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

+ W.P.(C) 12083/2025 & CM APPL. 49357/2025
M/S JEEVANTIKA ORGANIC FARMING LLPPetitioner

versus

GOVT OF NCT DELHI & ORS.Respondents

+ W.P.(C) 12087/2025 & CM APPL. 49365/2025
M/S TRISON BUILDCON LLPPetitioner

versus

GOVT OF NCT DELHI & ORS.Respondents

+ W.P.(C) 12110/2025 & CM APPL. 49391/2025
M/S TRISON BUILDCON LLPPetitioner

versus

GOVT OF NCT DELHI & ORS.Respondents

+ W.P.(C) 12128/2025 & CM APPL. 49476/2025
M/S JEEVANTIKA ORGANIC FARMING LLPPetitioner

versus

GOVT OF NCT DELHI & ORS.Respondents

+ W.P.(C) 12129/2025 & CM APPL. 49477/2025
M/S SAKSHAM INFRAEDGE LLPPetitioner

versus

GOVT OF NCT DELHI & ORS.Respondents



+ W.P.(C) 12130/2025 & CM APPL. 49478/2025
M/S SAKSHAM INFRAEDGE LLP

.....Petitioner

versus

GOVT OF NCT DELHI & ORS.

.....Respondents

Appearances:

Mr. Ashutosh Rana, Advocate for petitioners.

Mr. Lalitaksh Joshi, Ms. Ananaya Sanjiv Saraogi, Advocates for GNCTD [R-1 and 2].

Mr. Sanjay Kumar Pathak, SC with Mr. Sunil Kumar Jha, Mr. Mohd. Sueb Akhtar, Advocates for R-3/LAC.

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN

ORDER

% **12.08.2025**

1. Issue notice. Mr. Lalitaksh Joshi, learned counsel, accepts notice on behalf of respondent Nos. 1 and 2. Mr. Sanjay Kumar Pathak, learned Standing Counsel, accepts notice on behalf of respondent No. 3.

2. These six petitions all concern requests for registration of sale deeds of agricultural lands, which have been refused. The details of the sale deeds in question are tabulated below:

<i>Writ Petition</i>	<i>Vendors</i>	<i>Purchasers</i>	<i>Date of the Sale Deed</i>	<i>Subject Land</i>
W.P.(C) 12083/2025	Rahul & Sons (HUF)	M/s. Jeevantika Organic Farming LLP	15.09.2023	42/169 share in land admeasuring 8 bigha and 9 biswas, out of Khasra No. 101//4 (4-16), 101//5 (0-15) & 101//7 (2-18), situated in the revenue estate of Village Khanjhawala, Delhi – 110081.
W.P.(C) 12087/2025	Harkesh	M/s. Trison Buildcon	11.08.2023	60/840 share in land admeasuring 42 bighas,



		LLP		out of Khasra No. 46//1/2 (3-12), 10 (4-16), 47//5 (4-16), 65//14 (4-16), 16 (4-16), 17 (4-16), 18 (4-16), 93//16 (4-16) & 17 (4-16), situated in the revenue estate of Village Ladpur, Delhi – 110081.
W.P.(C) 12110/2025	Krishan Kumar	M/s. Trison Buildcon LLP	25.07.2023	Agricultural land measuring 01 Bigha 13 Biswas, out of Khasra No. 30//13 min (1-13), situated in the revenue estate of Village Kanjhawala, Delhi – 110081.
W.P.(C) 12128/2025	Jitender Singh and Amarjeet Singh	M/s. Jeevantika Organic Farming LLP	22.08.2023	Agricultural land admeasuring 03 bigha and 17 biswas, out of Khasra No. 85//18/4 (1-04) & Khasra No. 85//19/1 (2-13), situated in the revenue estate of Village Khanjawala, Delhi – 110081.
W.P.(C) 12129/2025	Seema	M/s Saksham Infraedge LLP	02.12.2022	Agricultural land measuring 01 Bigha 04 Biswas, out of Khasra No. 46//4 min (1-04), situated in the revenue estate of Village Kanjhawala, Tehsil Kanjhawala, District North-West, Delhi – 110081.
W.P.(C) 12130/2025	Jitender Dabas	M/s Saksham Infraedge LLP	02.12.2022	Agricultural land measuring 05 Bighas 01 Biswa, out of Khasra Nos. 46//4 min (0-19), 94//11 min (1-11), and 95//15 (2-11), situated in the revenue estate of Village Kanjhawala, Tehsil Kanjhawala, District North-West, Delhi – 110081.



3. The case of the petitioners in all these writ petitions is that they have purchased the subject land, by way of the Sale Deeds in question, but registration of the Sale Deeds has been refused on the ground that consolidation proceedings remain pending, and they have not submitted a No Objection Certificate [“NOC”] or Land Status Report.

4. In W.P.(C) 12083/2025, the petitioner has annexed a copy of a refusal order dated 15.09.2023, which in turn refers to an order of the District Magistrate (North West), Kanjhawala, Delhi, dated 05.12.2019, whereby issuance of NOC for the transfer of the subject land and mutation for the entire village of Kanjhawala has been stopped.

5. Mr. Ashutosh Rana, learned counsel for the petitioners, submits that the petitioners' cases are covered by the order of this Court in *Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.* [W.P.(C) 12122/2021, decided on 10.11.2023] [hereinafter, “*Okaya*”], and several orders which follow it. This Court has held that transfers ought not to be interdicted merely on the ground of pendency of consolidation proceedings, which tend to be fairly prolonged. Instead, it has been directed that registration cannot be held up for want of an NOC, provided that the purchasers undertake to take the land subject to the result of consolidation proceedings and without prejudice to the rights of any third parties.

6. Learned counsel for the respondents, who appear on advance notice, do not dispute that the present cases fall within the ratio of the order in *Okaya*. However, Mr. Pathak submits that the registration may also be made subject to verification of land acquisition status, as he does not have clear instructions in this regard.



7. Mr. Joshi makes one additional suggestion, which is that the undertaking recorded above be also made part of the registered Sale Deeds, so that any subsequent purchasers are aware of the undertaking.

8. While the suggestion is reasonable, having regard to the fact that the Sale Deeds in the present cases have been executed approximately two years ago, I am of the view that the concern expressed by Mr. Joshi can be alleviated by the petitioners filing a further undertaking before the Court, to the effect that the terms of this order will be disclosed in the event of any further transactions in the subject land, prior to conclusion of the consolidation proceedings.

9. Undertaking in the terms, recorded in paragraphs 5 and 8 above, be filed within one week from today, and copies be also served upon Mr. Joshi and Mr. Pathak.

10. Subject to the above, and to verification of the land acquisition status, following the order in *Okaya*, it is directed that the registration of the Sale Deeds will not be refused on the ground of pendency of consolidation proceedings and non-availability of an NOC in this regard.

11. It is made clear that the petitioners will take the property subject to the pending consolidation proceedings and without prejudice to the rights and contentions of third parties.

12. The writ petitions, alongwith pending applications, are disposed of with these observations.

PRATEEK JALAN, J

AUGUST 12, 2025

“Bhupi/JM”/