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

+ **W.P.(CRL) 1658/2026**

ANKUSH & ANR.

.....Petitioner

Through: Mr. Sanjay Rathi and Mr. Sanchit Jaglan, Advocates.

versus

STATE GOVT OF NCT OF DELHI AND ANRRespondent

Through: Mr. Sanjay Lao, Standing Counsel with SI Sachin Yadav, PS Mahendra Park.
Mr. Parth Khatri, Advocate for R2.

+ **W.P.(CRL) 696/2026**

SANDEEP ARYA

.....Petitioner

Through: Mr. Sanjay Rathi and Mr. Sanchit Jaglan, Advocates.

versus

THE STATE OF NCT OF DELHI AND ANRRespondent

Through: Mr. Sanjay Lao, Standing Counsel with SI Sachin Yadav, PS Mahendra Park.
Mr. Parth Khatri, Advocate for R2.

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN

ORDER

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22.05.2026

CRL.M.A. 16625/2026 (for exemption) in W.P.(CRL) 1658/2026

Exemption allowed, subject to all just exceptions.

The application stands disposed of.



W.P.(CRL) 1658/2026 & W.P.(CRL) 696/2026

1. By way of the present petitions, the petitioners seek quashing of FIR No. 395/2025 dated 18.07.2025, registered at Police Station Mahendra Park, District North-West, Delhi, under Sections 115(2)/126(2)/351(2)/3(5) of the Bharatiya Nyaya Sanhita, 2023 [“BNS”], alongwith all consequential proceedings arising therefrom. The petitions are based on a compromise – one of the accused filed W.P.(CRL) 696/2026 on the basis of a Compromise Deed dated 16.01.2026, while the other two accused subsequently filed W.P.(CRL) 1658/2026 on the basis of a Compromise Deed dated 21.04.2026.
2. Issue notice in W.P.(CRL) 1658/2026. Mr. Sanjay Lao, learned Standing Counsel, accepts notice on behalf of State. Mr. Parth Khatri, learned counsel, accepts notice on behalf of respondent No. 2 – complainant.
3. The parties are present in Court, and have been duly identified by their learned counsel as well as the Investigating Officer. The petitions are taken up for disposal with the consent of learned counsel for the parties.
4. The parties are known to each other and are stated to be friends. Certain disputes arose out of a financial transaction. Subsequently, the impugned FIR was registered at the instance of respondent No. 2, who alleged that, on 15.07.2025, the petitioner in W.P.(CRL) 696/2026, alongwith his associates [petitioners in W.P.(CRL) 1658/2026], abused him, whereupon a scuffle ensued between the parties. Upon completion of the investigation, a chargesheet was filed.
5. The parties have since resolved their disputes, as recorded in



Compromise Deeds dated 16.01.2026 and 21.04.2026. The settlement, which is without any monetary consideration, records that the parties are friends and have amicably settled their disputes.

6. Learned counsel for the parties also confirm that the settlement has been entered into voluntarily, without any coercion or undue influence.

7. Mr. Lao points out that the Medico-Legal Certificate characterises the injuries as grievous on account of a fracture suffered by respondent No. 2. Mr. Khatri states, upon instructions from respondent No. 2 who is present in Court, that the injuries have since healed, and there is no permanent damage. It is further submitted that no sharp weapon or firearm was used.

8. In light of the aforesaid, the parties seek quashing of the impugned FIR.

9. The Supreme Court has clearly held that, in certain circumstances, the High Courts, in exercise of their extraordinary powers, can quash criminal proceedings, even with respect to non-compoundable offences, on the ground that there is a compromise between the accused and the complainant, especially when no overarching public interest is adversely affected. Reference in this connection can be made to the judgment in *Gian Singh v. State of Punjab and Anr.* [(2012) 10 SCC 303], which held as follows:

“58. Where the High Court quashes a criminal proceeding having regard to the fact that the dispute between the offender and the victim has been settled although the offences are not compoundable, it does so as in its opinion, continuation of criminal proceedings will be an exercise in futility and justice in the case demands that the dispute between the parties is put to an end and peace is restored; securing the ends of justice being the ultimate guiding factor. No doubt, crimes are acts which have harmful effect on the public and consist in



