



2025:DHC:11781



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* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

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Decided on: 20.12.2025

+ **MAC.APP. 30/2025 & CM APPL. 2297/2025**
NATIONAL INSURANCE COMPANY LTDAppellant

versus

SANJU AND ORSRespondents

+ **MAC.APP. 39/2025 & CM APPL. 2601/2025**
NATIONAL INSURANCE COMPANY LTDAppellant

versus

SATVEER BHATI AND ORSRespondents

+ **MAC.APP. 40/2025 & CM APPL. 2606/2025**
NATIONAL INSURANCE COMPANY LTDAppellant

versus

SANJU AND ORSRespondents

+ **MAC.APP. 751/2025 & CM APPLs. 74237-38/2025**
TATA AIG GENERAL INSURANCE
COMPANY LTD.Appellant

versus

RUBI DEVIRespondent

+ **MAC.APP. 80/2025**
CHANCHAL DEVI AND ANOTHERAppellants

versus



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PUSHPENDER @ PUSHPENDRA SINGH
TOMAR AND OTHERS

.....Respondents

Appearances:

Mr. Aditya Singh, Mr. Shubham Singh, Mr. Kamal Kishor, Advocates for Appellant in item Nos. 1 to 3.

Mr. Vaibhav Singh & Mr. Rajesh Kumar, Advocates for Appellant – Tata AIG General Insurance Company Ltd in Item No. 4.

Mr. Pankaj Gupta, Advocate for Appellant in Item No. 5.

Ms. Tanya Singh, Mr. Vaibhav Verma, Mr. Ved Vyas Tripathi, Advocates for respondent in item Nos. 1 to 3.

Mr. Shrey Chathly, Advocate for R-1 & 2 in Item No. 4. [M:-9910211045].

Mr. R.K. Tripathi, Advocate for R-3 in Item No. 5.

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN

PRATEEK JALAN, J. (ORAL)

1. These five appeals have been heard together, as they all concern a common question, viz., the appropriate parameters for determination of loss of dependency in claims arising out of fatal accidents involving children below the age of 15 years. The appeals have been filed by the Insurance Companies in four cases [MAC.APP. 30/2025, MAC.APP. 39/2025, MAC.APP. 40/2025, and MAC.APP. 751/2025], and by the parents of the deceased [claimants before the Motor Accident Claims Tribunal] in the fifth case, i.e. MAC.APP. 80/2025.

2. The facts of each case, to the extent of involvement of the insured vehicles and findings of negligence against the drivers of the insured vehicles, as a result of which the child lost his/her life, are not disputed. It is, therefore, not necessary to advert to those facts in detail.



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3. The background relating to each victim and the consequent award of the Motor Accident Claims Tribunal [“Tribunal”] are enumerated in the table below:

Appeal No.	MAC.APP. 30/2025	MAC.APP. 39/2025	MAC.APP. 40/2025	MAC.APP. 751/2025	MAC.APP. 80/2025
Case No. before the Tribunal	MACT No. 658/2018	MACT No. 657/2018	MACT No. 662/2018	MACT No. 534/2023	MACT No. 233/2020
Date of the accident	15.03.2018	15.03.2018	15.03.2018	07.04.2023	24.09.2020
Name and age of the victim	Khushi 12 years	Nisha 7 years	Arjun 14 years	Ankit Yadav 7 years	Umesh 10 years
Income taken by the Tribunal for computation of dependency	Rs.9,118.66 per month	Rs.9,118.66 per month	Rs.9,118.66 per month	Rs.20,903 per month	Rs.30,000 per annum
Multiplier adopted by the Tribunal	18	18	18	18	15
Award on account of loss of dependency	Rs.13,79,000	Rs.13,79,000	Rs.13,79,000	Rs.31,60,533	Rs.4,50,000
Award on account of loss of consortium	Rs.48,400	Rs.48,400	Rs.48,400	Rs.96,800	Rs.80,000
Award on account of loss of estate	Rs.18,150	Rs.18,150	Rs.18,150	Rs.18,150	Rs.15,000
Award on account of funeral expenses	Rs.18,150	Rs.18,150	Rs.18,150	Rs.18,150	Rs.15,000
Total Compensation awarded	Rs.14,64,000	Rs.14,64,000	Rs.14,64,000	Rs.32,94,000	Rs.5,45,000

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MAC.APP. 30/2025 & Connected Matters

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4. I have heard Mr. Aditya Singh, Mr. Vaibhav Singh, and Mr. R.K. Tripathi, learned counsel for the Insurance Companies, and Ms. Tanya Singh, Mr. Pankaj Gupta, and Mr. Shrey Chathly, learned counsel for the claimants.

