



2026:CGHC:5182-DB

**NAFR****HIGH COURT OF CHHATTISGARH AT BILASPUR****WPC No. 366 of 2026**

Dr. Samriddhi Dubey D/o Shri Sandeep Dubey Aged About 25 Years  
 R/o Om Zone Colony, Shubham Vihar, Mangala, Bilaspur, District  
 Bilaspur (Chhattisgarh)

**... Petitioner****versus**

- 1 - The State of Chhattisgarh Through The Secretary, Department of Public Health And Family Welfare, Mantralaya, Mahanadi Bhawan, Nava Raipur, Atal Nagar, District Raipur, Chhattisgarh, 492002
- 2 - The Director Medical Education, Directorate of Medical Education, Swasthya Bhawan, Sector 19, North Block, Atal Nagar, Nava Raipur, Chhattisgarh, 492002
- 3 - The Commissioner Medical Education Commissionerate of Medical Education, Swasthya Bhawan, 2th Floor, Sector 19, North Block, Atal Nagar, Nava Raipur, Chhattisgarh, 492002
- 4 - The National Medical Commission Ministry Of Health And Family Welfare Through Its Director, Pocket- 14, Sector-8, Dwarka, Phase- 1, New Delhi- 110077

**... Respondents**

(Cause-title taken from Case Information System)

For Petitioner	:	Mr. Rajeev Shrivastava, learned Senior Advocate assisted by Mr. Sandeep Dubey and Mr. Kaif Ali, Advocate
For Respondents No.1 to 3	:	Mr. Shashank Thakur, Additional Advocate General
For Respondent No.4	:	Mr. Dhiraj Kumar Wankhede, Advocate



**Hon'ble Shri Ramesh Sinha, Chief Justice**  
**Hon'ble Shri Ravindra Kumar Agrawal, Judge**

**Order on Board**

**Per Ramesh Sinha, Chief Justice**

**30.01.2026**

1. Heard Mr. Rajeev Shrivastava, learned Senior Counsel assisted by Mr. Sandeep Dubey and Mr. Kaif Ali, learned counsel for the petitioner as well as Mr. Shashnak Thakur, learned Additional Advocate General, appearing for the State/respondents No.1 to 3 and Mr. Dhiraj Kumar Wankhede, learned counsel appearing for respondent No.4.
2. By way of this writ petition, the petitioner has prayed for following relief(s):-

*“10.1 That, the Hon'ble Court may kindly be pleased to call for the record in WPC/5937/2025 ~Dr. Samriddhi Dubey Vs State of Chhattisgarh as well as MCC/40/2026~The State of Chhattisgarh and other vs. Dr. Samriddhi Dubey.*

*10.2 That, the Hon'ble Court may kindly be pleased to issue direction/directions, writ/writs in the nature of certiorari and declare the amendment dated 22.01.2026 in Rule 11 of the Chhattisgarh Medical Post Graduate Admission Rules, 2025 (Annexure-P/1) ultra virus / unconstitutional being violative of the Article 14 of the Constitution of India in the interest of Justice.*

*10.3 That, the Hon'ble Court may kindly be*



*pleased to issue direction/directions, writ/writs in the nature of certiorari and quash / set-aside the notification dated 22.01.2026 (Annexure- P/2) in the interest of Justice.*

*10.4 That, the Hon'ble Court may kindly be pleased to issue direction/directions, writ/writs in the nature of certiorari and direct the respondents not to discriminate between the candidates belonging to categories mentioned in the amendment Rules, 2025 dated 22.01.2026.*

*10.5 That, this Hon'ble Court may kindly be pleased to grant any other relief(s), which is deemed fit and proper in the aforesaid facts and circumstances of the case including claim in subject dispute.”*

