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ANALYSIS OF THE JAYSHRI LAKSHMANRAO PATIL VS. CHIEF MINISTER OF MAHARASHTRA AND ORS CASE

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ABSTRACT

The Jayshree Patil vs. Chief Minister of Maharashtra case is a landmark decision that offers critical insights into the intersection of constitutional limits, social justice policies, and affirmative action in India. The case revolves around the Socially and Educationally Backward Classes (SEBC) Act, 2018, which sought to grant reservations to the Maratha community but exceeded the 50% reservation cap mandated by the Supreme Court in the Indra Sawhney (Mandal Commission) case (1992).

Background of the Case

Maratha Reservation History

The **Jayshree Patil vs. Chief Minister of Maharashtra** case is a pivotal judicial ruling that revisits and reinforces the constitutional limits on reservation policies in India. It specifically addressed the **Socially and Educationally Backward Classes (SEBC) Act, 2018**, enacted by the Maharashtra government to provide reservations for the Maratha community. The Act sought to allocate 16% reservation for Marathas in education and public employment, later reduced to 12%-13% following Bombay High Court intervention. However, this law faced significant legal challenges for violating the **50% cap on reservations** established in the Supreme Court's 1992 landmark judgment in the **Indra Sawhney (Mandal Commission) case**. The case became a battleground for debates on affirmative action, equality, and the evolving role of caste-based reservations in India.

The Maratha reservation was rooted in years of political lobbying and protests, particularly from sections of the community claiming underrepresentation in education and

government services. Historically, the Marathas were a powerful agrarian community, often wielding significant political and economic influence in Maharashtra. However, the decline of agriculture and rising unemployment among Maratha youth fueled demands for reservation benefits, resulting in the Maharashtra government passing the SEBC Act in 2018.

Key Contentions

1. Petitioner's Claims

The petitioner, Dr. Jayshree Patil, argued that the SEBC Act violated **Articles 14** and **16** of the Indian Constitution, which ensure equality before the law and equal opportunity in public employment. She contended that the Marathas, being a historically dominant, politically influential, and economically stable group, did not meet the criteria of social or educational backwardness required for reservations. Furthermore, she claimed that the law discriminated against other marginalized communities, thereby undermining the very purpose of affirmative action, which is to uplift truly disadvantaged groups.

2. Respondent's Defense:

The Maharashtra government defended the legislation by relying on the **Gaikwad Commission Report**, which purportedly identified social and economic disadvantages faced by the Marathas. The government argued that the historical injustices suffered by the community, coupled with their underrepresentation in education and government services, constituted **exceptional circumstances** justifying the reservation and the need to exceed the 50% ceiling. However, the Supreme Court found the Commission's data to be flawed, methodologically inadequate, and lacking contemporary relevance. Statistical evidence, the Court noted, indicated that the Marathas already had substantial representation in both education and public services.

Supreme Court's Judgment

The five-judge Constitution Bench unanimously struck down the reservation for Marathas, citing the following key issues:

1. 50% Reservation Cap

In its unanimous judgment, the five-judge Constitution Bench struck down the SEBC Act as unconstitutional. The Court reaffirmed the **50% cap on reservations**, holding it as a fundamental principle that ensures equality for all communities. It emphasized that exceptions to this cap could only be made in **extraordinary circumstances**, which were not evident in the Maratha case. The Court also noted that the Marathas, who constitute over 30% of Maharashtra's population, are neither a socially nor an educationally marginalized community. Historically, they have been landowners, and their literacy rates and economic conditions have significantly improved over the years. This made their inclusion under backward classes unjustifiable.

2. Inadequate Justification for Backwardness

- The **Gaikwad Commission's Report** was deemed **methodologically flawed**:
 - It failed to provide robust and current data.
 - The report overlooked significant **social and economic advancements** among the Maratha community, such as high literacy rates, landownership, and political representation.
 - Statistical evidence indicated that the Marathas were already adequately represented in government jobs and educational institutions.

3. Violation of Constitutional Articles

- The SEBC Act was found to violate:
 - **Article 14**: By creating inequality through unwarranted benefits for a dominant group.
 - **Article 16**: By exceeding the permissible limits of affirmative action without substantive evidence.

