

**PANEL OF RECOVERY OFFICERS
APPOINTED UNDER SECTION 28A OF THE SEBI ACT, 1992
DISCHARGING FUNCTIONS IN TERMS OF THE ORDERS PASSED BY THE
HON'BLE SUPREME COURT OF INDIA DATED 08.08.2024 AND 19.02.2026
IN THE MATTER OF PACL LTD.**

I.A. No(s).	211365 of 2023
File No.	SEBI/PACL/OBJ/RG/00719/2026
Name of the Objector/Applicant	M/s. Shubh Realty South Private Limited
MR No (s).	1837-16, 11839-16, 11840-16, 11841-16, 11842-16, 11853-16, 11854-16, 11855-16, 11916-16, 11917-16, 11919-16, 11920-16, 11927-16, 11929-16, 11932-16, 11933-16, 11934-16, 11935-16, 11936-16, 11937-16, 11955-16, 11956-16, 11957-16, 11958-16, 11960-16, 11961-16, 11963-16, 11964-16, 11965-16, 11966-16, 11967-16, 11968-16, 11970-16, 11971-16, 11990-16, 11991-16, 11992-16, 11993-16, 11996-16, 12013-16, 12014-16, 12016-16, 12017-16, 12018-16, 12019-16, 13362-16, 13363-16, 13364-16, 13410-16, 13411-16, 13412-16, 14559-16, 14560-16, 35844-16, 35849-16, 19990-17, 23031-17, 23199-17, 23200-17, 23201-17, 25912-17, 25914-17, 25915-17, 25989-17, 26146-17, 26147-17, 26148-17, 26149-17, 26150-17, 26152-17, 26154-17, 1025-18, 1078-18, 1079-18, 7838-18, 7839-18, 7867-18, 7868- 18, 7869-18, 7870-18, 8125-18, 8208-18, 8562-18, 8564-18, 8588-18, 8592-18, 8602-18, 8605-18, 9314-18, 9317-18, 9319-18, 9711-18, 12030- 18, 12858-18, 12861-18, 12863-18, 12870-18, 12871-18, 13528-18, 13529- 18, 13530-18, 15364-18, 8059-19

Background:

1. Securities and Exchange Board of India (hereinafter referred to as “SEBI”) on August 22, 2014 had passed an order against PACL Limited, its promoters and directors, inter alia,



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holding the schemes run by PACL Ltd. as Collective Investment Scheme (“CIS”) and directing them to refund the amounts collected from the investors within three months from the date of the order. Vide the said order, it was also directed that PACL Ltd. and its promoters/ directors shall not alienate or dispose of or sell any of the assets of PACL Ltd. except for the purpose of making refunds as directed in the order.

2. The order passed by SEBI was challenged by PACL Ltd. and four of its directors by filing appeals before the Hon’ble Securities Appellate Tribunal (“SAT”). The said appeals were dismissed by the Hon’ble SAT vide its common order dated August 12, 2015, with a direction to the appellants to refund the amounts collected from the investors within three months. Aggrieved by the order dated August 12, 2015 passed by the Hon’ble SAT, PACL Ltd and its directors had filed appeals before the Hon’ble Supreme Court of India.
3. The Hon’ble Supreme Court did not grant any stay on the aforementioned impugned order dated August 12, 2015 of the Hon’ble SAT, however, PACL Ltd. and its promoters/ directors did not refund the money to the investors. Accordingly, SEBI initiated recovery proceedings under Section 28A of the SEBI Act, 1992 against PACL Ltd. and its promoters/ directors vide recovery certificate no. 832 of 2015 drawn on December 11, 2015 and as a consequence thereof, all bank/ demat accounts and folios of mutual funds of PACL Ltd. and its promoters/ directors were attached by the Recovery Officer vide attachment order dated December 11, 2015.
4. During the hearing on the aforesaid civil appeals filed by PACL Ltd. and its directors (*Civil Appeal No. 13301 of 2015 – Subrata Bhattacharya Vs. SEBI and other connected matters*), the Hon’ble Court vide its order dated February 02, 2016 directed SEBI to constitute a committee under the Chairmanship of Hon’ble Mr. Justice R.M. Lodha, the former Chief Justice of India (hereinafter referred to as “the Committee”) for disposing of the land purchased by PACL Ltd. so that the sale proceeds can be paid to the investors, who have



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invested their funds in PACL Ltd. for purchase of the land. In the said civil appeals, the Hon'ble Supreme Court did not grant any stay on the orders passed by SEBI and the Hon'ble SAT. Therefore, directions for refund and direction regarding restraint on the PACL Ltd. and its promoters and directors from disposing, alienating or selling the assets of PACL Ltd., as given in the order, continues till date.

5. The Committee has from time to time requested the authorities for registration and revenue of different states to take necessary steps and issue necessary directions to Land Revenue Officers and Sub-registrar offices, to not effect registration/mutation/sale/transfer, etc. of properties wherein PACL Ltd. and/ or its group or its associates have, in any manner, right or interest.
6. Further, the Hon'ble Supreme Court vide its order dated July 25, 2016 restrained PACL Ltd. and/ or its Directors/Promoters/agents/employees/Group and/or associate companies from, in any manner, selling/transferring/alienating any of the properties wherein PACL Ltd. has, in any manner, a right/interest situated either within or outside India.
7. In the recovery proceedings mentioned in para 4 above, the Recovery Officer issued an attachment order dated September 07, 2016 against 640 associate companies of PACL Ltd. In the said order, *inter alia*, the registration authorities of all States and Union Territories were requested not to act upon any documents purporting to be dealing with transfer of properties by PACL Ltd. and / or the group/ associate entities of PACL Ltd. mentioned in the Annexure to the said attachment order, if presented for registration.
8. The Hon'ble Supreme Court, vide its order dated November 15, 2017, passed in Civil Appeal No. 13301/2015 and connected matters directed that all the grievances/ objections pertaining to the properties of PACL Ltd. would be taken up by Shri R.S. Virk, District Judge (Retd.).



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9. On April 30, 2019, in the recovery proceedings initiated against PACL Ltd. and Ors., the Recovery Officer issued a notice of attachment in respect of 25 front companies of PACL Ltd. Thereafter, on March 01, 2021, the Recovery Officer issued another notice of attachment in respect of 32 associate companies of PACL Ltd., which included 25 front companies of PACL Ltd. whose accounts were attached vide order dated April 30, 2019.
10. Vide order dated August 08, 2024 passed in *Civil Appeal No. 13301 of 2015 - Subrata Bhattacharya Vs. SEBI and other connected matters*, the Hon'ble Supreme Court has directed as under:

“.....10. Since, we had directed in our order dated 25.07.2024, that no fresh applications or objections shall be filed before or entertained by Shri R.S. Virk, District Judge (Retd.) and that the same shall be filed before the Committee, the Committee may deal with such applications/ objections, if filed before it, and dispose them of as per the provisions contained under Section-28(A) of the SEBI Act.....”

11. In compliance with the aforesaid order dated August 08, 2024 passed by the Hon'ble Supreme Court, all objections with respect to properties of PACL Ltd, which were pending before Shri R.S. Virk, District Judge (Retd.) and all new objections, are now to be dealt by the Recovery Officers attached to the Committee.
12. Subsequently, the Hon'ble Supreme Court passed the order dated February 19, 2026 in the matter of Subrata Bhattacharya vs. SEBI (Civil Appeal No. 13301 of 2015) directing, *inter alia*, that all interlocutory applications/Transferred Case falling under Category B, i.e. 106 sets of applications including the instant application, filed against the recommendations of Shri R.S. Virk, District Judge (Retd.), be placed before the Recovery Officers appointed under Section 28A of the SEBI Act, 1992. Accordingly, all such applications, including the instant application, are now to be dealt by the Recovery Officers appointed under Section 28A of the SEBI Act, 1992 in the matter of PACL Ltd.



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Present Interlocutory Application (I.A.):

13. The present I.A. No. 211365 of 2023 has been filed by M/s. Shubh Realty South Private Limited (hereinafter referred to as the “**SRSPL/Objector/Applicant**”), challenging the order dated July 31, 2023 passed by Shri R.S. Virk, District Judge (Retd.) (hereinafter referred to as the “**impugned order**”) in File No. 1028.

14. By the impugned order, the objection, seeking exclusion/delisting of properties (**Annexure 1 Table A to K**) situated in eleven villages, namely (i) Madhavakurichi Village, (ii) Mela Ilathaikulam Village, (iii) Ettankulam Village, (iv) Sayamalai Village, (v) Balapathirampapuram Village, (vi) Melamaruthappapuram Village, (vii) Pudur Village, (viii) Echanda Village, (ix) Therkku Sankarankovil Village, (x) Naduvakurichi Minor Village and (xi) Pattadaikatti Village, all situated in Tirunelveli District, Tamil Nadu (hereinafter referred as the “**impugned properties**”) attached by the Committee under the MR Nos. mentioned below, was dismissed:

11936-16, 14559-16, 13363-16, 13364-16, 14560-16, 11937-16,
11927-16, 13411-16, 13410-16, 13412-16, 11933-16, 11935-16, 11934-16,
12018-16, 12019-16, 12017-16, 7867-18, 7870-18, 12030-18, 19990-17,
7868-18, 7869-18, 7870-18, 26149-17, 26147-17, 26152-17, 26154-17,
26146-17, 25989-17, 26148-17, 26150-17, 11839-16, 11840-16, 11841-16,
11837-16, 11842-16, 11853-16, 11855-16, 11854-16, 11916-16, 11917-16,
11919-16, 11930-16, 11920-16, 11932-16, 11955-16, 11956-16, 11957-16,
11958-16, 11960-16, 11961-16, 11963-16, 11964-16, 11965-16, 11966-16,
11967-16, 11968-16, 11990-16, 11993-16, 11996-16, 12013-16, 12014-16,
12015-16, 12016-16, 8592-18, 25915-17, 9319-18, 12870-18, 12863-18, 8585-
18, 12861-18, 12858-18, 12852-18, 25912-17, 9318-18, 9314-18, 23045-17,
25914-17, 9317-18, 9313-18, 8588-18, 13530-18, 13529-18, 13528-18, 8564-
18, 8602-18, 8605-18, 7838-18, 9711-18, 7839-18, 1079-18, 1025-18, 8564-18,
1078-18 & 8562-18

15. It is noted that Shri R.S. Virk, District Judge (Retd.), vide the impugned order dated July 31, 2023, while holding that the objection petition (“**OP**”) had no merit, dismissed the petition observing that the objector relied solely on its own sale deeds without producing the earlier chain-of-title documents from its vendor, and had not disputed PACL's claim that the same



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lands were covered by pre-existing GPAs/ATSS. Noting that the objector's deeds run from 2004 to 2012, while PACL's GPAs pre-date them, and that the objector's own Annexure N to the OP showed a common vendor's wife and mother executing documents in favour of the objector coupled with the objector's further sale of several disputed properties (Survey Nos. 234, 238/1, 263 and various others) to third-party solar companies while still claiming them in the petition, the said petition was dismissed. Further, while dismissing the said petition, Shri R.S. Virk, District Judge (Retd.) held that the objector could not be said to have approached with clean hands which is reproduced below:

"...for which reason it cannot be considered to have filed the petition in hand with clean hands....."

.....

...some of the land parcels in question such as those comprised in survey nos. 234, 238/1 which are under attachment vide MR numbers 7867-18 and 7870-18 as also the land comprised in survey no. 263 which is under attachment vide MR number 7869-18 was sold by the objector herein in favour of M/s Sunstreet Solar Private Limited and M/s CSE Solar Sunpark Tamil Nadu Pvt Ltd... Similarly, survey nos. 262, 266/1, 267/3, 263, 264 and 266/2... were sold by the objector herein in favour of M/s Zonrenew Solar Pvt Ltd, Gokul, M/s Sunsole Solar Pvt Ltd and M/s Unosun Solar Pvt Ltd..."

16. The Applicant, being aggrieved by the aforesaid impugned order dated July 31, 2023 passed by Shri R.S. Virk, District Judge (Retd.), has filed the present I.A No. 211365 of 2023 seeking to impugn the impugned order on the basis of the following grounds:

16.1 Shri R.S. Virk, District Judge (Retd.) lacked jurisdiction in passing the impugned order as he was empowered to consider objections based on documents executed after February 02, 2016, in light of the contents of the 2nd Status Report filed by the Committee.

16.2 That the impugned order proceeded on erroneous basis that the order of the Hon'ble Supreme Court dated February 02, 2016 and July 25, 2016 in C.A. No. 13319 of 2015,



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contained no timeline/ restrictions for consideration of objections and thereby, wrongly rejected the objection of the Applicant.

- 16.3** The impugned order is fundamentally vitiated primarily because the objection was on the scope of enquiry delegated to Shri R.S. Virk, District Judge (Retd.) by the Lodha Committee, a remit circumscribed by the Committee's delegation and not expandable by reference to the order of the Hon'ble Supreme Court dated February 02, 2016, which pertains to the Committee's remit, not to Shri R.S. Virk, District Judge (Retd.).
- 16.4** PACL failed to produce documents evidencing transfer of properties from its "associates" to itself, failed to establish that consideration was paid by it and failed to show that purchases by associates were on its behalf rather than for individual benefit.
- 16.5** Shri R.S. Virk, District Judge (Retd.) erred in drawing an unfair inference against the Applicant's *bona fide* title based on unregistered GPAs/ATS, according sanctity to sale transactions purportedly executed through unregistered GPAs and ATS which were recognized as sham transactions and in misapplying *Ghanshyam v. Yogendra Rathi* (2023 SCC OnLine SC 725) with unwarranted "circumspection," disregarding settled law that valid title cannot be conveyed by a GPA, and ignoring that no entry in Book I means no purchaser would have notice of such a Power of Attorney.
- 16.6** An extraordinarily high, extralegal burden was imposed on the Applicant to investigate unregistered GPAs and monetary transactions between principal and agent, which are transactions not available in the public domain and therefore, incapable of being known to a prospective purchaser.
- 16.7** The impugned order placed an unfair onus on the Applicant to produce its vendors' chain of title while disregarding its own registered sale deeds, and wrongly reversed the burden of proof onto the Applicant/Objector instead of requiring PACL to establish its title, claim, or interest.
- 16.8** Shri R.S. Virk, District Judge (Retd.) failed to appreciate that many GPAs/ATS were executed in the name of PGF Limited, not PACL, and erroneously asserted PGF as a



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sister-concern/associate, thereby expanding his remit beyond companies under SEBI's scanner or this Court's orders.

- 16.9** Shri R.S. Virk, District Judge (Retd.) failed to appreciate that in several instances the Principal executing the GPA/ATS had already died (e.g., Mr. T.P. Pradeep), which would terminate the Agent's mandate under the GPA.
- 16.10** Shri R.S. Virk, District Judge (Retd.) failed to consider the Applicant's unchallenged possession of the lands for about two decades, its installation of Wind Turbine Generators ("WTGs"), and wrongly relegated objections of subsequent purchasers (whose title flows from the Applicant) to separate adjudication under Para 13(b) of the impugned order.
- 16.11** The impugned order created a cloud over title affecting customers and posed a threat to energy security in Tamil Nadu, disregarding that the WTGs qualify for RE Certification and grid sale.
- 16.12** The Applicant has been the legal owner of the impugned properties since purchase (prior to 2010), with no steps ever taken by PACL against it. The properties were never owned by PACL or PGF Ltd or any of its associates and were, therefore, wrongly included in the SIT investigation and SEBI's auction list.

17. It is the case of the Applicant that it is a non-government company incorporated on June 02, 2004 operating as a 100% subsidiary of a renewable energy major viz. M/s Suzlon Energy Limited. Engaged in the wind sector real estate, the company purchased lands across Tamil Nadu and other parts of the country to facilitate installation of windmills to generate green energy. On most of these sites, the Applicant has installed WTGs. The power plants set up on its lands generate power which is purchased by the Tamil Nadu Generation and Distribution Corporation (earlier known as 'Tamil Nadu Electricity Board'), through Power Purchase Agreements. The Applicant further submits that sometime during May 2022, some personnel of the Applicant company, during their visit to one of the Sub-Registrar's Office in Tirunelveli, were informed by an official that large volumes of the properties of the Applicant have been shown as properties of PACL and are subject matter of attachment



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and/or encumbrance. On further enquiry, the Applicant's representative found out that lands spread over various districts have been attached as properties of PACL, on the directions of the Committee. It is submitted that pursuant to the same, the Applicant had filed an OP before Shri R.S. Virk, District Judge (Retd.) which was taken on record and was numbered as OP no. 1028. In the said OP it was emphasized, *inter alia*, that the 2nd Status Report filed by the Committee has categorically stated that all objections based on documents purportedly executed after February 02, 2016 be scrutinized. Hence, one of the contentions raised by the Applicant was that the said Report made it clear that the transactions prior to February 02, 2016 would not be subject matter of enquiry before the Committee and that the properties of the Applicant were wrongly attached, they being all purchased by the Applicant on various dates, all prior to the year 2010. It was also pointed out that the transactions executed in favour of the Applicant in respect of the lands in question were registered sale deeds while the documents relied upon by PACL to assert a claim *qua* those lands were unregistered GPAs and ATSS.

18. The Applicant submits that it had furnished all relevant particulars pertaining to its ownership of the lands before Shri R.S. Virk, District Judge (Retd.), who has dismissed the OP of the Applicant erroneously by observing that the facts in hand ought to be seen with "*greater circumspection*".
19. As already referred in para 12 above, the Hon'ble Supreme Court, vide order dated February 19, 2026, while taking note of the segregation of the interlocutory applications (I.As) into five distinct categories i.e. Category A to E, observed that the issues arising in the identified 106 I.As (including the present I.A) require a detailed scrutiny of documentary material to determine the true nature and ownership of the properties in question and thus, directed that such matters ("Category B" applications i.e., applications challenging dismissal of objections by Shri R.S. Virk, District Judge (Retd.)) be placed before Recovery Officers appointed under Section 28A of the SEBI Act, 1992, for examination. In view of the same, the instant



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I.A is being considered and examined by the Panel of Recovery Officers appointed under Section 28A of the SEBI Act, 1992.

20. In compliance with the directions of the Hon'ble Supreme Court, the Applicant was granted opportunities of hearing on April 09, 2026 and May 12, 2026. During the hearings, the Applicant was represented by the Authorized Representative ('AR'), who, while reiterating the averments made in the I.A and the OP filed before Shri R.S. Virk, District Judge (Retd.), submitted as under:

20.1 The impugned properties pertained to various parcels of land spread across 11 villages in Tirunelveli District, Tamil Nadu admeasuring to a total of 662.79 Acres. It was further submitted that the Objector/Applicant is the *bona fide* owner of the impugned properties, having acquired the same through various duly registered sale deeds.

20.2 The documents relied upon by PACL to claim ownership over the impugned properties are, in contrast, unregistered GPA/ATS, which, in law and as settled by various judicial pronouncements, do not convey or transfer any valid title. While elaborating on the documents relied upon by PACL, the AR by taking example of Survey No. 1719/1 (*being part of the properties claimed by the Objector/Applicant*) highlighted several discrepancies raising doubts about their authenticity and validity, including, *inter alia*: (i) non-registration of GPA in the office of the Sub-Registrar having jurisdiction over the area where the property is situated, as required under the applicable laws in Tamil Nadu; (ii) death of the GPA principal, resulting in cessation of the agency; (iii) absence of year of endorsement on receipts appended to the ATS; (iv) payments allegedly made in cash without adequate supporting evidence; (v) handwritten insertions in material portions of the documents; (vi) non-delivery of possession under the ATS; and (vii) absence of subsequent registered sale deeds being executed pursuant to the ATS.