A. *APPLICABILITY OF NOTIONAL INCOME AS PER THE SECOND SCHEDULE VIS-À-VIS MINIMUM WAGES*

5. The principal ground urged by learned counsel for the Insurance Companies is that loss of dependency in such cases must be computed on the basis of “*notional income*” of a minor, as was provided under Section 163-A of the Motor Vehicles Act, 1988 [“the Act”], prior to its amendment by the Motor Vehicles (Amendment) Act, 2019. A number of authorities of the Supreme Court have been cited in support of this proposition, commencing with the decision in *Lata Wadhwa v. State of Bihar*¹ followed by *R. K. Malik v. Kiran Pal*², *Kishan Gopal v. Lala*³, *Puttamma v. K.L. Narayana Reddy*⁴, *Kurvan Ansari v. Shyam Kishore Murmu*⁵.

6. In all these cases, the Supreme Court determined compensation payable on the basis of notional income. The Second Schedule was relatable to Section 163-A of the pre-amendment Act⁶, which provided for compensation payable to victims of a road accident causing death or permanent disability/grievous injuries, without proof of negligence. However, in the aforesaid judgments, notional income was applied in cases involving the death of a minor child, even when claims were

¹ (2001) 8 SCC 197.

² (2009) 14 SCC 1 [hereinafter, “*R. K. Malik*”].

³ (2014) 1 SCC 244 [hereinafter, “*Kishan Gopal*”].

⁴ (2013) 15 SCC 45.

⁵ (2022) 1 SCC 317 [hereinafter, “*Kurvan Ansari*”].



instituted under Section 166 of the Act⁷.

7. The Court's judgments, however, provided that notional income provided in the Second Schedule at Rs. 15,000/- per annum was not to be taken as static, but was capable of adjustment on account of inflation and consequent diminution in the value of money. The notional income actually applied in these judgments of the Supreme Court varied from Rs.15,000/- per annum⁸ to Rs.30,000/- per annum⁹. In *Meena Devi*, lump sum compensation was awarded in the sum of Rs.5,00,000/- to each claimant.

8. The aforesaid principles were also followed in several judgments of this Court.

9. As against this line of authority, learned counsel for the claimants rely upon six judgments of the Supreme Court, and several judgments of this Court, which have awarded loss of future income in the case of minor victims by incorporating minimum wages payable to a skilled worker in the respective State.

10. The first of these cases was *Kajal v. Jagdish Chand*¹⁰, which was a case of injury inflicted upon a child of 12 years of age. The Court computed loss of future income on the basis of minimum wages of a skilled worker, reasoning as follows:

“20. Both the courts below have held that since the girl was a young child of 12 years only notional income of Rs 15,000 p.a. can be taken into consideration. We do not think this is a proper way of assessing the future loss of income. This young girl after studying could have

⁶ Corresponding to Section 164 of the Act after the 2019 Amendment.

⁷ *Meena Devi v. Nunu Chand Mahto*, (2023) 1 SCC 204 [hereinafter, “*Meena Devi*”].

⁸ *R. K. Malik*, paragraphs 14 to 17.

⁹ *Kishan Gopal*, paragraph 39.

¹⁰ (2020) 4 SCC 413 [hereinafter, “*Kajal*”].



worked and would have earned much more than Rs 15,000 p.a. Each case has to be decided on its own evidence but taking notional income to be Rs 15,000 p.a. is not at all justified. The appellant has placed before us material to show that the minimum wages payable to a skilled workman is Rs 4846 per month. In our opinion, this would be the minimum amount which she would have earned on becoming a major. Adding 40% for the future prospects, it works to be Rs 6784.40 per month i.e. 81,412.80 p.a. Applying the multiplier of 18, it works out to Rs 14,65,430.40, which is rounded off to Rs 14,66,000.”¹¹

11. The judgment in *Kajal* was followed in *Master Ayush v. Branch Manager, Reliance General Insurance Co. Ltd.*¹², *Minor Roopa v. The Divisional Manager, New India Assurance Company Ltd.*¹³, and *Baby Sakshi Greola v. Manzoor Ahmad Simon*¹⁴, which were all also cases where minor victims had suffered debilitating injuries.

