



\$~63

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

+ **W.P.(C) 6289/2026 & CM APPL. 30905/2026**

MANOJ KUMAR

.....Petitioner

Through: Mr. Anuroop P. S., Mr. Surinder Singh Rana and Mr. Aditya S.,
Advocates.

versus

THE GOVT OF N C T OF DELHI AND ANRRespondents

Through: Mr. Dinesh Malik, Panel Counsel,
GNCTD for R-1 and R-2.
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

%

08.05.2026

1. The Petitioner is purchaser of land admeasuring 1 Bigha 16 Biswas, comprised in Khasra Nos. 30//18 (1-1) and 22/21/2 (0-15), situated in the revenue estate of Village Kanjhawala, Delhi.
2. It is stated that Mr. Joginder Singh Dabas, being the recorded owner of the subject land, executed a Sale Deed dated 06th November, 2020 in favour of the Petitioner in respect thereof.
3. The Petitioner states that the aforesaid Sale Deed was presented before Respondent No. 2, i.e., Sub-Registrar-VI D (Kanjhawala), for registration on 06th November, 2020, and a receipt/slip was issued acknowledging presentation of the document. However, the registration has



not been processed further on account of insistence upon a No Objection Certificate [“NOC”] / Land Status Report [“LSR”], purportedly on the ground that Village Kanjhawala is under consolidation proceedings. Aggrieved thereby, the Petitioner has invoked this Court’s writ jurisdiction.

4. Mr. Dinesh Malik, panel counsel for Respondents No. 1 and 2, on instructions from the office of the Sub-Registrar, VI-D (Kanjhawala), submits that, in light of the circular dated 14th August, 2025 issued by the Office of the Divisional Commissioner, GNCTD, NOC/LSR is presently not being insisted upon.

5. Be that as it may, insofar as insistence on an NOC/LSR 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.

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.



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 disposed of by issuing directions in similar terms.

8. Accordingly, it is directed as under:

(i) The affidavit/undertaking already placed on record by the Petitioner is taken on record and accepted. The Petitioner 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. The present petition is disposed of, along with any pending application(s), in the above terms.

SANJEEV NARULA, J

MAY 8, 2026/hc