



\$~63

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

+ **W.P.(C) 8584/2026 & CM APPL. 40200/2026**

MEENAKSHI DEVI

.....Petitioner

Through: Mr. Jai Narayan and Mr. V.P. Dabas,
Advocates.

versus

G.N.C.T. OF DELHI & ORS.

.....Respondents

Through: Mr. Lalitaksh Joshi and Ms. Minu
Kumar, Advocates for R-1 & 2.

CORAM:

HON'BLE MR. JUSTICE SANJEEV NARULA

ORDER

02.07.2026

%

1. The Petitioner claims to be the purchaser of an Extended Lal Dora residential plot admeasuring 240 Sq. Yards out of Plot No. 142/176 (2-02), situated in the revenue estate of Village Kanjhawala, Delhi. It is stated that Respondent No. 3 executed a Sale Deed dated 19th September, 2024 in favour of the Petitioner in respect thereof. The Sale Deed was then presented for registration before the Sub-Registrar on the same date.

2. The Petitioner submits that, despite presentation of the Sale Deed and issuance of an acknowledgement receipt dated 19th September, 2024, the same has not been registered on account of the pendency of consolidation proceedings in Village Kanjhawala and non-availability of a sanction/NOC from the competent authority. Aggrieved thereby, the Petitioner has approached this Court.



3. Mr. Lalitaksh Joshi, counsel for Respondents No. 1 & 2, 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. In view of the same, Mr. Joshi submits that, Respondents No. 1 & 2 are not insisting upon an NOC/sanction at this stage for registration of the aforesaid Sale Deed.

4. 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.

5. 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.

6. For the foregoing reasons and having regard to the facts of the present case, and particularly in light of the stand taken by Respondents No. 1 & 2, this Court is of the opinion that the writ petition can be disposed of by issuing directions in similar terms.

7. Accordingly, it is directed as under:

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.



- (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.*, *Shailender Bansal* 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/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.
8. With the foregoing directions, the petition, along with any pending application(s), stands disposed of.

SANJEEV NARULA, J

JULY 2, 2026

as