12. This line of judgments has recently been reiterated in *Hitesh Nagjibhai Patel v. Bababhai Nagjibhai Rabari*¹⁵, which was once again an injury case. The Supreme Court held therein as follows:

“9. On the aspect of monthly income of the minor appellant, we are inclined to interfere with the judgment and order of the Courts below. In the present case, it is evident that the Courts below have failed to take into account the monthly income of the appellant while determining the quantum of compensation. It is now a well-entrenched and consistently reiterated principle of law that a minor child who suffers death or permanent disability in a motor vehicle accident, cannot be placed in the same category as a non-earning individual for the purposes of assessing the amount of compensation because the child was not engaged in gainful employment at the time of the accident. In such a case, the computation of compensation under the head of loss of income ought to be made by adopting, at the very least, the minimum wages payable to a skilled workman as notified for the relevant period in the respective State where the cause of

¹¹ Emphasis supplied.

¹² (2022) 7 SCC 738 [hereinafter, “*Master Ayush*”].

¹³ Civil Appeal No. 5069 of 2022, decided on 03.08.2022 [hereinafter, “*Minor Roopa*”].

¹⁴ 2024 SCC OnLine SC 3692 [hereinafter, “*Sakshi Greola*”].

¹⁵ SLP No. 14444/2025, decided on 08.08.2025 [hereinafter, “*Hitesh*”].



***action arises.** The said observation was rendered by this Court, in *Kajal v. Jagdish Chand and Ors.*, and *Baby Sakshi Greola v. Manzoor Ahmad Simon and Anr.**

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15. For the purpose of emphasis, it is again clarified here that when a Tribunal or the High Court in appeal, is concerned with the case involving a child having suffered injury or having passed away, the calculation of loss of income necessarily has to be made on the matric of minimum wages payable to a skilled worker in the respective State at the relevant point of time. It is our hope that this restatement helps avoiding such errors and thereby obviates the necessity of this Court's interference, applying well-established principles of law.¹⁶

13. Learned counsel for the claimants have also drawn my attention to the recent decision in *Devendra Kumar Tripathi v. Oriental Insurance Company Limited*¹⁷, in which the Supreme Court was concerned with a fatal accident involving a 14 year old boy. *Sakshi Greola* was cited to urge that loss of dependency be awarded on the basis of minimum wages. The Court addressed this issue as follows:

*“6. The facts in *Baby Sakshi Greola* (supra) are quite distinct from the present case. Here the child died and the claim of compensation by the parents would definitely stand on a different footing from that of a claim filed by a disabled child, destined to live the rest of his/her life with a debilitating condition of mental retardation and severe incontinence.*

*7. Be that as it may, **we are of the opinion that the monthly notional income can be adopted as per the Minimum Wages Act, 1948**, which both learned Counsel agree, for a Class B city is at Rs. 5400/- per month. A 40% increase has to be adopted for future prospects and the multiplier is 15 as held in *Reshma Kumari* (supra) and one-half deduction for personal expenses. The provision of Rs. 50,000/- as medical expenses is retained. The claimants are further entitled to loss of estate and funeral expenses at the rate of Rs. 15,000/- each and loss of filial consortium at the rate of Rs. 40,000/- each.”*¹⁸

¹⁶ Emphasis supplied.

¹⁷ 2025 SCC OnLine SC 2800 [hereinafter, “*Devendra Kumar Tripathi*”].

¹⁸ Emphasis supplied.



14. My attention has also been drawn to a judgment in *Thangavel v. The Managing Director, Tamil Nadu State Transport Corporation Limited*¹⁹, which, as it happens, was pronounced on the same day as *Hitesh*, i.e. 08.08.2025. This case also considers compensation for the death of a 10 year old child. The Tribunal had assessed compensation on the basis of income of Rs. 5,000/- per month, but the High Court reduced the income to Rs. 30,000/- per annum on the basis of the Second Schedule of the Act. The Supreme Court restored the order of the Tribunal, observing also that there was no appeal by the claimants seeking enhancement.

