



2. The facts of the case, briefly stated, are that the suit land originally stood recorded in the name of one Gadadhar Pradhan in the Sabik Record of Rights (ROR). Upon his death, the property devolved upon his legal heirs, namely, his wife, Uttam Bewa and daughter, Palei Dei. Uttam Bewa acting for the legal necessity of the family, transferred the entire suit land measuring Ac.0.250 decimals in favour of the petitioners by means of a registered sale deed bearing No. 5057 dated 11.09.1985 for consideration and delivered possession thereof. It is contended that ever since such purchase, the petitioners have been in peaceful possession and enjoyment of the suit land as rightful owners.

3. While the matter stood thus, Palei Dei, the daughter of the original recorded tenant and co-sharer, without any authority and in derogation of the earlier transfer executed two registered sale deeds on 29.09.1999, vide Sale Deed No. 4020 and Sale Deed No. 4021, transferring the suit land in two equal halves in favour of third parties, namely Sitanshu Sekhar Choudhury (O.P No. 3) and Smt. Rama Panda (O.P No.4). Said purchasers subsequently transferred their respective portions of



the suit land in favour of Ramesh Chandra Choudhury (O.P no.-5) by executing registered sale deeds dated 12.06.2007. Thereafter, Ramesh Chandra Choudhury, who is stated to be the Director of M/s Nrican Infra Pvt. Ltd., transferred the entire suit land in favour of the said company, i.e., Opposite Party No. 6, by way of a registered sale deed dated 23.06.2022. During the Hal Settlement operation, the ROR was finally published on 21.11.2013, wherein the suit land was recorded in the names of the subsequent purchasers, ignoring the prior purchase made by the petitioners. Upon coming to know about such recording and subsequent transactions, the petitioners filed the revision petition under Section 15(b) of the OSS Act seeking correction of the ROR.

4. The Revisional Authority upon due consideration dismissed the revision petition holding, inter alia, that it lacks jurisdiction to examine the validity of registered sale deeds and that the dispute raised involves adjudication of title which cannot be undertaken in a proceeding under Section 15(b) of the OSS Act. Said order is impugned in the present writ application.



5. Be it noted that despite service of notice, none appeared on behalf of the private Opposite Party Nos. 3, 5, and 6. This Court, by order dated 10.12.2025, held that service of notice upon them was sufficient on the basis of paper publication. Similarly, notice upon Opposite Party Nos. 2(a) and 4 were also held sufficient. However, none appeared on their behalf.

6. Heard Mr. B. Baug, learned Senior Counsel with Mr. G.R. Sahoo, learned counsel for the petitioners and Mr. S.N. Patnaik, learned Additional Government Advocate for the State.

7. Mr. Baug would argue that Revisional Authority has committed an error in dismissing the revision petition on the ground of maintainability. He submits that the petitioners had acquired right, title, and interest over the suit land on the basis of a registered sale deed dated 11.09.1985, much prior to the Hal Settlement operation and final publication of the ROR. He further submits that Revisional Authority failed to appreciate that the revision petition was filed for correction of the erroneous entries in the ROR, which did not reflect the pre-existing rights of the petitioners. According to him, the



authority has misdirected itself in law by taking into account subsequent transactions, particularly the sale deed of the year 2022, instead of examining whether the Hal ROR correctly recorded the rights of the parties as on the date of final publication.

He also argues that the authority, while exercising jurisdiction under Section 15(b) of the OSS Act is competent to examine the effect of registered documents for the limited purpose of determining the correctness of the entries in the ROR and the impugned order suffers from non-application of mind.

8. Per contra, Mr.Patnaik would argue that the Revisional Authority has rightly dismissed the revision petition as not maintainable.Dispute raised by the petitioners involves claims based on different registered sale deeds and determination of the validity thereof, which essentially pertains to adjudication of title.

He would further argue that the jurisdiction under Section 15(b) of the OSS Act is limited to correction of entries in the ROR and does not extend to deciding disputed questions of



title or examining the legality and validity of registered sale deeds. According to him, the petitioners, in the guise of seeking correction of the ROR are in fact seeking declaration of their title and invalidation of subsequent transactions, which can only be adjudicated by the competent Civil Court.

9. This Court having heard learned counsel for the parties at length and upon perusal of the pleadings and the impugned order, this Court finds that the entire claim of the petitioners is founded upon a prior registered sale deed of the year 1985 and challenge to subsequent sale deeds executed by other co-sharers and transferees. The petitioners seek to contend that the sale made by Palei Dei in the year 1999 is void and that the subsequent transfers made thereafter are invalid and consequently, the entries made in the ROR reflecting such transactions are erroneous.

Thus, this Court finds that the dispute raised is not mere question of correction of entries in the ROR but essentially relates to the validity of competing sale deeds and the consequent flow of title in respect of the suit land.



10. In the case of ***Pradeep Kumar Behera v. Commissioner of Land Records & Settlement***¹, it is well settled that the jurisdiction under Section 15(b) of the OSS Act is limited in scope and is intended for correction of entries in the ROR and does not extend to adjudication of disputed questions of title or to declare the validity or invalidity of registered sale deeds.

11. In the present case, determination of the petitioners' claim would necessarily require examination of the legality of the sale deed of the year 1985, determination of the rights of the co-sharers, adjudication upon the validity of subsequent transfers, and ultimately a declaration of title in favour of one party over the other. All such issues fall squarely within the domain of the competent Civil Court.

12. Revisional Authority has rightly observed that it lacks jurisdiction to examine or annul registered sale deeds. The petitioners, in the guise of seeking correction of the ROR are in effect inviting the authority to adjudicate title, which is impermissible in law.

¹ 2014 SCC OnLine Ori 520



13. As regards the submission of Mr.Baug that the fact that the petitioners' claim arises from a transaction prior to the Hal Settlement would not, by itself, confer jurisdiction upon the Revisional Authority to decide such complex questions of title.

14. This Court therefore, is of the considered view that the appropriate remedy available to the petitioners is to approach the competent Civil Court for declaration of their right, title and interest, along with consequential reliefs, in accordance with law.

15. For the foregoing reasons, therefore, this Court finds no merit in the writ petition, which is dismissed.

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Sashikanta Mishra,
Judge

Orissa High Court, Cuttack
The 31st March, 2026/ A.K. Rana, P.A.