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- 20.3** The AR also submitted that the order passed by Shri R.S. Virk, District Judge (Retd.) does not adequately consider the mandate of Section 54 of the Transfer of Property Act, 1882 (“TPA”), which governs transfer of immovable property, as well as the law laid down by the Hon’ble Supreme Court in relation to determination of title and validity of such transactions.
- 20.4** The claim made in the present I.A. corresponds only to the land currently in possession of the Objector/Applicant and excludes any portion thereof that has subsequently been transferred to third parties.
- 20.5** While going through the documents submitted, the AR by reading the relevant recitals of the sale deeds vide which Applicant is claiming title and the sale deeds vide which predecessors acquired the respective impugned properties, submitted that the individuals possessed valid ownership of the properties being transacted, and that all transfers were duly executed through registered documents. The AR further submitted that these sale deeds have been properly entered in the encumbrance certificates, and that the names of the Applicant and its predecessors have been duly recorded in the official Patta records as well.
- 20.6** Conversely, while going through the MR documents i.e., basis which the impugned properties have been attached by the Committee, the AR submitted that they consist of ATS and/or GPA and/or Special Powers of Attorney and/or Affidavits and/or Indemnity Bonds and/or Possession Certificates and/or Wills, which do not legally transfer any title. While emphasizing on Section 54 of the Transfer of Property Act, 1882, the AR specifically highlighted that the said ATS have not culminated into a sale deed, meaning thereby that no valid title was ever transferred to the purported agents of PACL. The AR went into the recitals of these MR documents and pointed out various structural inconsistencies thereby alleging their genuineness and legality, highlighting instances of selective stamping across pages, handwritten portions, lack



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of official countersignatures, execution by only a single entity, improper stamping, omission of dates and years and blank documents containing only signatures. The AR also questioned cash transactions undertaken by a public company and also highlighted the improper registration of documents by quoting Section 17(1) and Section 28 of the Registration Act, 1908, i.e., registration at jurisdictions other than where the properties are situated or where the principal resides.

20.7 The AR argued that these documents are not enforceable and that the Applicant's registered documents hold superior weight in a court of law over the incomplete, questionable records backing the attachment.

21. Based on the submissions made and discussions held during the hearing, the AR for the Objector/Applicant was advised to provide clarification regarding the properties which have been further sold by the Applicant but included in the claimed impugned properties. Additionally, the AR was also advised to provide certified translated copies of the documents that are submitted in vernacular languages, within a period of two weeks from the date of hearing i.e., on or before May 26, 2026. Subsequently, vide emails dated May 08, 2026, May 20, 2026, May 29, 2026, June 28, 2026, July 26, 2026, August 03, 2026, August 05, 2026, August 08, 2026, August 09, 2026, August 11, 2026, August 12, 2026 and August 17, 2026, the Applicant submitted additional submissions running in 18 volumes which included the translated Sale Deeds, Pattas, Encumbrance Certificate (EC), bank statements etc. which have been taken on record.

22. Now, before proceeding with the adjudication of the claim on the impugned properties by the Applicant, the Panel would like to give its observation/finding on certain other issues which have been brought to light upon seeking clarification/ confirmation from the Applicant and examination of documents.



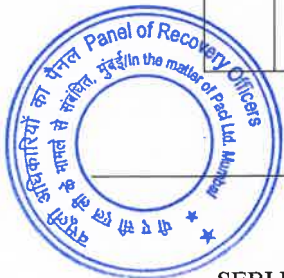
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23. It is noted that vide email dated May 20, 2026, an affidavit was filed on behalf of the Applicant stating that between the years 2021 and 2022, the Applicant had sold the parcels of lands situated at Mela Ilathaikulam Village which are included in the claimed impugned properties. It was further submitted that although the Applicant has included these land parcels in the list of claimed impugned properties, the Applicant claims no title over them. Instead, as a *bona fide* seller to these third parties, the Applicant is solely disputing the alleged title of PACL Ltd over the said land parcels. Furthermore, it has been stated that the third parties who purchased these land parcels from the Applicant are *bona fide* purchasers for valuable consideration. The details of the such impugned properties which have been further sold by the Applicant to third parties are as follows:

Details of land parcels situated at Mela Ilathaikulam Village which has been further sold by the Applicant

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Further sale by SRSPL	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 625/2005 20.05.2005	266/2	2.96	SRSPL vide Sale Deed dated 08.03.2022 bearing no. 725 of 2022 had further sold the following properties in favour of M/s Sunsole Solar Private Limited: i. Survey No. 266/2 admeasuring 2.96 Acres, ii. Survey No. 266/1 admeasuring 1.98 Acres and iii. Survey No. 267/3 admeasuring 1.82 Acres.	7870-18	2.97
2	Sale Deed 934/2005 04.07.2005	266/1	1.98		7868-18	1.98
3	Sale Deed 1137/2005 29.07.2005	267/3	1.82		7868-18	2.42
4	Sale Deed 1464/2005 01.09.2005	262	5	SRSPL vide Sale Deed dated 08.03.2022 bearing no. 726 of 2022 had further sold the said properties in favour of M/s Zonrenew Solar Private Limited: (i) Survey No. 261/2B admeasuring 2.62 Acres and (ii) Survey No. 262 admeasuring 05 Acres.	7868-18	5.98
5	Sale Deed 937/2005 04.07.2005	263	10.5	SRSPL vide Sale Deed dated March 08, 2022 bearing no. 768 of 2022 had further sold the said property i.e., Survey No. 263 admeasuring 6.25 Acres in favour of M/s CSE Solar Sun Park Tamil Nadu Pvt Ltd.	7869-18	10.5



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Further sale by SRSPL	MR No.	Extent (in Acres) in MR No.
6	Sale Deed 809/2005 17.06.2005	234	3.07	SRSPL vide Sale Deed dated December 23, 2021 bearing no. 3895 of 2021 had further sold the said properties in favour of M/S Raasun Solar Pvt Ltd. (i) Survey No. 234 admeasuring 3.07 Acres and (ii) Survey No. 238/1 admeasuring 7.00 Acres. M/S Raasun Solar Pvt Ltd. vide Sale Deed bearing no. 2287/2022 had further sold the properties in favour of M/s Sunstreet Solar Private Limited: (i) Survey No. 234 admeasuring 3.07 Acres, (ii) Survey No. 238/1 admeasuring 7.00 Acres.	7867-18	5.29
		238/1	7.00			7.01

23.1 Considering that the Applicant has already further sold/ transfered the abovementioned properties, which are included among the claimed impugned properties enlisted in Annexure 1, and in the light of the fact that the Applicant is not claiming title over such properties but only wants to dispute the title of PACL in them, the Panel is of the view that the claim of the Applicant over such impugne properties tabulated above is not maintainable and is liable to be disposed of without any determination on the merits.

23.2 Further, considering that the entities to whom the Applicant has further sold the abovementioned impugned properties i.e. the purchasers of such impugned properties have also filed separate I.As in respect of the said properties, which are being adjudicated by this Panel itself, the matter has been dealt with separately by this Panel in the said respective I.As.

24. On examining the documents provided by the Applicant/Objector alongwith the additional submissions and the chain of title documents placed on record, further clarifications were sought from the Applicant/Objector vide emails dated July 24, 2026, July 31, 2026, August 04, 2026, August 07, 2026, August 10, 2026, August 11, 2026 and August 16, 2026 to



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understand the exact measurement of lands claimed and the corresponding documents produced in support of the claim. The clarifications furnished by the AR in 07 sets alongwith the observations of the Panel, based on examining the material available on record, are as under:

24.1 Claims in Annexure 1 not to be considered in the present proceedings:

- a) On perusal of details of properties enlisted in the I.A and the OP and the clarifications furnished by the AR in respect thereof, it is noted that the following claims made in Annexure 1 do not warrant consideration on merit in the present proceedings, either because they were included inadvertently or duplicate claims have been made or the identified properties are the subject matter of separate objection petitions filed by another entity(s) and are still pending consideration before the Panel of Recovery Officers:

Sl. No.	Details of claim in the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
Madhavakurichi Village					
(i)	85	3258/2006	1719	2.50	Upon perusal of the corresponding document i.e. document no. 3258/2006, it is noted that the claimed Survey No. 1719 is not covered in the said document. Vide email dated July 27, 2026, the AR submitted that the said document has been added inadvertently. A separate claim in respect of the said land has already been made in another Objection Petition filed on behalf of M/s. Techno Electric & Engineering Co. Ltd. Accordingly, no relief is sought in relation to the said document in the present proceedings.
(ii)	99	3636/2012	1863	0.4	Upon perusal of the corresponding document i.e. document no. 3636/2012, it is noted that the claimed Survey No. 1863 is not covered in the said document. Vide email dated July 27, 2026, the AR submitted that the corresponding document i.e., Sale Deed bearing no. 3636/2012 may be ignored and the Sale Deed bearing no. 5099/2009 for Survey No. 1863 to an extent of 2.24 Acres may be considered. Upon further perusal of the claims made by the Applicant, it is noted that a separate claim for Survey



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Sl. No.	Details of claim in the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
					No.1863 to an extent of 2.24 Acres vide Sale Deed no. 5099/2009 is already made (reference drawn to Sl. no. 103 Table A page no. 5 of Shri R.S. Virk, District Judge (Retd.) order dated July 31, 2023).
(iii)	68	2861/2010	1751/1A	0.61	Vide email dated August 09, 2026, the AR submitted that the Applicant purchased a total extent of 1.82 Acres from one Mr. Sivaprasath through Sale deed 3261/2006. As the parent document was a joint patta, the name of Mr. Asirvatham was also reflected in the same. The said extent was also purchased from his legal heirs and is now claimed to be owned by the Applicant. Thus, the 0.61 Acres also forms part of the 1.82 Acres as claimed vide Sale Deed 3261/2006. Upon perusal of the claims at Annexure 1, it is observed that at Sl. No. 97 a calim is already made for Survey No. 1751/A admeasuring 1.82 Acres through Sale Deed 3261/2006.
Mela Ilathaikulam Village					
(iv)	3	934/2004	245	3.31	Vide email dated August 06, 2026, the AR submitted that the said documents have been added inadvertently and the same may be ignored. A separate claim in respect of the said lands have already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt. Ltd. Accordingly, no relief is sought in relation to the said documents in the present proceedings.
(v)	5.	706/2004	248/2	1.38	
(vi)	7.	1041/2004	259/2	2.35	
(vii)	8.		259/3	3.61	
Sayamalai Village					
(viii)	52	197/2012	907/3B1	0.45	Upon perusal of the corresponding document i.e. document no. 197/2012, it is noted that the same is executed in favour of M/s Suzlon Gujarat Wind Park Limited. Vide email dated July 27, 2026, the AR submitted that the said document has been added inadvertently and the Applicant is not dealing with the same.
Balapathirampuram Village					
(ix)	12	1335/2004	392/1	5.00	Upon perusal of the corresponding document i.e. document no. 1335/2004, it is noted that the same is executed in favour of M/s Sarjan Realities Pvt. Ltd. Vide email dated July 27, 2026, the AR submitted that the said document has been added inadvertently. A separate claim in respect of the said land has already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt Ltd. Accordingly, no relief is sought in relation to the said document in the present proceedings.
(x)	3	2036/2004	376/1D	1.78	Upon perusal of the documents shared, it is noted that



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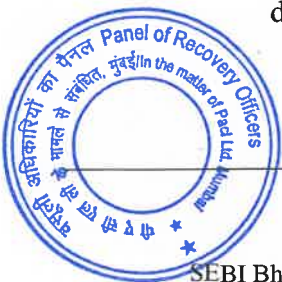
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Sl. No.	Details of claim in the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(xi)	11	1108/2004	391/2	6.70	the corresponding Sale Deeds have not been provided. Further, as per the table of claims shared, the said Sale Deeds are executed in favour of M/s SarjanRealities Pvt Ltd. Vide email dated July 27, 2026, the AR submitted that the said documents have been added inadvertently. A separate claim in respect of the said lands have already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt Ltd. Accordingly, no relief is sought in relation to the said documents in the present proceedings.
(xii)	15	1106/2004	404/1	1.58	
(xiii)	16	703/2004	405/1	8.03	
(xiv)	17	1721/200 & 121/2005	410/2	4.15	
(xv)	20	25/2005	418/1	3.22	
(xvi)	21	2064/2004	424/IB	1.83	
(xvii)	22	2064/2004	424/IC	0.28	
(xviii)	24	959/2004	428/2	2.38	
Pudur Village					Upon perusal of the corresponding document i.e., Deed of Exchange bearing No.1610/2011, it is noted that the claimed Survey No. 403/2 admeasuring 4.33 Acres has been exchanged by the Applicant with Shri. T. Chakkaravarthi. Vide email dated July 27, 2026, the AR confirmed the aforementioned exchange and submitted that claim was made inadvertently.
(xix)	9	930/2008 & Ex 1610/2011	403/2	4.33	

- b) Since the claims listed in the table above are either claims wherein no relief is being sought by the Applicant in the present proceedings or duplicate claims made in respect of properties which already are sold by the Applicant/Objector and separate objections have already been filed by other entities and proceedings are pending, they are not being adjudicated upon in the present order and are, accordingly, being disposed of without any determination on merits.

24.2 Claims in Annexure 1 which stand updated/modified:

- a) The following claims made in Annexure 1 stand modified/corrected as indicated below, on the basis of clarifications furnished by the AR, cross-verified against the underlying registered documents, the Encumbrance Certificates and the Committee's database:



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
Madhavakurichi Village					
(i)	3	3242/2006	1769/1A	0.96	Upon perusal of the corresponding document, it was noted that the claimed Survey No. 1769/1A is not covered therein. Vide email dated July 27, 2026, the AR submitted that Survey No. 1769/1 admeasuring 0.96 Acres mentioned in the corresponding document, presently stands renumbered as Survey No. 1769/1A.
(ii)	75	3242/2006	1815	1.8	It is noted that while the corresponding document i.e., Sale Deed no. 3242/2006 covers the claimed Survey No. as 1815, its parent Sale Deed no. 893/1996 mentions the Survey No. as 1815/1 admeasuring 1.80 Acres. Vide email dated August 04, 2026, the AR submitted that the claimed Survey No. is correctly recorded as Survey No. 1815 in the Schedule of Property. However, in the Statement under Rule 3 of the Tamil Nadu Stamp (Prevention of Undervaluation of Instruments) Rules, 1968, the survey number is incorrectly mentioned as Survey No. 1815/1 due to an inadvertent typographical error. The said typographical error may kindly be ignored.
Mela Ilathaikulam Village					
(iii)	14	937/2005	266/1	1.98	Upon perusal of the corresponding document, it is noted that the claimed Survey No. 266/1 is not covered therein. Vide email dated August 04, 2026, the AR submitted that the corresponding document i.e., Sale Deed bearing no. 937/2005 was mentioned due to an inadvertent typographical error instead of Sale Deed No. 934/2005.
(iv)	6	69/2006	259/1	8.14	Upon perusal of the corresponding document, it is noted that the claimed Survey No. 259/1 is covered to the extent of 2.18 Acres only. Vide email dated August 04, 2026, the AR submitted that the total extent 8.14 Acres is acquired by the Applicant and another entity. Thus, out of the total 8.14 Acres, the applicant only acquired 2.18 Acres, and the remaining was acquired by another entity, wherein a separate claim for the remaining extent has been filed vide separate objection petition on behalf of the said other entity. Accordingly, it has been clarified that the sale deed relating to Applicant's acquisition only for an extent of 2.18 Acres has been furnished and claimed.



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(v)	1	809/2005	234	5.29	Out of the claimed extent of 5.29 Acres, as per Affidavit dated May 20, 2026 submitted by the AR, it is noted that land to the extent of 3.07 Acres has been further sold by the Applicant vide Sale Deed no. 3895/2021 in favour of M/S Raasun Solar Pvt Ltd. Accordingly, it is submitted that the Applicant is not claiming any title over the said extent already sold by it.
Sayamalai Village					
(vi)	27	123/2008	918/1	2.62	Upon perusal of the corresponding document, it is noted that the claimed Survey No. 918/1 is not covered therein. Vide email dated July 27, 2026, the AR submitted that the corresponding document i.e., Sale Deed bearing no. 123/2008 was mentioned due to an inadvertent typographical error instead of Sale Deed No. 124/2008.
(vii)	12	126/2008	900/3	0.25	Upon perusal of the corresponding document, it was noted that the claimed Survey No. 900/3 was not covered therein. Vide email dated July 27, 2026, the AR submitted that the corresponding document i.e., Sale Deed bearing no. 126/2008 was mentioned due to an inadvertent typographical error instead of Sale Deed No. 237/2008. Also, that the claim is for an extent of 0.75 Acres instead of 0.25 as claimed earlier in the said Survey No. 900/3.
Balapathiramapuram Village					
(viii)	8	1108/2004 & 1562/2005	385/4B	2.36	Upon perusal of the corresponding document no. 1562/2005, it was noted that the claimed Survey No. 385/4B was covered to the extent of 01 Acre only, while the other corresponding Sale Deed no. 1108/2004 has not been provided. Vide email dated July 27, 2026, the AR submitted that a separate claim in respect of the Sale Deed No. 1108/2004 in Survey no. 385/4B has already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt Ltd. The extent of 01 Acre land claimed in Sale Deed No. 1562/2005 is apart from the extent mentioned in Sale Deed No. 1108/2005.



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(ix)	13	1110/2004	392/2	15.09	Vide email dated July 24, 2026, the AR was advised to submit the corresponding document i.e., Sale Deed no. 1110/2004, which as per the Applicant's data sheet (table/excel sheet) indicated as executed in favour of M/s Sarjan Realities Pvt Ltd. In response, the AR, vide email dated July 27, 2026, stated that the corresponding claim was instead reflected in Encumbrance Certificate against Document No. 2114/2011. However, upon perusal of the said Document No. 2114/2011, it is noted that it does not cover the claimed Survey No. Subsequently, vide email dated August 09, 2026, the AR submitted that parent document is Sale Deed No. 1104/1998.
(x)	14	1110/2004 & 1050/2007	404/2A	8	Vide email dated July 24, 2026, the AR was advised to submit the corresponding documents i.e., Sale Deed nos. 1110/2004 and 1050/2007, which as per the Applicant's data sheet (table/excel sheet) indicated as executed in favour of M/s Sarjan Realities Pvt Ltd. In response, the AR, vide email dated July 27, 2026, stated that the corresponding claim was instead reflected in Encumbrance Certificate against Document No. 2114/2011. However, upon perusal of the said Document No. 2114/2011, it is noted that it does not cover the claimed Survey No. Subsequently, vide email dated August 09, 2026, the AR submitted that the parent document are Sale Deed Nos. 1102/2004, 168/1998, and 1105/1998 respectively.
Melamaruthappapuram Village					



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(xi)	4	1917/2006	503	8.605	Upon perusal of the corresponding document, it is noted that land only to the extent of 2.13 Acres is covered for the claimed Survey No. 503. Further, the cheque no. is not mentioned in the said document. Vide email dated July 27, 2026, the AR submitted that the cheque no. for the sale deed bearing No. 1917/2006 is 0111559 for a sum of Rs. 1,59,750/- transferred by the Applicant to the vendor Mr. Murugaiah (POA holder) on 10/08/2006. Vide email dated August 09, 2026, the AR has further submitted that the Applicant had acquired the said Survey No. through the following: 1. SD No. 1997/2005 2. SD No. 1917/2006 3. SD No. 2214/2005 4. Release Deed No. 2221/2006 5. Release Deed No. 2321/2006
Pudur Village					
(xii)	3	930/2008	374/1	2.91	Upon perusal of the corresponding document, it is noted that land only to the extent of 01.94 Acres is covered for the claimed Survey No. 374/1. Vide email dated July 27, 2026, the AR submitted that claim to the extent of 2.91 Acres is covered in two Sale Deeds i.e, (i) Sale Deed No. 930/2008 (rectified vide email dated August 09, 2026) covering to the extent of 1.94 Acres and (ii) Sale Deed No. 933/2008 covering to the extent of 0.97 Acres.
(xiii)	13	927/2008	576/3	2.92	Upon perusal of the corresponding document, it is noted that land only to the extent of 02.65 Acres is covered for the claimed Survey No. 576/3. Vide email dated July 27, 2026, the AR submitted that the original claim of 2.92 Acres was due to an inadvertent typographical error. Accordingly, claim for 2.65 Acres in Survey No. 576/3 as covered in Sale Deed No 927/2008 is to be considered.