3. Learned Senior Counsel for the petitioner submits that the entire exercise undertaken by the State Government by amending Rule 11 of the Chhattisgarh Medical Post Graduate Admission Rules, 2025 on 22.01.2026 is ex facie arbitrary, illegal and vitiated by mala fides, inasmuch as it seeks to virtually nullify and overreach the binding judgment dated 20.11.2025 passed by the Division Bench of this Court in ***WPC/5937/2025 (Dr. Samriddhi Dubey Vs. State of Chhattisgarh and others), 2025 SCC OnLine Chh 10927***, as well as the clarification order dated ***16.01.2026*** passed in ***MCC/40/2026***. It is submitted that the earlier amendment dated 01.12.2025 was admittedly brought in compliance of the said judgment and was also in consonance with the law laid down by the Hon'ble Supreme Court in ***Dr. Tanvi Behl Vs. Shrey Goel***



**and others (Civil Appeal No. 9289 of 2019).** However, by merely changing certain words and expressions through the subsequent amendment dated 22.01.2026, the State has attempted to resurrect the very scheme of total institutional reservation which had already been declared unconstitutional, thereby rendering the amendment contemptuous in nature.

4. Learned Senior Counsel further submits that once the State itself had acted upon the amended Rules dated 01.12.2025, conducted the first and second rounds of counselling, allotted seats and granted admissions to eligible candidates including the present petitioner, the State was estopped in law from altering the rules of the game midstream. It is a settled proposition of law that the conditions of selection and admission cannot be changed after the commencement of the selection process, much less after its substantial completion. The cancellation of all admissions made pursuant to the first and second rounds of counselling, solely on the basis of a subsequent amendment dated 22.01.2026, is therefore violative of Articles 14 and 16 of the Constitution of India and hits at the very root of fairness, certainty and transparency in public admissions.
5. Learned Senior Counsel also submits that the impugned amendment dated 22.01.2026, under the guise of creating an “open category”, in effect reintroduces reservation norms even within the so-called open seats, thereby resulting in 100%



institutional and category-based reservation. Such a device is nothing but an indirect method of doing what could not be done directly and is squarely impermissible in view of the authoritative pronouncement of the Hon'ble Supreme Court in ***Dr. Tanvi Behl*** (*supra*), wherein it has been categorically held that institutional preference cannot eclipse merit and that a portion of seats must remain truly open and available to all eligible candidates on the basis of inter se merit alone. The learned Senior Counsel submits that the amended Rule 11(b), as brought into force on 22.01.2026, clearly violates the said constitutional mandate and judicial dictum.

6. Learned Senior Counsel lastly submits that the action of the State Government is also contrary to the repeated directions issued by the National Medical Commission mandating strict adherence to the admission timelines fixed by the Hon'ble Supreme Court for postgraduate medical courses. The State having consciously framed the amendment dated 01.12.2025, defended the same on affidavit before this Court, and allowed admissions to be completed thereunder, could not have retrospectively unsettled vested rights of students by introducing a subsequent amendment with only prospective effect. Such arbitrary cancellation of admissions not only causes irreparable prejudice to meritorious candidates but also leads to chaos in the admission process, which has been consistently deprecated by constitutional courts. On this ground alone, the impugned amendment dated



22.01.2026 deserves to be quashed and all admissions made pursuant to the valid amendment dated 01.12.2025 deserve to be protected.

7. On the other hand, learned Additional Advocate General appearing for the State vehemently opposes the submissions advanced by learned Senior Counsel for the petitioner and submits that this Court has already considered, examined and conclusively adjudicated the very same issue in **WPC No. 367 of 2026 (Anushka Yadav v. State of Chhattisgarh and others)** vide judgment dated **27.01.2026**.
8. It is submitted that in the said judgment, this Court, after taking into consideration the amendment of Rule 11 of the Chhattisgarh Medical Post Graduate Admission Rules, 2025, the judgment of the Hon'ble Supreme Court in **Dr. Tanvi Behl (supra)**, as well as the clarification order passed in **MCC No. 40 of 2026**, has categorically held that no candidate can claim any vested or indefeasible right on the basis of provisional allotment or admission, once the statutory rules governing admission stand amended in accordance with law. It is further submitted that the cancellation of earlier rounds of counselling and consequential admissions was necessitated to bring the admission process in strict conformity with constitutional principles and binding judicial pronouncements, and such action does not suffer from arbitrariness or illegality.



