

**Asha Sharma & Anr. Vs. Gaon Sabha Bawana & Anr.**

15.10.2025

Present : Shri Vinod Kumar, Counsel for Petitioner.  
: Shri Sumit Goel, Counsel for Respondent, Gram Sabha.

1. The Counsel for the Petitioner contended that R-2 herein Zile Singh moved an application for recording his cultivatory possession and also to update the records in respect of land bearing khasra no. 108/17 (1-12) and 108/24 (3-04) situated at village Bawana before Tehsildar, Narela. Thereafter, Tehsildar after seeking halka patwari report recorded that R-2 is in the possession of the said land and the whole land is being used for cultivation by R-2.
2. That thereafter, R-1, Gram Sabha challenged the order dated 01.07.2010 passed by Tehsildar and while doing so, R-1 wrongly mentioned the land bearing khasra no. 105/17(1-12) belonging to the present Petitioners being co-sharer of the land jointly with her brothers and sisters. In fact, R-1 by mistake had mentioned khasra no. 105/17 (1-12) instead of khasra no. 108/17.
3. Vide order dated 01.03.2021, the ADM (North) allowed the appeal of Gram Sabha and vested the land bearing khasra no. 105/17(1-12) which belongs to present Petitioners in Gram Sabha.
4. Counsel for Respondent, Gram Sabha contended that the Petitioner did not appear and follow his case before ADM, and it was dismissed for non-pursuance. Respondent also pointed out that Petitioner has not filed condonation of delay application in the present matter.
5. Petitioner is aggrieved by the order dated 01.03.2021 passed by Additional District Magistrate, (North) and seeks to quash/ set aside the impugned order as the ADM had wrongly mentioned khasra no. 105/17 (1-12) instead of

khasra no. 108/17. Petitioner also draw the attention to this Court of rulings of the Hon'ble Apex Court dated 14<sup>th</sup> March, 2023 in case **CA No. 3828/2017 Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others** as the village Bawana is urbanised on 16.05.2017

6. The Petitioner pleaded that he came to know about ADM order only recently and hence the limitation is waived off in interest of justice. The matter is remanded back to the concerned Deputy Commissioner to take into consideration the averments of the Petitioner before this Court and the judgements of Hon'ble Apex Court after the village stands urbanised, then pass a speaking and reasoned order preferably within next three months.
7. Interim orders to continue for next 15 days from the date of this order to allow Petitioner to appear before the Deputy Commissioner for a further decision.
8. The revision petition bearing no. 137/2025 titled '**Asha Sharma & Anr. Vs. Gaon Sabha Bawana & Anr.**' is disposed of in terms of the above.
9. File be consigned to record room after completion.

  
(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**Subhash Aggarwal & Anr. Vs. Gaon Sabha Libaspur**

15.10.2025

Present : Shri Vinod Kumar, Counsel for Petitioners.  
: Shri Sumit Goel, Counsel for Respondent.

1. The Petitioners filed the present revision petition seeking quashing of the pending proceedings before Deputy Commissioner (North) on the ground that revenue authorities cease to have jurisdiction post urbanisation of village Libaspur vide notification on 16.05.2017.
2. The Counsel for the Petitioner contended that the proceedings were initiated under Section 81 of the Delhi Land Reforms Act, 1954 against the Petitioner in respect of land in Khasra No.20//4/7 and 1 bigha situated in the revenue estate of village Libaspur, Delhi. The RA/SDM vide order dated 09.04.2021 dropped the proceedings under Section 81 of Delhi Land Reforms Act, 1954. The order of RA/SDM Alipur was challenged by Gram Sabha in appeal before the Deputy Commissioner (North). The proceedings are pending before Deputy Commissioner since 29.12.2021.
3. Petitioner is aggrieved by the order dated 09.04.2021 passed by RA/SDM, Alipur and pending proceedings before Deputy Commissioner (North) and seeks to quash/ set aside the impugned proceedings and order as the village Libaspur was declared as urbanised on 16.05.2017.
4. The case is accordingly remanded back to the concerned Deputy Commissioner to take into consideration all the above issues the fact of urbanisation, as also the order of Hon'ble Supreme Court of India of India **CA No. 3828/2017 Mohinder Singh (Dead) through LRs** the fact of urbanisation, as **and Another Vs. Narain**

***Singh and Others*** and then pass a speaking and reasoned order preferably within next three months.

5. The matter is accordingly remanded back to the concerned Deputy Commissioner.
6. The revision petition bearing no. 138/2025 titled '***Subhash Aggarwal & Anr. Vs. Gaon Sabha Libaspur***' is disposed of in terms of the above.
7. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**Manmohan Singh & Oberoi (through Attorney)**  
**Vs.**  
**Gaon Sabha Ghitorni**

15.10.2025

Present : Shri Vinod Kumar, Counsel for Petitioner.  
: Shri Sumit Goel, Counsel for Respondent.