15. In support of their position, learned counsel for the Insurance Companies seek to draw a distinction between injury cases and death cases. They contend that the latter line of decisions is applicable to only cases of injury, and not to cases of fatal accidents.

16. In my view, the distinction in this context does not survive the judgment in *Hitesh*²⁰, which specifically refers to both cases of children who lose their lives in road accidents, and those who suffer permanent disabilities. In both cases, loss of income, whether payable to the injured victim or to the parent as loss of dependency, is based upon a notional reckoning of the child's potential income.

17. The judgment in *Devendra Kumar Tripathi* also supports this conclusion. Even after advertng to the difference between injury cases and fatal accident cases, the Supreme Court adopted the yardstick of wages under the Minimum Wages Act, 1948, as the monthly notional

¹⁹ 2025 SCC OnLine SC 1649 [hereinafter, "*Thangavel*"].

²⁰ Paragraph 9 and 15.



income, even in a case of fatality. Taking a cue from the said judgment, the aforesaid authorities of the Supreme Court can be understood to apply minimum wages as the yardstick upon which notional income is to be quantified, even in cases of fatal accidents involving minors. Such a position would accord with the judgments cited on behalf of the Insurance Companies, which also affirm that notional income is not to be taken as static, but may be adjusted in accordance with the times.

18. An attempt was made to suggest that the judgment in *Hitesh*, to the extent that it applied minimum wages to fatal accident cases, is *per incuriam*, as it did not consider the earlier judgments in fatal accident cases, but only referred to judgments in injury cases. I am of the view that this submission is misconceived, and in any event, paragraph 15 of *Hitesh* precludes this Court from adopting a different metric. Further, the judgment in *Devendra Kumar Tripathi*, even while recognising this distinction, has adopted the same quantification in a death case. The aforesaid submission is, therefore, rejected.

19. I am fortified in this view by several judgments of Coordinate Benches of this Court which have followed the judgments in *Kajal*, *Sakshi Greola*, and *Hitesh*. In *Oriental Insurance Company Limited v. Reena Raghav*²¹, this Court took the view that minimum wages would be the proper yardstick for determination of notional income, and held as follows:

“3. The appellant challenges the Impugned Award contending that as the deceased was only a five year old child, therefore, the loss of dependency should have been determined on a notional basis and not

²¹ 2023 SCC OnLine Del 6695.



by applying the minimum wages of a skilled worker as notified by the State of Uttar Pradesh.

4. I am unable to find any merit in the said contention of the learned counsel for the appellant.

5. This Court in *United India Insurance Company Ltd. v. Jamaluddin Khan*, NC No. 2023: DHC: 6242, after a detailed examination of the precedents in this regard, has observed as under:

“20. The above judgments, therefore, have not laid down the basis on which notional income in case of a child is to be determined by the Tribunal, but have, on facts of those cases, held that the notional income determined by the learned Tribunal did not warrant any interference.

21. In view of the above decisions of the Supreme Court and of this Court, in my opinion, the most reasonable basis for determining the loss of dependency, even in the case of a minor, would be the minimum wages notified by the State Government where the minor resides at the time of the accident. As the notional income is being determined on basis of the minimum wages, I deem it appropriate also to add future prospects to such income at the rate of 40% by applying the principle laid down by the Supreme Court in *National Insurance Company Limited v. Pranay Sethi* (2017) 16 SCC 680.

22. Accordingly, it is directed that the compensation towards loss of dependency shall be assessed by taking minimum wages as notified by the Government of NCT of Delhi for the relevant period, that is 04.12.2017 for a skilled worker; 40% is to be added towards future prospects to such income; multiplier shall be 18....”²²

20. A further consideration on the same lines is found in *National Insurance Co. Ltd. v. Pooja*²³, which considers *R.K. Malik, Kishan Gopal, Kurvan Ansari, and Meena Devi*. However, it notes that the Second Schedule to the Act was deleted with effect from 01.09.2019 and recognizes “a definitive change of Principle of determination of the income of a deceased/disabled Child from Notional income with its correction on the basis of Cost Inflation Index to Minimum Wages”²⁴.

²² Emphasis supplied.

²³ 2025 SCC OnLine Del 1044 [hereinafter, “*Pooja*”].

²⁴ Paragraphs 19 to 27.