9. Learned Additional Advocate General thus submits that the present writ petition is squarely covered by the judgment rendered in ***Anushka Yadav (supra)*** and deserves dismissal on the ground of parity, judicial discipline and to avoid inconsistent decisions on identical issues.
10. Learned counsel appearing for respondent No. 4 adopts the submissions advanced by the learned Additional Advocate General appearing for the State and supports the impugned action of the respondent-State.
11. After considering the submissions advanced by the learned counsel for the parties and upon perusal of the material available on record, this Court, vide judgment dated 27.01.2026, dismissed ***WPC No. 367 of 2026*** in the following terms:—

*“15. The Chhattisgarh Government has framed the Chhattisgarh Medical Post Graduate Admission Rules, 2025, which is applicable w.e.f. 06.11.2025 provided the institutional preference to the candidates and the candidates, who are given preference, may not necessarily be domicile to the State of Chhattisgarh. Rule 11 of the said Rules of 2025 is necessary to notice here:-*

*“11. प्रवेश में वरीयता:—*

*(क) राज्य कोटे में उपलब्ध सीटों पर सर्वप्रथम उन अभ्यर्थियों को प्रवेश दिया जाएगा, जिन्होंने या तो पं. दीनदयाल उपाध्याय स्मृति स्वारक्ष्य विज्ञान एवं आयुष विश्वविद्यालय, छत्तीसगढ़ से संबद्ध चिकित्सा महाविद्यालय से एमबीबीएस डिग्री प्राप्त की हो अथवा जो सेवारत अभ्यर्थी हो।*



(ख) उपरोक्त उप-नियम (क) में उल्लिखित सभी पात्र अभ्यर्थियों को प्रवेश दिये जाने के उपरान्त यदि सीटें रिक्त रह जाती हैं, तो इन रिक्त सीटों पर, ऐसे अभ्यर्थियों को प्रवेश दिया जायेगा, जिन्होंने नियम 11(क) में उल्लेखित के अतिरिक्त किसी अन्य चिकित्सा महाविद्यालय से एमबीबीएस डिग्री प्राप्त की हो।”

16. *Earlier, one Dr. Samriddhi Dubey had filed a WPC No. 5937 of 2025 (Dr. Samriddhi Dubey v. State of Chhattisgarh and others) before coordinate Bench of this Court, which was decided on 20.11.2025 and in para 21 of the order, it has been decided that:-*

*“21. In view of the proposition of law as laid down by the Apex Court in Dr. Tanvi Behl (supra), Rule 11(a) and (b) of the Chhattisgarh Medical Post Graduate Admission Rules, 2025 are quashed being ultra vires and violative of Article 14 of the Constitution of India and the State shall not discriminate between the candidates belonging to the categories mentioned in Rule 11(a) and (b) of the Chhattisgarh Medical Post Graduate Admission Rules, 2025.”*

17. *Subsequent to that an application for clarification of the directions contained in paragraph 21 of the order dated 20.11.2025 passed in WPC No. 5937 of 2025 was filed by the State, which was registered as MCC No. 40 of 2026 (State of Chhattisgarh and others v. Dr. Samriddhi Dubey and others) and vide order dated 16.01.2026, the MCC was disposed of clarifying the followings:-*

*“14. According to the learned counsel for the applicant/State, the Government of Chhattisgarh, Medical Education Department, has issued a notification dated 01.12.2025 by substituting Rule 11(क) and (ख) and substituting it by Rule (क), (ख),*



(ग) (घ) of the Rules of 2025. Though the same is not the subject matter of this petition, however, for better understanding of the facts, we deem it appropriate to take note of the same, which reads as under:

“11. प्रवेश हेतु सीटों का संस्थागत आरक्षण :— शासकीय एवं निजी चिकित्सा की कुल उपलब्ध सीटों को दो वर्गों में विभाजित किया जाता है। संस्थागत आरक्षण हेतु 50 प्रतिशत सीटें, तथा ओपन मेरिट हेतु 50 प्रतिशत सीटें।