1. The Counsel for the Petitioner contended that he is the owner to the extent of 1/4<sup>th</sup> share of land bearing khasra no. 857(4-12) situated in village Ghitorni. The proceedings under Section 81 of Delhi Land Reforms Act, 1954 were initiated but the present Petitioner was not served any notice by the Revenue Assistant in those proceedings. The RA/SDM vide order dated 25.08.2008 dismissed the application under Appendix VI Rule 14 of Delhi Land Reforms act, 1954. This order was recalled vide order dated 25.07.2011 and again this application was dismissed in default on 08.08.2018. During the period of proceedings the village Ghitorni was declared as LDRA vide notification dated 18.06.2013. Again an application for restoration dated 12.09.2018 was dismissed vide order dated 09.02.2023 and the whole khasra no. was vested in Gram Sabha. That against the said order dated 09.02.2023 an appeal was filed before Deputy Commissioner.
2. Counsel for Respondent Gram Sabha submitted that Petitioner's application before RA/SDM, Vasant Vihar was dismissed for non-prosecution. Further, Respondent pointed out that Petitioner's father name mentioned in Khatouni and petition are different. Counsel for Respondent further wondered why the Petitioner did not challenged the vesting order dated 17.02.1999 and rather challenge the order dated 09.02.2023.

3. Petitioner is aggrieved by the order dated 09.02.2023 passed by RA/SDM, Vasant Vihar and pending proceedings before Deputy Commissioner and seeks to quash/ set aside the impugned proceedings and order as the village Ghitorni was declared as LDRA vide notification dated 18.06.2013 as well as urbanised on 20.11.2019.
4. The case is accordingly remanded back to the concerned Deputy Commissioner to take into consideration all the above issues the fact of urbanisation and then pass a speaking and reasoned order preferably within next three months in wake of Hon'ble Supreme Court of India of India in **CA No. 3828/2017 Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others.**
5. The revision petition bearing no. 141/2025 titled '**Manmohan Singh Oberoi Vs. Gaon Sabha Ghitorni.**' is disposed of in terms of the above.
6. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**Chander (Since Deceased) Through LRs  
Vs.  
Gram Sabha Bhati**

15.10.2025

Present : Shri Abhishek Gupta, Counsel for Petitioners.  
: Shri Sumit Goel, Counsel for Respondent Gram Sabha, Bhati.

1. Counsel for Petitioners filed the present revision petition under Section 187 of the Delhi Land Reforms Act, 1954 seeking quashing of the impugned order dated 24.11.2017 passed by the RA/SDM (Saket). Counsel for Petitioners contended that Petitioners are Bhumidars/owners of land bearing Khasra No.179/2(02-12) situated in the revenue estate of village Bhati, New Delhi. On the basis of Halqa Patwari report 08.08.2017, proceedings under Section 81 of DLR Act were initiated in the year 2007 against the Petitioners. Even before institution of the case, the Bhumidar Shri Chander has expired on 19.10.2003 and the case was instituted against a dead person without impleading his LRs. After a long trial, the RA/SDM passed order dated 24.11.2017 ejecting the original owner who had already died and vesting the land into Gram Sabha. The Respondent, GS however has not taken possession of suit land and LRs of Late Shri Chander are in cultivatory possession of the said land. Counsel for Petitioners further contended that against the order dated 24.11.2017 passed by the RA/SDM, an appeal was filed before the Collector (South), New Delhi which is still pending. Petitioner further contended that the land is no longer governed by the provisions of the DLR Act, as the village Bhati stand urbanized vide Gazette Notification dated 20.11.2019.
2. Counsel for Respondent, Gram Sabha submitted that the petition is premature and is not maintainable in this Court as the proceedings are pending before the DC (South), New Delhi.

3. It is seen from the records that village Bhati covered under Low Density Residential Area (LDRA) vide Notification dated 18.06.2013 and also stands urbanized vide Notification dated 20.11.2019.
4. Since, the proceedings are already pending before the DC (South), accordingly, the case is remanded back to the DC (South) with a direction to hear the petitioner and pass a speaking order preferably within three months keeping in view the fact that village stands urbanized and also covered under LDRA Notification in wake of the Hon'ble Supreme Court of India in judgement dated 14.03.2023 in case titled ***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others*** and the various orders/judgments of Hon'ble High Court of Delhi including that in WP(C) No.3502/2022 titled ***Rajeev Shah (Deceased) through LR Gayatri Shah Vs. Government of NCT of Delhi & Ors.*** and CS(OS) No. 78/2007 titled ***M/s. Shri Neelpadmaya Consumer Products Pvt. Ltd. Vs Sh. Satyabir @ Satbir & Ors.*** in this context.
5. The Revision Petition bearing no. 142/2025 titled ***Chander (Since Deceased) Through LRs Vs. Gram Sabha Bhati*** is disposed of in terms of above.
6. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

15.10.2025

Present : Shri Kameshwar Mishra, Counsel for Petitioner.  
: Shri Rahul Jariyal alongwith Shri Irshad Khan,  
Counsels for Respondent.

