



* IN THE HIGH COURT OF DELHI AT NEW DELHI

Reserved on: 28th August, 2025
Pronounced on: 16th October, 2025

+ CRL.REV.P. 219/2021

KHUSHWANT KAURPetitioner

Through: Mrs. Kajal Chandra, Ms. Hatneimawi,
Advocates.

versus

SMT GAGANDEEP SIDHURespondent

Through: Ms. Samvedna Verma, Advocate.

+ CRL.REV.P. 223/2021

DALJIT SINGH & ANR.Petitioners

Through: Mrs. Kajal Chandra, Ms. Hatneimawi,
Advocates.

versus

SMT GAGANDEEP SIDHURespondent

Through: Ms. Samvedna Verma, Advocate.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

JUDGMENT

SANJEEV NARULA, J.

1. Both these revision petitions arise out of disputes concerning the same property and rest on common factual foundations. As the grounds urged and the submissions addressed on either side are identical in substance, they are being decided together by this judgment.



Factual Background

2. The Respondent in both petitions, Gagandeep Sidhu, got married to Saravjeet Singh, the son of the Petitioners, namely Khushwant Kaur (mother-in-law) and late Daljit Singh (father-in-law), on 14th November, 2010 as per Hindu rites and ceremonies. After marriage, Gagandeep Sidhu moved into her matrimonial home at House No. 11/8, Gali No. 1 & 2, Old Gobindpura Extension, Delhi-110051¹. However, the matrimonial relationship soon deteriorated, giving rise to disputes between her and the Petitioners.

2.1. The Petitioners contend that owing to marital discord and differences, the Respondent along with her husband, Saravjeet Singh, initially began living at the ground floor of the matrimonial home. However, the continued strain in their relationship led the couple to move out of the matrimonial home and shift to a rented accommodation on 1st November, 2011. The Petitioners further assert that, prior to this, they had disowned and disentitled their son, Saravjeet Singh, from all movable and immovable properties through a public notice published in the *Rashtriya Sahara* on 29th October, 2011 and by an *itla peshbandi* lodged with P.S. Jagat Puri.

2.2. The Respondent disputes this version and asserts that on 2nd November, 2011, upon returning home, she found her husband and the Petitioners removing her belongings to a rented room, allegedly to dispossess her from the matrimonial home against her wishes.

2.3. The Petitioners asserts that on the night of 2nd November, 2011, the Respondent, accompanied by her family members, forcibly entered the



property, broke open the locks of the ground floor, and occupied the premises. They state that this prompted them to issue a legal notice dated 11th November, 2011, calling upon the Respondent to vacate the property, and subsequently to institute Civil Suit No. 248/2011 seeking a decree of permanent and mandatory injunction along with mesne profits.

2.4. In the above backdrop, the Respondent initiated proceedings under the Protection of Women from Domestic Violence Act, 2005² and filed a complaint under Section 12 of DV Act being V-08/2012, against Saravjeet Singh (husband), late Daljit Singh (father-in-law) and Khushwant Kaur (mother-in-law), *inter-alia* claiming a right of residence in the shared household – i.e., the ground floor of the subject property.

2.5. Conversely, Khushwant Kaur (mother-in-law) also filed a complaint under Section 12 of the DV Act, which was registered as V-27/2012, seeking *inter-alia* protection against the Respondent and her family members, from alienating or otherwise disposing off part of the subject property. Further, compensation of INR 10,000/- per month was sought from the Respondent for the illegal use and occupation of the subject property.

2.6. On 14th September, 2018, Civil Suit No. 248/2011 filed by late Daljit Singh was partly decreed and partly dismissed by the Additional Senior Civil Judge-cum-Guardian Judge, East District, Karkardooma Courts, Delhi. The Court declined to grant mandatory injunction against the Respondent, holding that such a relief was not maintainable in the absence of a finding of licence agreement and that the appropriate remedy was to seek the relief of possession and mesne profits. However, a decree of permanent prohibitory

¹ “subject property”

² “DV Act”



injunction was granted restraining the Respondent from obstructing the ingress and egress of the Petitioners through the main gate of the subject property. Pursuant thereto, late Daljit Singh instituted Civil Suit No.730/2018 seeking possession and mesne profits, which came to be dismissed *vide* order dated 10th October, 2023. In revision against the said order, this Court on 29th April, 2024 set aside the order and passed a decree for possession in late Daljit Singh's favour. However, the Supreme Court, in Special Leave Petition (Civil) No.11649/2024, has, as an interim measure, issued the following order:

