to appearing in examinations for the ongoing academic session.<sup>13</sup> The Court stayed on paragraph 249 on May 26, 2026, after which a problem arose as some universities started detaining students whose attendance is below the mandatory requirements from appearing in the examinations for the ongoing academic session.<sup>14</sup>

Various applications have been filed, praying that there was uncertainty based on the Delhi High Court judgement, during the contemporary academic session, so relaxation should be provided.<sup>15</sup> The law universities must be restrained from detaining students on account of shortage of attendance. The Supreme Court tagged the SLP filed by the Bar

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<sup>11</sup> Bar Council of India v. Union of India, SLP (Crl.) Diary No. 29604/2026 (SC May 26, 2026).

<sup>12</sup> Prakruthi Jain v. Bar Council of India, W.P. (C) No. 31 of 2025, ¶ 2 (SC July 21, 2026).

<sup>13</sup> Id. at ¶ 3.

<sup>14</sup> Id. at ¶ 4.

<sup>15</sup> Id. at ¶ 4.

Council of India and the writ petition filed by the students aggrieved, after the stay order and the actions of universities.

The Supreme Court observed that students had acted on the basis of the Delhi High Court judgment, which had diluted the attendance norms for law universities, and on the Bar Council of India's subsequent communication. The actions of the students were therefore treated as justified and bona fide. Further, clarification is provided that the applicability of the stay order issued on May 26, 2026, shall be prospective in nature.<sup>16</sup>

Finally, directions were issued that students whose academic sessions were ongoing when the Delhi High Court judgement was rendered shall not be detained or prevented from giving examinations for this time period academic sessions only. Students who are facing such consequences shall be permitted to appear for the final examinations. Furthermore, if a student is not able to appear before the examinations completely or partially due to various other reasons, they shall be allowed to take supplementary examinations for this session only. This shall be a one-time measure.<sup>17</sup>

The Supreme Court's order must therefore be read narrowly. It did not finally abolish attendance requirements for law students, nor did it declare that law universities are permanently barred from enforcing minimum attendance standards. Its immediate purpose was to protect students who had acted under the bona fide belief created by the Delhi High Court's judgment before the prospective stay was granted. This distinction is important because universities must continue to comply with existing regulatory norms, while also ensuring that students covered by the Supreme Court's one-time protection are not retrospectively prejudiced.

## VIII. PERSONAL OPINIONS

First, law universities should ensure strict compliance with the Supreme Court's order dated July 21, 2026. Students whose academic sessions were ongoing when the Delhi

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<sup>16</sup> Id. at ¶ 7.

<sup>17</sup> Id. at ¶ 8.

High Court delivered its judgment on November 3, 2025 should not be detained or prevented from appearing in examinations solely on the ground of shortage of attendance, provided they fall within the limited category protected by the Supreme Court's one-time relief.

Secondly, universities should review all detention decisions taken during the period of uncertainty between the Delhi High Court judgment and the prospective stay granted by the Supreme Court. Where examinations have already been conducted, affected students should be allowed to appear in supplementary examinations in accordance with the Supreme Court's order. Such supplementary examinations should be treated as remedial academic measures and should not be used to impose additional stigma on students.

Thirdly, the Bar Council of India should complete its stakeholder consultation on attendance norms within a defined and publicly notified timeline. The consultation should include students, student bodies, parents, faculty members, universities, State Bar Councils, and members of the legal profession. A revised attendance framework should be aligned with the objectives of legal education, including classroom learning, practical training, professional exposure, and student welfare.

Fourthly, universities should avoid recording adverse remarks on marksheets merely because a student received the benefit of the Supreme Court's one-time attendance-related relief. Academic records should reflect the student's examination performance and should not impose an additional penalty where the Court itself permitted the student to appear.

Finally, the revised framework should formally recognise internships, moot courts, seminars, court visits, legal-aid work, research projects, and academic competitions as integral components of legal education. Attendance norms should encourage academic discipline, but they should not operate in a manner that discourages practical legal training.

## **IX. SUGGESTIONS AND RECOMMENDATIONS**

In light of the Supreme Court's order dated July 21, 2026, law universities should ensure that students whose academic sessions were ongoing when the Delhi High Court delivered its judgment on November 3, 2025 are not detained or prevented from appearing in examinations solely on the ground of shortage of attendance. The protection granted by the Supreme Court was expressly framed as a one-time measure and should therefore be applied only within the limits identified by the Court.

## **X. CONCLUSION**

The issue regarding attendance has not been resolved until now. On August 25, 2026, the petition shall be listed for the final disposal. The judgement issued will be read by the law students with keen interest and determine the trajectory of the students and their relationship with their university. Whether the flexibility argument will prevail over the traditional methods of rote learning, or just attending the lecture will become important, then truly understanding it.

The judges should analyze the issue with a long-term vision, and the advancement of technology, and the need to utilize the time in a better way. International education frameworks should be considered, as their model of learning is more practical oriented, as compared to India. Law universities should review their actions and ensure compliance with the order issued by the Supreme Court. Where non-compliance is identified, appropriate rectification should be undertaken.

The future of this issue will depend on whether the regulatory framework can move beyond a purely numerical understanding of attendance. A student's engagement with legal education cannot be measured only by physical presence in the classroom. At the same time, attendance cannot be disregarded altogether because classroom teaching remains an important part of legal training. The appropriate solution lies in a balanced model that combines minimum classroom participation with recognised practical

learning, timely remedial measures, transparent attendance records, and proportionate academic consequences.

## **XI. BIBLIOGRAPHY**

### **A. Cases**

1. *Courts on its Own Motion in Re: Suicide Committed by Sushant Rohilla, Law Student of I.P. University*, 2025 SCC OnLine Del 7920.
2. *Prakruthi Jain v. Bar Council of India*, W.P.(C) No. 31 of 2025, Supreme Court of India, order dated July 21, 2026.
3. *SVKMS Narsee Monjee Institute of Management Studies v. Bar Council of India*, SLP (Crl.) No. 9450 of 2026, Supreme Court of India, order dated May 26, 2026.
4. *Bar Council of India v. Union of India*, SLP (Crl.) No. 10717 of 2026 / Diary No. 29604 of 2026, Supreme Court of India, order dated May 26, 2026.

### **B. Statutes and Rules**

1. Indian Penal Code, 1860, § 306.
2. Bar Council of India Rules of Legal Education, 2008, Rule 12.
3. Bar Council of India Rules of Legal Education, 2008, Schedule III, Rule 26.

### **C. Circulars and Policy Materials**

1. Bar Council of India, Circular No. BCI:D:5186/2024, LE Circular No. 13/2024, dated September 24, 2024.
2. National Education Policy, 2020.
3. University Grants Commission Regulations, 2003.