1. The Counsel for Petitioner contended that the present case is a restoration application which was filed due to dismissal of case no.311/2023 vide order dated 26.04.2024 for non-prosecution by the predecessor Financial Commissioner.
2. The Counsel for the Appellant contended that the appellant and both respondents are co-owners of the land. T-1 filed application u/s 36, DLR Act to lease out her share, which was allowed by the SDM/RA vide order dated 12.03.2021. In appeal, she approached the Deputy Commissioner concerned who also dismissed her appeal vide order dated 26.09.2023 mentioning "The Appellant has strenuously argued that the Respondent No. 1 does not have any share in the suit land as Respondent No. 1 and her husband have already sold their share. However, the Appellant has not filed on record, either in the appeal or before the Trial Court, any document to substantiate the said averment. The Appellant has filed copy of one family settlement dated and an affidavit along with it. The Respondent No. 1 however has argued that the said document has been forged by the Appellant and produced its original, which prima facie shows that the signatures of the Respondent No. 1 are mismatching with the copy supplied by the Appellant. The Appellant also argued that the Respondent No. 1 has sold the suit land to one Madan Pal, and that the Respondent No.

1 has sold land more than her designated share in suit land. However, the Appellant has failed to satisfy this Court as to why such sale by the R-1 was not challenged by the Appellant before the appropriate court".

3. Counsel for Respondents submitted that the copy of documents received by him is not legible and sought legible copy of the same for filing reply.
4. Petitioner is directed to provide a legible copy of documents to the respondent for filing of reply before the next date of hearing.
5. Adj. to 10.12.2025 for arguments.

**Financial Commissioner  
Delhi**

**Kamal Bardiya  
Vs.  
Gram Sabha Mehrauli**

**15.10.2025**

Present : Shri Vinod Kumar, Counsel for Petitioner.  
: Shri Lokeshwar Sharma, Counsel for Respondent Gram Sabha, Mehrauli.

1. Counsel for Petitioner has filed the present revision petition under Section 187 of the Delhi Land Reforms Act, 1954 seeking quashing of the impugned order dated 27.07.1993 passed by the RA/SDM (Mehrauli), Delhi. Counsel for Petitioner contended that Petitioner is the recorded owner and is in possession of Khasra No. 42/6 min. (1-02) total measuring 1 Bigha 02 Biswa situated in the revenue estate of village Mehrauli, New Delhi. The order dated 27.07.1993 passed by the RA/SDM was challenged before the Hon'ble High Court of Delhi in WP (C) No. 419/2025 by the Petitioner. However, the said writ petition was withdrawn by the Petitioner and the Hon'ble High Court vide order dated 07.04.2025 granted liberty to seek appropriate remedies before the Financial Commissioner.
2. Counsel for Petitioner further contended that in the month of January, Petitioner desired to sell his land and was looking for prospective purchasers for the same. During the sale purchase transaction prospective purchasers informed the Petitioner that the said land cannot be sold out as the same is a Government land being vested into Gram Sabha. Petitioner applied for complete copy of the record and on 03.12.2024 got the copy of the record. Petitioner was shocked to see that the proceedings under Section 81 of DLR Act, 1954 were initiated at his back qua the land in question in the year 1993. Thereafter a conditional order dated 17.02.1993 was passed by the RA/SDM. Subsequently, the said conditional order was also made absolute vide order dated 27.07.1993 whereby the land in question was

finally vested into Gram Sabha. Petitioner further contended that at no point of time any notice of appearance/hearing was served upon either of the Petitioner and Petitioner was absolutely unaware of any such proceedings being initiated in respect of their private land which the Petitioner had purchased by Registered Sale Deed. The conditional order was passed without giving Show Cause Notice and without providing opportunity to the Petitioner, thus clearly violating Rule 21B of DLR Rules. He also contended that the entire revenue estate of village Mehrauli was urbanized in the year 1963 under Section 507 of DMC Act vide Notification dated 23.05.1963. After the urbanization of the land, the provisions of DLR Act are not being applicable to the same.

3. Counsel for Respondent, Gram Sabha submitted in its reply that the impugned order dated 27.07.1993 passed under the DLR Act, has attended the finality as the same has not been challenged by the Petitioner within the time period of limitation. Moreover, this Court has no jurisdiction to try and entertain the present revision petition as admittedly the land in question has been urbanized from 1963, yet proceedings were never questioned until 2024 after attempted sale. There is no evidence that no opportunity of hearing granted to the Petitioner herein. After the withdrawal of W.P. No. 419/2025 from the Hon'ble High Court, present petition is not maintainable being barred by the period of limitation which is mis-use of process of law. When Hon'ble High Court did not entertain the petition, petitioner withdrew the same and filed the present revision petition. Petitioner has not filed any application for condonation of delay. The entire petition is based on denial and general allegation which amounts to an admission on the part of the Petitioner.
4. It is seen from the records that village Mehrauli stands urbanized vide Notification dated 23.05.1963.

