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

+ W.P.(C) 12416/2025 & CM APPL. 50636/2025

SAJJAN KUMAR

.....Petitioner

Through: Mr. Ashutosh Rana, Adv.

versus

GNCTD & ORS.

.....Respondents

Through: Mr. Abhinav Singh, Adv. for
GNCTD.

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN

ORDER

% **19.08.2025**

CM APPL. 50636/2025 (exemption)

Exemption is allowed, subject to all just exceptions.

Application stands disposed of.

W.P.(C) 12416/2025

1. The petitioner has filed this writ petition challenging an order dated 21.07.2025, by which the Sub-Registrar, North West Kanjhawala, (respondent No. 2), has refused to register a Sale Deed executed in his favour by Shri Chetak, on the ground of pending consolidation proceedings.

2. The petition concerns 1/4th share in land admeasuring 10 bigha and 09 biswas out of Khasra Nos. 68//21 (4-16), 67//24 (0-17) & 67//25 (4-16) in the revenue estate of Village, Khanjawala, Delhi – 110081 [“subject land”]. By a Sale Deed dated 16.07.2025, the petitioner agreed



to purchase the subject land from its erstwhile owner, Shri Chetak. The application for registration of the Sale Deed has, however, been declined by the impugned refusal order.

3. Learned counsel for the petitioner relies upon 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, to submit that the Court has permitted registration of Sale Deeds despite pendency of consolidation proceedings, on the undertaking of the purchasers that they would remain bound by the outcome of the consolidation proceedings, and would take the properties subject to the rights of any third parties.

4. Mr. Abhinav Singh, learned counsel appearing for the Government of National Capital Territory of Delhi [“GNCTD”], does not dispute that the present case is factually similar to *Okaya*. The petitioner has filed an affidavit with the writ petition stating as follows:

“3. That the deponent in terms of judgement of this Hon'ble Court dated 10.11.2023 in W.P. (CJ No. 12122/2021 titled Okaya Infocom Pvt. Ltd. & Anr. vs GNCTD & Anr undertakes that the deponent is agreeable to purchasing the property in question, subject to the outcome of consolidation and without prejudice to the rights and contentions of the third party.

4. That the deponent also undertakes that if and when the deponent enters into a sale-purchase agreement with regard to the property in question, the deponent will apprise the subsequent purchaser that the sale deed in favour of the deponent was registered only after the deponent agreed to purchasing the property in question, subject to the outcome of consolidation and without prejudice to the rights and contentions of the third party.”

5. In view of the above, the conditions laid down in *Okaya* stand fulfilled.

6. It is a matter of concern that, despite the decision in *Okaya* and



several cases which follow it, including those pertaining to the very same village, Kanjhawala, the Sub-Registrar continues to decline registration on the same ground. The Court is repeatedly faced with writ petitions by transacting parties seeking registration of their Sale Deeds in circumstances entirely covered by *Okaya*. To avoid unnecessary harassment to transacting parties, it would be appropriate for the GNCTD to consider issuance of appropriate instructions, in terms of the aforesaid Order, to the Registrars/Sub-Registrars. A copy of this Order be forwarded by Mr. Singh to the Chief Secretary, GNCTD, for necessary action.

7. The writ petition is disposed of with the direction that the registration of the Sale Deed in question, will not be refused on the ground of pendency of consolidation proceedings or consequent non-availability of the Land Status Report/No Objection Certificate.

PRATEEK JALAN, J

AUGUST 19, 2025

Rb/JM/