This was reiterated in *Rakesh Sharma v. Ashok*²⁵ and *Cholamandalam MS General Insurance Co. Ltd. v. Bhupan Paswan*²⁶. *Bhupan Paswan* was carried to the Supreme Court in SLP (C) 17412/2025, but the Special Leave Petition was dismissed by an order dated 17.07.2025, with the following observations:

“Having considered the matter, we do not find any merit to interfere in the impugned judgment. Accordingly, the Special Leave Petition stands dismissed.”

21. Having regard to the legal position enunciated in the above judgments, I am of the view that, even in the case of a fatal accident involving a minor child, the notional income for the purposes of loss of dependency would be computed on the basis of minimum wages of a skilled worker in the concerned State.

22. I am not persuaded to a contrary conclusion by the judgment in *Thangavel*. In that case, which the Supreme Court has incidentally classified as a “non-reportable” judgment, the Court itself noted that the claimant had not sought enhancement of compensation. The judgment cannot, therefore, be read as laying down a general proposition that, notional income must be quantified on a particular basis.

B. APPLICABLE MULTIPLIER

23. In four of the cases [MAC.APP. 30/2025, MAC.APP. 39/2025, MAC.APP. 40/2025, MAC.APP. 751/2025], the Tribunal adopted the multiplier of 18 for computation of loss of dependency, whereas in MAC.APP. 80/2025, the multiplier of 15 was adopted. In all five cases, the age of the deceased victim was between 5 and 15 years.

²⁵ 2025 SCC OnLine Del 1364 [hereinafter, “*Rakesh Sharma*”].

²⁶ 2025 SCC OnLine Del 1045 [hereinafter, “*Bhupan Paswan*”].



24. Learned counsel for the Insurance Companies submit that the applicable multiplier, in such circumstances, ought to have been 15, having regard to the decision in *Sarla Verma v. DTC*²⁷, as confirmed by the Constitution Bench in *National Insurance Company Ltd. v. Pranay Sethi*²⁸.

25. However, learned counsel for the claimants submit that the Supreme Court, in *Kajal, Master Ayush*, and *Sakshi Greola*, adopted the multiplier of 18, even when the victims were below 15 years of age. I have also been referred to a judgment in *Karuna Parmar v. Prakash Sinha*²⁹, where the Supreme Court applied the multiplier of 18 in a case involving the death of six year old child.

26. In my view, the argument, at least before this Court, is foreclosed by the judgments in *Pooja, Rakesh Sharma*, and *Bhupan Paswan*, where the multiplier 18 has been adopted after considering the judgments in *Sarla Verma, Kajal, Master Ayush*, and *Sakshi Greola*. The discussion on this aspect in *Bhupan Paswan* reads as follows:

“31. The learned Tribunal has computed the compensation by applying a multiplier of 15, by considering the age of the deceased.

32. The calculation of Multiplier has been laid down in the case of *Sarla Varma (Supra)* as under:-

“21. We therefore hold that the multiplier to be used should be as mentioned in column (4) of the Table above (prepared by applying *Susamma Thomas, Trilok Chandra and Charlie*), which starts with an operative multiplier of 18 (for the age groups of 15 to 20 and 21 to 25 years), reduced by one unit for every five years, that is M-17 for 26 to 30 years, M-16 for 31 to 35 years, M-15 for 36 to 40 years, M-14 for 41 to 45 years, and M-13 for 46 to 50 years, then reduced by two units

²⁷ (2009) 6 SCC 121 [hereinafter, “*Sarla Verma*”].

²⁸ (2017) 16 SCC 680 [hereinafter, “*Pranay Sethi*”].

²⁹ 2025 INSC 1244.



for every five years, that is, M-11 for 51 to 55 years, M-9 for 56 to 60 years, M-7 for 61 to 65 years and M-5 for 66 to 70 years.”

33. Evidently, the Judgment is silent on the multiplier to be used for the victims under 15 years of age. This incongruity in the matter of selection of multiplier in the case of persons in the age group up to 15 years was noted in by the Apex the case of Divya vs. National Insurance Company Ltd., Civil Appeal No. 7605/2022.

34. In the most recent judgment of the Supreme Court in Baby Sakshi Greola vs. Manzoor Ahmad Simon & Anr., SLP (C) No. 10996/2018, while referring to the judgments of Kajal (supra) and Master Ayush (supra), the Apex Court has applied the multiplier of 18 for a minor.