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(xiv)	14	929/2008 & Ex 1610/2011	592	2.57	Upon perusal of the corresponding document i.e., Sale Deed 929/2008, it is noted that the claimed Survey No. is not covered therein, whereas Survey No. 592/1 to the extent of 02.10 Acres is covered. Vide email dated July 27, 2026, the AR submitted that Survey No. 592 has been subdivided into two Survey Nos. bearing numbers 592/1 and 592/2. Accordingly, claim for 02.10 Acres in Survey No. 592/1, as covered in Sale Deed No 929/2008, is to be considered. Further, upon perusal of the corresponding document i.e., Deed of Exchange bearing No.1610/2011, it is noted that land to the extent of 2.05 Acres in the claimed Survey No. 592/1 has been exchanged by the Applicant SRSPL with Shri. T. Chakkaravarthi. Vide email dated July 27, 2026, the AR confirmed the aforementioned exchange and submitted that the remaining extent of 0.15 Acres still belongs to the Applicant, which is being claimed under the said proceedings.
(xv)	12	928/ 2008 Ex 1610/2011	579	5.26	Upon perusal of the corresponding document i.e., Deed of Exchange bearing No.1610/2011, it is noted that land to the extent of 4.96 Acres in the claimed Survey No. 579 has been exchanged by the Applicant SRSPL with Shri. T. Chakkaravarthi. Vide email dated July 27, 2026, the AR confirmed the aforementioned exchange and submitted that the remaining extent of 0.30 Acres still belongs to the Applicant, which is being claimed under the said proceedings.
(xvi)	-	927/2008	592/2	2.57	Vide email date August 09, 2026, the AR submitted that while the Applicant purchased Survey No. 592/2 admeasuring 2.57 Acres vide Sale Deed 927/2008, claim for the same was inadvertently omitted in the original claim.
Echanda Village					
(xvii)	4	572/2009	492/3	1.77	Upon perusal of the corresponding document, it is noted that the same is a Release Deed wherein the releaser i.e., Shri. Muthupandi merely acknowledges the purchase of the said land by SRSPL from Shri. K.V. Govindan by virtue of a Sale Deed dated March 06, 2007 and relinquishes all his rights over the said land. Vide email dated August 06, 2026, the AR submitted that the Applicant had purchased the claimed extent under Survey No. 492/3 from the vendor by way of



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
					Sale Deed No. 1611/2007 dated 06.03.2007.
Therkku Sankarankovil Village					
(xviii)	1	450/2008	126/2B1	0.39	Upon perusal of the corresponding document, it is noted that the claimed Survey No. 126/2B1 is not covered therein. Vide email dated July 27, 2026, the AR submitted that Survey No. 126/2B was mentioned as Survey No. 126/2B1 due to an inadvertent typographical error. Accordingly, the claim is for an extent of 0.39 Acres in Survey No. 126/2B covered in Sale Deed No. 450/2008.
(xix)	2	450/2008	125/5	1.29	Upon perusal of the corresponding document, it is noted that land to the extent of 1.285 Acres only is covered for the claimed Survey No. 125/5. Vide email dated July 27, 2026, the AR submitted that extent was inadvertently mentioned as 1.29 Acres instead of 1.285 Acres due to an inadvertent rounding/conversion error in the decimal value of the said extent of land.
(xx)	3	450/2008	125/8	1.71	Upon perusal of the corresponding document, it is noted that land to the extent of 1.705 Acres only is covered for the claimed Survey No. 125/8. Vide email dated July 27, 2026, the AR submitted that extent was inadvertently mentioned as 1.71 Acres instead of 1.705 Acres due to an inadvertent rounding/conversion error in the decimal value of the said extent of land.
Naduvakurichi Minor Village					
(xxi)	1	1879/2006	39	6.37	Upon perusal of the corresponding document, it is noted that land only to the extent of 02.00 Acres is covered for the claimed Survey No. 39. Vide email dated July 27, 2026, the AR submitted that claim to the extent of 6.37 Acres is covered in two Sale Deeds i.e., (i) Sale Deed No. 1879/2006 covering land to the extent of 2.00 Acres and (ii) Sale Deed No. 1877/2006 covering land to the extent of 4.37 Acres.



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Sl. No.	Details of claim in the the petition filed before Mr. R. S. Virk, District Judge (Retd.) [refer Annexure 1]				Remarks
	Sl. No.	Doc. no.	Survey No.	Extent (in Acres)	
(xxii)	8	396/2007	75/1A1	2.77	Upon perusal, it is noted that Survey no. as per the corresponding Sale Deed no. 396/2007 is 75/1A. Vide email dated July 27, 2026, the AR submitted that the claim pertains to Survey No. 75/1A covered under Sale Deed No. 396/2007. The Survey No. was inadvertently mentioned as 75/1A1 instead of 75/1A.
Pattadaikatti Village					
(xxiii)	3	1242/2007 & 195/2008	283/1A	4.57	Upon perusal of the corresponding document i.e., Sale Deed no. 1242/2007, it is noted that it does not cover the claimed Survey No. Further, upon perusal of the other corresponding document i.e., Sale Deed no. 195/2008, it is noted that land to the extent of 1.14 Acres only is covered for the claimed Survey No. 283/1A. Vide email dated July 27, 2026, the AR submitted that Sale deed Doc Number has been inadvertently mentioned as 1242/2007 instead of 1243/2007.
(xxiv)	5	1424/2008 & 1611/2007	292	2.62	Upon perusal of the corresponding document i.e., Sale Deed no. 1424/2008, it is noted that the claimed Survey No. 292 is not covered therein. Vide email dated July 27, 2026, the AR submitted that the claimed Survey No. 292 was subdivided as 292/1. The Sale Deed no. 1424/2008 covers Survey No 292/1 and Sale deed 1611/2007 covers Survey No. 292, which was the survey no. prior to subdivision which post sub-division is Survey No. 292/1.

- b) Based on the above clarifications furnished by the AR, the claims in Annexure 1 stand modified/updated and are being, accordingly, adjudicated by this Panel.

EXAMINATION OF DOCUMENTS ON RECORD AND OBSERVATIONS/FINDINGS OF THE PANEL:

25. Before getting into the merits of the case, it is deemed appropriate to record, at this juncture, that the findings recorded in the present order proceed on the basis of the claim of ownership



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of the impugned properties by the Applicant based on the documentary evidence produced in support thereof.

25.1 In this regard, it is relevant to note that Shri R.S. Virk, District Judge (Retd.), in the impugned order dated July 31, 2023, had already observed that the Applicant could not be said to have approached with clean hands, inasmuch as: (i) the Applicant had included, in its list of claimed impugned properties, survey numbers which it had already further sold to third parties including M/s Sunstreet Solar Private Limited, M/s CSE Solar Sunpark Tamil Nadu Pvt Ltd, M/s Zonrenew Solar Pvt Ltd, M/s Sunsole Solar Pvt Ltd and M/s Unosun Solar Pvt Ltd, while continuing to assert a claim over the very same properties in the objection petition; and (ii) the Applicant had filed objections on behalf of M/s Sarjan Realities Pvt. Ltd., claiming it to be its sister concern/group entity, a fact disclosed only after being specifically pointed out to counsel for the Applicant during the course of arguments, and not by way of any proactive disclosure.

25.2 It is observed that a similar pattern has persisted before this Panel as well. During the course of the present proceedings, it has been found that: (i) several survey numbers came to be included in the Applicant's claim inadvertently, the underlying documents relied upon not in fact covering the survey numbers claimed (as, for instance, in respect of the claims at Sl. No. 85 and Sl. No. 99 of properties situated at Madhavakurichi Village listed in Annexure 1), (ii) instances where the Sale Deed cited in support of a claim was, on verification, found to be entirely unconnected with the survey number claimed, the correct Sale Deed being identified and placed on record only thereafter, (iii) separate objection petitions in respect of certain claimed properties had already been filed separately, including M/s Sarjan Realities Pvt. Ltd., without this fact being disclosed at the outset, and (iv) at least one claimed property was found, on verification, to have been executed in favour of another group entity of the Applicant, namely M/s Suzlon Gujarat Wind Park Limited, and not the Applicant itself. In each of these



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instances, the position came to be clarified by the Applicant only upon specific queries being raised by the Panel, and not by way of any proactive or voluntary disclosure.

25.3 Further, while the Applicant did file an affidavit dated May 20, 2026 disclosing certain land parcels situated at Mela Ilathaikulam Village which it had further sold to third parties, the said affidavit did not, in the first instance, disclose the sale of Survey No. 264 (admeasuring 6.57 Acres) in favour of M/s Unosun Solar Private Limited. This fact was placed on record by the Applicant only upon a specific clarification being sought by the Panel in this regard.

25.4 In view of the foregoing, it is clarified that the present order proceeds solely on the basis of the submissions made, and the documents produced, by the Applicant in support of its claim of ownership over the impugned properties, and is confined to the extent of such claim. This order does not constitute a finding, one way or the other, as to whether the Applicant has, in the meanwhile, alienated any part of the impugned properties in favour of third parties. Any such alienation, if subsisting, shall have to be independently examined and dealt with in accordance with law separately, including in the separate I.As already pending before this Panel filed by the purchasers, who have claimed to have purchased the properties from the Applicant.

26. Now, the village-wise observations of the Panel, after considering the submissions made in the I.A and the OP along with its annexures filed before Shri R.S. Virk, District Judge (Retd.) and the documents produced before the Panel of Recovery Officers along with clarifications furnished and examination of the corresponding documents under MR Nos. (*pertaining only to the Applicant's claimed Survey Numbers, notwithstanding other unclaimed Survey Numbers listed therein*) seized by CBI from the possession of PACL Ltd. and thereafter, attached by the Committee, are detailed as under:



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MR Nos. WHEREIN M/S. PGF LTD IS THE PURCHASER:

A. Impugned properties claimed at Mela Ilathaikulam, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 01: Details of transactions in impugned properties at Mela Ilathaikulam Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1.	Sale Deed 790/2005 15.06.2005	265	3.04	7870-18	6.08
2.	Sale Deed 1259/2005 13.08.2005	267/2	4.32	7867-18	4.32
3.	Sale Deed 809/2005 17.06.2005	234	2.22	7867-18	5.29
4.	Easementary Right Agreement 1549/2005 09.09.2005	246	22.72	12030-18	22.74
5.	Sale Deed 69/2006 18.01.2006	259/1	2.18	7868-18	2.17

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 01A: Details of MR Nos., Mela Ilathaikulam Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	7867-18	ATS	Stamp Paper No. 7735	11.10.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	234 238/1 267/2	5.29 7.01 4.32
2	7868-18	ATS	Stamp Paper No. 7736	11.10.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	259/1 262 266/1 267/3	2.17 5.98 1.98 2.42
3	7869-18	ATS	Stamp Paper No. 7734	11.10.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	263	10.5
4	7870-18	ATS	Stamp Paper No. 7737	11.10.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	265 266/2	6.08 2.97
5	12030-18	ATS	Stamp Paper No. 13133	09.11.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	246	22.74

पता (केवल पत्राचार हेतु) / Address for correspondence only:

सेबी भवन, प्लॉट सं. सी4-ए, 'जी' ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400051

SEBI Bhavan, BKC, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051



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**B. Impugned properties claimed at Balapathirapuram Village, Tirunelveli District,
Tamil Nadu**

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 02: Details of transactions in impugned properties at Balapathirapuram Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 676/2005 11.04.2008	373/5B	6.84	23201-17	8.56
2	Sale Deed 867/2005 06.05.2005	376/1A	2.93	12871/18	2.93
		378/3A	1.23	12871/18	1.24
3	Sale Deed 1165/2005 08.06.2005	378/1	3.16	9319-18	3.16
4	Sale Deed 1363/2005 23.06.2005	386/4B	3.09	23200-17	3.15
5	Sale Deed 1562/2005 08.07.2005	385/4A	0.2	12870-18 23031/17	0.31 0.73
		385/4B	01.00	12870-18 23031/17	0.31 3.90
6	Sale Deed 1563/2005 08.07.2005	390/2	3.2	12863-18	3.2
7	Sale Deed 1741/2005 22.07.2005	413/1	3.03	9314-18 23031/17	2.00 3.29
8	Sale Deed 1803/2005 28.07.2005	426/1	3.87	9317/18 8208/18 25914/17	1.09 2.00 2.69
9	Sale Deed 1259/2005 15.06.2005	447/2A	1.86	8588-18	4
10	Sale Deed 1623/2008 11.08.2008	91/1	0.45	8592-18	1.62 (including Survey No. 91/2)
11	Sale Deed 2081/2010 20.09.2010	414/3	0.12	23200-17	3.16
12	Sale Deed 2114/2011 08.11.2011	504/5	0.36	23199-17	1.03
13	Sale Deed 1114/2004 27.07.2004	392/2	15.09	12861-18	5.54
14	Sale Deed	404/2A	8.00	12858-18	9.99



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
	1110-2004 & 1050/2007 27.07.2004 & 26.04.2007				

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 02A: Details of MR Nos., Balapathirapuram Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	8208-18	GPA	174/98	22.10.1998	Shri. Ramasamy s/o Shri. Perumal Thevar	Shri. Sandeep Chona s/o Shri. J.K.Chona	426/1	2
		ATS	-	21.11.1998	Shri. Ramasamy s/o Shri. Perumal Thevar	M/s PGF Ltd		
2	9317-18	GPA	182/98	10.12.1998	Shri. Saudana Thevar s/o Shri. Perumal Thevar	Shri. Sandeep Chona s/o Shri. J.K.Chona	426/1	1.09
		ATS	-	14.12.1998	Shri. Sandeep Chona s/o Shri. J.K.Chona	M/s PGF Ltd		
3	25914-17	GPA	112/98	11.06.1998	Shri. Subbiah Thevar s/o Shri. Perumal Thevar	Shri. Atul Bhasin s/o Shri. Y.R.Bhasin	426/1	2.69
		ATS	-	04.09.1998	Shri. Atul Bhasin s/o Shri. Y.R.Bhasin	M/s PGF Ltd	-	2.69
4	8588-18	GPA	163/98	21.09.1998	Shri. Muthusamy Thevar s/o Shri. Vel Thevar	Shri. Sandeep Chona s/o Shri. J.K.Chona	447/2A	4.00
		ATS	-	21.11.1998	Shri. Sandeep Chona s/o Shri. J.K.Chona	M/s PGF Ltd	-	3.52
5	8592-18	GPA	148/99	25.02.1999	Shri. Subbaiah s/o Shri. Kulanthaivelu	Shri. Sandeep Chona s/o Shri. J.K.Chona	91/1,2	1.65
		ATS	-	05.03.1999	Shri. Sandeep Chona s/o Shri. J.K.Chona	M/s PGF Ltd		
6	9319-18	GPA	195/98	24.12.1998	Shri. Chennappa Reddiar s/o Shri. Pethusamy Reddiar	Shri. Sandeep Chona s/o Shri. J.K.Chona	378/1	3.16

पता (केवल पत्राचार हेतु) / Address for correspondence only:

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SEBI Bhavan, BKC, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051



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S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		ATS	—	19.01.1999	Shri. Sandeep Chona s/o Shri. J.K.Choma	M/s PGF Ltd		
7	12863-18	GPA	156/98	28.08.1998	Shri. Shammugiah Thewar s/o Shri. Chelliah Thewar	Shri. Sandeep Chona s/o Shri. J.K.Chona	390/2	3.20
		ATS	—	21.11.1998	Shri. Sandeep Chona s/o Shri. J.K.Chona	M/s PGF Ltd Kumar Mishra	—	3.47
8	12870-18	GPA	22/99	10.03.1999	Shri. Maruthiah Thewar s/o Shri. Kanchi Thewar	Shri. Vinod Tiwari s/o Shri. B.R.Tiwari	385/4A 385/4B	0.31 0.31
		ATS	—	05.04.1999	Shri. Vinod Tiwari s/o Shri. B.R.Tiwari	M/s PGF Ltd		
9	23031-17	GPA	52/98	08.05.1998	Shri. Vellachamy s/o Shri. Kauchi Thevar	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	385/4A 385/4B	0.54 0.54
			—		Smt. Krishnamaal w/o Shri. Madasamy Thevar	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	385/4A 3854B 413/1	0.19 3.36 3.29
		ATS	—	28.04.1998	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	M/s PGF Ltd	385/4A 3854B	0.19 3.37
10	9314-18	GPA	3/99	13.01.1999	Shri. Vellaisami Thevar s/o Shri. Shamunga Thevar	Shri. Sandeep Chona s/o Shri. J.K.Choma	413/1	2.00
		ATS	—	20.01.1998	Shri. Sandeep Chona s/o Shri. J.K.Choma	M/s PGF Ltd		
11	12871-18	GPA	21/99	10.03.1999	Shri. Ramar Reddiar s/o Shri. Kondu Reddiar	Vinod Tiwari s/o B.R.Tiwari	376/1A 378/3A	2.93 1.24
		ATS	—	05.04.1999	Shri. Vinod Tiwari s/o Shri. B.R.Tiwari	M/s PGF Ltd		
12	23199-17	GPA	37/98	06.04.1998	Shri. Paramiah Thevar & another, s/o Late Paramu Thevar	Shri. Atul Bhasin s/o Shri. Y.R.Bhasin	504/5	1.03
		ATS	—	05.04.1998	Shri. Atul Bhasin s/o Shri. Y.R.Bhasin	M/s PGF Ltd		
13	23200-17	GPA	57/98	11.05.1998	Smt. Ramalakshmi w/o Shri. Muthiahamsy Thevar	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	414/3	1.58
			—	—	Shri. Kanapathy sundaram & others	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	414/3 386/4B	1.58 0.07



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S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
			38/98	02.02.2005	Ms. Chinnathai d/o Shri. Ramiah Thevar & others	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	386/4B	3.08
		ATS	-	05.05.1998	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	M/s PGF Ltd	414/3 386/4B	1.58 0.07
14	23201-17	GPA	153/98	12.08.1998	Shri. Anautharay s/o Shri. Krishnasamy	Shri. Sandeep Chona s/o Shri. J.K Chona	373/5B	8.56
			-	-	Shri. Paramu Thevar s/o Shri. Munu Thevar and others	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin		
		ATS	-	-	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	M/s PGF Ltd		
15	12861-18	GPA	20/4	04.03.1999	Shri. Subramanian s/o Shri. Krishnaswami Ansari	Shri. Vinod Tiwari s/o Late Shri. B.R. Tiwari	392/2	5.53
		ATS	-	04.03.1999	Shri. Vinod Tiwari s/o Late Shri. B.R. Tiwari	M/s PGF Ltd		
16	12858-18	GPA	19/4	04.03.1999	Shri. Chelliah Reddiar s/o Shri. Perumal Reddiar	Shri. Vinod Tiwari s/o Late Shri. B.R. Tiwari	404/2A	9.99
		ATS	-	04.03.1999	Shri. Vinod Tiwari s/o Late Shri. B.R. Tiwari	M/s PGF Ltd		

C. Impugned properties claimed at Melamaruthappapuram Village, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 03: Details of transactions in impugned properties at Melamaruthappapuram Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 1174/2005 08.06.2005	505/2	4.12	8125-18	1.05
2	Sale Deed 1177/2005 08.06.2005	501	0.94	8125-18	1.48
3	Sale Deed 1181/2005		2.65		



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
4	08.06.2005		2.39		
	Sale Deed 1303/2005 12.06.2005				
		502	3.48	8125-18	0.87
5	Sale Deed 1730/2005 02.07.2005	498/1	0.63	8125-18	0.63

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 03A: Details of MR Nos., Melamaruthappapuram Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	8059-19	GPA	58/4	11.05.1998	Shri. Maruthapandian s/o Shri. Chellian	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	503	6.44
2	8125-18	ATS	—	12.05.1998	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	M/s. PGF Limited	505/2	1.05
							501	1.48
							502	0.87
							498/1	0.63
		GPA	114/98	11.06.1998	Shri. Periya Madasamy Thevar s/o Shri. Veeraputra Thevar	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	501	1.48
							502	0.87
			99/4	03.06.1998	Shri. Samuthrapandi s/o Shri. Ladu Thevar	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	505/2	1.05

D. Impugned properties claimed at Pudur Village, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 04: Details of transactions in impugned properties at Pudur Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 2285/2007 09.08.2007	365/2	1.22	13529-18	1.22
2	Sale Deed 930/2008		1.43		1.43
	22.02.2008		1.94		4.82



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
		393/3	0.21	13529-18	0.43
		615	4.28	13529-18	4.28
		366	2.3	13530-18	2.3
		386	3.62	13529-18	3.62
		393/1	1.47	13529-18	4.71
3	Sale Deed 931/2008 22.02.2008	394/1	3.43	13528-18	3.43
		394/5	0.26	13528-18	0.26
4	Sale Deed 933/2008 22.02.2008	619	2.4	13530-18	2.4
		620/2	1.48		1.48
		374/1	0.97		0.97
5	Sale Deed 927/2008 22.02.2008	576/3	2.65	13528-18	2.65
		622	3.8		3.8
		489/4	0.07		0.07
		593/2	2.75		2.75
		663	4.52		4.52
		356	2.08		2.08
7	Sale Deed 929/2008 22.02.2008	592/1	0.15	13528-18	-

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 04A: Details of MR Nos., Pudur Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1.	13528-18	ATS	—	16.08.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Ltd.	576/3 593/2 663 622 356 394/1 592/2 394/5	2.65 2.75 4.52 3.8 2.08 3.43 2.57 0.26
2.	13529-18	ATS	—	09.08.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Ltd	365/2 364/1 615 386 374/1 393/1 393/3	1.22 1.43 4.28 3.62 4.82 4.71 0.43