(क) संस्थागत आरक्षण – 50 प्रतिशत सीटें

शासकीय एवं निजी चिकित्सा महाविद्यालयों की कुल सीटों उन अभ्यर्थियों के लिए आरक्षित रहेगा जिहोने छत्तीसगढ़ राज्य में स्थित एनएमसी द्वारा मान्यता प्राप्त चिकित्सा महाविद्यालयों से एमबीबीएस उत्तीर्ण किया है अथवा जो सेवारत अभ्यर्थी है। इन सीटों पर प्रवेश केवल संस्थागत आरक्षण के पात्र अभ्यर्थियों के मध्य मेरिट के आधार पर दिया जाएगा।

(ख) गैर संस्थागत आरक्षण – 50 प्रतिशत सीटें

गैर संस्थागत आरक्षण शेष 50 प्रतिशत सीटें ओपन कैटेगरी मानी जाएंगी। इन सीटों पर प्रवेश सभी पात्र अभ्यर्थियों हेतु राज्य-स्तरीय मेरिट सूची के आधार पर किया जाएगा। ओपन सीटों पर किसी प्रकार की संस्थागत आरक्षण लागू नहीं होगी।

(ग) उपरोक्त दोनों श्रेणीयों में राज्य में प्रचलित आरक्षण नियम 6 के तहत लागू होगा।

(घ) यदि संस्थागत आरक्षण के अंतर्गत निर्धारित सीटों पर पात्र अभ्यर्थी उपलब्ध नहीं होते हैं, तो मॉप-अप राउण्ड की आवंटन प्रक्रिया के समय उन रिक्त सीटों का अंतरण (*conversion*) करते हुए उन्हें सामान्य (ओपन) श्रेणी में कर दिया जाएगा।”

15. *The Hon'ble Apex Court, in Tanvi Behl (supra) has observed that domicile based reservation in PG Medical course is bad but the Apex Court has also clearly stated that a reasonable number of institution based reservation is permissible. Further, a miscellaneous application being MA No. 512/2025 in CA No. 9289/2019 was filed before the Apex Court, wherein the Hon'ble Apex Court vide order dated 24.03.2025, in the first paragraph has observed that the residence based*



reservations were not permissible for postgraduate seats in medical colleges and that only reservation to a limited extent is permissible, for institutional preference alone, meaning thereby that institutional preference is permitted to a certain extent.

16. In view of the above, the contents of paragraph 21 of the order dated 20.11.2025 passed in WPC No. 5937/2025, "and the State shall not discriminate between the candidates belonging to the categories mentioned in Rule 11(a) and (b) of the Chhattisgarh Medical Post Graduate Admission Rules, 2025", stands deleted and the State shall act in accordance with the ratio laid down by the Apex Court in **Tanvi Behl** (supra)."

18. In the case of "**Dr. Tanvi Behl**" (supra), the Hon'ble Supreme Court has held that:-

"31. We are all domiciled in the territory of India. We are all residents of India. Our common bond as citizens and residents of one country gives us the right not only to choose our residence anywhere in India, but also gives us the right to carry on trade & business or a profession anywhere in India. It also gives us the right to seek admission in educational institutions across India. The benefit of 'reservation' in educational institutions including medical colleges to those who reside in a particular State can be given to a certain degree only in MBBS courses, for which we have assigned reasons in the preceding paragraphs. But considering the importance of specialists doctors' in PG Medical Course, reservation at the higher level on the basis of 'residence' would be violative of Article 14 of the Constitution of India. This has been explained with pronounced clarity both in **Jagadish Saran** and **Pradeep Jain**. If such a reservation is permitted then it would be an invasion on the fundamental rights of several students, who are being treated unequally simply for the reasons



*that they belong to a different State in the Union! This would be a violation of the equality clause in Article 14 of the Constitution and would amount to a denial of equality before the law.*