4. Interpretation of the 102nd Constitutional Amendment

The Court also addressed the implications of the **102nd Constitutional Amendment**, which introduced **Article 342A**. This article vested the power to identify socially and educationally backward classes for central purposes in the President and Parliament. While the judgment clarified that states retain the authority to identify backward classes for state-specific purposes, the majority opinion emphasized that such identification must align with constitutional principles. The Court criticized the SEBC Act for its lack of substantive evidence to support claims of backwardness and for breaching constitutional limits on reservations.

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Key Observations by the Court

Social and Political Representation of Marathas

- The Court noted that the Marathas:
 - Constituted over **30%** of Maharashtra’s population.
 - Had significant representation in politics, landownership, and public administration.
- Historically, Marathas were **landowners and economically stable**, distinguishing them from marginalized groups for whom reservations were originally intended.

Reservation as a Tool for Social Justice

- The Court emphasized that reservations are meant to uplift genuinely disadvantaged communities, not to serve politically influential groups.
- It reiterated that affirmative action must address the needs of **underprivileged and underrepresented** groups rather than perpetuating **inequality under the guise of equality**.

Economic Criteria vs. Caste-Based Reservation

- The judgment highlighted ongoing societal debates about moving away from **caste-based reservations** to criteria focused on **economic deprivation**. The Maratha case underlined the need for:
 - Transparent data collection.
 - Policies that adapt to evolving social realities.

Implications of the Verdict

1. Reinforcement of the 50% Cap

- The ruling underscores the importance of adhering to the **50% limit** on reservations unless **exceptional circumstances** are demonstrated with solid evidence.

2. Challenges to Other Reservation Policies

- The judgment may influence other state-specific and central policies, such as:
 - Tamil Nadu’s **69% reservation policy**.
 - The **10% Economically Weaker Sections (EWS)** quota introduced in 2019.

3. Recalibrating Affirmative Action

- The case encourages a broader discussion on:
 - Whether reservations should focus more on **economic conditions** than caste alone.
 - Ensuring policies are based on **empirical evidence** rather than political expediency.

4. Strengthened Judicial Oversight

- By striking down the SEBC Act, the Court reinforced its role as a constitutional watchdog, ensuring that reservation

policies remain grounded in fairness, equality, and merit.

Broader Social and Legal Analysis

Equity vs. Equality

- The Court balanced the **principle of equity** (addressing historical injustices) with **equality** (ensuring fairness in opportunity).
- The judgment critiques the misuse of reservations for political gains rather than genuine upliftment.

Reservations as an Exception, Not the Rule

- The verdict reaffirms that reservations should remain a limited measure to address specific disadvantages, rather than a blanket policy benefiting dominant groups.

Addressing Implementation Flaws

- The case highlights deficiencies in data collection and reliance on outdated methodologies, urging policymakers to adopt more rigorous and contemporary approaches.

Conclusion

The **Jayshree Patil vs. Chief Minister of Maharashtra** case is a defining moment in India's reservation jurisprudence. By invalidating the Maratha reservation, the Supreme Court reinforced the need for **constitutional discipline** in social justice policies. The judgment sends a strong message to governments, emphasizing that:

- Affirmative action must be **evidence-based**.
- Reservations should uplift the **truly disadvantaged**, not perpetuate privilege.

This case invites deeper reflection on the evolving role of reservations in a changing society, highlighting the need for **data-driven, inclusive, and constitutionally sound** policymaking.

The judgment carries broad implications. It reaffirmed the necessity of adhering to the 50% cap, preserving the balance between affirmative action and equality. By striking down the Maratha reservation, the Court reinforced the importance of evidence-based policymaking and the need for data that accurately reflects the conditions of the targeted community. The decision also raises important questions about the future of reservation policies, particularly in states like Tamil Nadu, which has a 69% reservation policy, and the central government's 10% quota for Economically Weaker Sections (EWS). Moreover, the verdict reignited debates about the relevance of caste-based reservations in modern India, where economic deprivation may increasingly require attention as a criterion for affirmative action.

The ruling underscored the judiciary's role as a guardian of constitutional values, ensuring that social justice policies remain fair and equitable. Reservations, the Court observed, should not serve as a tool to reinforce privilege but must uplift genuinely marginalized groups. This judgment, by striking down a law that sought to benefit a dominant community, sends a strong message that the principles of equality and meritocracy cannot be compromised without compelling and extraordinary justification. It invites a broader reflection on the evolving role of reservations in Indian society and highlights the urgent need for reforms grounded in rigorous data and constitutional discipline.