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

+ **CRL.M.C. 9228/2025, CRL.M.A. 38517-38518/2025**

ZILE SINGH

.....Petitioner

Through: Mr. Aditya Singh, Advocate.

versus

STATE OF NCT OF DELHI & ANR.

.....Respondent

Through: Mr. Hitesh Vali, APP with SI
Vinod Kumar, PS Mehrauli.

Mr. Faiyaz Hasan, Mr. Nadeem
Khan and Mr. Neerav Anand,
Advocates for R2.

+ **CRL.M.C. 1753/2026, CRL.M.A. 7151-7152/2026**

BHARAT MEHLAWAT AND ORS.

.....Petitioner

Through: Mr. Faiyaz Hasan, Mr. Nadeem
Khan and Mr. Neerav Anand,
Advocates.

versus

STATE NCT OF DELHI AND ORS

.....Respondent

Through: Mr. Hitesh Vali, APP with SI
Vinod Kumar, PS Mehrauli.

Mr. Aditya Singh, Advocate for R2
and R3.

+ **CRL.M.C. 1765/2026, CRL.M.A. 7203-7204/2026**

NUTAN PANWAR & ORS.

.....Petitioner

Through: Mr. Faiyaz Hasan, Mr. Nadeem
Khan and Mr. Neerav Anand,
Advocates.

versus



STATE OF DELHI & ANR.

.....Respondent

Through: Mr. Hitesh Vali, APP with SI
Vinod Kumar, PS Mehrauli.
Mr. Aditya Singh, Advocate for
R2.

CORAM:

HON'BLE MR. JUSTICE PRATEEK JALAN

ORDER

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21.04.2026

1. The present petitions have been filed under Section 528 of the Bharatiya Nagarik Suraksha Sanhita, 2023 ["BNSS"] (corresponding to Section 482 of the Code of Criminal Procedure, 1973 ["CrPC"]), seeking quashing of three cross-FIRs, being – [a] FIR No. 319/2017 dated 23.05.2017, registered under Sections 323/354/354B/506/509/34 of the Indian Penal Code, 1860 ["IPC"] [subject matter of CRL.M.C. 9228/2025]; [b] FIR No. 210/2017 dated 07.04.2017, registered under Sections 356/323/506/509/34 of the IPC [subject matter of CRL.M.C. 1753/2026]; and [c] FIR No. 324/2017 dated 25.05.2017, registered under Sections 323/341/354/506/34 of the IPC [subject matter of CRL.M.C. 1765/2026]. The aforesaid FIRs were registered at Police Station Mehrauli, District South, New Delhi. The petitions are founded on a compromise arrived at between the parties.

2. Issue notice. Mr. Hitesh Vali, learned Additional Public Prosecutor, accepts notice on behalf of the State in all the petitions. Mr. Faiyaz Hasan, learned counsel, accepts notice on behalf of respondent No. 2 in CRL.M.C. 9228/2025. Mr. Aditya Singh, learned counsel, accepts notice of behalf of respondent Nos. 2 and 3 in CRL.M.C.



1753/2026, and respondent No. 2 in CRL.M.C. 1765/2026.

3. The petitions are taken up for disposal with the consent of learned counsel for the parties.

4. The disputes between the parties, who are family members, stem from a property dispute and led to the registration of cross-FIRs at the instance of respondent No. 2 in the respective petitions. Upon completion of the investigation, chargesheets have been filed in all three cases.

5. The parties seek quashing of the FIRs on the ground that they have now decided to bury the hatchet. To this end, the parties have entered into settlements dated 20.03.2025 and 03.05.2025, under the aegis of the Mediation Centre, Saket Courts, New Delhi.

6. In view of the aforesaid, the parties seek quashing of the impugned FIRs.

7. The parties are present in Court and have been duly identified by the Investigating Officer, as well as by their respective learned counsel.

8. The settlements do not involve any monetary consideration, and record that the parties do not wish to pursue criminal proceedings against each other. Affidavits of the respective complainants, signifying their no-objection to the quashing of the impugned FIRs and all consequential proceedings arising therefrom, have also been placed on record.

9. The parties have confirmed before the Court that they have amicably settled their disputes, and state that the settlements have been implemented in full. The complainants in all the three petitions, who are present in Court and represented by counsel, state that the allegations under Sections 354 and 354B of the IPC arose out of a misunderstanding, and that they do not wish to pursue the same.



10. I am also informed that a petition [CRL.M.C. 7616/2025: *Sunil Kumar and Ors. v. State (NCT of Delhi) and Anr.*], seeking quashing of a connected FIR bearing No. 211/2017 registered at Police Station Mehrauli, District South, New Delhi, under Sections 356/354/342/506/509/34 of the IPC, has been allowed by this Court *vide* order dated 22.12.2025.

11. Although the offences under Sections 354, 354B, and 356 of the IPC are non-compoundable, the Supreme Court has clearly held that, in certain circumstances, the High Courts, in exercise of their powers under Section 482 of the CrPC [corresponding to Section 528 of the BNSS], 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

12. In *Gian Singh v. State of Punjab and Anr.* [(2012) 10 SCC 303], the Supreme Court 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.]

13. In the present case, the impugned FIRs arise out of a property dispute amongst family members. The complainants in CRL.M.C. 9228/2025 and CRL.M.C. 1765/2026 have stated that the allegations under Sections 354/354B of the IPC arose on account of misunderstandings, and that they do not wish to pursue the same. The allegations, therefore, do not implicate any larger public interest or involve grave criminality. The parties have also agreed to bury the hatchet.

14. Applying the principles laid down by the Supreme Court, it is pertinent to note that the complainants have also affirmed the voluntary nature of the settlement before the Court. In these circumstances, the continuation of criminal proceedings is unlikely to result in a conviction and would serve no useful purpose, while merely adding to the burden on the justice system and causing unnecessary consumption of public



resources.

15. The petitions are, therefore, allowed, and all proceedings emanating from FIR No. 319/2017 dated 23.05.2017, registered under Sections 323/354/354B/506/509/34 of the IPC; FIR No. 210/2017 dated 07.04.2017, registered under Sections 356/323/506/509/34 of the IPC; and FIR No. 324/2017 dated 25.05.2017, registered under Sections 323/341/354/506/34 of the IPC, all registered at Police Station Mehrauli, District South, New Delhi, are hereby quashed.

16. However, considering that the criminal justice machinery had been set in motion and that considerable time of both the State and the Court has been expended, the petitioners in each of the three cases will collectively deposit costs of Rs. 25,000/- to 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.

17. The petitions, alongwith pending applications, accordingly stand disposed of.

PRATEEK JALAN, J

APRIL 21, 2026

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