

**Case No. 196 of 2025**

19.11.2025

Present : Shri Ravinder Kumar Sehrawat, Counsel for Petitioner.  
: Shri Sunil Chauhan, Counsel for R-1.

1. Counsel for Petitioner contended that Petitioner is aggrieved by the orders of Consolidation Officer dated 12.08.2022 wherein land bearing khasra no. 37/22(2-19) has been withdrawn from the Petitioner on the application of the Respondent herein, without considering the fact that the Petitioner was never supplied with the copy of application filed by R-1 before the C.O. Moreover, at the time of passing of Resolution No. 159 dated 27.12.2010, none including R-1, herein had raised any objection to the said allotment.
2. Counsel for Respondent submitted that consolidation proceedings were going on when the impugned order was passed by the Consolidation Officer in the year 2022 and the consolidation proceedings were completed in the year 2024. Moreover, the impugned order had been passed much earlier than the passing of the judgement by the Hon'ble Supreme Court of India in *Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others* 14<sup>th</sup> March 2023 whereby revenue proceedings were declared non-est after urbanisation.
3. Heard the parties, both parties may file their written arguments/ submissions, with citations if any, in support of their contentions by 30<sup>th</sup> November 2025, whereafter orders shall be passed based on documents available on record.
4. Case is reserved for pronouncement of orders on 17.12.2025.

19.11.2025

Present : Shri Sanjiv Tyagi, Counsel for Petitioner.  
: Shri Abhishek Tyagi, Proxy Counsel along with Shri A.K. Duggal, for R-1, Review Applicant.

1. Counsel for Review Applicant submitted that the present petition filed against the Tehsildar's order dated 11.01.2019, directing up-dation of revenue records as per the Consolidation Officer's order dated 12.07.1988, which has attained finality after being upheld by the Hon'ble Supreme Court in Civil Appeal No. 2522/2016 on 04.03.2016.
2. Counsel R-1/ review applicant further submitted that vide order dated 04.08.2023, this Hon'ble Court disposed of the petition holding that, due to the urbanization of Village Burari vide Notification dated 16.05.2017, its jurisdiction had become non-est. This finding was based on the Supreme Court's judgment dated 14.03.2023 in Mohinder Singh vs. Narayan Singh, holding that issuance of a notification under Section 507(a) of the DMC Act, 1957 renders proceedings under the Delhi Land Reforms Act non-est. On this basis, the Court also held that the Tehsildar's order dated 11.01.2019 had become non-est after the 16.05.2017 notification. The said finding has caused grave prejudice to the Petitioner. Hence, the petitioner seeks review of the order dated 04.08.2023.
3. Counsel for R-1 submitted that the Financial Commissioner, by order dated 11.11.1987, dismissed the revision but allowed the appellants to approach the Tehsildar/Consolidation Officer for verification of their shares. The Tehsildar thereafter passed an order

on 12.07.1988, dividing the land in Khewat Nos. 73 and 85 among the parties and recording that 94 bigha 15 biswa land was left out for distribution with the consent of all.

4. Counsel for Petitioner contended that the Supreme Court held that earlier proceedings about bhumidari rights had already attained finality. The appellants later claimed they were not given their entire 1/5<sup>th</sup> share and were permitted to pursue any other legal remedy for this grievance. Their claim related to the leftover 94 bigha 15 biswa land, which was not part of earlier proceedings. Though they filed a suit, they withdrew it and wrongly filed a revision again, which was correctly dismissed by the authorities and upheld by the High Court.
5. Heard the parties, both parties may file their brief written arguments/ submissions, with citations if any, in support of their contentions by the end of November 2025, whereafter orders shall be passed based on documents available on record.
6. Case is reserved for pronouncement of orders on 17.12.2025.

**Financial Commissioner  
Delhi**

26.11.2025

Present : Ms. Nishtha Sinha, Proxy Counsel for Petitioner.  
: Shri S.S. Rana, Counsel for R-4.

