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

+ **W.P.(C) 7945/2026 & CM APPL. 38235/2026**

SANGEEETA JAIN

.....Petitioner

Through: Mr. Viksit Singh, Mr. Deepanshu
Malik, Advocates.

versus

GNCTD & ORS.

.....Respondents

Through: Mr. Sanjay Kumar Pathak, Standing
Counsel with Mr. Sunil Kumar Jha,
Mr. M.S. Akhtar, Ms. Joohu Kumari,
Mr. Kushagra Dixit, Advocates for
LAC.
Mr. Mohit Agarwal, Mr. Prerak
Khurana, Advocates.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

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29.05.2026

1. The Petitioner is the purchaser of agricultural land comprising: (i) 1/2 share in land admeasuring 43 Bighas 08 Biswas bearing Khasra Nos. 1 etc./3 (5-13), 61 (1-18), 64 (5-13), 279 (23-09), 439 (0-10) and 579 (6-05); and (ii) 1/8 share in land admeasuring 47 Bighas 15 Biswas bearing Khasra Nos. 1 etc./281 (12-06), 371 (4-09), 385 (14-06), 507 Min. (1-10), 577 (6-17) and 27 (8-07), situated in the revenue estate of Village Mundhela Khurd, Tehsil Najafgarh, New Delhi. It is stated that the vendors, namely Mr. Rajesh, Mr. Rohit and Mr. Sachin were the recorded co-owners/co-bhumidars in respect of the said land.
2. It is stated that the aforesaid land was purchased by the Petitioner



from the aforesaid vendors for valid sale consideration and a Sale Deed dated 04th October, 2018 was duly executed in favour of the Petitioner.

3. It is stated that the aforesaid Sale Deed was presented before Respondent No. 4, i.e., the Sub-Registrar IX(A), Najafgarh, after compliance with the requisite legal formalities. The grievance of the Petitioner is that the document has not been registered and continues to remain pending on account of the pendency of consolidation proceedings in Village Mundhela Khurd and the insistence upon an NOC/LSR/sanction under Section 30 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948. Aggrieved thereby, the Petitioner has approached this Court.

4. Mr. Sanjay Kumar Pathak, Standing Counsel, fairly submits that the issue raised in the present petition is covered by the decisions of this Court in ***Okaya Infocom Pvt. Ltd. & Anr. v. Govt. of NCT of Delhi & Anr.***¹ and subsequent orders following the same. Mr. Pathak also places reliance upon Circular dated 14th August, 2025 issued by the Government of NCT of Delhi. In view thereof, it is submitted that the Respondents are not insisting upon any NOC/LSR/sanction at this stage for registration of the Sale Deed.

5. Indeed, in ***Okaya Infocom Pvt. Ltd.***, this Court 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/sanction. 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 several 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. For the foregoing reasons and having regard to the facts of the present case, and particularly in light of the stand taken by the Respondents, 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 Petitioner shall file an undertaking by way of an affidavit stating that the factum of this order shall be disclosed in the event of any further transaction relating to the subject land, prior to the conclusion of the consolidation proceedings. Let the said undertaking be filed within a period of two weeks from today. Upon filing of such undertaking, the Petitioner shall remain bound thereby.

(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

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.



consolidation proceedings or non-availability of any NOC/LSR/sanction 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 29, 2026/ab