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S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
3.	13530-18	ATS	—	08.08.2001	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Ltd	619 620/2 374/1 366	2.40 1.48 0.97 2.30

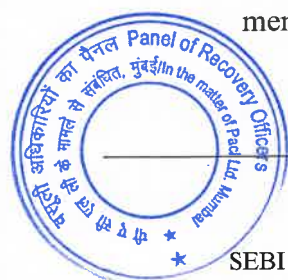
E. Impugned properties claimed at Echanda Village, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 05: Details of transactions in impugned properties at Echanda Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No. claimed by the Applicant	Extent (in Acres) in MR No.	Additional MR No. appearing in impugned order	Extent (in Acres) in MR No. appearing in impugned order
1	Sale Deed 1611/2007 06.03.2007	491/1 491/2 535/5 535/6 492/3 535/7E 535/7F 535/7D	1.74 2.02 1.8 1.62 1.77 0.64 0.36 0.35	8564-18 8605-18 8605-18 8605-18 8605-18 8605-18 8564-18	1.74 2.02 1.80 1.62 1.77 - -	- 8602-18 8602-18 8602/18 8602/18 8602/18	- 2.02 1.8 1.62 1.77 - -
2	Deed of Release 1646/2009 06.08.2009						
3	Sale Deed 1611/2007 & 1242/2007 06.03.2007 & 22.03.2007	492/2	1.98	8605-18	1.98	8602/18	1.98
4	Sale Deed 1645/2009 06.08.2009	535/7C	0.2	8605-18 8564/18	No MR	8602/18	-

Upon perusal of the impugned order dated July 31, 2023, it is observed that Shri. R. S. Virk District Judge (Retd.) has, in addition to the MR No. furnished by the Applicant, mentioned an additional MR No. 8602/18 (which contains an ATS executed in favour of



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M/s. PGF Limited). Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee including documents under MR. No. 8602/18 are as under:

Table 05A: Details of MR Nos., Echanda Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	8564-18	ATS	—	30.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	491/1 535/7	1.74 0.15
2	8602-18	ATS	—	31.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	491/2 492/2 492/3 535/5 535/6 535/7	2.01 1.98 1.77 1.80 1.62 1.24
3	8605-18	GPA	256/04	23.04.2004	Shri. K. V. govinda s/o Shri Pokkan	Shri. Avtar Singh s/o Shri. Basawa Singh	491/2 492/2 492/3 535/5 535/6 535/7	2.02 1.98 1.77 1.80 1.62 1.24

F. Impugned properties claimed at Naduvakurichi Village, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 06: Details of transactions in impugned properties at Naduvakurichi Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 1876/2006 18.12.2006	53 54/2 54/8 54/9	4.85 0.62 0.98 0.88	1025-18	4.84 0.62 0.98 0.88
2	Sale Deed 1879/2006 18.12.2006	39	2	1079-18 1025-18	3.99 2.00
3	Sale Deed 1877/2006 18.12.2006		4.37		
4	Sale Deed 376/2007 06.03.2007	55/1 55/2	1.29 1.59	8564-18	1.33 1.25



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
5	Sale Deed 396/2007 18.12.2006	75/1A	2.77	1079-18	2.77
		75/1C	0.07		0.07
		76/1	4.99		4.99
		76/4	4.37		4.37
		89/2	5.04		5.04
		90/2	4.22		4.22
		91/1	0.72		0.72

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 06A: Details of MR Nos., Naduvakurichi Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	1025-18	ATS	—	08.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	53	4.84
							54/2	0.62
							54/8	0.98
							54/9	0.88
							39	2.00
2	1079-18	ATS	—	16.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	39	3.99
							75/1A	2.77
							75/1C	0.07
							91/1	0.72
							76/1	4.99
							76/4	4.37
							89/2	5.4
3	8564-18	ATS	—	30.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	90/2	4.22
							55/1	1.33
							55/2	1.25

G. Impugned properties claimed at Pattadaikatti Village, Tirunelveli District, Tamil Nadu

Details of impugned properties claimed by the Applicant at the below-mentioned village in Tirunelveli District are as under:

Table 07: Details of transactions in impugned properties at Pattadaikatti Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 195/2008 13.02.2008	283/1A	1.14	1078-18	1.15



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.
2	Sale Deed 1243/2007 22.03.2007	206/1	3.42	1078-18	2.08
3	Sale Deed 197/2008 13.02.2008		4.12		
4	Sale Deed 1611/2007 06.03.2007	291	5.88	8562-18	2.9
5	Sale Deed 35/2008 10.01.2008				
6	Sale Deed 1424/2008, 07.10.2008				
7	Sale Deed 1611/2007, 06.03.2007	292/1 earlier 292	2.62	8562-18	4.33
8	Sale Deed 37/2008, 10.01.2008	292	5.25	1078-18	5.25
9	Sale Deed 194/2008, 13.02.2008	201			

Details of documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee are as under:

Table 07A: Details of MR Nos., Pattadaikatti Village, Tirunelveli District

S. No.	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	1078-18	ATS	—	16.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	201 206/1 283/1A	5.25 2.08 1.15
2	8562-18	ATS	—	31.10.2002	Shri. Avtar Singh s/o Shri. Basawa Singh	M/s. PGF Limited	291 292	2.9 4.33

26.1 It is noted from an examination of the corresponding documents under the MR Nos. for impugned properties mentioned at Tables 01-07 above that the same contains documents which are GPAs executed in favour of different individuals and ATSs executed in favour of M/s. PGF Limited.



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26.2 It is the contention of the Applicant in the I.A that Shri R.S. Virk, District Judge (Retd.) in the impugned order failed to appreciate that many GPAs/ATS were executed in the name of PGF Limited, not PACL, and erroneously asserted PGF as a sister-concern/associate, thereby expanding the remit beyond companies under SEBI's scanner or this Court's orders.

26.3 Here, reference is made to the order dated August 22, 2014 passed by SEBI, which observed PACL's *modus operandi* as holding very limited stock of lands in its name, with most land held through GPA/ATS/through associate companies, as it was unable to purchase the land in its own name beyond certain limits due to land laws and other applicable laws of the land in different States of the country. Reference is further be made to the admission of PACL Ltd. itself during the proceeding before the Whole Time Member, SEBI, that it was in a practice of buying lands through its agents for the purpose of its business.

26.4 Thus, the contention of the Applicant that the impugned order erroneously asserted PGF Ltd as a sister-concern/associate, thereby expanding the remit beyond companies under SEBI's scanner or this Court's orders, does not hold merit.

26.5 Notwithstanding the above, the Panel notes that the Hon'ble Supreme Court, vide its order dated January 22, 2016 passed in *C.A. No. 6572 of 2004 – M/s PGF Ltd. & Ors. Vs. Union of India & Anr.*, has appointed another Committee of Justice Vikramajit Sen, Former Judge, Supreme Court of India and Justice R. V. Easwer, Former Judge, Delhi High Court, for realization of the monies by way of sale of immovable properties, as well as liquidation of fixed deposit receipts, for disbursement of monies collected by M/s PGF Limited to its investors. Thus, any immovable property of M/s PGF Limited is in the domain of the said Committee and consequently, any objection relating to such property can be looked into only by the said Committee. It is pertinent to note that by placing reliance on the said order of the Apex Court, an order dated August 18, 2022 was passed



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by Shri. R. S. Virk District Judge (Retd.), in the objection file by M/s Bhuj Developers Pvt. Ltd., whereby Shri. R. S. Virk District Judge (Retd.) had dismissed the objection filed by M/s Bhuj Developers Pvt. Ltd., for want of jurisdiction. The Panel further notes that the said order passed by Shri. R. S. Virk District Judge (Retd.) has been relied upon by the Panel of Recovery Officers attached with the PACL Committee in many such cases e.g., order no. SEBI/PACL/RO/RG/RD-2/ORD/34/2026 dated March 24, 2026 in objection filed by Mr. Ranjeet Khare, order no. SEBI/PACL/RO/RG/RD-2/ORD/18/2026 dated February 26, 2026 in objection filed by Mrs. T. Kamala etc, and accordingly, the said objection petitions were dismissed on the ground that the matter ought to be considered by Justice Sen Committee.

26.6 In the light of the above, considering that the documents seized under the MR Nos. corresponding to impugned properties at Survey Nos. mentioned at Table 01-07 above comprise of GPAs and unregistered ATs wherein M/s. PGF Limited is the purchaser, the claim relating to the said impugned Survey Nos. is found to be not maintainable before the Justice (Retd.) R.M. Lodha Committee (in the matter of PACL Ltd.) and is required to be dealt with by Justice Sen Committee. Accordingly, the Panel is of the view that the I.A., insofar as it relates to the abovementioned impugned properties at Tables 01-07, deserves to be disposed of without any determination on merits.

OTHER IMPUGNED PROPERTIES CLAIMED BY THE APPLICANT:

27. In order to decide the I.A for the impugned properties claimed, excluding the ones mentioned in the Table 01-07 above which have been already disposed of by this Panel without going into the merits, on examining the registered sale deeds in favor of the Applicant/ Objector and the sale deeds in favor of the predecessors-in title, the Encumbrance certificate(s), the Patta and the documents in support of the payment of consideration by the Applicant/Objector, the following village-wise observations of the Panel for the said impugned properties are as under:



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A. Impugned properties claimed at Madhavakurichi Village, Tirunelveli District, Tamil Nadu

Table 08: Details of transactions in impugned properties at Madhavakurichi Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 3242/2006 15.12.2006	1769/1A	0.96	Shri. P.M. Joseph s/o Shri. P.J. Mathew	SRSPL	Rs. 5,22,900/- paid through cheque No. 131569 dated 18.10.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the schedule properties by virtue of Sale Deeds bearing nos.: (i) 893/1996 dated 02.04.1996, and (ii) 575/1997 dated 13.03.1997.	SD 893/1996 covers all Survey. Nos. except Survey. No. 1838/1 SD 575/1997 covers Survey No. 1838/1.	SD 893/1996	13411-16	0.96
		1730/1	3.08						13363-16	3.08	
		1767/1	1.23						SD 575/1997	13411-16	1.99
		1767/2	1.23								1.92
		1768/2	2.14								2.15
		1769/2	2.89								2.88
		1814/2	1.19						SD 3242/2006	13410-16	1.33
		1815	1.80								1.80
		1816/2	1.84								1.84
		1838/1	0.20							13412-16	4.61
2	Sale Deed 3257/2006 22.12.2006	1755/1	2.42	Smt. Prabha w/o. Shri. Appu	SRSPL	Rs.90,180/- paid through cheque No. 131569 dated 18.10.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the property at Survey No. 1755/1 by virtue of Sale Deed bearing no. 392/1995 dated 24.02.1995.	SD 392/1995	SD 392/1995	11933-16	2.42
									SD 3257/2006		
3	Sale Deed 3258/2006 22.12.2006	1700/1	0.73	Shri. G. Suresh s/o. Shri. P. K. Prabhakaran	SRSPL	Rs. 3,37,680/- paid through cheque No. 887036 dated 5.09.2005 drawn on Corporation bank, Tirunelveli	Vendor became owner of the schedule properties by virtue of Sale Deeds bearing nos.: (i) 3031/1995, (ii) 3032/1995, (iii) 3033/1995 and	SD 3033/1995	SD 3033/1995	11935-16	0.73
		1701/1	0.70						0.70		
		1703/2	1.00						SD 3032/1995		1.00
		1724/2	0.86								0.86
		1784	1.91						SD 3031/1995	11936-16	1.92
		1717	2.50								8.20
		1718	2.50						SD 3032/1995	SD 3258/2006	4.86



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
		1792	2.50			Branch.	(iv) 3038/1995.			14559-16	2.80
		1793	2.45							14559-16	7.50
		1719/3	0.89			Cheque appearing in the bank statement		SD 3031/1995		11935	0.89
4	Sale Deed 7236/2011 02.11.2011	1793	4.57	(i) Shri. R. Arumugam s/o. Shri. Raman, (ii) Shri. Arunachalam, (iii) Shri. Ganapathy Konar both s/o. Late Sivanu Konar (iv) Shri. Murugan, (v) Shri. Senthil Kumar, both s/o. Late Karuppasamy Konar, (vi) Shri. Subbiah Konar s/o. Shri. Sappani Konar, (vii) Shri. Mani s/o. Late Meenakshi, and (viii) Shri. Krishnamoorth i s/o. Late Kanagaraj Iyer.	SRSPL	Rs. 4,03,000/- paid through cheque No. 530165 dated 02.11.2011 drawn on Corporation bank, Tirunelveli Branch. Rs. 2,91,000/- paid through cheque No. 529713 dated 18.05.2011 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	Vendor (i) Shri. R. Arumugam became owner of the schedule property (Part) by virtue of Sale Deed bearing no. 7192/2011. The schedule property (Part) originally belonged to Late Komba Konar vide Patta no. 2084 issued by the Head Quarters Deputy Thesilder, Triunelveli. After the death of Shri. Komba Konar the said property devolved on his legal heirs Late Sivanu Konar and Late Karuppasamy Konar. After their death the said property devolved to their legal heirs i.e., Vendors (ii) Shri. Arunachalam, (iii) Shri. Ganapathy Konar, (iv) Shri. Murugan, and (v) Shri. Senthil Kumar. Vendor (vi) Shri. Subbiah Konar became owner of the schedule property (Part) by way of ancestral means and Patta No. 2084 issued by the Head Quarters Deputy	SD 7192/2011 Patta 2084	SD 7192/2011 SD 7236/2011	14559-16	7.50



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
							Thesilder, Triunelveli. The schedule property (Part) originally belonged to Late Masanathammal vide Patta no. 2084 issued by the Head Quarters Depty Thesilder, Triunelveli. After the death of Smt. Masanathammal the said property devolved on her only legal heir Late Meenakshi. After her death the said property devolved to her legal heir i.e., Vendor (vii) Shri. Mani. Vendor (viii) Shri. Krishnamoorthi became owner of the schedule property (Part) by way of ancestral means from his father.				
5	Sale Deed 3259/2006 22.12.2006	1756/1	2.66	Shri. M.A Joseph Deeban s/o. Shri. M.V. Antony	SRSPL	Rs. 1,80,000/- paid through cheque No. 131569 dated 18.10.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 1693/1995.	SD 1693/1995	SD 1693/1995 SD 3259/2006	13411-16	1.32
		1756/2								13411-16	1.52
		1819	3.63							11934-16	3.63
		1820	3.71							13364-16	3.71
	Sale Deed	1740/2	1.77	Shri. P.P.	SRSPL	Rs. 1,07,820/-	Vendor became owner of	SD 1680/2003	SD 1680/2003	13364-16	1.77



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
	3260/2006 22.12.2006	1741/3	3.06	Unnikrishnan s/o. Shri. P.K. prabhakaran		paid through cheque No. 887992 dated 13.8.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	the schedule properties by virtue of Sale Deed bearing no. 1680/2003.		SD 3260/2006		3.06
7	Sale Deed 3261/2006 22.12.2006	1749	2.52	(i) Shri. E.R. Siva Prasad	SRSPL	Rs. 1,11,420/- paid through cheque No. 135169 dated 18.10.2005 drawn on Corporation bank, Tirunelveli Branch. (131569) Cheque appearing in the bank statement	Vendors became owner of the schedule properties by virtue of Sale Deeds bearing nos.: (i) 1690/1999 and (ii) 1691/1999	SD 1690/1999 covers Survey No. 1749. SD 1691/1999 covers Survey Nos. 1751/1A & 1751/1B.	SD 1690/1999	13411-16	2.52
		1751/IB	1.82	s/o. Shri. Raghavan, and					SD 1691/1999	13363-16	1.85
		1751/1A	1.82	(ii) Shri. E. Dini Prakash s/o. Shri. E.K. Prakasan.					SD 3261/2006	13363-16	1.82
8	Sale Deed 2861/2010 21.06.2010			(i) Smt. Arputham w/o. Late Asirvatham, (ii) Shri. Anthoni & (iii) Shri. Arulmani, both s/o. Late Asirvatham, (iv) Smt. Chandra,	SRSPL	Rs. 1,50,000/- paid through cheque No. 418314 dated 21.06.2010 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendors became owner of the schedule properties by way of ancestral means from their ancestors and Patta No. 2006 issued by the Head Quarters Deputy Thesildar, Tirunelveli.	Patta No. 2006	SD 2861/2010		



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				(v) Smt. Mariya Puspham, both d/o Late Asirvatham, (vi) Smt. Rajammal d/o. Late Suvisesamutthu, and (vii) Smt. Jebamalai w/o. Late Jeyapaul.							
9	Sale Deed 3262/2006 22.12.2006	1821/2 1821/1	3.27 1.10	Shri. K.D. Baby s/o. Shri. Devassy	SRSPL	Rs. 90,000/- paid through cheque No. 131569 dated 18.10.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 1309/1997.	SD 1309/1997	SD 1309/2007 SD 3262/2006	13364-16 13412-16	3.27 1.10
10	Sale Deed 1137/2007 26.04.2007	1613/2 1619/2 1620 1645/2 1655/1 1655/3 1758 1766/2 1773 1774	1.49 1.77 1.75 2.72 2.33 0.57 2.16 0.14 1.44 4.03	Shri. S. Chelladurai s/o. Shri. Sankara Thevar	SRSPL	Rs. 8,45,200/- paid through cheque No. 106036 dated 26.9.2006 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 704/2007.	SD 704/2007	SD 704/2007. SD 1137/2007	11936-16 13363-16 11936-16 13363-16 13363-16 13364-16 14560-16	1.50 1.77 1.75 2.73 2.33 0.57 7.17 2.14 1.44 2.69 2.70



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
		1775	3.44			statement				13364-16	6.87
		1787/2	1.31							13364-16	1.31
		1858	3.78							13364-16	3.78
		1859/1	1.61							13364-16	1.61
		1867	1.72							11936-16	1.72
		1869	4.40							11936-16	4.40
		1659/2	2.53							13363-16	2.53
		1669	1.51							13364-16	1.51
11	Sale Deed 1138/2007 26.04.2007	1629	5.04	Shri. S. Chelladurai	SRSPL	Rs. 7,59,600/- paid through cheque No. 111563 dated 10.8.2006 drawn on Corporation bank, Tirunelveli Branch.	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 704/2007.	SD 704/2007	SD 704/2007	No MR found	
		1642	2.16	s/o. Shri. Sankara Thevar					SD 1138/2007	13363-16	2.15
		1653	3.00							11937-16	3.00
		1654	1.48							11937-16	1.48
		1680/1B	1.79							11937-16	1.79
		1702/2	1.40							11937-16	1.40
		1703/1	3.20							11927-16	3.20
		1724/1	2.16							11927-16	2.16
		1749	1.26			Cheque appearing in the bank statement				13411-16	2.52 (2.52 Acres also claimed vide SD 3261/2006)
		1823/2	1.07							11937-16	1.07
		1831/2	0.52							11937-16	0.52
		1837	1.95							11937-16	1.95
		1868	1.05							11936-16	1.04
		1792	2.36							14559-16	2.80 (2.50 Acres also claimed vide SD 3258/2006)
		1793	1.51							14559-16	7.02 (4.57 Acres & 2.45 Acres also claimed

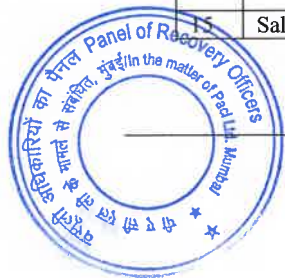


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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
											vide SD 3258/2006 & SD 7236/2011)
		1794	1.32							14559-16	0.74
		1719/1	1.95							11936-16	3.58
12	Sale Deed 4778/2010 23.09.2010		1.63	(i) Shri. Mohanraj s/o. Shri. Masilamani,	SRSPL	Rs. 38,500/- paid through DD.No. 941820 dated 23.09.2010 drawn on Corporation bank, Tirunelveli Branch.	Vendors became owner of the schedule properties by way of ancestral means from their ancestors and Patta No. 2125 issued by the Head Quarters Depty Thesilder, Triunelveli.	Patta No. 2125	SD 4778/2010		
		1719/2	0.70	(ii) Shri. Augustinraj s/o. Shri. Jeyapaul, (iii) Smt. Rajammal d/o. Shri. Suviseshamuth u, (iv) Smt. Jebamalai w/o Shri. Jeyapaul, (v) Smt. Mariyajothi w/o. Shri. Augustin, (vi) Shri. Durairaj (vii) Shri. Andi both s/o. Shri. Appavu, (viii) Shri. Arumugam s/o. Shri. Puthiyavan, (ix) Shri. Murugan s/o		Rs. 33,000/- paid through DD.No.941821 dated 23.09.2010 drawn on Corporation bank, Tirunelveli Branch.				11936-16	1.64
						Rs. 1,45,200/- paid through DD.No.941822 dated 23.09.2010 drawn on Corporation bank, Tirunelveli Branch.					
						Rs. 2,36,878 appearing in the bank statement					