wrongdoing that seriously endangers and threatens the well-being of the society and it is not safe to leave the crime-doer only because he and the victim have settled the dispute amicably or that the victim has been paid compensation, yet certain crimes have been made compoundable in law, with or without the permission of the court. In respect of serious offences like murder, rape, dacoity, etc., or other offences of mental depravity under IPC or offences of moral turpitude under special statutes, like the Prevention of Corruption Act or the offences committed by public servants while working in that capacity, the settlement between the offender and the victim can have no legal sanction at all. However, certain offences which overwhelmingly and predominantly bear civil flavour having arisen out of civil, mercantile, commercial, financial, partnership or such like transactions or the offences arising out of matrimony, particularly relating to dowry, etc. or the family dispute, **where the wrong is basically to the victim and the offender and the victim have settled all disputes between them amicably, irrespective of the fact that such offences have not been made compoundable, the High Court may within the framework of its inherent power, quash the criminal proceeding or criminal complaint or FIR if it is satisfied that on the face of such settlement, there is hardly any likelihood of the offender being convicted and by not quashing the criminal proceedings, justice shall be casualty and ends of justice shall be defeated.** The above list is illustrative and not exhaustive. Each case will depend on its own facts and no hard-and-fast category can be prescribed.”

[Emphasis supplied.]

Further, in *Narinder Singh and Ors. v. State of Punjab and Anr.* [(2014) 6 SCC 466], the Supreme Court has also laid down guidelines for High Courts while accepting settlement deeds between parties and quashing the proceedings. The relevant observations in the said decision read as under:

“29. In view of the aforesaid discussion, we sum up and lay down the following principles by which the High Court would be guided in giving adequate treatment to the settlement between the parties and exercising its power under Section 482 of the Code while accepting the settlement and quashing the proceedings or refusing to accept the settlement with direction to continue with the criminal proceedings:

29.1. Power conferred under Section 482 of the Code is to be distinguished from the power which lies in the Court to compound the offences under Section 320 of the Code. No doubt, under Section 482 of the Code, the High Court has inherent power to quash the criminal proceedings even in those cases which are not compoundable, where



the parties have settled the matter between themselves. However, this power is to be exercised sparingly and with caution.

29.2. When the parties have reached the settlement and on that basis petition for quashing the criminal proceedings is filed, the guiding factor in such cases would be to secure:

(i) ends of justice, or

(ii) to prevent abuse of the process of any court.

While exercising the power the High Court is to form an opinion on either of the aforesaid two objectives.

29.3. Such a power is not to be exercised in those prosecutions which involve heinous and serious offences of mental depravity or offences like murder, rape, dacoity, etc. Such offences are not private in nature and have a serious impact on society. Similarly, for the offences alleged to have been committed under special statute like the Prevention of Corruption Act or the offences committed by public servants while working in that capacity are not to be quashed merely on the basis of compromise between the victim and the offender.

29.4. On the other hand, those criminal cases having overwhelmingly and predominantly civil character, particularly those arising out of commercial transactions or arising out of matrimonial relationship or family disputes should be quashed when the parties have resolved their entire disputes among themselves.

29.5. While exercising its powers, the High Court is to examine as to whether the possibility of conviction is remote and bleak and continuation of criminal cases would put the accused to great oppression and prejudice and extreme injustice would be caused to him by not quashing the criminal cases.”

[Emphasis supplied.]

10. The offences alleged in the impugned FIR arise out of a dispute between parties who are stated to be friends. As noted above, although the Medico-Legal Certificate records grievous injuries, the injuries have since healed and there is no permanent damage. The allegations, therefore, do not implicate any wider public interest or disclose grave criminality. Applying the principles laid down by the Supreme Court, it is also relevant that respondent No. 2 has affirmed before this Court that the settlement was entered into voluntarily. In these circumstances, the continuation of the criminal proceedings is unlikely to result in a



conviction and would serve no useful purpose, while only contributing to the burden on the criminal justice system and leading to unnecessary consumption of public resources.

11. However, having regard to the nature of the incident, the petitioners in W.P. (CRL) 1658/2026 are directed to pay costs of Rs. 7,500/- each, and the petitioner in W.P. (CRL) 696/2026 is directed to pay costs of Rs. 15,000/- to the Delhi High Court Bar Association [A/C No. 15530110179338, IFSC No. UCBA0001553, Bank Name: UCO Bank, Branch: Delhi High Court], within two weeks from today. An affidavit of compliance shall be filed within two weeks thereafter.

12. In view of the foregoing discussion, the petitions are allowed, and FIR No. 395/2025 dated 18.07.2025, registered at Police Station Mahendra Park, District North-West, Delhi, under Sections 115(2)/126(2)/351(2)/3(5) of the BNS, alongwith all consequential proceedings arising therefrom, is hereby quashed, subject to payment of costs as aforesaid.

13. The petitions accordingly stand disposed of.

PRATEEK JALAN, J

MAY 22, 2026

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