35. Thus, in light of the above judgments, this Court deems it appropriate to ascertain the Multiplier as ‘18’ to calculate the loss of dependency is calculated accordingly.”

As noted above, the Supreme Court declined special leave to appeal against this judgment.

27. Having regard to the binding judgment of the Coordinate Bench, which considers *Sarla Verma*, I am of the view that the applicable multiplier in such cases would be 18.

C. QUANTIFICATION IN MAC. APP. 80/2025

28. The claimants assail an award arising out of the death of their 10 year old child in a road accident. The Tribunal assessed compensation relying *inter alia* upon the Supreme Court judgments in *R.K. Malik*, *Kurvan Ansari*, and *Meena Devi*, fixing the notional income at Rs.30,000/- per annum and multiplier as 15. The total compensation, after addition of loss of consortium of Rs.80,000/- and funeral expenses of Rs.15,000/-, was therefore fixed at Rs.5,45,000/-.

29. In the light of the principles discussed above, the calculation for loss of dependency requires re-fixation. It is accepted that the minimum wages of a skilled worker in Delhi, as on the date of the accident



[24.09.2020], was Rs. 18,563/- per month. The loss of dependency is, therefore, re-computed as follows:

Heads	Awarded by this Court
Monthly income [Minimum wages applicable to a skilled person]	Rs.18,563/-
Annual income [18,563 x 12]	Rs.2,22,756/-
Future prospects [2,22,756 x 40%]	Rs.89,102.4/-
Annual income after accounting for future prospects [2,22,756 + 89,102.4]	Rs.3,11,858.4/-
Deduction of personal expenses (1/2) [3,11,858.4 – 1,55,929.20]	Rs.1,55,929.20/-
Applicable Multiplier	18
Award on account of loss of dependency [1,55,929.20 x 18]	Rs.28,06,725.6/- (rounded off to Rs. 28,06,726/-)

30. The claimants are also entitled to loss of consortium of Rs. 40,000/- each, amounting to Rs. 80,000/-, funeral charges of Rs.15,000/-, and loss of estate of Rs.15,000/-. The total compensation would, therefore, amount to Rs. 29,16,726/-.

D. CONCLUSION

I. MAC.APP. 30/2025, MAC.APP. 39/2025, MAC.APP. 40/2025, and MAC.APP. 751/2025

31. In these appeals filed by the Insurance Companies, no other ground of appeal has been raised. As a result of the above discussion, these appeals are, therefore, liable to be dismissed.

32. By orders dated 15.01.2025 and 16.01.2025 in MAC.APP. 30/2025, MAC.APP. 39/2025, and MAC.APP. 40/2025, only 50% of the



awarded amount was deposited in this Court. The amount deposited in this Court be transferred to the Tribunal, and the balance amount, alongwith interest at the rate of 7.5% per annum, as granted by the Tribunal, from the date of filing of the claim petitions, be deposited by the Insurance Companies with the Tribunal within eight weeks from today.

33. Any disbursement that was due to the claimants, but has not been made due to the stay order, be disbursed forthwith, and future disbursements will abide by the impugned award of the Tribunal in each case.

II. MAC.APP. 80/2025

34. The impugned award is enhanced by Rs.23,76,726/-, from Rs.5,40,000/- to Rs.29,16,726/-.

35. The Insurance Company is directed to deposit the awarded amount in terms of this judgment, alongwith interest at the rate of 8% per annum, as granted by the Tribunal, from the date of filing of the petition, with the Tribunal within a period of eight weeks.

36. Mr. Pankaj Gupta, learned counsel for the claimants, states that the Tribunal has awarded a sum of Rs. 40,000/- to the father of the deceased [appellant No. 2 herein], and the balance to the mother [appellant No. 1 herein]. The aforesaid directions are maintained.

37. However, having regard to the fact that the quantum of compensation has undergone a significant increase, the Tribunal may reconsider the disbursement scheme and issue necessary directions. The claimants will appear before the Tribunal on 28.01.2026 for this purpose.

38. The appeals, alongwith pending applications, stand disposed of in



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terms of the aforesaid.

39. Statutory deposit, if any, be refunded to the Insurance Companies, in all five cases.

PRATEEK JALAN, J

DECEMBER 20, 2025

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