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				Shri. Puthiyavan, and (x) Shri. Karaiyadiyan s/o Shri. Veeran.							
13	Sale Deed 1139/2007 26.04.2007	1672/2B	0.265	Shri. S. Chelladurai s/o. Shri. Sankara Thevar	SRSPL	Rs. 3,96,400/- paid through cheque No. 111457 dated 30.6.2006 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 704/2007.	SD 704/2007	SD 704/2007 SD 1139/2007	13410-16	0.75
		1672/3B	0.335								0.95
		1706/2	0.689								1.95
		1707/2	0.890								2.52
		1709/2	1.125								3.19
		1712/2	0.593								1.68
		1713/1	0.423								1.20
		1714/1	1.559								4.42
		1716/1	0.272								0.77
		1786/2	0.427								1.21
		1711/1	1.129								3.20
		1708/1	0.557								1.58
		1715/1	1.961							11936-16	4.20
		1721	2.880							13364-16	3.84
		1787/1	0.589							13412-16	1.26
14	Sale Deed 1140/2007 26.04.2007	1700/2	4.28	Shri. N. Paramasivam s/o. Shri. Nainar	SRSPL	Rs. 4,31,600/- paid through cheque No. 111457 dated 30.6.2006 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the schedule properties by virtue of Sale Deed bearing no. 703/2007.	SD 703/2007	SD 703/2007 SD 1140/2007	13363-16	4.29
		1701/2	1.42								1.42
		1741/2	0.70								0.70
		1760	2.34								2.33
		1761/1	0.83								0.83
		1761/2	0.81								0.82
		1762	2.32								2.32
		1763/1	1.09								1.09
		1763/2	0.88								0.88
		1836	2.70								2.70
		1830/2	2.34							13364-16	2.35
15	Sale Deed	1778/1	1.36	(i) ...	SRSPL	Rs. 2,98,000/-	Vendor (v) Shri.	Patta 1365	SD 893/2008	13411-16	1.36



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
	893/2008 19.02.2008	1779/1	2.07	(v) Shri. Velayutham s/o. Shri. Duraipandi @ Karaiyalan		paid through cheque No. 106689 dated 31.10.2006 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Velayutham s/o. Shri. Duraipandi @ Karaiyalan became owner of the schedule properties by way of inheritance and vide Patta No. 1365 issued by the Head Quarters Deputy Thesilder, Triunelveli.				2.08
16	Sale Deed 894/2008 19.02.2008	1822/IBI 1822/2	1.05 3.10	Shri. P.M. Joseph s/o. Shri. P.J. Mathew	SRSPL	Rs. 1,36,260/- paid through cheque No. 106689 dated 31.10.2006 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendors became owner of the schedule properties by way of inheritance and vide Patta Nos. 1969 and 2192 issued by the Head Quarters Deputy Thesilder, Triunelveli.	Patta 1969 Patta 2192	SD 894/2008	13412-16 13364-16	1.05 3.10
17	Sale Deed 5099/2009 12.09.2009	1608/1 1774 1863 1866 1865/1 1873/2 1631	0.21 1.37 2.24 2.50 6.46 3.88 0.88	(i) Smt. Sivaniyammal, (ii) Shri. Sudalaimuthu, (iii) Shri. Arumugam, (iv) Shri. Chokkalingam and (v) Shri. Chelladurai s/o Shri. Sankara Thevar	SRSPL	Rs. 5,00,000/- paid through cheque No. 217280 dated 12.9.2009 drawn on Corporation bank, Tirunelveli Branch. Rs. 2,89,300/- paid through cheque No. 217281 dated	Vendors i) Smt. Sivaniyammal, (ii) Shri. Sudalaimuthu, (iii) Shri. Arumugam, and (iv) Shri. Chokkalingam became owner of the schedule properties by way of inheritance. Vendor (v) Shri. Chelladurai became owner of the schedule properties by way of purchase under Sale Deed Doc No.	SD 241/2007	SD 241/2007 SD 5099/2009	12019-16 13364-16 14560-16 12018-16 13362-16 14560-16	0.85 2.69 2.70 3.36 3.75 9.68 3.88 1.32



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
						12.9.2009 drawn on Corporation bank, Tirunelveli Branch. Cheque No. 217280 appearing in the bank statement Copy of cheque no 217281 provided.	241/2007.				
18	Sale Deed 2513/2010 25.05.2010	1653 1654	1.20 0.59	(i) Smt. Firthouse Late P.M.S. Sheik Sintha, (ii) Smt. Pathumuthu Beevi w/o. Late P.M.S. Sheik Sintha, (iii) Smt. Parakkal Beevi d/o. Late P.M.S. Sheik Sintha, (iv) Smt. Aminal Beevi d/o. Late P.M.S. Sheik Sintha, (v) Shri. S. Abdul Haheem s/o. Late P.M.S. Sheik Sintha,	SRSPL	Rs. 2,48,750/- paid through cheque No. 418257 dated 25.5.2010 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	The schedule properties originally belonged to Late P.M.S. Sheik Sintha by virtue of Sale Deed Doc Nos. 797/1974 and 876/1974. After the death of Shri. P.M.S. Sheik Sintha, the said properties devolved to his legal heirs i.e., the Vendors.	SD 797/1974 SD 876/1974	SD 797/1974 SD 876/1974 SD 2513/2010	11937-16	3.00 1.48



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				(vi) Shri. Mohammed Ibrahim s/o. Late P.M.S. Sheik Sintha, (vii) Smt. Sulbiha d/o. Late P.M.S. Sheik Sintha, (viii) Smt. Sahila Banu d/o. Late P.M.S. Sheik Sintha, (ix) Smt. Johara Beevi d/o. Late P.M.S. Sheik Sintha.							
19	Deed of Exchange 5341/2012 27.08.2012	1646/2	0.08	(i) ... (ii) Shri. T. Balakrishnan	SRSPL	-	The schedule property belonged to (ii) Shri. T. Balakrishnan by virtue of Sale Deed Doc No. 6613/2010.	SD 6613/2010	SD 6613/2010 Deed of Exchange 5341/2012	12017-16	2.89



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In order to further examine the claim on the abovementioned impugned properties, the Panel perused the documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 08A: Details of MR Nos., Madhavakurichi Village, Tirunelveli District

S. No	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	11927-16	GPA	31/04	28.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1703/1 1724/1	3.20
		ATS	-	28.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		2.16
		SPA	-	28.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Affidavit	-	-	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
		Indemnity Bond	-	28.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
		Possession Certificate	-	28.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
2	11933-16	GPA	262/03	30.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1755/1	2.42
		ATS	-	07.04.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
3	11934-16	GPA	263/05	30.12.2003	Shri. Josephdeepan s/o Shri. Antony	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1819	3.63
		ATS	-	07.04.2003	Shri. Josephdeepan s/o Shri. Antony	M/s. PACL India Limited		
4	11935-16	GPA	264/03	30.12.2003	Shri. Suresh s/o Shri. Gangadharan	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1700/1 1701/1 1703/2 1719/3	0.73 0.70 1.00 0.89
		ATS	-	07.04.____	Shri. Suresh s/o Shri. Gangadharan	M/s. PACL India Limited	1724/2 1784	0.86 1.92
5	11936-16	GPA	400/03	05.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1719/1	3.58
							1613/2	1.50
							1619/2	1.77
							1620	1.75



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S. No	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		ATS	-	12.04.2004	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1758 1867 1869 1868 1715/1 1717 1718 1719/2	7.17 1.72 4.40 1.04 4.20 8.20 4.86 1.64
6	11937-16	GPA	02/04	08.01.2004	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1653 1654 1823/2 1831/2 1653 1680/1B	3.00 1.48 1.07 0.52 3.00 1.79
		ATS	-	07.04.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1702/2 1837 1654	1.40 1.95 1.48
7	12017-16	GPA	236/03	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1646/2	2.89
		ATS	-	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	M/s. PACL India Limited		
		Affidavit	-	-	Shri. N. Ramasubbu s/o Shri. Narayanasamy	M/s. PACL India Limited		
		Indemnity Bond	-	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	M/s. PACL India Limited		
		SPA	-	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Possession Certificate	-	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	M/s. PACL India Limited		
		Will	-	24.11.2003	Shri. N. Ramasubbu s/o Shri. Narayanasamy	M/s. PACL India Limited		
		Sale Deed	512/94	25.03.1994	Shri. Sankara Narayanan s/o Shri. Pichiah Konar	Smt. Julie w/o Shri. K. T. Xavier		
8	12018-16	GPA	240/03	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1863 1866	3.36 3.75

पता (केवल पत्राचार हेतु) / Address for correspondence only:
सेबी भवन, प्लॉट सं. सी4-ए, 'जी' ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400051

SEBI Bhavan, BKC, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051



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S. No	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		ATS	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
		Affidavit	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
		Indemnity Bond	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
		SPA	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Possession Certificate	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
		Will	-	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
9	12019-16	GPA	232/03	24.11.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1608/1	0.85
		ATS	-	24.11.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
		SPA		24.11.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
10	13362-16	GPA	240/03	04.12.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1865/1 1873/2	9.68 3.88
		ATS	-	10.02.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		
11	13363-16	ATS	-	07.02.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1751/1B 1645/2 1655/1 1655/3 1766/2 1773 1659/2 1642 1700/2 1701/2 1741/2 1760 1761/1 1761/2 1762 1763/1	1.85 2.73 2.33 0.57 2.14 1.44 2.53 2.15 4.29 1.42 0.70 2.33 0.83 0.82 2.32 1.09
		GPA	398/03	03.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Affidavit			Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
		Indemnity Bond	-	03.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		
		SPA		03.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		



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S. No	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		Possession Certificate	-	03.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1763/2 1836 1730/1 1751/1A	0.88 2.70 3.08 1.82
12	13364-16	GPA	399/03	04.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1775 1787/2 1830/2	6.87 1.31 2.35
		ATS	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1740/2 1821/2	1.77 3.27
		Affidavit	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1858 1859/1 1669	3.78 1.61 1.51
		Indemnity Bond	-	-	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1721 1741/3 1820	3.84 3.06 3.71
		SPA	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1774 1822/2	2.69 3.10
		Possession Certificate	-	04.12.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
13	13410-16	GPA	233/03	24.11.2003	Shri. Pradeep s/o Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1672/2B 1672/3B 1706/2 1707/2	0.75 0.95 1.95 2.52
		ATS	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1716/1 1708/1 1814/2	0.77 1.58 1.33
		Affidavit	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1709/2 1712/2 1713/1	3.19 1.68 1.20
		Indemnity Bond	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1714/1 1786/2	4.42 1.21
		SPA	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1711/1 1815 1816/2	3.20 1.80 1.84
14	13411-16	GPA	234/03	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1749 1767/1 1767/2	2.52 1.99 1.92
		ATS	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1756/1 1756/2	1.32 1.52
		Affidavit	-	-	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1769/1 1768/2 1769/2	0.96 2.15 2.88
		Indemnity Bond	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1778/1 1779/1	1.36 2.08
		SPA	13387	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Possession Certificate		24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		



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S. No	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
15	13412-16	GPA	235/03	24.11.2003	Shri. Pradeep s/o Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1787/1 1821/1 1822/1B1 1838/1	1.26
		ATS	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		1.10
		Affidavit	-	-	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		1.05
		Indemnity Bond	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited		4.61
		SPA	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
		Possession Certificate	-	24.11.2003	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		
16	14559-16	ATS	-	15.10.2003	Shri. Pradeep s/o Shri. Prabhakaram	M/s. PACL India Limited	1792 1793 1794	2.80
		GPA	120/04	15.06.2004	Shri. Pradeep s/o Shri. Prabhakaram	Shri. Tarlochan Singh s/o Shri. Sadhur Singh		7.50 0.74
17	14560-16	GPA	119/04	15.06.2004	Shri. R. Dharmaraj s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhur Singh	1774 1631	2.70 1.32
		ATS	-	13.10.2003	Shri. R. Dharmaraj s/o Shri. Ramasamy	M/s. PACL India Limited		

From the above, it is observed that the documents contained under the said MR Nos. are GPA(s) executed by different individuals in favour of different individuals, and unregistered ATS/Affidavit/Indemnity Bond/ Possession Certificate/Will/Special Power of Attorney (SPA) executed in favour of M/s. PACL India Limited.



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B. Impugned properties claimed at Ettankulam Village, Tirunelveli District, Tamil Nadu

Table 09: Details of Transactions in impugned properties, Ettankulam Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendor(s) Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 3002/2010 23.06.2010	232/2	0.715	(i) ... (viii) Shri. Paramasiva Thevar (ix) Shri. Muthukutti (x) Smt. Sivani (xi) Smt. Gandhi (xii) Shri. Vembu Ammal (xiii) Smt. Chockammal (xiv) Smt. Arumugam (xv) Smt. Uchimahali (xvi) Shri. Gopal ... (xxi) ...	SRSPL	Rs. 2,86,540/- paid through cheque No. 810734 dated 22.8.2008 drawn on Corporation bank, Tirunelveli Branch. Rs. 1,26,460/- paid through cheque No. 744937 dated 11.9.2008 drawn on Corporation bank, Tirunelveli Branch. Rs. 6,250/- paid through cheque No. 417811 dated 03.5.2010 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	Vendor (viii) Shri. Paramasiva Thevar is the owner of the schedule property in Survey No. 232/2 by way of Sale Deed Doc No. 910/2006 dated 07.04.2006. Vendors (ix) Shri. Muthukutti, (x) Smt. Sivani, (xi) Smt. Gandhi, (xii) Shri. Vembu Ammal, (xiii) Smt. Chockammal, (xiv) Smt. Arumugam, (xv) Smt. Uchimahali, and (xvi) Shri. Gopal, are the owners of the schedule property in Survey No. 232/2 by way of ancestral means from their ancestors Late Periya Sudalaimuthu Konar and Chinna Sudalaimuthu Konar whose name mentioned in Patta No. 668 issued by the Head Quarters Deputy Thesildar, Tirunelveli.	SD 910/2006	SD 910/2006 SD 3002/2010	15364-18	MR No. does not cover the impugned Survey No.



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In order to further examine the claim on the abovementioned impugned property at Survey No. 232/2, the Panel perused the documents covered under the corresponding MR No. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 09A: Details of MR Nos., Ettankulam Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	15364-18	Sale Deed	1552/04	21.06.2004	Shri. M. K. Narayana Kutty s/o Late . K. Krishnan	Shri. Mahesh Dutt s/o Shri. Shankar Dutt	232/12 *	0.64
							235/3	0.33
							237/2	0.70
							277/3	5.01
							279/1	1.94
							279/3	0.80
		Sale Deed	776/1993	24.05.1993	Shri. Ramanuja Naidu s/o Shri. Balakrishna Naidu & 7 others	Shri.T. Krishnan Nair s/o Shri. Narayana Menon	282	2.00
							289/1	0.99
							289/3	1.76
							294/3	1.46
							300/2	0.09
							300/5	0.20
							318/5A	1.00
							318/5B	0.18

* **Note:** The impugned property at Survey No. 232/2, Ettankulam Village, does not find mention anywhere in the Schedule of Properties in the above Sale Deeds under MR No. 15364-18.



C. Impugned properties claimed at Sayamalai Village, Tirunelveli District, Tamil Nadu

Table 10: Details of transactions in impugned properties at Sayamalai Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 122/2008 25.01.2008	912/1	0.90	(i) Shri. Ramaraja Thalaivar s/o. Shri. Rajapandi Thalaivar @ Periyasamy Thalaivar, ...	SRSPL	Rs. 3,21,575/- paid through cheque No. 115404 dated 24.4.2007 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor viz. (i) Shri. Ramaraja Thalaivar became owner of the property at Survey No. 912/1 admeasuring 0.90 Acres by way of inheritance and vide Patta No. 625 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 625	SD 366/1982	11966-16	0.90
		925/8	0.84	(iv) Shri. Balasubramanian s/o Shri. Varramu Thevar, (v) Shri. Periyasamy Thevar s/o Late Krishnasamy Thevar, ... (viii) ...			Vendor viz. (iv) Shri. Balasubramanian s/o Shri. Varramu Thevar became owner of the property at Survey No. 925/8 admeasuring 0.84 Acres by way of inheritance and vide Patta No. 395 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 395	SD 122/2008		11854-16
		1008	0.53				Vendor viz. (v) Shri. Periyasamy Thevar became owner of the following properties: (i) Survey Nos. 1008(P) and 1009/1(P) admeasuring 0.53 & 0.50 Acres respectively vide Sale Deed Doc No. 366/1982. (ii) Survey No. 1009/2(P) admesuring 0.39 vide Gift Deed Doc No. 169/1975.	SD 366/1982 covers Survey Nos. 1008 & 1009/1 GD 169/1975 covers Survey No.1009/2		26146-17	1.60
		1009/1	0.50						26146-17	1.49	
		1009/2	0.39						11932-16	1.16	
2	Sale Deed 123/2008 25.01.2008	910	4.36	(i) Shri. Chinna Ramasamy Thevar s/o Shri. Subbaiah Thevar, (ii) Imayam Kanda Thalaivar, (iii) Shri. Thalaivar N.T.M, both s/o. Late Navakodi Narayana	SRSPL	Rs. 5,39,231/- paid through cheque No. 115404 dated 24.4.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (i) Shri. Chinna Ramasamy Thevar became owner of the property at Survey No. 910 admeasuring 4.36 Acres vide Sale Deed Doc No. 1170/2000.	SD 1170/2000	SD 1170/2000	11837-16	4.36
		843/2	2.10				Originally belonged to Late Navakodi Narayana Thalaivar. After his death, vendors (ii) Imayam Kanda Thalaivar and (iii)	Patta No. 553	SD 123/2008		11930-16



S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				Thalaivar, (iv) Shri. Periyasamy s/o Shri. Udayar, (v) ..., (vi) Shri. Chellasamy s/o. Late Gomathiraja Thalaivar and (vii) Shri. Ramasamy s/o. Late Shanmugasamy.		Cheque appearing in the bank statement	Shri. Thalaivar, being his legal heirs became owner of the said property by way of inheritance and vide Patta No. 553 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.				
		873/3A	1.67				Originally belonged to Late Annammal. After his death, vendor (iv) Shri. Periyasamy, being his only legal heir became owner of the said property by way of inheritance and vide Patta No. 40 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 40		11968-16	0.80
		887/2C	0.44				Originally belonged to Late Gomathiraja Thalaivar. After his death, his son viz. vendor (vi) Shri. Chellasamy, being his only legal heir became owner of the said property by way of inheritance and vide Patta No. 149 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 149		11957-16	0.44
		934/IB	3.00				Originally belonged to Late Shanmugasamy. After his death, his son viz. vendor (vii) Shri. Ramasamy, being his only legal heir became owner of the said property by way of inheritance and vide Patta Nos. 170 and No 171 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 170		11996-16	3.00
		934/IC	3.01					Patta No. 171		11996-16	3.01
3	Sale Deed 124/2008 25.01.2008	918/2	2.42	(i) Shri. Rajendran s/o. Shri. Rathinasamy,	SRSPL	Rs. 7,57,225/- paid through cheque No. 117588 dated 13.4.2007 drawn on Corporation	Originally belonged to Late Rathinasamy Nadar. After his death, his son viz. vendor (i) Shri. Rajendran, being his legal heir became owner of the said properties by way of inheritance	Patta No. 585	SD 124/2008	11965-16	2.22
		932/5	1.56	(ii) Shri. Annamalaisamy s/o. Shri. Palanisamy, (iii) Shri. Puspharaj						11965-16	1.56



