



\$~91 to 94

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

+ **W.P.(C) 14990/2025**

PARVEEN GUPTA & ANR.

.....Petitioners

versus

GNCTD & ORS.

.....Respondents

+ **W.P.(C) 14991/2025**

M/S TRISON BUILDCON LLP

.....Petitioner

versus

GOVT OF NCT OF DELHI & ORS.

.....Respondents

+ **W.P.(C) 14992/2025**

PARVEEN GUPTA & ANR.

.....Petitioners

versus

GNCTD & ORS.

.....Respondents

+ **W.P.(C) 14994/2025**

PARVEEN GUPTA & ANR.

.....Petitioners

versus

GOVT OF NCT DELHI & ORS.

.....Respondents

***Appearance:-***

Mr. Ashutosh Rana, Advocate for Petitioners in Item Nos. 91 to 94

Ms. Avni Singh, Panel Counsel for GNCTD with Mr. Abhimanyu Kapoor, Advocate for R-1 to 3 in Item Nos. 91, 93 & 94.

Mr. Lalitaksh Joshi & Ms. Ananya Sanjiv Saraogi, Advocates for GNCTD in Item No. 92

Mr. Sanjay Kumar Pathak, Standing Counsel with Mr. K.K. Keran Pathak, Mr. Sunil Kumar Jha & Mr. Mohd. Sueb Akhtar, Advocates for R-3/LAC in Item Nos. 91 to 94.



**CORAM:**  
**HON'BLE MR. JUSTICE PRATEEK JALAN**

**ORDER**

% **25.09.2025**

**CM APPL. 61601/2025 (Exemption) in W.P.(C) 14990/2025**

**CM APPL. 61602/2025 (Exemption) in W.P.(C) 14991/2025**

**CM APPL. 61603/2025 (Exemption) in W.P.(C) 14992/2025**

**CM APPL. 61605/2025 (Exemption) in W.P.(C) 14994/2025**

Exemptions allowed, subject to all just exceptions.

The applications stand disposed of.

**W.P.(C) 14990/2025, W.P.(C) 14991/2025, W.P.(C) 14992/2025,**  
**W.P.(C) 14994/2025**

1. Issue notice. Ms. Avni Singh, learned Panel Counsel, Mr. Lalitaksh Joshi, learned counsel and Mr. Sanjay Kumar Pathak, learned Standing Counsel, accept notice on behalf of respondents.
2. These four writ petitions have been filed seeking a direction upon the respondent – Government of National Capital Territory of Delhi [“GNCTD”] to register the respective sale deeds executed in the petitioners’ favour pursuant to the purchase of agricultural land from the erstwhile owners.
3. The details of the sale deeds and land are as follows:

| <b>Writ<br/>Petition</b> | <b>Vendors</b>             | <b>Purchasers</b>                         | <b>Subject Land</b>                                                                                                             | <b>Date of<br/>Sale Deed</b> |
|--------------------------|----------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| WP (C)<br>14990/2025     | Mohinder<br>Kumar<br>Banga | Praveen<br>Gupta and<br>Vibhuti<br>Gupta. | Land<br>admeasuring 02<br>Bigha and 08<br>Biswas, out of<br>khasra No. 93//12<br>(2-08), in the<br>revenue estate of<br>Village | 24.12.2019                   |



|                     |                                                         |                                          |                                                                                                                                                                                           |            |
|---------------------|---------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
|                     |                                                         |                                          | Khanjawala,<br>Delhi – 110081.                                                                                                                                                            |            |
| WP(C)<br>14991/2025 | Krishnan<br>Dabas alias<br>Krishnan<br>Chander          | M/s. Trison<br>Buildcon<br>LLP           | Land<br>admeasuring 02<br>Bigha & 06<br>Biswas, out of<br>khasra No. 57//12<br>min (2-06),<br>situated in the<br>revenue estate of<br>Village<br>Khanjawala, Delhi<br>– 110081.           | 04.07.2023 |
| WP(C)<br>14992/2025 | Aastha<br>Garg                                          | Praveen<br>Gupta and<br>Vibhuti<br>Gupta | Land<br>admeasuring 04<br>Bigha and 16<br>Biswas, out of<br>khasra No. 98//14<br>(4-16) in the<br>revenue estate of<br>Village<br>Khanjawala,<br>Delhi – 110081.                          | 24.12.2019 |
| WP(C)<br>14994/2025 | M/s. S.M.<br>Pilfer Proof<br>Caps<br>Private<br>Limited | Praveen<br>Gupta and<br>Vibhuti<br>Gupta | Land<br>admeasuring 05<br>Bighas and 11<br>Biswas, out of<br>khasra Nos.<br>98//15 min (0-15)<br>& 25 min (4-16)<br>in the revenue<br>estate of Village<br>Khanjawala,<br>Delhi – 110081. | 24.12.2019 |

4. In all cases, the registration of the sale deed has not yet been



effected, and no reasons for the delay have been formally communicated to the petitioners. It is, however, submitted that the registration has been refused on the ground that consolidation proceedings in respect of Village Kanjhawala remain pending, and that neither a No Objection Certificate [“NOC”] nor a Land Status Report [“LSR”].

5. Mr. Ashutosh Rana, learned counsel for the petitioners, first draws my attention to a Circular dated 14.08.2025 issued by GNCTD, which sets out the grounds on which registration of a sale deed may be refused. It is contended that the present cases do not fall within the grounds mentioned in the Circular.

6. Mr. Rana further draws my attention to an order of this Court in *M/s Jeevantika Organic Farming LLP v. Govt. of NCT of Delhi & Ors.* [W.P.(C) 12083/2025 and connected matters; decided on 12.08.2025] [hereinafter “*Jeevantika*”], which concerned similar requests relating to agricultural land in Village Khanjawala. These writ petitions were disposed of with the following directions:

*“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.”*

7. Learned counsel for the respondents, on instructions, submit that the present cases may also be disposed of in terms of the directions issued in *Jeevantika*.

8. In view thereof, these writ petitions are disposed of in the terms of the directions in paragraphs 6 to 11 of *Jeevantika*, as extracted above. The registration of the Sale Deeds be done within a period of four weeks.

**PRATEEK JALAN, J**

**SEPTEMBER 25, 2025/‘pv/sd’/**