32. *The law laid down in Jagadish Saran and Pradeep Jain has been followed by this Court in a number of decisions including the Constitution Bench decision in Saurabh Chaudri. We may also refer here judgments such as Magan Mehrotra and Ors. v. Union of India (UOI) and Ors. (2003) 11 SCC 186, Nikhil Himthani vs. State of Uttarakhand and Others (2013) 10 SCC 237, Vishal Goyal and Others v. State of Karnataka and Others (2014) 11 SCC 456 and Neil Aurelio Nunes (OBC Reservation) and Others v. Union of India and Others (2022) 4 SCC 1, which have all followed Pradeep Jain. Thus, residence-based reservations are not permissible in PG medical courses.*

33. *Having made the above determination that residence-based reservation is impermissible in PG Medical courses, the State quota seats, apart from a reasonable number of institution-based reservations, have to be filled strictly on the basis of merit in the All- India examination. Thus, out of 64 seats which were to be filled by the State in its quota 32 could have been filled on the basis of institutional preference, and these are valid. But the other 32 seats earmarked as U.T. Chandigarh pool were wrongly filled on the basis of residence, and we uphold the findings of the High Court on this crucial aspect.”*

19. *When the coordinate Bench of this Court has already clarified in paragraph 21 of the order dated 20.11.2025, passed in WPC No. 5937 of 2025 that, the State shall not discriminate between the candidates belonging to the categories mentioned in Rule 11 (a) and (b) of the Chhattisgarh Medical Post Graduate Admission*



*Rules, 2025, the petitioner cannot claim any benefit, even if she was provided the provisional admission in the PG Medical Course and she paid the requisite fee against the allotted seat.*

*20. On 22.01.2026, the State Government vide its notification amended the Chhattisgarh Medical Post Graduate Admission Rules, 2025 and the Rule 11 has been amended, which is given as below:-*

### अधिसूचना

क्रमांक RULE-801/205/2025-MED. छत्तीसगढ़

चिकित्सा महाविद्यालय के स्नातकोत्तर पाठ्यक्रम में प्रदेश अधिनियम 2002 ( 28 सन् 2002) की धारा-3 सहप्रित धारा 4 द्वारा प्रदत्त शक्तियों को प्रयोग में लाते हुए राज्य राज्य सरकार एतद्वारा छत्तीसगढ़ चिकित्सा स्नातकोत्तर प्रवेश नियम, 2025 में निम्नलिखित संशोधन करते हैं. अर्थात्-

### संशोधन

उक्त नियमों में-

नियम-11 के स्थान पर निम्नलिखित नियम प्रतिस्थापित किया जाये. अर्थात्-

#### 11. प्रवेश हेतु सीटों का विभाजन

(क) शासकीय चिकित्सा महाविद्यालयों की सीटों में अखिल भारतीय कोटे हेतु समर्पित की गई 50 प्रतिशत सीटों के उपरांत शेष उपलब्ध 50 प्रतिशत राज्य कोटे की सीटों पर वे पंजीकृत अभ्यर्थी जिन्होंने एम.बी.बी. एस. पाठ्यक्रम छत्तीसगढ़ राज्य में स्थित राष्ट्रीय आयुर्विज्ञान आयोग द्वारा मान्यता प्राप्त चिकित्सा महाविद्यालयों से उत्तीर्ण किया है अथवा जो छत्तीसगढ़ राज्य के सेवारत अभ्यर्थी हैं। प्रवेश हेतु पात्र होंगे।

(ख) निजी चिकित्सा महाविद्यालयों की सीटों में कुल सीटों के 50 प्रतिशत सीटों पर वे पंजीकृत अभ्यर्थी, जिन्होंने एम.बी.बी. एस पाठ्यक्रम छत्तीसगढ़ राज्य में स्थित राष्ट्रीय आयुर्विज्ञान आयोग द्वारा मान्यता प्राप्त चिकित्सा महाविद्यालयों से उत्तीर्ण किया है अथवा जो छत्तीसगढ़ राज्य के सेवारत अभ्यर्थी है, प्रवेश हेतु पात्र होंगे।