5. It is noted that in proceedings under Section 81 of the DLR Act, 1954, original jurisdiction lies with the SDM/RA and the first appeal lies before the DC Concerned.
6. Accordingly, the case is remanded back to the DC concerned with the direction to hear the petitioner and pass a speaking order preferably within three months keeping in view the fact that village stands urbanized and also various rulings of the Hon'ble Apex Court judgement dated 14.03.2023 in case titled ***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others*** in this regard.
7. The Revision Petition bearing no. 90/2025 titled ***Kamal Bardiya Vs. Gram Sabha Mehrauli*** is disposed of in terms of above.
8. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**M/s R.B. Commodities Pvt. Ltd.  
Vs.  
Gram Sabha Singhu & Anr.**

15.10.2025

Present : Shri Vinod Kumar, Counsel for Petitioner.  
: Shri Lokeshwar Sharma, Counsel for Respondent Gram Sabha, Singhu.

1. Counsel for Petitioner filed the present revision petition under Section 187 of the Delhi Land Reforms Act, 1954 seeking quashing of the impugned order dated 09.01.2015 passed by the RA/SDM (Alipur). Counsel for Petitioner contended that Petitioner is a private company incorporated under Companies Act, 1956, purchased the subject land vide two different Sale Deeds dated 01.09.2010 in favour of Petitioner and the same have been mutated vide Mutation No. 437 & 439 dated 01.09.2010.
  
2. Counsel for Petitioner further contended that on the basis of the Halqa Patwari Report dated 18.08.2012, proceedings under Section 81 of DLR Act were initiated by the RA/SDM vide Case No. 571/RA/ALP/212 titled "G.S. Singhu Vs R.B. Commodiers" which is wrongly mentioned and the correct name is R. B. Commodities Pvt. Ltd. As per Halqa Patwari report, the subject land being part of this present petition is being used for non-agricultural purposes by constructing the boundary walls, rooms and ways. The said report is totally contrary to the original position of the subject land. Upon the said report, RA/SDM passed Restraintment Order dated 11.09.2012 thereby restraining the owner of the land to continue with the further construction and to stop the same immediately. The conditional order dated 23.10.2012 was issued to M/s R.B. Commodores which is incorrect and no such company or entity exist and the name of the recorded owner of the subject land is M/s R.B. Commodities Pvt. Ltd. Thereafter, RA/SDM vide order dated 12.12.2014 had finally disposed of the proceedings

and made the conditional order as absolute. The RA/SDM passed final order dated 09.01.2015 vesting the land of the petitioner in Gram Sabha which is not maintainable and without jurisdiction as the subject land declared as LDRA vide Notification dated 18.06.2013 and also urbanised vide Notification dated 20.11.2019. Aggrieved by the order dated 09.01.2015, Petitioner filed the appeal before the DC (North), Alipur, Delhi which is pending.

3. Counsel for Respondent, Gram Sabha submitted that the petition is premature and is not maintainable in this Court as the proceedings are pending before the DC (North), Delhi.
4. Since, the proceedings are already pending before the DC (North), accordingly, the case is remanded back to the DC (North) with a direction to hear the petitioner and pass a speaking order preferably within three months keeping in view the fact that village stands urbanized and covered under LDRA Notification in wake of the Hon'ble Supreme Court of India in judgement dated 14.03.2023 in case titled ***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others*** and the various orders/judgments of Hon'ble High Court of Delhi including that in WP(C) No.3502/2022 titled ***Rajeev Shah (Deceased) through LR Gayatri Shah Vs. Government of NCT of Delhi & Ors.*** and CS(OS) No. 78/2007 titled ***M/s. Shri Neelpadmaya Consumer Products Pvt. Ltd. Vs Sh. Satyabir @ Satbir & Ors.*** in this context.
5. The Revision Petition bearing No. 188/2025 titled ***M/s R.B. Commodities Pvt. Ltd. Vs. Gram Sabha Singh & Anr.*** is disposed of in terms of above.
6. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

15.10.2025

Present : Shri Deepak Khosla, Counsel for Petitioner.  
: Shri Pradeep, Counsel for R-1 and R-2.  
: Shri Bhim Krishna, Proxy Counsel for R-3, SDM.

1. Counsel for Petitioner stated that he has filed the present revision petition against the orders dated 05.04.2023 passed by the Settlement Officer (Consolidation)/SDM on review application.
2. The facts of the case in brief are that the father of the petitioner purchased land in village pooth khurd in the year 1972. The consolidation proceedings in the village commenced in 1996 and completed in 1999. The predecessor of Petitioner raised a demand during the consolidation and was allotted 6 biswas land bearing no.206 in Khasra No.156. However, the said land was withdrawn from petitioner/ predecessor and allotted to predecessor of R-1 and R-2 without giving any notice to the Petitioner. Against this withdrawal, the petitioner approached the Consolidation Officer who vide order dated 18.02.2014 re-allotted the land to the Petitioner herein. Against this order, the respondent filed appeal before the Settlement Officer (Consolidation) u/s 21(3) of Consolidation Act, 1954 vide order dated 07.07.2021 who dismissed the appeal. In the meanwhile, the Petitioner was put in possession of allotted land. Aggrieved by the dismissal of his appeal, the respondent filed review which was allowed vide impugned order dated 05.04.2023.

