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

+ W.P.(C) 1133/2026, CM APPL. 5575/2026

SAJJAN KUMAR

.....Petitioner

Through: Mr. Ashutosh Rana, Advocate.

versus

GNCTD & ORS.

.....Respondents

Through: Mr. Abhinav Singh, Advocate for
GNCTD.
Mr. Sanjay Kumar Pathak, SC with
Mrs. K.K. Kiran Pathak, Mr. Sunil
Kumar Jha and Mr. M.S. Akhtar,
Advocates for R-3.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **28.01.2026**

1. The Petitioner is the intending purchaser of land admeasuring 01 bigha and 01 *biswa* out of *Khasra* No. 142/802 (2-02) situated in the revenue estate of Village Khanjawala, Delhi – 110081. A sale deed dated 18th December, 2025 was executed in favour of the Petitioner by the recorded owner and was duly presented before Respondent No. 2 (Sub-Registrar) for registration. A receipt evidencing such presentation has been issued; however, the document has not been processed further.
2. It is the case of the Petitioner that despite repeated follow-ups with Respondent No. 2, the sale deed has neither been registered nor has any formal order of refusal been passed, thereby constraining the Petitioner to invoke the writ jurisdiction of this Court.



3. Counsel for the Respondents submits that the land in question is under consolidation proceedings and, in the absence of a No Objection Certificate (NOC)/land status report from the competent authority, the registration could not be processed. It is further submitted that the land proposed to be transferred could be under acquisition and the status is required to be verified.

4. As regards the requirement of NOC founded on the pendency of consolidation proceedings, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***⁴ has ruled that considering the prolonged nature of consolidation proceedings, registration of a sale deed cannot be indefinitely withheld on the ground of non-availability of an NOC. The Court accordingly directed the Sub-Registrar to proceed with registration in accordance with law, without insisting upon any sanction, approval, or NOC linked to consolidation. The same view was reiterated by this Court by judgment dated 12th August, 2025 in ***Jeevantika Organic Farming LLP v. Govt of NCT of Delhi & Ors.***⁵ and other connected matters.⁶ In the said case, the Court taking note of the stand of the government, provided for an undertaking to be furnished by the intending purchaser.

5. In light of the aforementioned decisions, this Court is of the opinion that the present petition can be disposed of by issuing directions in similar terms.

6. Accordingly, the following directions are issued:

(i) The Petitioner shall file an undertaking by way of an affidavit, stating that the factum of this order shall be disclosed in the event of any further transaction relating to the subject land, prior to the conclusion of the

⁴ In *W.P.(C) 12122/2021*, decided on 10th November, 2023.

⁵ In *W.P. (C) 12083/2025* & other connected matters decided on 12th August, 2025.



consolidation proceedings. The undertaking already placed on record is taken on record to this effect is accepted and the Petitioner shall remain bound thereby.

(ii) Any violation of the aforesaid undertaking shall entail consequences in accordance with law. The said undertaking shall also form part of the registered sale deed, so as to put any subsequent purchaser to notice of the subsisting undertaking.

(iii) Subject to verification of the land acquisition status, and in line with the decisions in ***Okaya Infocom Pvt. Ltd.*** and ***Jeevantika Organic Farming LLP***, it is directed that the registration of the sale deed dated 18th December, 2025, which is pending with Respondent No. 2, shall not be refused solely on the ground of pendency of consolidation proceedings or non-availability of any NOC in that regard. The same be proceeded further in accordance with law.

(iv) It is clarified that the registration shall be without prejudice to the pending consolidation proceedings and shall remain subject to the rights, claims, and contentions of third parties, if any.

7. With the following directions, the petition is disposed of along with pending application(s), if any.

SANJEEV NARULA, J

JANUARY 28, 2026

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