शेष उपलब्ध 50 प्रतिशत सीटों को प्रावीण्यता के आधार पर ओपन सीटों की भाँति आवंटित किया जाएगा। इस प्रयोजन हेतु ऐसे अभ्यर्थी जिन्होंने एम.बी.बी.एस. पाठ्यक्रम छत्तीसगढ़ राज्य में स्थित राष्ट्रीय आयुविज्ञान आयोग द्वारा मान्यता प्राप्त चिकित्सा महाविद्यालयों से उत्तीर्ण नहीं किया है (गैर संस्थागत अभ्यर्थी), पात्र होंगे।

(ग) निजी चिकित्सा महाविद्यालयों की 50 प्रतिशत ओपन सीटों पर भी राज्य में प्रचलित आरक्षण नियम-6 लागू होगा।

(घ) यदि शासकीय चिकित्सा महाविद्यालय की सीटों के विरुद्ध पात्र अभ्यर्थी उपलब्ध नहीं होते हैं एवं सीटें रिक्त रह जाती हैं, तो काउंसिलिंग की तृतीय चरण की आवंटन प्रक्रिया के समय उन रिक्त सीटों को रूपांतरित (*Conversion*) करते हुए उन्हें गैर संस्थागत अभ्यर्थियों को आवंटित किया जा सकेगा।

*21. Pursuant to the notification dated 22.01.2026, considering that there may be change of entire reservation roster/seat matrix and the allotment may also be changed, an order has been issued by the respondent No.3 on 22.01.2026 and cancelled the first and second phase of counselling and also cancelled the allotment of the seats vide its notice dated 22.01.2026 (Annexure P/1) and on 23.01.2026, an explanation has been published by the respondent No.3 to clarify the allotment of seats under the institutional and non-institutional quota. The said clarification is also necessary to notice here:-*

“छत्तीसगढ़ राजपत्र (असाधारण) क्रमांक 40. अधिसूचना क्रमांक RULE-801/205/2025-MED, नवा रायपुर अटल नगर, दिनांक 22 जनवरी 2026 द्वारा चिकित्सा स्नातकोत्तर (एम.डी./एम.एस.) पाठ्यक्रम, प्रवेश वर्ष 2025 के नियमों में किए गए संशोधन के संबंध में यह स्पष्ट किया जाता है कि उक्त अधिसूचना में उल्लिखित '50 प्रतिशत सीटों पर ओपन कैटेगरी (Open Category) के आधार पर आवंटन का आशय यह है कि इन सीटों पर आवंटन पूर्णतः मेरिट के आधार पर किया जाएगा, जिसमें संस्थागत (Institutional) एवं गैर-संस्थागत (Non-Institutional)



दोनों ही कोटे के पात्र अन्यर्थी समान रूप से पात्र होंगे।।”

22. *Since, Rule 11(a) and (b) of the said Rules of 2025 has been amended and the respondent No.3 has cancelled the earlier round of counseling and allotment of seats, the petitioner cannot claim as a indefeasible right that she should be entitled for the allotted seat of Medical P.G. Course, on which she has already taken admission.*

23. *In view of the foregoing analysis, this Court finds no merit in the present writ petition. The impugned orders dated 22.01.2026 and 23.01.2026 issued by the respondent-State have been passed in faithful compliance with the law laid down by the Hon'ble Supreme Court in the case of “**Dr. Tanvi Behl**” (supra) and the clarificatory order passed by this Court in WPC No. 5937 of 2025 and MCC No. 40 of 2026. The State has acted within its constitutional and statutory domain to ensure that admissions to Post Graduate Medical Courses are made strictly in accordance with settled legal principles and constitutional mandates. It is well settled that no vested or indefeasible right accrues merely on the basis of provisional allotment or admission, particularly when such admissions are subject to judicial scrutiny and correction.*

24. *Accordingly, the writ petition is dismissed.*

25. *It is further directed that this order shall have the effect “in rem” and shall apply uniformly to all similarly situated candidates. The issues adjudicated herein stand conclusively settled, and*



