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

+ **W.P.(C) 6288/2026 & CM APPL. 30903/2026**

AZAD SINGH & ANR.

.....Petitioners

Through: Mr. Rahul Sharma, Mr. Manoj Kumar, Mr. Raj Kishore Garg and Mr. Vijay Prajapati, Advocates.

versus

SUB REGISTRAR VI D & ANR.

.....Respondents

Through: Mr. Lalitaksh Joshi and Ms. Minu Kumari, Advocates for GNCTD.
Mr. Sanjay Kumar Pathak, SC with Mr. Sunil Kumar Jha, Mr. M. S. Akhtar, Ms. Joohu Kumari and Mr. Kushagra Dixit, Advocates.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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08.05.2026

1. Petitioner No. 1, namely, Mr. Azad Singh, is the recorded owner of residential land admeasuring 10 Biswas out of total land admeasuring 02 Bigha 02 Biswas, comprised in Khasra No. 142//556 (2-2), situated within the extended Lal Dora of Village Kanjhawala, Delhi - 110081.
2. It is stated that Petitioner No. 1, namely Mr. Azad Singh, executed a Sale Deed dated 03rd December, 2020 in favour of Petitioner No. 2, namely, Ms. Karuna, in respect of the subject land for valid sale consideration.
3. It is further stated that the aforesaid Sale Deed was presented before Respondent No. 1, i.e., Sub-Registrar VI-D, for registration on 03rd December, 2020. However, the Respondents have not proceeded to register



the document on account of non-availability of a No Objection Certificate [“NOC”] / Land Status Report [“LSR”], purportedly owing to pendency of consolidation proceedings in Village Kanjhawala. Aggrieved thereby, the Petitioners have approached this Court.

4. Counsel for the Respondents submits that the subject land is under consolidation proceedings, and therefore, processing of the document requires an NOC/LSR and verification from the competent authority.

5. Insofar as insistence on NOC on account of pending 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 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.

6. 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.

7. 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

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.



disposed of by issuing directions in similar terms.

8. Accordingly, it is directed as under:

(i) The affidavit/undertaking already placed on record by Petitioner No. 2 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.

9. With the foregoing directions, the petition is disposed of along with the pending application.

SANJEEV NARULA, J

MAY 8, 2026/hc