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

+ **W.P.(C) 2907/2026**

RITU JAIN AND ORS

.....Petitioners

Through: Mr. Rajesh Yadav, Senior Advocate
with Mr. S.S Rana, Mr. Virender
Singh, Mr. Anuroop P.S., Advocates.

versus

THE GOVT OF NCT OF DELHI AND ANR

.....Respondents

Through: Mr. Manashwy Jha, Panel Counsel
(Civil) for GNCTD.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

% **26.05.2026**

CM APPL. 37004/2026 (seeking early hearing)

1. For the grounds and reasons stated in the application, the present application is allowed and is taken up on the Board today itself.
2. The application stands disposed of.

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3. Petitioner No. 1 is the purchaser of residential property bearing Plot No. 287, admeasuring 1050 sq. yds. out of Khasra No. 142/287, situated in the Extended Lal Dora of Village Kanjhawala, Delhi. It is stated that Petitioners No. 2 to 6 were the recorded co-owners of the said property.
4. It is stated that the aforesaid property was purchased by Petitioner No. 1 from Petitioners No. 2 to 6 for valid sale consideration and a Sale Deed dated 17th February, 2026 was duly executed in favour of Petitioner No. 1 through the attorneys of Petitioners No. 2 to 6.
5. It is stated that the aforesaid Sale Deed was presented before the concerned Sub-Registrar on 17th February, 2026 after compliance with the requisite legal formalities. The grievance of the Petitioners is that the



document has not been registered and continues to remain pending on account of the pendency of consolidation proceedings in Village Kanjhawala and the insistence on a No Objection Certificate [“NOC”] / Land Status Report [“LSR”] from the Competent Authority. Aggrieved thereby, the Petitioners have approached this Court.

6. Mr. Manashwy Jha, Panel Counsel (Civil) for GNCTD, fairly submits that the issue raised in the present petition is covered by the decisions of this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹ and subsequent orders following the same. In view of the same, it is submitted that, the Respondents are not insisting upon an NOC at this stage for registration of the aforesaid Sale Deed.

7. Indeed, in ***Okaya Infocom Pvt. Ltd.***, this Court held that, having regard to the prolonged nature of consolidation proceedings, registration of such documents cannot be indefinitely withheld solely on the ground of non-availability of an NOC. The Sub-Registrar was directed to proceed in accordance with law, without insisting upon any sanction, approval, or NOC linked exclusively to consolidation proceedings.

8. The aforesaid legal position has been reiterated in subsequent decisions, including in ***Jeevantika Organic Farming LLP v. Govt. of NCT of Delhi & Ors.***², wherein, while taking note of the stand of the Government, this Court balanced equities by requiring the intending purchaser(s) therein to furnish an undertaking. The underlying principle, namely that registration cannot be stalled indefinitely on account of pending consolidation proceedings, is equally applicable to the present case.

¹ In *W.P.(C) 12122/2021*, decided on 10th November, 2023.

² In *W.P. (C) 12083/2025* & other connected matters decided on 12th August, 2025.



9. For the foregoing reasons and having regard to the facts of the present case, and particularly in light of the stand taken by the Respondents, this Court is of the opinion that the writ petition can be disposed of by issuing directions in similar terms.

10. Accordingly, it is directed as under:

(i) The affidavit/undertaking already placed on record by the Petitioners is taken on record and accepted. The Petitioners shall remain bound by the same.

(ii) Any breach of the aforesaid undertaking shall entail consequences in accordance with law. The undertaking shall also form part of the Sale Deed so as to put any subsequent transferee to notice.

(iii) Subject to verification of the land acquisition status by the competent authority, 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 shall not be refused solely on the ground of pendency of consolidation proceedings or non-availability of any NOC/LSR in that regard, and shall be processed 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.

11. With the foregoing directions, the petition is disposed of, along with the pending application(s).

SANJEEV NARULA, J

MAY 26, 2026/ab