*no separate or successive petitions raising identical grounds shall be entertained by this Court, so as to prevent multiplicity of litigation and to ensure certainty, finality and discipline in the Post Graduate medical admission process."*

12. Upon a comprehensive consideration of the pleadings, the rival submissions advanced by learned counsel for the parties, the statutory framework governing Post Graduate medical admissions, and the binding judicial precedents holding the field, this Court is of the considered opinion that the controversy raised in the present writ petition is no longer res integra. The issues sought to be agitated by the petitioner stand squarely covered and conclusively answered by the judgment dated **27.01.2026** passed by this Court in **WPC No. 367 of 2026 (Anushka Yadav v. State of Chhattisgarh and others)**, wherein identical challenges to the amendment of Rule 11 of the Chhattisgarh Medical Post Graduate Admission Rules, 2025 and the consequent cancellation of counselling were repelled after detailed examination of the very same judgments, notifications and statutory provisions relied upon by the petitioner herein. Judicial discipline, consistency and comity demand that this Court follows the said binding precedent, particularly when no distinguishing feature in facts or law has been demonstrated.
13. This Court further holds that the amendment dated 22.01.2026 to Rule 11 of the Rules, 2025 cannot be said to be arbitrary, unconstitutional or violative of Article 14 of the Constitution of



India. On the contrary, the amendment has been brought to realign the admission process with the authoritative law laid down by the Hon'ble Supreme Court in *Dr. Tanvi Behl* (supra) and the clarificatory directions issued by this Court in **MCC No. 40 of 2026**. The State Government, in exercise of its legislative and executive competence, was well within its jurisdiction to rectify the seat matrix and counselling process in order to remove constitutional infirmities and to ensure that institutional preference remains confined within permissible limits. Merely because admissions had been provisionally granted in earlier counselling rounds does not crystallise any vested or indefeasible right in favour of the petitioner.

14. It is a settled principle of law that admissions granted subject to statutory rules and judicial scrutiny are always provisional and conditional in nature, and are liable to be altered, modified or even cancelled if the governing rules undergo valid amendment or are found inconsistent with constitutional or statutory mandates. The petitioner, having participated in the counselling process with open eyes and full knowledge that the admission was subject to the final outcome of pending litigations and rule amendments, cannot invoke the doctrine of estoppel or legitimate expectation against the State. The larger public interest in maintaining a constitutionally compliant, merit-based and uniform admission process must prevail over individual equities.



15. The cancellation of the first and second rounds of counselling and allotments pursuant to the amendment dated 22.01.2026 cannot, therefore, be construed as illegal or arbitrary. Rather, the said action was a necessary administrative consequence flowing from the restructuring of the reservation roster and seat distribution. The clarification issued on 23.01.2026 further demonstrates that the State has consciously ensured that the “open category” seats are allotted strictly on merit, without institutional discrimination, thereby fully conforming to the ratio of *Dr. Tanvi Behl (supra)*. This Court finds no element of mala fides, colourable exercise of power or contumacious conduct on the part of the respondent–State.

16. In view of the foregoing discussion and respectfully following the judgment rendered in **WPC No. 367 of 2026 (Anushka Yadav v. State of Chhattisgarh and others)**, this Court finds no merit in the present writ petition. The same is accordingly dismissed. No costs.

17. It is further clarified that this judgment shall operate *in rem* and shall apply uniformly to all similarly situated candidates. All issues arising out of or connected with the amendment of Rule 11 of the Chhattisgarh Medical Post Graduate Admission Rules, 2025 and the consequential counselling process stand conclusively settled. No fresh or successive writ petitions raising identical or substantially similar grounds shall be entertained by this Court, so



as to prevent multiplicity of litigation and to ensure certainty, finality and discipline in the Post Graduate medical admission process.

**Sd/-**

**(Ravindra Kumar Agrawal)**  
**Judge**

**Sd/-**

**(Ramesh Sinha)**  
**Chief Justice**

Anu