
(2025) 12 DEL CK 0023

Delhi HC

Case No: Letters Patent Appeal No. 52 Of 2022

Kanchana Rai

APPELLANT

Vs

Satula Devi & Ors.

RESPONDENT

Date of Decision: Dec. 17, 2025

Hon'ble Judges: Anil Kshetarpal, J; Harish Vaidyanathan Shankar, J

Bench: Division Bench

Advocate: Sandeep Sethi, D. Abhinav Rao, Vikas Singh, Varun Singh, Alankriti Dwivedi, Deepeika Kalia, Sudeep Chandra, Bhumi Sharma, Ravi Sharma, Anjani Kumar Rai, Trideep Pais, B. Shravanth Shanker, K.K. Rai, Anshul Rai, S.K. Pandey, Awanish Kumar, Chandrashekhar A. Chakalabbi, Sreoshi Chatterjee, Basabi Pandey, Mallika Ranjan

Final Decision: Disposed Of

Judgement

Anil Kshetarpal, J

CM APPL. 74934/2025[For clarification of judgment dated 16.09.2025] in **LPA 209/2021**

CM APPL. 69765/2025 and CM APPL. 73989/2025 [For clarification of judgment dated 16.09.2025] in **LPA 52/2022**

1. By way of the present Applications, the Applicants are seeking clarification of the detailed common judgment passed by this Bench on 16.09.2025, wherein as many as 11 Letter Patent Appeals (LPAs), one Regular First Appeal (RFA) and one First Appeal against the order (FAO), were finally disposed of, while issuing certain directions.

2. In the aforesaid 11 LPAs, the orders dated 02.06.2021, 23.07.2021, 19.07.2021, 04.06.2021, 29.10.2021, 06.01.2022, 11.07.2022, were challenged, whereas the RFA and FAO assail the validity of judgments dated 10.04.2023 and 20.11.2023, respectively.

3. The present applications seeking clarification have been filed by Smt. Uma Devi and Smt. Kanchana Rai. It has been argued that the alleged factual narrations and objections recorded in the interim orders passed by the learned Single Judge [hereinafter referred to as LSJ] from time to time, insofar as they relate to the parties including the Applicant, should not affect the various proceedings pending before the Court. It is further contended that none of the parties should be allowed to use such interim observations recorded in those orders to the prejudice of the Applicant.

4. It is submitted that unless such clarification issued, the rights of the Applicant may be gravely prejudiced. According to the Applicant, said clarification if not issued, would result in an inconsistency with the intention of this Court to relegate the matter back to the Probate Court to adjudicate the Probate Petition independently.

5. This Court has considered the submissions; however, we are of the view that there is in fact no requirement to issue any clarification with respect to the judgment dated 16.09.2025. It is well settled that the interim orders passed by a Court from time to time during the pendency of the petitions, and the final judgment passed at the time of their disposal, merge into the final Appellate Order/Judgment passed by the Appellate Court/Forum. It is for this reason that the interim orders cease to exist in law, once the final judgment is delivered.

6. In other words, all the orders either interim or not passed by the Court during the pendency of the writ petition, probate petition or suit stood merged in the one final judgment delivered by this Bench on 16.09.2025.

7. Accordingly, once the aforesaid orders have merged in the final judgment by this Bench on 16.09.2025, we do not find it appropriate to issue any clarification.

8. With these observations, the present applications are disposed of.