1. The Proxy Counsel for Petitioner requested for pass over the matter as the main Counsel is stuck in the Hon'ble High Court of Delhi and filed an application to waive off the cost of Rs.3,000/- imposed on the last date of hearing i.e. on 19.11.2025. At the request of the Proxy Counsel for Petitioner, the cost imposed is reduced to Rs. 1000/- to be deposited with DDO, GAD, GNCTD before the next date of hearing.
2. The Counsel for R-4 submitted that this revision petition is not maintainable before this Hon'ble Court as the Petitioner has already availed the opportunity under Section 21(4) of the Consolidation Act before the DC/Assistant Director (Consolidation) and no remedy under Section 42 in revision lies in such cases. Therefore, the Petitioner should approach the Hon'ble High Court of Delhi invoking its writ jurisdiction. In support of his contention, the Counsel for R-4 filed copy of following three judgments i.e. (i) Roop Chand V/s State of Punjab in WP (C) No. 77/1957 dated 10.10.1962 passed by the Hon'ble Supreme Court of India, (ii) Dhani Ram (Deceased.) Through LRs Vs GNCTD & Ors. in WP (C) No. 4200/2008 dated 10.08.2011 passed by the Hon'ble High Court of Delhi and (iii) Rajinder Singh and Ors. Vs. GNCTD & Ors. dated 17.08.2007 passed by the Hon'ble High Court of Delhi. He further submitted that the facts of the present case are similar to Rajinder Singh case and drew the attention of the court towards para 17 of the judgment wherein it is held that :

*" 17. The scope of the powers of the Financial Commissioner under Section 42 have been explained by the Hon'ble Supreme Court in Roop Chand v. State of Punjab 1963 Supp SCR 439 and by this Court in Suraj Mal v. Manohar Lal 2nd (1973) Del 1016 both of which have recently been followed by this Court in Dhani Ram v. Ram Sarup. decision dated 2.7.2007 in W.P. (C)*

*No. 3232 of 2002. The Hon'ble Supreme Court construed the word "any order passed by any Officer" occurring in Section 42 of the Holdings Act as not including an Order made under Section 21(4) by the Collector. In the instant case, the order dated 1.12.1997 passed by the CO under Section 21 of the Holdings Act could be challenged under Section 21(2) by filing objections. In fact, Respondent No. 3 availed of that remedy and filed an objection only to the extent that he was denied allotment of the plot in pre-consolidation Khasra No. 522 although he had a boring on the said plot. His objection was not, at that stage, to either the sale deeds executed by in favor of the petitioners here by their father on 22.7.1996 or even to the power of the CO to extend the time for submitting claims. Respondent No. 3 then appealed to the SO under Section 21(3). The SO allowed the appeal on 28.2.2000. Thereafter, the appeal by the petitioners under Section 21(4) was allowed by the Collector on 25.8.2000. The Financial Commissioner dismissed the revision petition filed thereafter by Respondent No.3 as not maintainable. Thus as far as the statutory remedies were concerned, they were availed of and the result was that the order dated 1.12.1997 of the CO stood affirmed".*

3. On the other hand, the Proxy Counsel for Petitioner relied upon para No.5 of the judgment dated 08.01.2025 in WPC No.132/2025 passed by the Hon'ble High Court of Delhi wherein it is held that :

*"5. Mr. Rizwan, learned counsel for the petitioner, submits that the power of revision lies against the original order of re-partition, and not against the appellant order. However, Mr. Singh, having taken instructions, states that the Financial Commissioner does entertain revision petitions, even when appellate remedies under Sections 21(3) and 21(4) have been exhausted.*

*6. Having regard to the provision of Section 42, I do not discern any statutory impediment to exercise of revisional jurisdiction."*

and informed that she has rightly approached the Hon'ble Financial Commissioner as per the directions of the Hon'ble High Court of Delhi.

4. The Proxy Counsel for Petitioner also relied upon the judgment passed by the Hon'ble High Court of Delhi in

WPC No.3490/2010 titled "All India Equality Forum & Ors. Vs. UOI & Ors" and undertook to file a copy of the said judgment before the next date of hearing.

5. In rebuttal, the Counsel for R-4 submitted that the said order dated 08.01.2025 was passed by the Hon'ble High Court of Delhi on the very first hearing itself without issuing any notice to him, hence he had no opportunity to oppose the said order.
6. Keeping in view the specific directions passed by the Hon'ble High Court of Delhi in WPC No.132/2025, as mentioned above, this court is inclined to admit the revision petition and proceed further in the matter.
7. Adj. to 14.01.2026 for further arguments.

  
**Financial Commissioner,  
Delhi**

**Case No. 349 of 2024**  
**Shri Ajay Kumar Mann & Anr.**  
**Vs.**  
**Consolidation Officer/Tehsildar, Alipur & Ors.**

19.11.2025

Present : Shri N. S. Dalal, Counsel for Petitioners.  
: Shri Vaibhav Kumar, Proxy Counsel for R-2.  
: Shri Shyam Pal, Kanungo (SDM Alipur).

