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

+ **W.P.(C) 6430/2026, CM APPL. 31689/2026**

JITIN GARG

.....Petitioner

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

versus

THE GOVT OF NCT OF DELHI AND ANRRespondents

Through: Mr. Lalitaksh Joshi and Ms. Mina
Kumari, Advocates for GNCTD.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

12.05.2026

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1. The Petitioner is a purchaser of land measuring 2 Bigha 8 Biswas out of Khasra No. 44//13 min, situated in the revenue estate of Village Kanjhawala, Delhi.
2. It is stated that the aforesaid land was purchased by the Petitioner from Mr. Rakesh Jain, being the recorded owner thereof, for valid sale consideration, and a Sale Deed dated 01st December, 2025 was duly executed in favour of the Petitioner.
3. It is stated that the aforesaid Sale Deed was presented before Respondent No. 2, i.e., Sub-Registrar-VI D (Kanjhawala), for registration on 01st December, 2025, and a receipt/slip bearing Serial No. 2025/14/21432 acknowledging presentation of the document was also issued on the same date. However, Respondent No. 2 has not proceeded to register the



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

4. Counsel for the Respondents submits that since the land is under consolidation proceedings, any transfer would require NOC/LSR and verification from the competent authority.

5. 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 while dealing with the registration of sale deeds, 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.

6. 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.

7. In view of the aforesaid legal position, and having regard to the facts

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.



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

SANJEEV NARULA, J

MAY 12, 2026

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