- “1. *Issue Notice*
2. *There shall be stay of the judgment and order dated dated 29-04-2024 passed by the High Court of Delhi in CRP No. 4/2024 till the next date of hearing*
3. *List after service is complete.*” [SIC]

2.7. In the context of these multiple proceedings between the parties before different forums, the complaint filed by Khushwant Kaur under Section 12 of the DV Act (V-27/2012) titled ***Khushwant Kaur v. Gagandeep Sidhu*** came to be decided on 07th March, 2020. The findings are summarised as follows:

- (i) On the question whether Khushwant Kaur was an “*aggrieved person*” entitled to relief under the PWDV Act, the Trial Court found her version unreliable, noting contradictions in her allegations and absence of any contemporaneous complaint against the Respondent. The Court observed that the petition appeared to be a counter-blast to earlier proceedings initiated by the Respondent Gagandeep Sidhu under Section 12 of the DV Act and under Sections 498A/406/34 IPC.
- (ii) The Trial Court also held that the Petitioner's reliance on a



“*disownment notice*” of her son Saravjeet Singh was contrived and orchestrated. It emphasized that such notices have no dispositive legal effect on rights under the PWDV Act. The non-impleadment of Saravjeet Singh, despite his central role in the controversy, further undermined the Petitioner’s case.

(iii) The Court concluded that the Khushwant Kaur was not an aggrieved person within the meaning of the Act. Nonetheless, considering her age and right to peaceful residence, the Court enjoined the respondent and her family from contacting Khushwant Kaur or her husband, late Daljit Singh, and from interfering with their possession and enjoyment of the first floor of the subject property.

(iv) The Court declined to grant compensation of INR 10,000/- per month as claimed. It held that the Respondent too had a recognised right of residence in the shared household i.e., the ground floor of the property, and could not be directed to vacate the same or to pay use/occupation charges.

2.8. The complaint filed by Gagandeep Sidhu under Section 12 of the DV Act (V-08/2012), was finally adjudicated by order dated 01st July, 2020. The Trial Court, held that the Petitioners were guilty of domestic abuse, and issued directions restraining them from committing any further acts of domestic violence against the Respondent. The Court further restrained the Petitioners herein from dispossessing the Respondent from the subject property and further prohibited them from entering or alienating the said property without following due process of law.

2.9. Aggrieved by the aforesaid decisions, the parties carried the matter in appeal. Khushwant Kaur preferred Criminal Appeal No. 64/2020 challenging the order dated 07th March, 2020 passed in Complaint Case No.



V-27/2012. Separately, late Daljit Singh and Khushwant Kaur jointly preferred Criminal Appeal No. 67/2020 against the order dated 01st July, 2020 arising from Complaint Case No. V-08/2012. For completeness, it may also be recorded that Saravjeet Singh (husband of the Respondent) filed an independent appeal, being Criminal Appeal No. 68/2020, likewise directed against the order dated 01st July, 2020 passed in V-08/2012.

2.10. All three appeals were heard together and decided by a common order dated 27th April, 2021, passed by the Additional Sessions Judge-03, East District, Karkardooma Courts, Delhi. By the said order, the Appellate Court dismissed all three appeals and declined to interfere with the respective decisions of the Trial Court. Aggrieved thereby, the Petitioners have preferred the present revision petitions before this Court. The following table sets out the particulars of the proceedings at each stage for clarity:

Complaint No.	Proceedings before the Trial Court	Corresponding Appeal before the Appellate Court	Present Petition before this Court	Revision before this Court
V-27/2012 (filed by Khushwant Kaur against Gagandeep Sidhu)	Order dated 7 th March, 2020 passed by MM, Mahila Court, East District, New Delhi	<i>Crl. Appeal No. 64/2020</i> filed against order dated 7 th March, 2020 , decided by common order dated 27 th April, 2021	<i>Crl. Rev. P. 219/2021</i> filed by Khushwant Kaur – impugning the orders dated 7 th March, 2020 and 27 th April, 2021	
V-08/2012 (filed by Gagandeep Sidhu against Saravjeet Singh, late Daljit Singh and Khushwant Kaur)	Order dated 1 st July, 2020 passed by the MM, Mahila Court, East District, New Delhi	<i>Crl. Appeal No. 67/2020</i> filed against order dated 1 st July, 2020 , decided by common order dated 27 th April, 2021	<i>Crl. Rev. P. 223/2021</i> filed by late Daljit Singh and Khushwant Kaur – impugning the orders dated 1 st July, 2020 and 27 th April, 2021	