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				s/o Late Ramasamy, (iv) Shri. Imayamkanda Thalaivar, (v) Thalaivar N.T.M, both s/o. Shri. Navakodi Narayana Thalaivar, and (vi) Shri. Neelavarna Vayalaramu Thalaivar s/o. Late Venkateshwara Thalaivar.		bank, Tirunelveli Branch. Cheque appearing in the bank statement	and vide Patta No. 585 issued by the Head Quarters Deputy Thesildar, Sankarankoil Taluk. Originally belonged to Late Palanisamy. After his death, his son viz. vendor (ii) Shri. Annamalaisamy, being his only legal heir became owner of the said property by way of inheritance and vide Patta No. 383 issued by the Head Quarters Deputy Thesildar, Sankarankoil Taluk. Vendor (iii) Shri. Puspharaj became owner of the said properties by way of inheritance and vide Patta No. 414 issued by the Head Quarters Deputy Thesildar, Sankarankoil Taluk. Originally belonged to Shri. Neelavarna Vayalaramu Thalaivar and Late Navakodi Narayana Thalaivar. After the death of Shri. Navakodi Narayana Thalaivar, his sons viz. vendors (iv) Shri. Imayamkanda Thalaivar and (v) Thalaivar N.T.M, being his legal heirs became owners of the said property by way of inheritance and vide Patta No. 1503 issued by the Head Quarters Deputy Thesildar, Sankarankoil Taluk. Originally belonged to Late Navakodi Narayana Thalaivar. After his death, his sons viz. vendors (iv) Shri. Imayamkanda Thalaivar and (v) Thalaivar N.T.M, being his legal heirs became owners of the said properties by				
		918/1	2.62					Patta No. 383		11955-16	2.62
		932/2	1.50							11955-16	1.51
		892/6	2.25					Patta No. 414		11956-16	2.25
		923/3	1.63							11956-16	1.63
		946/3B	3.26					Patta No. 1503		11917-16	1.63
		899/3	0.75					Patta No. 372		26152-17	0.75
		899/4	0.68							26152-17	0.68



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
4	Sale Deed 125/2008 25.01.2008	912/2	1.03	(i) Shri. Gurusamy Thevar s/o. Shri. Arunagiri Thevar,	SRSPL	Rs. 5,51,078/- paid through cheque No. 117588 dated 13.4.2007 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	way of inheritance and vide Patta No. 372 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.				
		933/3	2.40	(ii) Shri. Kanthiah Thalaivar s/o. Late Kanthasamy Thalaivar,			Vendor viz. (i) Shri. Gurusamy Thevar became owner of the said property by way of inheritance and vide Patta No. 1342 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1342	SD 125/2008	11967-16	1.37
				(iii) Shri. Chinna Ramasamy s/o. Late Mahalinga Thalaivar, ...			Vendors viz. (ii) Shri. Kanthiah Thalaivar and (iii) Shri. Chinna Ramasamy, became owners of the said property by way of inheritance and vide Patta No. 1343 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1343		11970-16 11971-16 35844-16 35849-16	Survey No. 933/3 is not covered. Survey No. 933 is covered to the extent of 1.28 Acres, 0.64 Acres, 2.56 Acres & 0.64 Acres, respectively.
		998/IAI	3.41	(vii) Shri. Raja Thalaivar s/o Shri. Krishnan, ...			Vendors viz. (vii) Shri. Raja Thalaivar s/o Shri. Krishnan, became owner of the said properties by way of inheritance and vide Patta Nos. 1224 and 811 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1224		26154-17	3.41
		997/1	6.31	(ix) ...				Patta No. 811		26154-17	6.31
5	Sale Deed 126/2008 25.01.2008	891/2	1.13	(i) Shri. Swaminathan s/o Shri. Sankaranarayana,	SRSPL	Rs. 1,26,468/- paid through cheque No. 115404 dated 23.4.2007 drawn on Corporation bank, Tirunelveli Branch. Rs. 4,73,016/-	Vendor viz. (i) Shri. Swaminathan became owner of the said property by way of inheritance and vide Patta No. 1247 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1247	SD 126/2008	12016-16	2.26
		907/3C	2.16	(ii) Shri. Pushparaj s/o Shri. Pooludaiyar, (iii) Shri. Mandira Thevar s/o Shri. Azhaku Thevar, (iv) Shri. Kombiah s/o Shri. Poolthevar, (v) Shri. Balaji s/o			Vendor viz. (ii) Shri. Pushparaj became owner of the said property by way of inheritance and vide Patta No. 1341 issued by the Head Quarters Depty Thesilder,	Patta No. 1341		12013-16	2.16



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
6	Sale Deed 127/2008			Shri. Selvaraj,		paid through	Sankarankoil Taluk.				
		903/2	0.40	(vi) Shri. Kombaiiah		cheque No. 115441 dated 4.5.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendors viz. (iii) Shri. Mandira Thevar, (iv) Shri. Kombiah and (v) Shri. Balaji, became owners of the said properties by way of inheritance and vide Patta No. 1215 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 1215		11916-16	0.40
		935	2.85	Thevar s/o Late Subbiah Thevar,						11916-16	2.85
		936/3	2.00	(vii) Shri. Periasamy s/o Late Niraikula Thevar,						11916-16	2.00
				(viii) Shri. Malaisamy s/o Late Mahalinga Thevar,		Cheques appearing in the bank statement	Vendor viz. (vi) Shri. Kombaiiah Thevar became owner of the said property by way of inheritance and vide Patta No. 543 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 543		11960-16	1.14
		891/3	1.14	(ix) Shri Arunachala Nagaraj s/o late Ponnusamy Thevar and			Vendors viz. (vii) Shri. Periasamy and (viii) Shri. Malaisamy, became owners of the said property by way of inheritance from their fathers, who obtained title through Patta No. 1069 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 1069		11990-16 11991-16 11992-16	1.46 1.46 1.46
		949/2	4.36	(x) Shri. G. Chelladurai s/o Late Gomathiraj Thalaivar.			Vendor viz. (ix) Shri Arunachala Nagaraj became owner of the said property by way of inheritance from his father, who obtained title through Patta No. 774 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 774		11958-16	1.41
		883/1A	1.41				Vendor viz. (x) Shri. G. Chelladurai became owner of the said property by way of inheritance from his father, who obtained title through Patta No. 149 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 149		11961-16	2.26
		891/1	2.26								
6	Sale Deed 127/2008	884/1	3.03	(i) Shri. Swaminatha Pandian s/o. Shri.	SRSPL	Rs.55,580/- paid through	Originally belonged to Late Valliammal. After her death, her	Patta No. 695	SD 127/2008	12014-16	3.03

पता (केवल पत्राचार हेतु) / Address for correspondence only:

सेबी भवन, प्लॉट सं. सी4-ए, 'जी' ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400051

SEBI Bhavan, BKC, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
	25.01.2008			Theivendra Thalaivar, (ii) Dhanalakshmi d/o Shri. Theivendra Thalaivar and (iii) Shri. Sundarraj s/o. Shri. Perumal Thevar.		cheque No. 117588 dated 13.4.2007 drawn on Corporation bank, Tirunelveli Branch. Rs.6,11,265/- paid through cheque No. 115404 dated 24.4.2007 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	children viz. vendors (i) Shri. Swaminatha Pandian and (ii) Dhanalakshmi, being her legal heirs became owners of the said property by way of inheritance and vide Patta No. 695 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.				
		884/2A	1.16				Vendor viz. (i) Shri. Swaminatha Pandian became owner of the said properties by way of inheritance and vide Patta No. 370 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 370		11963-16	2.08
		886	6.14							11964-16	6.14
		888	6.47							11964-16	6.47
		1307/2	2.90				Vendor viz. (iii) Shri. Sundarraj became owner of the said property by way of inheritance and vide Patta No. 262 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 262		11853-16	2.90
7	Sale Deed 128/2008 25.01.2008	1311/4	0.91	(i) Shri. Niraikulathan Thevar, ..., (iv) Shri. Ramamurthy Thalaivar s/o Shri. Thangapandi thalaivar, (v) Shri. Shanmugasundararajakula Subramanian s/o Shri. Veemathevar, ... (viii) ...	SRSPL	Rs. 4,01,461/- paid through cheque No. 115404 dated 24.4.2007 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor viz. (iv) Shri. Ramamurthy Thalaivar became owner of the said property by way of inheritance and vide Patta No. 663 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 663	SD 128/2008	11855-16	0.91
		887/2A	0.605				Vendor viz. (v) Shri. Shanmugasundararajakula Subramanian became owner of the said property by way of inheritance and vide Patta No. 775 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 775		11993-16	0.61
8	Sale Deed 232/2008 11.02.2008	877/2	2.29	(i) Shri. A. Venkatesan s/o Shri. Anavarathan and (ii) Shri. S.	SRSPL	Rs. 8,94,180/- paid through cheque No. 115463 dated	Vendor viz. (i) Shri. A. Venkatesan became owner of the following impugned properties:	SD 518/2007	SD 518/2007	26147-17	2.29
		892/3	0.68				(i) Survey No. 877/2 by way of	SD 673/2007		11919-16	0.67



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
				Lakshmana Raja s/o. Shri. Sankaran		18.5.2007 drawn on Corporation bank, Tirunelveli Branch.	Sale Deed Doc No. 518/2007. (ii) Survey No. 892/3 by way of Sale Deed Doc No. 673/2007.		673/2007 SD 960/2007		
		1025/1	1.86			Cheque appearing in the bank statement	Vendor viz. (ii) Shri. S. Lakshmana Raja became owner of the said property by way of Sale Deed Doc No. 960/2007.	SD 960/2007	SD 232/2008	26150-17	1.86
9	Sale Deed 233/2008 11.02.2008	1021/1	2.96	(i) Shri. Pitchaipandian s/o. Late Thavasikannu Thevar, ... (xix)...	SRSPL	Rs. 6,91,730/- paid through cheque No. 115463 dated 18.5.2007 drawn on Corporation bank, Tirunelveli Branch. Rs. 91,742/- paid through cheque No. 115495 dated 28.5.2007 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	Vendor viz. (i) Shri. Pitchaipandian became owner of the said property by way of inheritance from his father vide Patta No. 1360 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1360	SD 233/2008	26148-17	5.97
10	Sale Deed 234/2008 11.02.2008	1015/2	2.33	(i) ... (ii) Shri. S. Lakshmana Raja s/o. Shri. Sankaran	SRSPL	Rs. 8,23,923/- paid through cheque No. 115463 dated 18.5.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (ii) Shri. S. Lakshmana Raja became owner of the said property by way of Sale Deed Doc No. 1383/2007.	SD 1383/2007	SD 1383/2007 SD 234/2008	25989-17	2.34



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
						Cheque appearing in the bank statement					
11	Sale Deed 236/2008 11.02.2008	890/1	5.16	(i) Shri. Mariappan and (ii) Shri. Rajendran s/o. Shri. Rathinasamy Nadar.	SRSPL	Rs. 2,60,590/- paid through cheque No. 115457 dated 11.5.2007 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor viz. (ii) Shri. Rajendran became owner of the said property by way of inheritance from his father vide Patta No. 769 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 769	SD 236/2008	11965-16	5.16
12	Sale Deed 237/2008 11.02.2008	925/13	0.125	(i) Shri. Chinna Sundaraja s/o Late Mahalinga Thalaivar, ... (v) Shri. Chinnadurai Pandian s/o Shri.Vellaisamy Thevar and (vi) Shri. Ramraj s/o late Perumal Thevar.	SRSPL	Rs. 5,51,940/- paid through cheque No. 115457 dated 11.5.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (i) Shri. Chinna Sundaraja became owner of the said properties by way of inheritance from his father vide Patta Nos. 1232, 1065, 502, 826, 1356, 1399, 830 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 830 covers the Survey Nos.	SD 102/2003	11842-16	0.15
		928/6	0.235						SD 237/2008		0.47
		900/3	0.75			Rs. 37,368/- paid through cheque No. 115463 dated 18.5.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (v) Shri. Chinnadurai Pandian became owner of the said property by way of Sale Deed Doc No. 102/2003.	SD 102/2003		11839-16 11840-16 11841-16	0.75
		847	6.79			Cheques appearing in the bank statement	Vendor viz.(vi) Shri. Ramraj became owner of the said property by way of inheritance and vide Patta No. 1663 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 1663		11920-16	6.80



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
13	Sale Deed 5539/2011 14.12.2011	867/2B1	0.30	Shri. S.S. Murugesan s/o. Shri. Shanmugasundaram	SRSPL	Rs. 1,71,250/- paid through cheque No. 531011 dated 10.10.2011 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the said property by virtue of Sale Deed Doc no. 4687/2011.	SD 4687/2011 - 867/2B1 (0.30)	SD 4687/2011 SD 5539/2011	26149-17	6.49
14	Sale Deed 995/2012 16.03.2012	889/3	0.05	Shri. B. Ameer John s/o Shri. Bahrudeen	SRSPL	Rs. 53,275/- paid through cheque No. 530195 dated 29.11.2011 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendor became owner of the said property by virtue of Sale Deed Doc no. 646/2012.	SD 646/2012	SD 646/2012 SD 995/2012	11963-16	2.58



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In order to further examine the claim on the abovementioned impugned properties, the Panel perused the documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 10A: Details of MR Nos., Sayamalai Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1.	11837-16	ATS	-	10.04.2003	Shri. Chinnaramasamy Thevar s/o Shri. Subbiah Thevar	M/s PACL India Ltd.	910	4.36
		GPA	791/03	22.12.2003	Shri. Chinnaramasamy Thevar s/o Shri. Subbiah Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
2.	11839-16	ATS	-	10.04.2003	Shri. Ponnu Pandiyan s/o Shri. Perumal Thevar	M/s PACL India Ltd.	900/3	0.25
		GPA	787/03	22.12.2003	Shri. Ponnu Pandiyan s/o Shri. Perumal Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
3.	11840-16	ATS	-	10.04.2003	Shri. Chinna Mariyappan s/o Shri. Perumal Thevar	M/s PACL India Ltd.		0.26
		GPA	788/03	22.12.2003	Shri. Chinna Mariyappan s/o Shri. Perumal Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
4.	11841-16	ATS	-	10.04.2003	Shri. Mariappan s/o Shri. Perumal Thevar	M/s PACL India Ltd.		0.25
		GPA	789/03	22.12.2003	Shri. Mariappan s/o Shri. Perumal Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
5.	11842-16	GPA	790/03	22.12.2003	Shri. Chinna Sundararaj s/o Shri. Mahalinga Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	928/6 925/13	0.47 0.15
		ATS	-	09.04.2003	Shri. Imanyamkanda Thalaivar s/o Shri. Navakodinarayana Thalaivar	M/s PACL India Ltd.		
6.	11853-16	ATS	-	09.04.2003	Shri. Sundar Raj s/o Shri. Perumal	M/s PACL India Ltd.	1307/2	2.90
		GPA	782/03	22.12.2003	Shri. Sundar Raj s/o Shri. Perumal	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
7.	11854-16	ATS	-	10.04.2003	Shri. Bala Subramaniyan s/o Shri. Varamuthalaivar	M/s PACL India Ltd.	925/8	0.84
		GPA	783/03	22.12.2003	Shri. Bala Subramaniyan s/o Shri. Varamuthalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		
8.	11855-16	GPA	784/03	22.12.2003	Shri. Durai Pandi s/o Shri. Rama Samy	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1311/4	0.91



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S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
					Thevar			
		ATS	-	09.04.2003	Shri. Durai Pandi s/o Shri. Rama Samy Thevar	M/s PACL India Ltd.		
9.	11916-16	GPA	772/03	14.12.2003	Shri. Selvaraj s/o Shri. Manthira Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	903/2	0.40
		ATS	-	09.04.2003	Shri. Selvaraj s/o Shri. Manthira Thevar	M/s PACL India Ltd.	935 936/3	2.85 2.00
10.	11917-16	GPA	773/03	19.12.2003	Shri. Imanyamkanda Thalaivar s/o Shri. Navakodinarayana Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	946/3B	1.63
		ATS	-	09.04.2003	Shri. Imanyamkanda Thalaivar s/o Shri. Navakodinarayana Thalaivar	M/s PACL India Ltd.		
11.	11919-16	GPA	774/03	19.12.2003	Shri. Arunachalam s/o Shri. Natarajan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	892/3	0.67
		ATS	-	09.04.2003	Shri. Arunachalam s/o Shri. Natarajan	M/s PACL India Ltd.		
12.	11920-16	GPA	775/03	19.12.2003	Shri. Ramarasa s/o Shri. Perumal Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	847	6.80
		ATS	-	09.04.2003	Shri. Ramarasa s/o Shri. Perumal Thevar	M/s PACL India Ltd.		
13.	11930-16	GPA	03/04	02.01.2004	Shri. Imanyamkanda Thalaivar s/o Shri. Navakodi Narayana	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	843/2	2.11
		ATS	-	10.04.2003	Shri. Imanyamkanda Thalaivar s/o Shri. Navakodi Narayana	M/s PACL India Ltd.		
14.	11932-16	GPA	05/04	02.01.2004	Shri. Selvaraj s/o Shri. Periyasamy Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1009/2	1.16
		ATS	-	10.04.2003	Shri. Selvaraj s/o Shri. Periyasamy Thalaivar	M/s PACL India Ltd.		
15.	11955-16	GPA	740/03	09.12.2003	Shri. Annamalaisamy s/o Shri. Palanisamy Nadar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	918/1 932/2	2.62 1.51
		ATS	-	10.04.2003	Shri. Annamalaisamy s/o Shri. Palanisamy Nadar	M/s PACL India Ltd.		
16.	11956-16	GPA	741/03	09.12.2003	Shri. Pushparaj s/o Shri. Ramasamy Nadar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	892/6 923/3	2.25 1.63
		ATS	-	08.04.2003	Shri. Pushparaj s/o Shri. Ramasamy Nadar	M/s PACL India Ltd.		
17.	11957-16	GPA	742/03	09.12.2003	Shri. Chelladurai s/o Shri. Gomathiraja Thaloivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	887/2C	0.44

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S. No	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		ATS	-	08.04.2003	Shri. Chelladurai s/o Shri. Gomathiraja Thaloivar	M/s PACL India Ltd.		
18.	11958-16	GPA	743/03	09.12.2003	Shri. Arunachala Nagaraj s/o Shri. Ponnusamy Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	883/1A	1.41
		ATS	-	08.04.2003	Shri. Arunachala Nagaraj s/o Shri. Ponnusamy Thevar	M/s PACL India Ltd.		
19.	11960-16	GPA	745/03	09.12.2003	Smt. Minnalkodi w/o Shri. Kombaiiah Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	891/3	1.14
		ATS	-	08.04.2003	Smt. Minnalkodi w/o Shri. Kombaiiah Thevar	M/s PACL India Ltd.		
20.	11961-16	GPA	757/03	17.12.2003	Smt. Thirupathi w/o Shri. Mudiappan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	891/1	2.26
		ATS	-	08.04.2003	Smt. Thirupathi w/o Shri. Mudiappan	M/s PACL India Ltd.		
21.	11963-16	GPA	748/03	09.12.2003	Smt. Mariyammal w/o Shri. Ramasamy Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	889/3 884/2A	2.58 2.08
		ATS	-	08.04.2003	Smt. Mariyammal w/o Shri. Ramasamy Thalaivar	M/s PACL India Ltd.		
22.	11964-16	GPA	749/03	09.12.2003	Shri. Swaminatha s/o Shri. Divendra Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	886 888	6.14 6.47
		ATS	-	08.04.2003	Shri. Swaminatha s/o Shri. Divendra Thalaivar	M/s PACL India Ltd.		
23.	11965-16	GPA	750/03	09.12.2003	Shri. Rajendran s/o Shri. Rathiina Samy	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	890/1 918/2 932/5	5.16 2.22 1.56
		ATS	-	08.04.2003	Shri. Rajendran s/o Shri. Rathiina Samy	M/s PACL India Ltd.		
24.	11966-16	GPA	755/03	17.12.2003	Shri. Ramaraj Thalaivar s/o Shri. Periya Samy Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	912/1	0.90
		ATS	-	08.04.2003	Shri. Ramaraj Thalaivar s/o Shri. Periya Samy Thalaivar	M/s PACL India Ltd.		
25.	11967-16	GPA	756/03	17.12.2003	Shri. Arunachalam Ashokraj s/o Shri. A.D. Anbudaiyan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	912/2	1.37
		ATS	-	08.04.2003	Shri. Arunachalam Ashokraj s/o Shri. A.D. Anbudaiyan	M/s PACL India Ltd.		
26.	11968-16	GPA	10/04	02.01.2004	Shri. Periyasamy s/o Shri. Udayar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	873/3A	0.80



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S. No	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
		ATS	-	08.04.2003	Shri. Periyasamy s/o Shri. Udaiyar	M/s PACL India Ltd.		
27.	11971-16	GPA	07/04	02.01.2004	Shri. Kanthaiya Thalawar s/o Shri. Kanthasamy Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	933	0.64
		ATS	-	10.04.2003	Shri. Kanthaiya Thalawar s/o Shri. Kanthasamy Thalaivar	M/s PACL India Ltd.		
28.	11970-16	GPA	07/04	02.01.2004	Shri. Sundar Raj s/o Shri. Gomathiraja Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	933	1.28
		ATS	-	08.04.2003	Shri. Sundar Raj s/o Shri. Gomathiraja Thalaivar	M/s PACL India Ltd.		
29.	35844-16	GPA	23/04	12.01.2004	Shri. Kulakkathar s/o Shri. Ramaiah Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	933	2.56
		ATS	-	02.05.2003	Shri. Kulakkathar s/o Shri. Ramaiah Thalaivar	M/s PACL India Ltd.		
30.	35849-16	GPA	29/04	12.01.2004	Shri. Periyasamy s/o Shri. Mahalinga Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	933	0.64
31.	11990-16	GPA	764/03	17.12.2003	Shri. Irulappaa Thevar s/o Shri. Periyasami Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	949/2	1.46
		ATS	-	09.04.2003	Shri. Irulappaa Thevar s/o Shri. Periyasami Thevar	M/s PACL India Ltd.		
32.	11991-16	GPA	765/03	17.12.2003	Shri. MahalingaThevar s/o Shri. Sivanu Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	949/2	1.46
		ATS	-	09.04.2003	Shri. MahalingaThevar s/o Shri. Sivanu Thevar	M/s PACL India Ltd.		
33.	11992-16	GPA	766/03	17.12.2003	Shri. Niraikulathu s/o Shri. Sivanu Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	949/2	1.46
		ATS	-	09.04.2003	Shri. Niraikulathu s/o Shri. Sivanu Thevar	M/s PACL India Ltd.		
34.	11993-16	GPA	767/03	17.12.2003	Shri. Subramaniyan s/o Shri. Veemathalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	887/2A	0.61
		ATS	-	09.04.2003	Shri. Subramaniyan s/o Shri. Veemathalaivar	M/s PACL India Ltd.		
35.	11996-16	GPA	771/03	19.12.2003	Shri. Ramasami Thalaivar s/o Shri. Shunmugasami Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	934/1B 934/1C	3.00 3.01
		ATS	-	09.04.2003	Shri. Ramasami Thalaivar s/o Shri. Shunmugasami Thalaivar	M/s PACL India Ltd.		