3. Counsel for Petitioner submitted that the contention of the respondent at the time of review was that there was fraud committed by the petitioner herein in the present case therefore, the provisions of Limitation Act are not applicable, was accepted by the SO(C) and review was allowed. The Counsel for Petitioner vehemently argued that the details of the fraud committed have not been placed on record by the Respondent.
4. Counsel for R-1 and R-2 rebutted the contentions of the Counsel for Petitioner by stating that the Petitioner herein by impersonation has obtained allotment of industrial plot. Therefore, the allotment in favour of petitioner herein is an erred allotment.
5. Proxy Counsel for R-3, SO(C)/SDM sought time as the main counsel is not available. Allowed with a cost of Rs. 1000/- which is to be deposited in the account of DDO, GAD, GNCTD before the next date of hearing and further directed to appear and file reply with advance copy to both the parties before the next date of hearing.
6. Adj. to 10.12.2025 for further arguments.

**Financial Commissioner  
Delhi**

15.10.2025

Present : Shri S. S. Rana, Proxy Counsel for Petitioner.  
: None for Respondents.

1. Proxy Counsel for Petitioner requested for adjournment as the main counsel is not available due to emergent situation in his family. Request is allowed as a final opportunity to appear and lead the case on the next date of hearing.
2. None appeared for respondents. Issue notice to all respondents to appear and lead the case on the next date of hearing and a cost of Rs.1000/- is imposed on each respondent which is deposited in the account of DDO, GAD, GNCTD before the next date of hearing.
3. Adj. to 19.11.2025.

**Financial Commissioner  
Delhi**

**Case No. 31 of 2025**

15.10.2025

Present : Shri S. S. Rana, Proxy Counsel for Petitioner.  
: None for Respondents.

1. Proxy Counsel for Petitioner requested for adjournment as the main counsel is not available due to emergent situation in his family. Request is allowed as a final opportunity to appear and lead the case on the next date of hearing failing which, cost shall be imposed.
2. None appeared for respondents. Issue notice to all respondents to appear and lead the case on the next date of hearing and a cost of Rs.1000/- is imposed on each respondents which are deposited in the account of DDO, GAD, GNCTD before the next date of hearing.
3. Adj. to 19.11.2025.



**Financial Commissioner  
Delhi**

<b>Case Nos.</b>	<b>Title</b>
163/2025	<i>Shri Haripal Singh &amp; Ors. Vs. CO/Tehsildar (Alipur) &amp; Anr.</i>
164/2025	<i>Sh. Bhup Singh &amp; Ors. Vs. CO/Tehsildar (Alipur) &amp; Ors.</i>

15.10.2025

Present : Shri S.S. Rana, Counsel for Petitioners (in both cases).  
 : Shri Vinod Kumar, Counsel for R-2 (in both cases).  
 : Shri Vipin Kaushik, Counsel for R-3 (in case No.164/2025)

1. The present petitions have been filed under Section 42 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948 seeking quashing/setting aside the order dated 21.01.2019 (Resolution No.365) passed by Consolidation Officer without jurisdiction as the said village Alipur was urbanized vide notification on 16.05.2017.
2. The Counsel for Petitioners pleaded that in this matter the judgment on which the R-2 has relied upon is not identical to the instant case before this court. The Petitioners' present land measuring 19 biswas (in case No.163/2025) & 07 biswas (in case No.164/2025) was deducted in 2019 itself by the C.O. when the urbanization notification was issued in the year 2017 so that the C.O. has no jurisdiction as per the submissions of the R-1 herein. Further, the land allotted to other person is totally against the provisions of law as the part of land of Petitioners was withdrawn which they owned since 1953-54 in their Khata.
3. The R-2 submitted that the Resolution was passed in the year 2019 and after passing Resolution the records of consolidation was consigned to the revenue records in the year 2019. The R-2 also submitted that the consolidation proceedings have completed in the village Khera Kalan in the year 2025 and in village Alipur were completed in the year 2019, after urbanization notification of the year 2017.
4. The R-2 further submitted that he is on the issue of limitation and maintainability aspect to be decided from 2019. The Petitioners could have filed the appeal before

S.O. in the year 2019 and why they have approached this court in the year 2025. The R-2 also placed on record judgment of Hon'ble High Court of Delhi dated 30.09.2008 titled titled "*Shri Leo Puri Vs. C.O. & Ors.*" whereby the appeal was dismissed stating therein that "...*there is no infirmity with the judgment passed by the learned Single judge. It is interesting to note that the subsequent order dated 25<sup>th</sup> September, 2006 passed by the Consolidation Officer, in pursuance to the impugned order, has not been challenged by the Appellant. Accordingly, the appeal is dismissed, but with no order as to costs*". In support of his submissions, R-2 also placed on records following judgments passed by this court i) dated 14.03.2024 titled "*Ramphal Vs. C.O. (Galibpur)*" and ii) dated 31.05.2024 titled "*Sitaram Vs. C.O. (Bakoli) & Anr.*" wherein in both the cases this court has observed "...*that the revenue courts have no jurisdiction to enter into such matters where either the land/village has been declared urbanized or declared Low Density Residential Area and the provisions of Delhi Land Reforms Act, 1954 cease to apply since 18.06.2013 in this case as the revenue courts ceased to have jurisdiction...*".