Submissions of the Petitioners

3. Mrs. Kajal Chandra, counsel for the Petitioners, assails the common



order dated 27th April, 2021 passed by the Appellate Court, as well as the underlying orders of the Trial Court, on the following grounds:

3.1. The Courts below failed to properly appreciate the material facts and evidence on record. The impugned orders rest upon conjectures and surmises rather than concrete findings. Mere vague and unsubstantiated allegations of domestic violence are insufficient to attract the provisions of the DV Act.

3.2. Late Daljit Singh (identified as Petitioner No.1) was the absolute and exclusive owner of the subject property. It is his self-acquired property and not ancestral. Consequently, the said property could not be treated as a “*shared household*” within the meaning of Section 2(s) of the DV Act.

3.3. The Petitioners further rely upon subsequent proceedings. In Civil Suit No. 730/2018, an application under Order XII Rule 6 CPC seeking a decree for possession was initially dismissed. In revision, by order dated 29th April, 2024, the suit was decreed by this Court in favour of the Petitioners, holding that late Daljit Singh was the absolute owner of the subject property and that it was his self-acquired asset. As regards mesne profits, the Petitioners note that the Revisional Court in C.R.P. No. 4/2024 directed the parties to lead evidence before the Trial Court for determination of the issue in accordance with law.

3.4. The subject property neither constitutes the matrimonial home nor the “*shared household*” of the Respondent, for the following reasons:

(a) The property being the self-acquired property of late Daljit Singh, as upheld in the above civil proceedings, does not fall within the ambit of a *shared household*. The Appellate Court erred in observing that the Petitioners failed to produce the complete chain of title documents. All



requisite records were placed before the Court, establishing that the property exclusively belonged to late Daljit Singh.

(b) Under Section 17(1) of the DV Act, a wife's right of residence arises only where the house belongs to her husband, is rented by him, or forms part of the joint family of which he is a member. None of these conditions are satisfied in the present case. The Respondent's husband, Saravjeet Singh, has been residing separately in rented accommodation since 2011. The Respondent and her husband had earlier occupied the subject property merely as licensees, and the licence stood revoked when Saravjeet Singh was disowned by late Daljit Singh in 2011 through a public notice. Consequently, the subject property cannot be deemed a *shared household* within the meaning of the DV Act.

3.5. The Respondent is in illegal occupation of the premises and, in fact, resides with her mother and minor daughter elsewhere. Reliance is placed on the electricity consumption records, showing a usage of merely 28W, which indicates that no one resides in the property. Respondent's occupation is motivated by an intent to harass and usurp the property. Considering that the Petitioners are senior citizens who depend upon rental income, it is prayed that the Respondent be directed to vacate the premises or, alternatively, to pay use and occupation charges of INR 10,000 per month.

3.6. The reliefs granted under the DV Act, particularly the restraint on alienation of the subject property, in effect operate as an injunction against the lawful owner. The Petitioners contend that such directions travel beyond the limited scope of the DV Act, which is a summary jurisdiction intended to secure protection from domestic violence, not to adjudicate proprietary or possessory rights.



3.7. Even assuming past cohabitation, there existed no domestic relationship between the parties at the time of filing of the complaint, as the Respondent and her husband had been residing separately since 2011. The right of residence under Section 17 of the DV Act presupposes a subsisting domestic relationship; once cohabitation ceased and the parties began living apart, the claim of residence no longer survived. The impugned orders, in effect, granted an injunction against the Petitioners, who are the lawful owners of the subject property, without satisfying the statutory conditions contemplated under Section 19(1)(a) to (f) of the DV Act.

3.8. In the alternative, the Petitioners advance principles of equity and submit that even if the Respondent is found entitled to protection from domestic violence, such protection need not entail continued residence in the subject property. It is submitted that the objectives of the statute could equally have been achieved by directing provision of suitable alternate accommodation or monetary assistance under Section 19(1)(f), thereby balancing the Respondent's right of protection with the Petitioners' ownership rights and advanced age.