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S. No	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
36.	12013-16	GPA	761/03	17.12.2003	Shri. Pushbaraj s/o Shri. Pooludaiyar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	907/3C	2.16
		ATS	-	08.04.2003	Shri. Pushbaraj s/o Shri. Pooludaiyar	M/s PACL India Ltd.		
37.	12014-16	GPA	760/03	17.12.2003	Smt. Dhanalakshmi w/o Shri. Deivendira Pardiyan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	884/1	3.03
		ATS	-	08.04.2003	Smt. Dhanalakshmi w/o Shri. Deivendira Pardiyan	M/s PACL India Ltd.		
38.	12016-16	GPA	758/03	17.12.2003	Shri. Swaminathan s/o Shri. Sankaranarayanan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	891/2	2.26
		ATS	-	08.04.2003	Shri. Swaminathan s/o Shri. Sankaranarayanan	M/s PACL India Ltd.		
39.	26146-17	GPA	38/04	14.01.2004	Shri. Ramakrishnan s/o Shri. Ramasamy	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1008 1009/1	1.60 1.49
40.	26147-17	GPA	47/04	23.01.2004	Shri. Marisami s/o Shri. Thavasi Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	877/2	2.29
41.	26148-17	GPA	48/04	23.01.2004	Shri. Chinnaramu Thevar s/o Shri. Veliyappa Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1021/1	5.97
42.	26149-17	GPA	49/04	23.01.2004	Smt. Muthammal w/o Shri. Thavasi Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	867/2B1	6.49
43.	26150-17	GPA	50/04	23.01.2004	Shri. Periyasamy Thalaivar s/o Shri. Duraikannu Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1025/1	1.86
44.	26152-18	GPA	52/04	23.01.2004	Shri. Thalaivar s/o Shri. Navakodi Narayana Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	899/4 899/3	0.68 0.75
45.	25989-17	GPA	69/04	29.01.2004	Shri. Muthupandi s/o Shri. Shanmugaiah Thevar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	1015/2	2.34
46.	26154-17	GPA	54/04	23.01.2004	Shri. Subbiah Thalaivar s/o Shri. Subramaniye Thalaivar	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	997/1 998/1A1	6.31 3.41

From above, it is observed that the documents contained under the said MR Nos. are GPA(s) executed by different individuals in favour of different individuals, and unregistered ATS executed in favour of M/s. PACL India Limited.



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D. Impugned properties at Melamaruthappapuram Village, Tirunelveli District, Tamil Nadu

Table 11: Details of transactions in impugned properties at Melamaruthappapuram Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in encumbrance certificate	MR No.	Extent (in Acres) in MR No.
1.	Sale Deed 1917/2006 09.08.2006	503	8.605	(i) Smt. Marithai w/o. Shri. Rajendran, (ii) Smt. Madathiammal w/o. Shri. Shanmugaiah Thevar, (iii) Shri. Duraisamy s/o. Shri. Shanmugaiah Thevar. Represented through their Power Agent Attorney Shri. Murugiah.	SRSPL	Rs.1,59,750/- paid through cheque No. 111559 dated 9.8.2006 drawn on Corporation bank, Tirunelveli Branch in favour of Power Agent Attorney Shri. Murugiah. Cheque appearing in the bank statement	Vendors are absolute owners of Survey No. 503 admeasuring 2.13 Acres vide Gift Deed No. 239/1980, Sale Deed bearing no. 241 /1997 and vide Patta No. 1388 issued by the Head Quarters Depty Thesilder, Veerakeralamputhur Taluk, Tirunelveli District.	GD 239/1980 SD 241/1997	GD 239/1980 SD 241/1997 SD 1917/2006	8059-19	6.44
	Sale Deed 1997/2005 17.08.2005			(i) Shri. Maruthaooa Pandian s/o Shri. Chelliah Thevar, (ii) Smt. Vellathai w/o. Shri. Maruthapaa pandian, (iii) Shri. Chokkiya Thevar s/o. Shri. Muthiah Thevar, (iv) Shri. Kottaiya Thevar s/o. Shri. Muthiah Thevar, (v) Shri. Murugaiah and (vi) Shri. Selvam, both s/o Shri. Vellaisamy Thevar @Maruthaiah Thevar.		Rs.1,29,600/- paid through cheque No. 888012 dated 17.8.2005 drawn on Corporation bank, Tirunelveli Branch. Cheque appearing in the bank statement	Vendors are absolute owners of the property Survey No. 503 admeasuring 5.4 Acres by way of inheritance and vide Patta No. 1388 issued by the Head Quarters Depty Thesilder, Veerakeralamputhur Taluk, Tirunelveli District.	Patta No. 1388	SD 1997/2005		
	Sale Deed 2214/2005 01.09.2005			Shri. P. Ramalingam s/o Shri. Paramu Thevar		Rs. 25,800/- paid through cheque No. 887019 dated 01.09.2005 drawn on Corporation bank, Tirunelveli Branch.	Land originally belonged Late Paramu Thevar. Vide Partition Deed dated 30.10.1995 between the sons of Late Paramu Thevar, the		SD 2214/2005		



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Execute d in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in encumbrance certificate	MR No.	Extent (in Acres) in MR No.
						Cheque appearing in the bank statement	said Survey No. 503 admeasuring 1.075 Acres was allotted to the vendor Shri. P. Ramalingam s/o Shri. Paramu Thevar and joint Patta No. 1388 issued by the Head Quarters Depty Thesilder, Veerakeralamputhur Taluk, Tirunelveli District stands in the name of the vendor.				
	Deed of Release 2221/2006 14.09.2006			Shri. Kumar s/o Shri. Kottaisamy	SRSPL	Rs. 1,50,000/- paid through cheque No. 108237 dated 14.09.2006 drawn on Corporation bank, Tirunelveli Branch. Rs. 1,00,000/- paid through cheque No. 108239 dated 14.09.2006 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	-	No details of the parent document mentioned in the Deed of Release	SD 2221/2006		
	Deed of Release 2321/2006			Document not provided					SD 2321/2006		



In order to further examine the claim on the abovementioned impugned property, the Panel perused the documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 11A: Details of MR Nos., Melamaruthappapuram Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	8059-19	GPA	58/4	11.05.1998	Shri. Maruthapandian s/o Shri. Chellian	Shri. Atul Bhasin S/o Shri. Y.R.Bhasin	503	6.44

From above, it is observed that the document contained under the said MR No. is a GPA executed by Shri. Maruthapandian s/o Shri. Chellian in favour of Shri. Atul Bhasin S/o Shri. Y.R. Bhasin.

E. Impugned properties claimed at Pudur Village, Tirunelveli District, Tamil Nadu

Table 12: Details of transactions in impugned properties at Pudur Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 928/2008 22.02.2008	579	0.3	(i) (xii) Shri. Suchar Konar s/o late Shri. Arumuga Konar, (xiii) Shri. Vel Konar s/o late Shri. Arumuga Konar, (xiv) Smt. Esakkiammal w/o Shri. Karuppasamy Konar and d/o late Shri. Arumuga Konar, ... (xviii) ...	SRSPL	Rs. 1,86,474/- paid through cheque No. 636446 dated 12.09.2007 drawn on Corporation bank, Tirunelveli Branch. Rs. 8,52,904/- paid through cheque No. 636450 dated 12.09.2007 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	Vendors xii) Shri. Suchar Konar s/o late Shri. Arumuga Konar, (xiii) Shri. Vel Konar s/o late Shri. Arumuga Konar, and (xiv) Smt. Esakkiammal w/o Shri. Karuppasamy Konar and d/o late Shri. Arumuga Konar, became owner of the property in Survey No. 579 admeasuring 5.26 Acres by way of inheritance and vide Patta No. 590 issued by the Head Quarters Depty Thesilder, Triunelveli.	Patta 590	SD 928/2008	12929-16	1.01



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In order to further examine the claim on the abovementioned impugned properties, the Panel perused the documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 12A: Details of MR Nos., Pudur Village, Tirunelveli District

S. No.	MR No.	Nature of Doc.	Doc. no.	Doc. date	Executor/ Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	12929-16	GPA	413	20.06.2002	Shri. Ponraj s/o Shri. Stephan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh	579	1.01
		ATS	-	08.04.2002	Shri. Ponraj s/o Shri. Stephan	M/s. PACL India Limited		
		Affidavit	-	09.05.2002	Shri. Ponraj s/o Shri. Stephan	M/s. PACL India Limited		
		Indemnity Bond	-	20.06.2002	Shri. Ponraj s/o Shri. Stephan	M/s. PACL India Limited		
		SPA	-	08.04.2002	Shri. Ponraj s/o Shri. Stephan	Shri. Tarlochan Singh s/o Shri. Sadhu Singh		

From above, it is observed that the documents contained under the said MR No. 12929-16 contains a GPA and SPA executed by Shri. Ponraj s/o Shri. Stephan in favour of Shri. Tarlochan Singh s/o Shri. Sadhu Singh, and ATS, Affidavit and Indemnity bond executed by Shri. Ponraj s/o Shri. Stephan in favour of M/s. PACL India Limited.



F. Impugned properties claimed at Therkku Sankarankovil, Tirunelveli District, Tamil Nadu

Table 13: Details of transactions in impugned properties at Therkku Sankarankovil Village, Tirunelveli District

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	Executed by (Vendor/s)	Executed in favor of	Sale Consideration, Payment evidence	Vendors Title Deed	Parent Title Deed	Entries in EC	MR No.	Extent (in Acres) in MR No.
1	Sale Deed 447/2008 20.02.2008	126/3	0.91	(i) ...	SRSPL	Rs. 5,02,232/- paid through cheque No. 636404 dated 27.08.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (iv) Smt. Sundarachi Ammal became owner of the said properties by way of inheritance and vide Patta No. 557 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk.	Patta No. 557	SD 447/2008	9711-18	0.91
		131/1	0.57	...							0.57
		132/3	0.84	(iv) Smt. Sundarachi Ammal w/o. Late Muthiah Servai.							0.84
		133/3	0.48								0.47
2	Sale Deed 450/2008 20-02-2008	125/5	1.285	(i) Shri. Azhakumuthu Servai s/o. Shri. Shanmugam Servai,	SRSPL	Rs. 9,42,296/- paid through cheque No. 125745 dated 22.08.2007 drawn on Corporation bank, Tirunelveli Branch.	Vendor viz. (i) Shri. Azhakumuthu Servai became owner of the following properties by way of inheritance and vide Patta No. 1516 issued by the Head Quarters Deputy Thesilder, Sankarankoil Taluk:	Patta No. 1516	SD 450/2008	7838-18	1.29
		125/8	1.705	(ii) Shri. Sankarapandian s/o. Shri. Mutthu Servai, ... (iv)...							1.71



		126/2B	0.39				Vendor viz. (ii) Shri. Sankarapandian became owner of the said property Survey No. 126/2B admeasuring 0.39 Acres by way of inheritance from his wife Late Villiammal and vide Patta Nos. 581, 2121 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 2121		9711-18	0.37
3	Sale Deed 451/2008 20.02.2008	130/1	2.47	(i) Shri. Sankarapandian s/o. Shri. Mutthu Servai, ... (x) ...	SRSPL	Rs. 5,98,185/- paid through cheque No. 125745 dated 22.08.2007 drawn on Corporation bank, Tirunelveli Branch. Rs. 3,28,143/- paid through cheque No. 636404 dated 27.08.2007 drawn on Corporation bank, Tirunelveli Branch. Cheques appearing in the bank statement	Vendor viz. (i) Shri. Sankarapandian became owner of the said properties by way of inheritance and vide Patta No. 4254 issued by the Head Quarters Depty Thesilder, Sankarankoil Taluk.	Patta No. 4254	SD 451/2008		2.87



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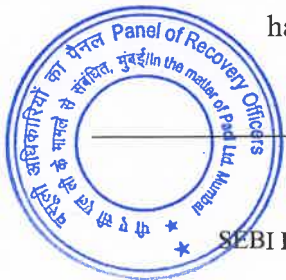
In order to further examine the claim on the abovementioned impugned properties, the Panel perused the documents covered under the corresponding MR Nos. seized by the CBI from the possession of PACL Ltd. and thereafter attached by the Committee. Details of the MR documents examined by the Panel are as below:

Table 13A: Details of MR Nos., Therkku Sankarankovil Village, Tirunelveli District

S. No.	MR NO.	Nature of Doc.	Doc. no.	Doc. date	Executor/Vendor	Vendee / Buyer / Purchaser	Survey No.	Extent (in Acres)
1	7838-18	Sale Deed	1897/04	17.09.2004	Shri. Alagumuthu s/o Late Maruthappan Servai and Shri. Kaliyammal w/o Late Shanmugam Servai	Shri. Mahinder singh s/o Shri. Gopi Lal	125/5 125/8	1.29 1.71
2	7839-18	Sale Deed	1896/04	17.09.2004	Smt. Sundaratchi w/o Lt. Muthaiah Servai, Shri. Velsam s/o Late Shanmugam Servai & 14 others	Shri. Pradeep Kumar s/o Shri. Moolchand	131/1 132/3 133/3	0.57 0.84 0.47
3	9711-18	Sale Deed	1708/04	31.08.2004	Smt. M. Sundaratchi w/o late Muthaiah Servai, Shri. Sankarapandian s/o. Shri. Mutthu Servai & 04 others	Shri. Lalit Sharma s/o Shri. Ram Gopal Sharma	126/2B 126/3 130/1	0.37 0.91 2.87

27.1 It is noted that the vendors in the abovementioned sale deeds under the MR Nos. mentioned at Table 13A, owned the respective properties by inheritance from their ancestors. Further, upon perusal of the EC furnished by the Applicant for the period January 01, 1975 to April 14, 2026 in respect of properties at Therkku Sankarankovil Village, it is noted that the aforementioned sale deeds under the MR documents are duly reflected in the EC.

27.2 It is noteworthy to mention here that the abovementioned title deeds i.e., Sale Deeds bearing nos. 1708/04, 1896/04 and 1897/04 in the MR Nos. i.e., 9711-18, 7839-18 and 7838-18, have been seized by CBI from the possession of PACL Ltd. and therefore, have been attached by the Committee. At this juncture, reference can be made to the



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order dated August 22, 2014 passed by SEBI, wherein observations with respect to the *modus operandi* adopted by PACL Ltd. have been made which are as under:

".....At this stage, I note from the details submitted during the course of investigation that PACL had mobilized funds from its customers to the tune of ₹ 44,736 crores till March 31, 2012. Further by its own admission, it has collected ₹ 4364,78,08,345 from 39,97,357 customers during the period of February 26, 2013 to June 15, 2014. The total amount mobilized comes to a whopping 49,100 crore. This figure could have been even more if PACL would have provided the details of the funds mobilized during the period of April 01, 2012 to February 25, 2013. The collection of such huge funds suggests that PACL has many more customers than the stated 1.22 crore. In this regard, I also refer to the proposal of PACL and its directors as forwarded to SEBI through their advocates and note that it has 4,63,13,342 customers to whom the land has not yet been allotted. Thus, a quick calculation of the total number of the customer of PACL comes to around 5.85 crore which includes the customers who said to have been allotted land and who are yet to be allotted the land....." (at pp. 71-72)

".....From the above, it is noted that PACL has very limited stock of lands in its name and that most of the lands are held through General Power of Attorney/through Agreement to Sale/through associate companies. PACL in its reply has informed that the said associate companies are controlled by its friends and nears and dears of the management of PACL. I observe that PACL enters into an MoU with the associate companies for the purchase of land. The MoU inter-alia, states that as PACL is unable to purchase the land in its own name beyond certain limits due to the land laws and other applicable laws of the land in different States of the country, PACL has nominated the associate company to purchase the land for PACL and get the sale deed executed in the name of associate company....." (at p. 80)

27.3 Further, reference can also be made to the aforementioned SEBI order dated August 22, 2014 wherein PACL Ltd. itself, during the proceeding before the Whole Time Member, SEBI, had admitted that for the purpose of its business, it was buying lands through its agents. The same is reproduced as under:



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“.....PACL uses agents to carry out its business. Depending on the years of experience, the agents are entitled to various designations. The agent in turn engages field associates who interact with the potential customers and explain the plans for purchase of land. As the business of PACL is propelled through word-of-mouth, it is important to incentivize the agents and field associates appropriately by way of commission. In the process, PACL often makes payment to the field associates directly as per the understanding with the agent in order to ensure that the field associates are not deprived of their commission, after deducting the requisite amount from the commission paid to the relevant agents. The large amount of commission, reflected in the balance sheet not only constitutes the commissions paid to the agents/ field associates, but also other commissions paid in relation to the procurement of the land by PACL and sale of spaces in residential and commercial projects developed by PACL in the ordinary course of business” (at p. 26-27)

27.4 In view of the above and considering the very fact that the abovementioned Sale Deeds under MR. Nos. 7838-18, 7839-18 and 9711-18 were in possession of PACL Ltd., it is inferred that the purchaser in the said Sale Deeds had purchased the relevant impugned properties mentioned therein on behalf of PACL Ltd. as its agent/employee/associate, as PACL Ltd. was unable to own lands in its own name beyond certain limits due to the land laws of the country. Hence, the actual beneficial owner of the said impugned properties was no other than PACL Ltd.

27.5 It is pertinent to note that vendors/sellers in the sale deeds under the MR documents and from whom the Applicant acquired the impugned properties owned their respective properties by way of inheritance from their ancestors. Further, the vendors under the MR documents and from whom the Applicant has claimed to have acquired the impugned properties are the either the same individuals or appear to be the decedents/relatives of such individuals. On perusing the EC records for the said survey numbers, it is observed that the sale deeds in the MR documents as well as the sale deeds through which the Applicant acquired the impugned properties are duly entered and find mention in the EC. Also, it is observed that the entry in the EC for the sale



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deeds in the MR documents (i.e. Sale deed Nos. 1708/04, 1896/04 and 1897/04) preceeds the entry for the sale deeds through which the Applicant acquired the impugned properties (i.e. Sale deed Nos. 447/08, 450/08 and 451/08). However, there is nothing on record to show that the properties described/mentioned/dealt with in the MR documents and ones which form a part of the sale deeds through which the Applicant is claiming title, are distinct from each other or form different part of the same larger land parcel. Thus, in the absence of any documentary evidence to show otherwise, it can be inferred that the land parcels in the MR documents under the said survey numbers and the land parcels mentioned in the sale deeds executed in favour of the Applicant are the same land parcels under the said survey nos. i.e. Survey Nos. mentioned at Table 13. In view thereof, the Panel observes that there is no material on record which explains how title in the said impugned properties could be transferred to the Applicant in the year 2008 when the title had already been conveyed to the purchasers in the MR documents i.e., agent/employee/associate of PACL Ltd in the year 2004 itself. Here reliance is placed on the legal maxim *nemo dat quod non habet*, i.e. “no one can confer a better title than what he himself has” and therefore, a vendor cannot transfer a title to the purchaser better than what he/she possesses. This indicates that the Applicant’s vendors no longer held any valid title in the impugned properties in year 2008 to convey when they transacted in the impugned properties with the Applicant. Assuming without admitting that the submissions of the Applicant are correct, the fact that the purchasers under the Sale Deeds in the MR documents i.e., the agent/employee/associate of PACL Ltd. had acquired the same impugned properties in the year 2004 vide registered sale deeds cannot be denied.