5. On query from the court regarding why the Petitioner has approached this court after the resolution was passed in the year 2019, the Petitioners submitted that they have cited various judgments of the Hon'ble High Courts in support of their contentions, where the powers of C.O. ceased after consignment of records, and the powers of S.O. also ceased. However, this court enjoys the power under Section 42 of East Punjab Holding (Consolidation & Prevention of Fragmentation) Act, 1948 as a Chief Commissioner and hence the Petitioners approached this court by filing their petitions. The Counsel for Petitioners further contended that neither they were made party nor they were issued notices by C.O. and the order of deduction was never communicated to them for this purpose they have annexed the copy of whole case record of trial court.
6. In interest of justice, the limitation period is waived off. In the light of the submissions made by both the parties, the

cases are remanded back to the Settlement Officer (Consolidation), Alipur who shall pass a speaking order preferably within three months of the issue of this order.

7. The revision petitions bearing No. 163/2025 titled ***Shri Haripal Singh & Ors. Vs. CO/Tehsildar (Alipur) & Anr.*** and No.164/2025 titled ***Sh. Bhup Singh & Ors. Vs. CO/Tehsildar (Alipur) & Ors.*** is disposed of in terms of above.
8. Files be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**Smt. Sneh Gupta Vs. C.O. (Village Singhola) & Ors.**

15.10.2025

Present : Shri Sushil Kumar, Counsel for Petitioner.  
: None for Respondents.

1. Counsel for Petitioner stated that the petitioner is the original right holder of village Singhola where consolidation proceedings are in operation and repartition in the village took place between 26.05.1997 to 02.06.1997. In the repartition U/s 21 (1) of the Consolidation Act, land comprising in Kh. No. 16/22/1 (0-17), 22/3/2(3-8), 4(1-5), 7(2-2), 8(0-17), 11(2-4) total measuring 10 Bighas 13 Biswas (Sada Rakba) was allotted to the petitioner. Vide order dated 29.01.2009 (Resolution No.66) passed by the Consolidation Officer under section 21 (2) of the Consolidation Act, the aforesaid land was withdrawn and land comprising in Khasra No.11/8(3-18), 13(3-18), 12 Min (2-3) (Sada Rakba) was allotted to the petitioner.
2. That vide another resolution No. 84 dated 14.01.2010 passed by the consolidation officer, the aforesaid land allotted to the petitioner vide resolution No.66 was withdrawn and Khasra No.11/19(4-16) 203(1-17), 18(2-12) was allotted to the petitioner. The resolution No.84 was found non-existent as the Consolidation Officer disowned the same. The aforesaid Resolution No. 84 was cancelled by the Consolidation Officer himself vide another Resolution No.87 dated 01.04.2010.
3. That the Consolidation Officer ceased to have any power with respect to the allotment made to the petitioner as the Consolidation Officer/respondent No.1 does not enjoy further powers to cancel or withdraw or to review his own order dated 29.01.2009 vide Resolution NO.66 was passed. Vide impugned order dated 05.02.2013, Resolution NO.129, the Consolidation Officer/R-1 has withdrawn Khasra No.11/8 (2-8) from the petitioner and allotted to respondents no. 2 and 3 and in lieu of same allotted Khasra No.11/12 (2-13) 19(1-5) to the petitioner.

4. That the Resolution No.129 dated 05.02.2013 is without any jurisdiction and Consolidation Officer is without jurisdiction and he has no power to amend/review or alter his own order. No notice was ever served to the petitioner. The land allotted to the petitioner vide resolution No.66 dated 29.01.2009 is situated at one consolidated place and Khasra No.11/8 abuts main road and the impugned order has been passed deliberately and malafidely by the CO to give advantage respondents No.2 and 3 by allotting the Khasra number/land abutting main road which is neither justified nor judicious. Moreover, the petitioner had no knowledge of the impugned order as no notice was ever served to her. In addition, the petitioner is still in possession of the land which was allotted to her vide resolution no.66 dt. 9.01.2009.
5. The Counsel for Petitioner further submitted that consolidation officer has no jurisdiction after consigning the record and he cannot take up the case suo moto because consolidation proceedings have been completed. The counsel further stated that this Court has jurisdiction u/s 42 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948, to order the Consolidation Officer to rectify any error made during consolidation.
6. The Counsel for Petitioner accordingly prayed for setting aside the impugned order dated 05.02.2013 passed by the Consolidation Officer/R-1. Counsel filed judgement passed by Hon'ble High Court of Delhi in WPC No.17691-93/2006 in the matter of "Rishi Prakash & Ors. VS. the Financial Commissioner & Ors.", wherein it was held that:-