Submissions of the Respondent:

4. Ms. Samvedna Verma, counsel for the Respondent, controverts the submissions advanced on behalf of the Petitioners and supports the concurrent findings of the Courts below on the following grounds:

4.1. There is ample material on record that establishes that the subject property constitutes a *shared household* within the meaning of Section 2(s) of the DV Act. The Respondent began residing in the said property immediately after her marriage and continued during the subsistence of her



domestic relationship with her husband. She was unlawfully attempted to be dispossessed from the premises on 2nd November, 2011 by the Petitioners and her husband without notice or due process. The contention that she has no right of residence stood rejected in multiple proceedings between the parties.

4.2. The Petitioners' claim that the subject property is the self-acquired and exclusive property of late Daljit Singh is misconceived and based on unreliable and fabricated documents. In its order dated 7th March, 2020, the Trial Court also noted the false and incomplete chain of documents produced by the Petitioners and rightly held that the Respondent's right of residence stood protected under the statute.

4.3. The Trial Court's order dated 01st July, 2020 merely directed that the Respondent shall not be evicted from the property without following due process of law. Such a direction does not confer ownership but merely protects her statutory right of residence guaranteed under Sections 17 and 19 of the DV Act. The protection order, therefore, is in consonance with law and necessary to prevent unlawful dispossession. The Respondent continues to remain in lawful possession and cannot be characterised as a trespasser. Consequently, the reliefs of mandatory injunction or mesne profits claimed by the Petitioners are unsustainable.

Analysis

5. The present revision petitions arise from a long-standing matrimonial discord that has, over the years, expanded into multiple proceedings before various civil and criminal fora. At the heart of the dispute lies a modest residential property at Old Gobindpura Extension, Delhi, which was once



the matrimonial home of the Respondent and her husband. The Respondent asserts a statutory right of residence therein under the DV Act, whereas the Petitioners claim exclusive ownership and seek her eviction, contending that the property is the self-acquired estate of late Daljit Singh and cannot be deemed a *shared household*.

6. The controversy has travelled through various courts. The Mahila Court, while entertaining the Respondent's complaint under Section 12 of the DV Act, restrained the Petitioners from dispossessing her from the premises without due process of law. That order, as well as the concurrent rejection of a counter-complaint filed by the mother-in-law, was affirmed by the Appellate Court by a common order dated 27th April, 2021. The Petitioners now seek to overturn those concurrent findings, urging that the DV forum exceeded its jurisdiction by granting what, in effect, amounts to an injunction against the lawful owners of the property. The Respondent, on the other hand, defends the orders as legitimate protection of her right to residence in the shared household.

7. During the pendency of these proceedings, Petitioner No. 1 in Criminal Revision Petition No. 223/2021, Daljit Singh, passed away. Consequently, the said revision petition now survives and is being pursued solely by Petitioner No. 2, Khushwant Kaur.

Limited scope of revisional jurisdiction

8. The jurisdiction under Sections 397 and 401 Code of Criminal Procedure, 1973 is supervisory, not appellate. Interference is warranted where the impugned order is illegal, suffers from material irregularity, or is perverse; re-appreciation of evidence as if in appeal is impermissible. The



principle is well settled in the Supreme Court decisions of *State of Kerala v. Puttumana Illath Jathavedan Namboodiri*³ and *Sanjaysinh Ramrao Chavan v. Dattatray Gulabrao Phalke*⁴. Measured against that yardstick, the inquiry here is confined to whether the Courts below misdirected themselves in law in recognising the Respondent's residence protection.

Statutory framework

9. The central question remains: whether the ground floor of the property bearing No. 11/8, Gali Nos. 1 and 2, Old Gobindpura Extension, Delhi-110051, constitutes a “*shared household*” within the meaning of Section 2(s) read with Section 17 of the DV Act, and whether the protection granted to the Respondent against dispossession was justified in law.