1. Counsel for Petitioner contended that the Petitioners are challenging the changes made in their Khata by Resolution No. 365 dated 21.01.2019 and Resolution No. 355 dated 07.01.2019 issued by the Consolidation Officer. Further, the predecessor-in-interest of the petitioners, Shri Ram Swaroop was the recorded owner of the land in village Alipur Garhi/Alipur, Delhi and he was allotted land in Kh. No.103/10, 86/8, 86/14, 86/17 during consolidation proceedings and vide resolution No.365 dated 21.01.2019, the then Consolidation Officer changed position of the land and also reduced their total area and as such area of Khasra no.103/10 have been reduced from 2 bigha 19 biswa to 2 bigha 9 biswa. Moreover, khasra no.13/10/1 (7 biswa) has been wrongly allotted to Revti Raman, Respondent No.3 herein. The said revenue estate of village Alipur has been declared urbanized on 16.05.2017, after which the consolidation authorities had no legal power to alter the revenue records, as held by the Hon'ble High Court in 2010 in Indu Khurana Judgement as well as the Hon'ble Supreme Court in "***Mohinder Singh (Deceased) through LRs. Vs. Narain Singh (Deceased) through LRs***".
2. The Petitioners discovered in 2024 that their land in specific khasra numbers was subdivided and partly transferred to other parties without notice and after urbanisation. Hence, these changes were made violating principles of natural justice and also without jurisdiction. The Petitioners have remained in possession and their ownership is based on mutation and inheritance from their predecessor-iinterest. The Petitioners prayed to quash all proceedings and changes made to their Khata after 16.05.2017 as legally void for want of jurisdiction.
3. The rulings of the Hon'ble Supreme Court in Civil Revision No. 3828 of 2017 titled ***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. Alipur as urbanised vide notification dated 16.05.2017. 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.

4. The basic purpose of the Consolidation Act 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.
5. The matter is accordingly remanded back to the Consolidation officer to take into consideration all the above issues, including the judgement of Hon'ble High Court of Delhi in Indu Khurana as well as the judgement passed by the Hon'ble Supreme Court in "***Mohinder Singh (Deceased) through LRs. Vs. Narain Singh (Deceased) through LRs.***", as also the judgement dated 03.08.2023 passed by the predecessor Financial Commissioner in case no.77/2021, on the applicability of Consolidation Act after the village stands urbanised on 16.05.2017 may also be kept in view while passing a speaking and reasoned order, preferably within next three months
6. The revision petition bearing no. 349/2024 is disposed of in terms of the above. File be consigned to record room after completion.



(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

***Rajesh Jain & Sons, HUF***  
***Vs.***  
***Consolidation Officer/Tehsildar (Nangli Poona)***

19.11.2025

Present : Shri N. S. Dalal, Counsel for Petitioner.  
: Shri Shyampal, Kanungo for Respondent, C.O.

1. Counsel for Petitioner contended that the Petitioner is the recorded owner and in possession of land measuring 1 bigha 4 biswas in Khasra No. 2/24 min, in the revenue estate of Village Nangli Poona, Delhi that was urbanized on 16.05.2017. The ownership is duly established by a registered sale deed, mutation records, and revenue entries, including sale and partition among previous owners, resulting in the Petitioner being shown as Khatedar No. 64/75. Despite legal ownership and possession, the authorities failed to prepare and supply the Khatoni Pamaish (record of rights) for the said land at the time of consignment of records, although required by law. The omission was acknowledged by the authorities as a lapse and despite requests, the Petitioner's rightful revenue record (Khatoni Pamaish) was not issued. This failure to prepare and provide the Khatoni Pamaish constitutes dereliction of statutory duty under Section 36 of the East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948. The Petitioner respectfully seeks a direction from this Hon'ble Court to the Respondent to prepare and supply the Khatoni Pamaish for the land in question to fulfil statutory obligations, as provided under Section 22 and Section 36, East Punjab Holdings (Consolidation and Prevention of Fragmentation) Act, 1948.

2. Representative for Respondent, C.O. did not have any counter to the arguments made by the Counsel for Petitioner and also failed to deposit the cost which was imposed on the last date of hearing.
3. In view of the facts and circumstances of the case, the matter is remanded back to the concerned Settlement Officer (Consolidation) with a direction to hear and pass a speaking order keeping in view the fact that the said village Nangli Poona stands urbanized on 16.05.2017. He/She may keep in view the judgment passed in 2010 by Hon'ble High Court of Delhi in ***Indu Khurana vs. Gram Sabha & Ors.*** case as well as the judgment dated 14.03.2023 titled ***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others*** passed by the Hon'ble Supreme Court of India, as also the judgment of predecessor Financial Commissioner in case no. 77/2021 dated 03.08.2023 while passing the order, preferably within three months.
4. File be consigned to record room after completion.