***"In view of the legal position emerging from the authorities cited above, I am of the opinion that the view taken by the Financial Commissioner that the order of the C.O. resulted in a review of the earlier order, as it has relocated the plots is correct. It has rightly been held by him that if there was any grievance regarding the allotment, it should have been addressed in appropriate proceedings. The power of C.O. under Section 43A of the Act is only to remove the obvious clerical or arithmetical mistake as a result of an omission in the scheme or order. In my view Section 43A of the Act, in no circumstance, gives jurisdiction to the C.O. to review his earlier order and relocate the plots allotted under the scheme".***

7. It is learnt that consolidation proceedings are underway in the village "Singola" and the record has not been consigned yet. Accordingly, the present matter is remanded back to the Settlement Officer (Consolidation) to hear all the concerned parties and pass a speaking order preferably within three months of this order.
8. The revision petition bearing no. 177/2025 is disposed of in terms of the above.
9. File be consigned to record room after completion.

**(PRASHANT GOYAL)**  
**Financial Commissioner**  
**Delhi**

**Omprakash Rana & Ors.  
Vs.  
Consolidation Officer (Khera Kalan) & Anr.**

15.10.2025

Present : Shri Prashant Singh, Counsel for Petitioners.  
: None for Respondents.

1. Counsel for Petitioner stated that the petitioners have preferred the present petition under Section 42 of East Punjab Holdings (Consolidation and Prevention of Fragmentation) act, 1948, against impugned order dated 06.07.2022 passed vide resolution no. 363 by consolidation officer (Khera Kalan) by which the consolidation officer partitioned the joint land holding of petitioners and respondent no. 2 against the rules and without issuing notice upon petitioners.
2. That the consolidation proceedings were held in village from 07.12.1999 to 10.12.1999 and in repartition proceedings initially vide resolution no. 134 dated 24.06.2009, khata of petitioners and respondent no. 2 were kept joint while separating with khata no. 653/2. The agriculture joint holding continued to be joint holding/Khata of the petitioners and respondent no. 2, even after repartition was carried out by Consolidation Officer in year 1999. The said decision of Consolidation Officer to maintain the joint holding/khata qua Khasra Nos. 41/15 (1-16), 41/16(5-08), 84/16(1-2) 84/17(3-19), 84/18 (4-16), 84/23(4-7), 84/24(2-3), 84/19 (1-00), 84/22(1-00), 29/17(1-00), 29/23(1-02), 29/24(4-16), 29/25(4-14), 41/3(4-16), 41/4(4-16), 41/5(4-16), 41/6(4-16), 41/15(3-00), 63/13(4-16), 63/14(4-16), 80/4(4-16), 80/5(4-16), 80/6(4-16), 80/7(4-16), 80/8(1-7), 81/1(4-16), 81/2(4-16), 81/3(4-12), 81/4(4-12), 81/6(3-10), 81/7(4-16), 81/8(4-12), 81/9(4-16), 81/10(4-16), 82/12(1-3), 82/13(1-13), 82/26(1-9), 82/27(1-13), 82/28(0-16), 82/29(4-13), 84/12(1-12), 84/13(4-16), 84/19(1-8), 84/21(0-8), 84/22(3-7), 68/25(0-19), Village Khera Kalan, Delhi, attained finality as no one from village or joint

Khatedars/co-owners i.e petitioners or respondent no. 2, filed any objection or claim in this regard within prescribed time as per section 21 (1) and 21 (2) of East Punjab Holdings (Consolidation & Prevention of Fragmentation) Act, 1948, and thus, the said proceedings with respect to joint holding of parties attained finality.

3. That since the petitioners and respondent no. 2 were having joint agricultural holdings falling in aforesaid Khasra, they are in possession of the said land jointly. CO/R-1 vide order dated 06.07.2022 bearing resolution no. 363 ordered the partition of the joint holdings of petitioners and respondent no. 2. The petitioners were not even served notice of the partition proceedings and the shares of all co-owners were not separated in fair and equitable manner and no report from concerned Patwari was called regarding the status of possession over land. The rights of the Petitioners have been violated and also the proceedings were carried without issuing notice upon petitioners and respondent no. 1 has failed to exercise its jurisdiction as per rules governing partition of joint holding. Further proceedings were carried against dead person i.e Surender without impleading his legal heirs.
4. That the respondent no. 2 filed an application seeking separation of joint holdings/khata qua agriculture land in Khasra Nos. 41/15 (1-16), 41/16 (5 - 8) 84/16 (1 - 2) 84/17 (3 - 19) 84/18 (4-16), 84/23 (4 - 7) 84/24 (2 - 3) 84/19 (1-00), and 84/22 (1 + 0) while claiming himself to be in possession of the said land. Respondent no. 2 had never been in exclusive possession of afore said khasra no. and till date the said land falling in afore mentioned khasra no. is in joint possession of all petitioners and respondent no. 2. On the said application, CO did not even issue notice to all the joint holders. None of the petitioners gave their consent to the said seeking partition or separation of joint holding between parties. The entire proceedings were conducted by CO behind the back of.petitioners.

