

BLOGS

Case Brief : R. Saravanan v. Periyar University, 2026

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The case of **R. Saravanan v. Periyar University, 2026** is a landmark Supreme Court of India ruling that establishes a *Letters Patent Bench cannot interfere with a just and reasonable decision of a writ court under Article 226 merely because it holds a different view, reinforcing that a government employee cannot be removed based on disciplinary inquiries built on suspicion and conjectures rather than actual evidence.*

Facts (R. Saravanan v. Periyar University, 2026)

R. Saravanan was Deputy Registrar of Periyar University. After a complaint about his assets, the University set up an inquiry, and a one-man Commission headed by a retired judicial officer later found three charges proved.

These were that he influenced the grant of affiliation to a college where his wife was Managing Trustee, that he bought a house property without permission, and that he bought a Santro car beyond his means.

The Syndicate accepted the report and removed him from service in July 2013. **He challenged this under Article 226.** The Single Judge held that the findings were perverse and not supported by evidence, and interfered with the punishment.

The Division Bench, in a Letters Patent appeal under Clause 15, **re-examined the evidence and restored the removal. Saravanan appealed to the Supreme Court.**

Arguments

Appellant (Saravanan): The one-man Commission was only meant to verify facts and had no authority to frame charges, so **the inquiry was without authority of law and the removal was void.** The findings on all three charges were speculative and had no evidence behind them. The Division Bench wrongly re-appreciated the evidence and replaced the writ court's view with its

OWN.

Respondent (Periyar University): The writ petition was not maintainable because he had not used the statutory appeal under **Rule 19 of the Tamil Nadu Civil Services (Discipline and Appeal) Rules, 1955**. Nothing in law barred a domestic inquiry through a one-man Commission headed by a retired judicial officer. A writ court cannot act as an appellate court and re-examine the correctness of a departmental decision.

Issues

- Whether a *Letters Patent Bench* can interfere with a writ court's decision under Article 226 merely because it takes a different view.
- Whether the inquiry findings were perverse for want of evidence, so that the writ court was right to interfere in the disciplinary action.

Judgment (R. Saravanan v. Periyar University, 2026)

The Court first rejected the challenge to the inquiry procedure. The **Commission was validly appointed under Rule 17(g)**, the appellant had full knowledge of the charges, and **22 witnesses were examined in his presence**. But the findings on the three charges were held perverse.

They rested on conjecture, for example that influence “could not be ruled out”, and on drawing an adverse inference from his failure to produce a title deed, when it was the University's job to prove the charge.

The Court held that finding perversity is not re-appraising evidence. A finding with no evidence behind **it is a question of law, which certiorari can correct**. On maintainability, **it said the exhaustion of statutory remedy is a rule of convenience and not an absolute bar, especially because removal from service is the harshest penalty**.

The Court then dealt with the Letters Patent jurisdiction. An appeal under Clause 15 lies on both facts and law and is not the same as a second appeal under **Section 100 CPC**.

But the Bench should be slow to disturb a writ court's reasoned exercise of discretion. Here the **Division Bench had re-examined the evidence and drawn its own inferences without**

cogent grounds. The Supreme Court set aside the Division Bench's judgment of 29 August 2019 and restored the writ court's decision.

Ratio Decidendi

A Letters Patent Bench cannot interfere with a writ court's decision under Article 226 on a mere showing of some error of fact or law, or because it prefers another view.

If the **writ court's decision is just, reasonable and not against public policy, it should stand.** Interference is justified only **where the findings are demonstrably erroneous and the mistake is glaring on the face of the record, supported by cogent grounds and not a minor error.**