10. Section 2(a) defines an “*aggrieved person*” as any woman who is, or has been, in a domestic relationship with the respondent and who alleges domestic violence. Section 2(f) defines “*domestic relationship*” to include a relationship between two persons who live, or have at any point of time lived, together in a shared household. Section 2(s) defines “*shared household*” to mean the household where the aggrieved person lives, or has at any stage lived, in a domestic relationship with the respondent. Section 17(1) declares that every woman in a domestic relationship shall have the right to reside in the shared household, whether or not she has any right, title or beneficial interest in it. Section 17(2) stipulates she shall not be evicted or excluded except by procedure established by law. Section 19 empowers the Magistrate to pass residence orders, including to restrain dispossession, to direct a respondent to remove himself, to restrain entry into specified

³ (1999) 2 SCC 452.



portions, and importantly for present purposes, to restrain alienation or encumbrance of the shared household [Section 19(1)(a) to (d)], and to order suitable alternate accommodation or monetary relief where appropriate [Section 19(1)(f)].

The precedent

11. In *Satish Chander Ahuja v. Sneha Ahuja*⁵, the Supreme Court overruled the narrow approach in *S.R. Batra v. Taruna Batra*⁶, and clarified that a wife's right of residence does not hinge on the niceties of title. A property exclusively owned by in-laws may constitute a *shared household* if the aggrieved woman lived there with her husband in a domestic relationship. The DV Act is protective in character; residence orders do not adjudicate title and do not confer proprietary rights, but they do shield the aggrieved woman from dispossession, save in accordance with law.

12. Certain facts are not in dispute in any meaningful way for the present purposes. The Respondent married on 14th November, 2010 and, immediately thereafter, began residing at the subject premises with her husband and in-laws. That residence brings the premises within Section 2(s): it is a household where she lived in a domestic relationship. Once that threshold is crossed, Section 17(1) confers a right of residence irrespective of title, and Section 17(2) forbids eviction except by due process. The contention that the husband moved out in 2011, or that the parents-in-law “disowned” him, does not denude the house of its character as a *shared household*. The argument does not bear scrutiny when measured against

⁴ (2015) 3 SCC 123.

⁵ (2021) 1 SCC 414.

⁶ (2007) 3 SCC 169.



Satish Chander Ahuja.

13. We now turn to the specific grounds of challenge. First, the Petitioner states that the property was self-acquired by late Daljit Singh and, therefore, outside the DV Act. The submission misdirects itself. Ownership is immaterial for Section 17 so long as the Section 2(s) test is satisfied. ***Satish Chander Ahuja*** is decisive on this point. The civil court's decree regarding title, even if presently stayed, has no determinative bearing on residence protection under the DV Act. Title is for the civil court; residence protection is within the DV forum's remit.

14. Second, it is urged that there was no subsisting domestic relationship when the complaint was filed, since the couple had separated in 2011. Section 2(f) expressly embraces relationships where the parties “*have at any point of time lived together*” in a shared household. The Act is framed to protect against consequences that often follow separation, including dispossession. To suggest that the right of residence ceases the moment cohabitation ceases would render Sections 2(s) and 17 otiose and defeat the purpose of the Statute. The contention, with respect, is more rhetorical flourish than substance.

15. Third, it is argued that the Magistrate exceeded jurisdiction by issuing restraints akin to an injunction against the “*lawful owner*”, including a restraint on alienation. This submission overlooks Section 19(1)(d) of the DV Act, which in terms authorises the court to restrain the respondent from alienating or encumbering the shared household. The order under challenge does not confer title; it preserves the status quo so that the respondent is not evicted by self-help or by transfers calculated to defeat her protection. That is precisely what the statute contemplates.



16. Whether she was physically present on every day, or intermittently, cannot displace the legal character of the premises as a *shared household*, nor can it justify extra-legal eviction.

Question of Actual Residence and Electricity Consumption

17. Much emphasis was laid by counsel for the Petitioners on the contention that the Respondent has not been residing in the subject premises and is attempting to retain possession without actual use. To substantiate this, certain electricity bills relating to the meter installed at the premises were produced before this Court, purportedly showing negligible consumption. From this, it was urged that the Respondent's continued possession is motivated, malicious, and intended only to harass the Petitioners or obstruct their enjoyment of property.

18. The Respondent firmly disputes this contention and asserts that she continues to reside on the ground floor of the subject property. It was also pointed out that the electricity bills now relied upon were never part of the record before the Trial Court or the Appellate Court.

19. Upon careful consideration, this Court finds that the issue of physical occupation is a pure question of fact. Both the Mahila Court and the Appellate Court relied on evidence duly brought on record, including contemporaneous statements, and concluded that the Respondent was residing in the premises. The electricity bills now produced for the first time cannot be used to challenge these concurrent findings. The revisional jurisdiction under Sections 397 and 401 CrPC does not permit the introduction of fresh evidence or re-evaluation of factual findings not part of the trial record.



