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

+ W.P.(C) 6458/2026, CM APPL. 31856/2026

JATIN 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.
Mr. Sanjay Kumar Pathak, SC for R-1
with Mr. Sunil Kumar Jha and Mr.
Kushagra Dixit, Advocates.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

12.05.2026

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1. The Petitioner is the beneficiary of a Release Deed dated 1st December, 2025 executed in respect of land measuring 2 Bigha 14 Biswas out of Khasra No. 50//2 min (2-14), situated in the revenue estate of Village Kanjhawala, Delhi - 110081.

2. It is stated that Mr. Rakesh Jain, being the recorded co-owner in possession of the aforesaid land, executed the aforesaid Release Deed in favour of the Petitioner. The said document was presented before Respondent No. 2, i.e., Sub-Registrar-VI D (Kanjhawala), for registration on 1st December, 2025 and a receipt/slip acknowledging presentation of the document was also issued on the same date.

3. According to the Petitioner, when he approached the office of Respondent No. 2 for collection of the registered document, he was informed that the registration process could not be completed unless a No



Objection Certificate/Land Status Report [“*NOC/LSR*”] was obtained from the concerned authority on account of 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 in question falls in a village where consolidation proceedings are stated to be pending, registration of the subject document would require an *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.

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

SANJEEV NARULA, J

MAY 12, 2026

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