(PRASHANT GOYAL)  
Financial Commissioner  
Delhi

**Gindori Devi  
Vs.  
Consolidation Officer/Tehsildar**

03.12.2025

Present : None for Petitioner.  
: Shri Ashish Soni, Patwari for Respondent, C.O.

1. It is seen from the records that the said village Paprawat stands urbanized after Notification under Section 507 of Delhi Municipal Act on 16.05.2017 and Revenue Authorities cease to have jurisdiction after urbanization in terms of the Hon'ble Supreme Court Judgment dated 14.03.2023 in case titled "***Mohinder Singh (Dead) through LRs and Another Vs. Narain Singh and Others***".
2. None appeared for the Petitioner today despite case being called twice. Today, final opportunity was given to the Petitioner to appear and lead the case.
3. It is also noted that none appeared for Petitioner on the last date of hearing also i.e. 26.11.2025 and a cost of Rs. 2000/- was imposed upon her and which was to be deposited today. No proof submitted for same.
4. It seems that the Petitioner is not keen to pursue the matter. Accordingly, the revision petition bearing No.362/2024 titled "***Gindori Devi Vs. Consolidation Officer/Tehsildar***" is dismissed for non-pursuance.
5. File be consigned to record room after completion.

**(PRASHANT GOYAL)  
Financial Commissioner  
Delhi**

19.11.2025

Present : Shri Jatin Sharma, Counsel for Petitioner.  
: Shri Vinod Kumar, Counsel for R-2.

1. The Counsel for Petitioner filed the copy of ordersheet dated 07.07.2022 passed by C.O. alongwith copy of receipt of deposit of cost of Rs.5,000/- imposed upon the Petitioner.
2. In support of his contention, the Counsel for Petitioner filed copy of two judgements dated 04.02.2022 in WP (C) No. 5627/2020 case titled "*M/s. Sanvik Engineers India Pvt. Ltd & Anr Vs. GNCTD*" and dated 09.01.2023 in WPC No.195/2023 & 212/2023 case titled "*Jeevashram Vs. GNCTD & Ors.*" passed by the Hon'ble High Court of Delhi. This court noted that these judgments were passed much before the judgment passed by the Apex Court in case title "***Mohinder Singh (Dead) Through LRs & Anr. Vs. Narain Singh & Ors, 2023 SCC OnLine SC 261***" in the month of March, 2023.
3. The Counsel for R-2 submitted that the copy of order dated 07.07.2022 filed by the Petitioner, is not a detailed order passed by the C.O. This order of 2022 was passed by the C.O. on the application filed by R-2 to implement the order passed by the District Magistrate in the year 2015. The Counsel for R-2 further submitted that the main order was of the year 2015 and the village Kanjhawla was subsequently urbanized in the year 2017. The Counsel for R-2 further submitted that the Petitioner herein has already filed two civil suits to pass decree of declaration as well as injunction in favour of the Petitioner in the same matter and the said suits are still pending. The Petitioner should have approached

the Settlement Officer against the C.O. order instead of approaching civil court.

4. Both the parties are directed to file their written submissions in brief alongwith citations, if any, in support of their averments by the last week of November, 2025, whereafter orders shall be passed on the basis of documents available on record.
5. The case is reserved for pronouncement of orders on 24.12.2025.

**Financial Commissioner,  
Delhi**

19.11.2025

Mentioned today by Shri Diwas Kumar and Shivam Sharma, Counsel for Petitioner.

1. Case is mentioned today.
2. The Counsel for Petitioner contended that the present revision petition has been filed under Section 42 of the East Punjab Holding (Consolidation & Prevention of Fragmentation) Act, 1948 challenging the reduction of 8 biswa of land. The main contention of the Petitioner is that he is the recorded bhumidar and in possession of land bearing Khasra No. 10/22 (04-04) in Village Badusarai and was cultivating the said land continuously. Thereafter, upon conclusion of consolidation proceedings in said village, the Petitioner was allotted pre-consolidation holding bearing Khata/Khatoni No. 206/173, Khasra No. 10/23. However, the area recorded in the post-consolidation record is only 3 Bigha 8 Biswa thereby resulting deduction of 8 Biswa from the Petitioner's original holding. The Counsel for Petitioner prayed for status quo of the said land holding and the deduction be restricted upto 4 Biswa only.
3. It is noted that the Petitioner has not mentioned about the year of consolidation as well as the reduction/deduction made in the khata of the Petitioner.
4. Still in the interest of justice, issue dasti notice to the Respondent, CO to appear and lead the case on the next date of hearing.
5. List on 03.12.2025.

**Financial Commissioner,  
Delhi**