20. Even otherwise, low electricity consumption, taken in isolation, is at best a weak indicator of non-occupation. It can result from a variety of factors including conservation, intermittent absence, or partial use, and cannot, without corroboration, displace findings reached on the basis of direct evidence. To equate low consumption with abandonment would be speculative and inconsistent with the limited scope of revision.

21. Furthermore, a report submitted by the office of the Sub-Divisional Magistrate (Preet Vihar), under the Maintenance and Welfare of Parents and Senior Citizens Rules, 2016, records that the Respondent, Gagandeep Sidhu, resided in the property in 2010 after marrying the Petitioners' son. This was corroborated by certain witnesses. The report further reinforces the factual findings in her favour. In the absence of any demonstrable perversity in the appreciation of evidence, this Court cannot interfere with the concurrent conclusions merely on the basis of documents sought to be introduced at the revision stage.

22. Accordingly, the contention that the Respondent's possession is merely notional or *mala fide*, founded on selective reliance upon electricity bills, stands rejected. The protective orders passed by the courts below rest upon adequate material and cannot be disturbed in exercise of revisional scrutiny.

On balancing competing interests

23. The record reflects an unfortunate turn of events: the passing of the original Petitioner No. 1, Daljit Singh. The Court is conscious that his demise has altered the requirements of space that initially gave rise to these proceedings. What remains is a situation in which two sets of legitimate



interests must be balanced. On one side stands the Respondent-daughter-in-law, whose right of residence in the *shared household* is protected by statute; on the other is a senior-citizen Petitioner who seeks peace, privacy, and the ability to enjoy their property without intrusion.

24. The material on record, including the findings of the Magistrate and the Appellate Court, indicates that the parties presently occupy separate floors of the same building. That physical separation has, to some degree, already achieved the equilibrium that Section 19 of the DV Act aims for protection without displacement. So long as each side respects the boundaries of use recognised by the courts below, coexistence in distinct portions of the property ensures that neither protection nor ownership is rendered illusory.

25. The Court is therefore satisfied that the existing arrangement, whereby the Petitioners occupy the first floor, and the Respondent resides on the ground floor, sufficiently accommodates both interests. It neither deprives the Petitioners of possession nor leaves the Respondent shelter-less. The residence order, limited to preventing dispossession without due process, operates as a safeguard rather than a sanction. This practical balance also accords with the principle of proportionality that underlies the protective jurisdiction under the DV Act.

26. Two further points merit recording for completeness. First, if protection is warranted, it should have been by way of alternate accommodation or monetary relief under Section 19(1)(f), not continued residence. That is a matter of judicial discretion. The Magistrate, and then the Appellate Court, chose the less intrusive course of restraining dispossession without adjudicating title. In revision, this Court will not



substitute its own preference for a lawful exercise of discretion that accords with the object of the Act. Where protection can be secured by maintaining possession until due process is invoked in civil proceedings, the approach cannot be faulted.

27. The multiplicity of civil proceedings, including orders passed by a coordinate bench of this Court in C.R.P. 4/2024 and the pendency of SLP (Civil) No. 11649/2024 before the Supreme Court, do not eclipse the DV Court's power to grant residence protection. Section 26 of the DV Act permits reliefs to be sought before civil courts as well; it does not bar reliefs under the Act itself. Second, the DV forum did not adjudicate title nor grant proprietary relief. It merely insulated the Respondent from being turned out without due process. That limited protective remit is squarely within the statutory framework.

Conclusion

28. In the result, the concurrent findings of the Trial Court and the Appellate Court disclose neither illegality nor perversity. The subject premises qualifies as a *shared household* within Section 2(s); the Respondent's right of residence under Section 17 stands attracted; and the residence orders under Section 19, including restraints against dispossession and alienation, fall well within jurisdiction and purpose. The revision petitions therefore fail.

29. For clarity, nothing in this judgment touches upon questions of title, ownership, or mesne profits, which remain the domain of the competent civil court and the Supreme Court in the pending proceedings. The parties are at liberty to pursue those remedies; this judgment concerns only the



protective umbrella of the DV Act.

30. Accordingly, the present revision petitions are dismissed.

SANJEEV NARULA, J

OCTOBER 16, 2025/ab