5. That CO was duty bound to proceed with application of respondent no. 2 in accordance with rules. He had exceeded his jurisdiction by passing impugned order dated 06.07.2022 while acting on application of respondent no. 2, as the impugned order dated 06.07.2022 has not been passed while invoking jurisdiction legally. Petitioners were never served with notice to the proceedings before Consolidation Officer and petitioners never gave their consent for separation of joint holding. The order dated 06.07.2022 has not partitioned the joint holding completely and in fair and equitable manner. Further notice prepared in name of Surender, who had already passed away in December, 2021 could not have been considered in proceedings. The impugned order dated 06.07.2022 suffers from legal infirmity. The order passed by respondent no. 1, by which the joint holdings of petitioners and respondent no. is partitioned is not based on equity and is tilted in favour of respondent no. 2 and was against the interest of petition. since repartition proceedings in village Khera Kalan, Delhi were conducted from 07.12.1999 to 10.12.1999 and the same attaining finality in absence of any objection by any joint land holders/co-owners. Therefore, respondent no. 1 had exceeded his jurisdiction by passing impugned order dated 06.07.2022 while acting on application of respondent no. 2, as the impugned order dated 06.07.2022 has not been passed while invoking jurisdiction legally.
6. The Counsel for Petitioner accordingly prayed for setting aside the impugned order dated 06.07.2022 vide Resolution no.363 passed by the Consolidation Officer/R-1.
7. The rulings of the Hon'ble Supreme Court in Civil Revision No. 3828 of 2017 ***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others*** do not provide for continued applicability of the Delhi Land Reforms Act, 1954 by the revenue courts. After the declaration of the land/village i.e. Khera Kalan as urbanised vide notification dated 20.11.2019. The definition of the land which is derived from the Delhi Land Reforms Act is non-est, once the

Delhi Land Reforms Act goes, in terms of the above judgment.

8. Averting to the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948, the purpose of this Consolidation Act as mentioned in its preamble is "*An Act to provide for the compulsory consolidation of agricultural holdings and for preventing the fragmentation of agricultural holdings in the State of Punjab and for the assignment or reservation of land for common purpose of the village*". The entire outcome of the process of consolidation to achieve the purpose stated in the preamble of consolidation is to prepare a new record of rights in accordance with the Land Revenue Act as per Section 22 of the Consolidation Act.
9. The basic purpose of the Consolidation Act therefore is to prevent fragmentation of land and to render agricultural activity to remain viable. The mother document on which the entire consolidation is based on, is the 'record of rights'. The record of rights in the Consolidation Act is as defined in Sections 6 and 22 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948 and takes its definition from the Punjab Land Revenue Act, 1887. In the case of GNCTD, the same Punjab Land Revenue Act, 1887 has been extended to Delhi through the aegis of Delhi Land Revenue Act, 1954.
10. Similarly, as per Section 2(b) the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948 - (b) "*Consolidation of Holdings*" means the amalgamation and the redistribution of all or any of the lands in an estate or sub-division of an estate so as to reduce the number of plots in the holdings; Further, 'economic holding' and 'estate' have been defined vide Section 3(7) and 3(8) of the Delhi Land Reforms Act, 1954.
11. Therefore, it is seen that once Delhi Land Reforms Act, 1954 and consequently, the Delhi Land Revenue Act, 1954 cease to apply, the definition of 'estate', 'record of rights' and 'economic holding' are not available for the purpose of the consolidation proceedings under the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948.

12. In the light of all the foregoing, in the matter where the village already stood declared as urbanised in 2019 would involve entering into an area where the revenue courts have no jurisdiction to enter. Further in the present case, the consolidation proceedings were initiated much prior to date of notification declaring the village Khera Kalan, Delhi as urbanised. Therefore, the Hon'ble Supreme Court of India judgement in Mohinder Singh is applicable in the present case also.
13. The matter is accordingly remanded back to the Settlement officer to take into consideration all the above issues, including the judgement of Hon'ble Supreme Court in Civil Appeal No 3828/2017 titled "***Mohinder Singh (Deceased Through LRs. Versus Narain Singh & Ors.***" and the judgement dated 03.08.2023 passed by the predecessor Financial Commissioner in case no.77/2021 and in many other such cases, on the applicability of Consolidation Act after the village stands urbanised may also be kept in view while passing a speaking and reasoned order, preferably within next three months.
14. The concerned District Collector may also take stock of the situation and provide suitable guidance to the subordinate officers on their jurisdiction post urbanisation of village.
15. The revision petition bearing no. 175/2025 is disposed of in terms of the above.
16. File be consigned to record room after completion.



(PRASHANT GOYAL)  
Financial Commissioner  
Delhi