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

+ **W.P.(C) 5657/2026 & CM APPL. 27814/2026**

INDUPREET THUKRAL AND ANR

.....Petitioners

Through: Mr. S.S. Rana, Mr. Mukesh Rana, Mr.
Anuroop P.S. Mr. Aditya S. and Mr.
Gopal Rana, Advocates.

versus

THE GOVT OF NCT OF DELHI AND ORS

.....Respondents

Through: Mr. Sanjay Kumar Pathak, SC with
Mr. Sunil Kumar Jha, Mr. M.S.
Akhtar and Mr. Kushagra Dixit,
Advocates for R-1.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

27.04.2026

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1. The Petitioners are purchasers of land measuring 03 Bigha 01 Biswa, comprised in Khasra Nos. 66//13 min (0-5) and 14 min (2-16), situated in the revenue estate of Village Kanjhawala, Delhi, which is stated to have been conveyed to them by the recorded owner, Dinesh Dabas, by way of a sale deed dated 08th April, 2026.

2. The aforesaid sale deed was presented for registration before the office of the Sub-Registrar, Kanjhawala VI D (Respondent No. 2), and a receipt/slip bearing No. 2026/14/2218 dated 08th April, 2026 was issued acknowledging presentation. However, it is stated that the document has not been registered on account of insistence upon production of a No Objection Certificate [“NOC”]/Land Status Report [“LSR”] from the Consolidation



Officer, and no formal order of refusal has been passed.

3. Counsel for the Respondents submits that the land falls in a village where consolidation proceedings are stated to be pending, and contends that an NOC/LSR from the Consolidation Authorities is required prior to registration of the sale deed.

4. Insofar as the insistence on an NOC/LSR founded on the pendency of consolidation proceedings is concerned, this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹, 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 a sanction/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.

5. The aforesaid legal position was reiterated by this Court 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.

6. In view of the aforesaid legal position, and having regard to the facts of the present case, this Court is of the opinion that the writ petition can be disposed of by issuing directions in similar terms.

7. Accordingly, it is directed as under:

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.



- (i) The affidavit/undertaking(s) already placed on record by the Petitioners are taken on record and accepted. The Petitioners shall remain bound by the same.
- (ii) Any breach of the aforesaid undertaking(s) shall entail consequences in accordance with law. The undertaking(s) 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.
8. With the following directions, the petition is disposed of along with pending application(s), if any.

SANJEEV NARULA, J

APRIL 27, 2026

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