27.6 In view of the above, the Panel is of the view that the Applicant’s I.A., in respect of the impugned properties at Survey nos. mentioned at Table 13 above, is liable to be disallowed.



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28. In order to ascertain ownership of the impugned properties at various Survey Nos. mentioned at Tables 08 -12 above, the documents furnished before the Panel of Recovery Officers namely, Applicant's Sale Deed, the parent documents by which the said impugned property devolved upon the predecessors-in-title to the Applicant, the Applicant's bank statements evidencing payment of sale consideration and the EC reflecting entries of the said transactions were examined. Upon examination of the said documents in respect of each of the remaining impugned properties, it is observed that the said documents establish the chain of title from the Vendor(s) to the Applicant, and that the entries in the EC as well as the payment particulars are found to be consistent with, and duly corroborated by, the underlying Sale Deeds/Deeds of Release. Accordingly, a detailed transaction-wise analysis for some of the impugned properties situated at different villages in Tirunelveli District is as under:

28.1 Impugned properties mentioned at Table 08, Serial No. 01, situated at Madhavakurichi Village, Tirunelveli District, Tamil Nadu: The Applicant/SRSPL (Vendee) acquired the said properties (Survey No. 1769/1A admeasuring 0.96 Acres, Survey No. 1730/1 admeasuring 3.08 Acres, Survey No. 1767/1 admeasuring 1.23 Acres, etc.) through Sale Deed No. 3242/2006 dated December 15, 2006, from Shri P.M. Joseph, S/o Shri P.J. Mathew (Vendor), for a total sale consideration of Rs. 5,22,900/-, paid through Cheque No. 131569 dated October 18, 2005, drawn on Corporation Bank, Tirunelveli Branch.

- a) Vendor's title: The Vendor is observed to have become the owner of the conveyed impugned properties by virtue of two earlier Sale Deeds, namely (i) 893/1996 dated April 02, 1996, and (ii) 575/1997 dated March 13, 1997. These parent documents were examined to establish the ownership of the Vendor (predecessor-in-title to the Applicant).
- b) Payment: The Applicant's bank statement was examined, and Cheque No. 131569 was found duly reflected therein.



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- c) Revenue records: The EC in respect of the conveyed impugned properties was examined, and entries for both the parent Sale Deeds and the Applicant's Sale Deed were found duly reflected in the EC.

28.2 Impugned properties mentioned at Table 08, Serial No. 15, situated at Madhavakurichi Village, Tirunelveli District, Tamil Nadu: The Applicant/SRSPL (Vendee) acquired the said properties (Survey No. 1778/1 admeasuring 1.36 Acres and Survey No. 1779/1 admeasuring 2.07 Acres) through Sale Deed No. 893/2008 dated February 19, 2008, from Shri Velayutham S/o Shri Duraipandi @ Karaiyalan (Vendor), for a total sale consideration of Rs. 2,98,000/-, paid through Cheque No. 106689 dated October 31, 2006, drawn on Corporation Bank, Tirunelveli Branch.

- a) Vendor's title: The Vendor is observed to have become the owner of the conveyed impugned properties by way of inheritance, as evidenced by Patta No. 1365 issued by the Headquarters Deputy Tahsildar, Tirunelveli. The said Patta 1365 reflects Shri Duraipandi @ Karaiyalan, as holder of Survey No. 1778/1 admeasuring 1.359 Acres and Survey No. 1779/1 admeasuring 2.076 Acres, of which the properties conveyed to the Applicant form part of.
- b) Payment: The Applicant's bank statement was examined, and the said Cheque No. 106689 was found duly reflected therein.
- c) Revenue records: The EC in respect of the conveyed impugned properties was examined, and the entry for the Applicant's Sale Deed was found duly reflected in the EC.

28.3 Impugned properties mentioned at Table 10, Serial No. 4, situated at Sayamalai Village, Tirunelveli District, Tamil Nadu: The Applicant/SRSPL (Vendee) acquired the said properties (Survey No. 912/2 admeasuring 1.03 Acres, Survey No. 933/3 admeasuring 2.40 Acres, Survey No. 998/1A1 admeasuring 3.41 Acres, and Survey No. 997/1 admeasuring 6.31 Acres) through Sale Deed No. 125/2008 dated January 25, 2008, from (i) Shri Gurusamy Thevar S/o Shri Arunagiri Thevar, (ii) Shri Kanthiah



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Thalaivar S/o Late Kanthasamy Thalaivar, (iii) Shri Chinna Ramasamy S/o Late Mahalinga Thalaivar, (vii) Shri Raja Thalaivar S/o Shri Krishnan, (viii) Smt. Ramalakshmi, and (ix) Smt. Kaliasammal, both D/o Late Subbiah Thevar (Vendors), for a total sale consideration of Rs. 5,51,078/-, paid through Cheque No. 117588 dated April 13, 2007, drawn on Corporation Bank, Tirunelveli Branch. In order to verify the said transaction and the Vendors' title thereto, the following was examined:

- a) Vendors' title: Survey No. 912/2 - Vendor (i) Shri Gurusamy Thevar, is observed to have become the owner of Survey No. 912/2 by way of inheritance, as evidenced by Patta No. 1342 issued by the Headquarters Deputy Tahsildar, Sankarankoil Taluk which reflects him as holder of Survey No. 912/2 admeasuring 1.37 Acres. Survey No. 933/3 - Vendors (ii) Shri Kanthiah Thalaivar and (iii) Shri Chinna Ramasamy s/o. Late Mahalinga Thalaivar are observed to have become owners of Survey No. 933/3 by way of inheritance, as evidenced by Patta No. 1343 issued by the Headquarters Deputy Tahsildar, Sankarankoil Taluk, which reflects Shri Kanthiah Thalaivar and Shri. Mahalinga Thalaivar as holder of Survey No. 933/3 admeasuring 2.40 Acres. Survey Nos. 998/1A1 and 997/1 - Vendor (vii) Shri Raja Thalaivar, is observed to have become owner of Survey Nos. 998/1A1 and 997/1 by way of inheritance, as evidenced by Patta No. 1224 reflecting Survey No. 998/1A1 admeasuring 3.41 Acres, and Patta No. 811 reflecting Survey No. 997/1 admeasuring 6.31 Acres, both in the name of Shri Raja Thalaivar.
- b) Payment: The Applicant's bank statement was examined, and the said Cheque No. 117588 was found duly reflected therein.
- c) Revenue records: The EC in respect of the conveyed impugned properties was examined, and the entry for the Applicant's Sale Deed was found duly reflected in the EC.

28.4 Impugned properties mentioned at Table 11, Serial No. 1, situated at Melamaruthappapuram Village, Tirunelveli District, Tamil Nadu: The



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Applicant/SRSPL (Vendee) acquired the said property (Survey No. 503 admeasuring 8.605 Acres vide the following:-

- Sale Deed No. 1917/2006 dated August 09, 2006 from (i) Smt. Marithai W/o Shri Rajendran, (ii) Smt. Madathiammal W/o Shri Shanmugaiah Thevar, and (iii) Shri Duraisamy S/o Shri Shanmugaiah Thevar (Vendors), represented through their Power of Attorney holder, Shri Murugiah, for a sale consideration of Rs. 1,59,750/-, paid through Cheque No. 111559 dated August 09, 2006, drawn on Corporation Bank, Tirunelveli Branch, in favour of the said Power of Attorney holder.
 - a) Vendors' title: The Vendors are stated to be the absolute owners of Survey No. 503 admeasuring 2.13 Acres, by virtue of Gift Deed No. 239/1980 (in favour of Vendor (ii), for 0.2 Acres) and Sale Deed No. 241/1997 (in favour of Vendor (i), for 4.30 Acres), read with Patta No. 1388 issued by the Headquarters Deputy Tahsildar, Veerakeralamputhur Taluk, Tirunelveli District.
 - b) Payment: The Applicant's bank statement was examined, and Cheque No. 111559 was found duly reflected therein.
 - c) Revenue records: The EC was examined, and entries for parent documents i.e., Gift Deed No. 239/1980 and Sale Deed No. 241/1997, and Applicant Sale Deed No. 1917/2006 were found duly reflected in the EC.
- Sale Deed No. 1997/2005 dated August 17, 2005: from (i) Shri Maruthappa Pandian S/o Shri Chelliah Thevar, (ii) Smt. Vellathai W/o Shri Maruthappa Pandian, (iii) Shri Chokkiya Thevar S/o Shri Muthiah Thevar, (iv) Shri Kottaiya Thevar S/o Shri Muthiah Thevar, (v) Shri Murugaiah, and (vi) Shri Selvam, both s/o Shri Vellaisamy Thevar @ Maruthaiah Thevar (Vendors), for a sale consideration of Rs. 1,29,600/-, paid through Cheque No. 888012 dated August 17, 2005, drawn on Corporation Bank, Tirunelveli Branch.
 - a) Vendors' title: The Vendors are stated to be the absolute owners of Survey No. 503 admeasuring 5.4 Acres, by way of inheritance, as evidenced by Patta No.



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1388 issued by the Headquarters Deputy Tahsildar, Veerakeralamputhur Taluk, Tirunelveli District, which reflect Vendors (i) and (ii), together with Shri P. Ramalingam S/o Shri Paramu Thevar, as Patta holders.

- b) Payment: The Applicant's bank statement was examined, and Cheque No. 888012 was found duly reflected therein.
- c) Revenue records: The EC was examined, and the entry for Sale Deed No. 1997/2005 was found duly reflected in the EC.

➤ Sale Deed No. 2214/2005 dated September 01, 2005: from Shri P. Ramalingam S/o Shri Paramu Thevar (Vendor), for a sale consideration of Rs. 25,800/-, paid through Cheque No. 887019 dated September 01, 2005, drawn on Corporation Bank, Tirunelveli Branch.

- a) Vendor's title: The land is stated to have originally belonged to Late Paramu Thevar. Vide Partition Deed dated October 30, 1995, between the sons of Late Paramu Thevar, Survey No. 503 admeasuring 1.075 Acres was allotted to the Vendor, and joint Patta No. 1388 (the same Patta referred to above in Sale Deed No. 1997/2005) stands in his name.
- b) Payment: The Applicant's bank statement was examined, and Cheque No. 887019 was found duly reflected therein.
- c) Revenue records: The EC was examined, and the entry for Sale Deed No. 2214/2005 was found duly reflected at Vol. XVI, pg. 269 (Entry No. 25).

➤ Deed of Release No. 2221/2006 dated September 14, 2006: SRSPL obtained a release of rights over Survey No. 503 from Shri Kumar S/o Shri Kottaisamy, for a total consideration of Rs. 2,50,000/-, paid through two cheques, (i) Cheque No. 108237 dated September 14, 2006 for Rs. 1,50,000/-, and (ii) Cheque No. 108239 dated September 14, 2006 for Rs. 1,00,000/-, both drawn on Corporation Bank, Tirunelveli Branch.



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- a) Vendor's title: No parent title particulars are mentioned in the release deed.
 - b) Payment: The Applicant's bank statement was examined, and both cheques were found duly reflected therein.
 - c) Revenue records: The EC was examined, and the entry for Deed of Release No. 2221/2006 was found duly reflected therein.
- Deed of Release No. 2321/2006: The underlying document has not been furnished. The EC was examined, and the entry for Deed of Release No. 2321/2006 was found duly reflected therein.

It is pertinent to note that extent of 8.605 Acres in Survey No. 503 already stands fully accounted for under the abovementioned Sale Deed Nos. 1917/2006, 1997/2005 and 2214/2005 and it is understood that the land extent released, vide the Release Deed Nos. 2221/2006 and 2321/2006, in favour of the Applicant is over and above the extent claimed by the Applicant.

29. It is pertinent to mention here that a similar pattern for examination of the documentary evidence namely, the Sale Deed/Deed of Release executed in favour of the Applicant, the Vendor's title deed, the parent title documents through which title devolved upon the Vendor as predecessor-in-title of the Applicant has been examined. Furthermore, the corresponding entries reflecting the said transactions in the EC and the Applicant's bank statement, to verify that the sale consideration recorded in the respective Sale Deed/Deed of Release stands duly reflected therein has been followed in respect of each the remaining/other impugned properties as well. For the sake of brevity, a detailed transaction-wise analysis on the same lines as set out hereinabove has not been separately reproduced for each of the remaining impugned properties. However, it is clarified that the same exercise of verification has been undertaken in respect of each and every impugned property forming part of the present I.A.,



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and the property-wise/village-wise findings of the Panel arrived at pursuant to such verification are mentioned in the direction part of this order.

SPECIFIC FINDINGS OF THE PANEL FOR CERTAIN SURVEY Nos.

Impugned properties at Madhavakurichi Village, Tirunelveli District, Tamil Nadu

30. With respect to the impugned property at Survey No. 1629 admeasuring 5.04 Acres situated at Madhavakurichi Village, Tirunelveli District, it is noted that no MR No. has been submitted by the Applicant. Further, the database maintained by the Committee was also examined and no entry in respect of the impugned property at Survey No. 1629 finds any mention in the said database. However, on perusal of the furnished EC for the period January 01, 1995 to April 26, 2026, it is noted that an entry having no. 14/2022 dated August 03, 2022 against PACL Ltd with remarks '*Lists entries involving PACL Ltd and official correspondance referencing CBI LETTE NO.2000 RC BD 1/2014/E/0004/CBI/BS 7FC /NEW DELHI DATED 14.05.2018*' encumbrancing the impugned Survey No. 1629 to the extent of 02 Hectare (04.94 Acres) is observed. Thus, even though there is no MR document available on record, it is established from the EC that the impugned property at Survey No. 1629 is attached as the same has been attached *prima facie* being a PACL property. In order to ascertain ownership of the Applicant in the said Survey No. 1629, the documents furnished before the Panel of Recovery Officers namely, Applicant's Sale Deed, the parent documents by which the said impugned property devolved upon the predecessors-in-title to the Applicant, the Applicant's bank statements evidencing payment of sale consideration were examined, the details of which are described at Table 08, Serial No. 11. It is observed that the said documents establish the chain of title from the Vendor(s) to the Applicant which is duly reflected in the EC, and that the payment particulars are found to be consistent with, and duly corroborated by, the underlying bank statements produced by the Applicant. In view of the above, the Panel is of the view that the claim of the Applicant in respect of said impugned property at Survey No. 1629 deserved to be allowed to the extent attached in the EC entry showing attachment. i.e, 02 Hectare (04.94 Acres).



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31. With respect to the impugned property at Survey No. 1646/2, admeasuring 0.08 Acres, situated at Madhavakurichi Village, Tirunelveli District, claimed vide Deed of Exchange dated August 27, 2012 bearing no. 5341/2012 under MR No. 12017-16, it is observed that in addition to GPA, ATS, Affidavite, Indemnity Bond, SPA, Possession Certificate and Will executed by one Shri. N. Ramasubbu s/o Shri. Narayanasamy in favour of either M/s. PACL India Limited or Shri. Tarlochan Singh, the said MR No. 12017-16 also contain a Sale Deed dated March 25, 1994 bearing no. 512/1994 executed in favour of Smt. Julie w/o Shri. K. T. Xavier by one Shri. Sankara Narayanan conveying his ancestral property at Survey No. 1646/2 admeasuring 2.89 Acres. Upon perusal of the EC furnished by the Applicant for the period January 01, 1995 to April 26, 2026 in respect of properties at Madhavakurichi Village, an entry for a Sale Deed No. 2656/2003 reveals subsequent sale of the said property by Smt. Julie to one Shri. N. Ramasubbu, the same individual who is observed to have executed the abovementioned GPA, ATS, Affidavite, Indemnity Bond, SPA, Possession Certificate and Will under the said MR No. 12017-16 in favour of either M/s. PACL India Limited or Shri. Tarlochan Singh. Furthermore, as detailed in Table 08, Serial No. 19, it is noted that the Applicant and the predecessors-in-title to the Applicant acquired the said impugned property vide the abovementioned Deed of Exchange and Sale Deed No. 6613/2010, respectively, which are observed to be duly entered in the EC. Here, it is important to note that the entry in the EC for the sale deed in the MR document preceeds the entry for the sale deed and Deed of Exchange through which the predecessors-in-title to the Applicant and the Applicant, respectively, acquired the impugned property. Moreover, there is nothing on record to either show the flow of chain of title from Shri. N. Ramasubbu to the predecessors-in-title to the Applicant or that the property described/mentioned/dealt with in the MR documents and the sale deed of the predecessors-in-title to the Applicant are distinct from each other or different part of the same larger land. In view of the above, the Panel is not in a position to decide on the claim of the Applicant, and therefore, the present I.A. qua Survey No. 1646/2 stands disposed of without any direction.



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32. With respect to the impugned property at Survey No. 1719/1, admeasuring 3.58 Acres, situated at Madhavakurichi Village, Tirunelveli District, vide Sale Deed under MR No. 11936-16, upon examination of the database maintained by the Committee, it is observed that the same Survey No. under the same MR No. was also the subject matter of an objection petition filed earlier by M/s. Techno Electric & Engineering Co. Ltd. (hereinafter referred to as "**M/s. Techno**"), for land extent of 2.84 Acres in Survey No. 1719/1, which M/s. Techno had claimed to have purchased from the Applicant vide Sale Deed dated May 18, 2011, bearing No. 3309/2011. The said matter was decided vide order dated April 08, 2025 in File No. SEBI/PACL/OBJ/AR/00070/2024 by the Recovery Officer attached to the PACL Committee, and on examining the material available on record, the said objection was allowed. Thereafter, the Nodal Officer-cum-Secretary to the Committee has even issued a communication dated May 15, 2025 to M/s Techno in respect of land to the extent of 2.84 Acres in Survey No. 1719/1 under MR No. 11936-16 confirming that the encumbrance/attachment of PACL over the said impugned property stands withdrawn and further issued 'No Objection' in favor of M/s Techno to deal with the said impugned property. In view of the same, the attachment of the said impugned property at Survey No. 1719/1, admeasuring 2.84 Acres under MR No. 11936-16, no longer subsists with the Committee. In view of the same, the claim of the Applicant in respect of said impugned property at Survey No. 1719/1 as described at table Table 08, Serial No. 12 established in favour of the Applicant basis examination of the documents furnished before the Panel of Recovery Officers namely, Applicant's Sale Deed, the parent documents by which the said impugned property devolved upon the predecessors-in-title to the Applicant and the Applicant's bank statements evidencing payment of sale consideration, can be allowed only to the extent remaining i.e., 0.74 Acres (3.58 Acres – 2.84 Acres) attached under MR No. 11936-16.

33. With respect to the impugned property at Survey Nos. 1751/1A admeasuring 1.82 Acres and 1751/1B admeasuring 1.82 Acres situated at Madhavakurichi Village, Tirunelveli District,



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vide Sale Deed under MR No. 13363-16, upon examination of the database maintained by the Committee, it is observed that the same Survey Nos. i.e., 1751/1A admeasuring 1.82 Acres and 1751/1B admeasuring 1.85 Acres, under the same MR No. were also the subject matter of another objection petition earlier filed by M/s. Techno which it had claimed to have purchased from the Applicant vide two separate Sale Deeds dated April 26, 2011 and September 09, 2011, bearing Nos. 2692/2011 and 6007/2011, respectively. The said matter was decided vide order dated April 16, 2025 in File No. SEBI/PACL/OBJ/NS/00071/2024 by the Recovery Officer, and on examining the material available on record, the said objection was allowed. Thereafter, the Nodal Officer-cum-Secretary to the Committee has even issued a communication dated June 10, 2025 to M/s Techno in respect of the said Survey Nos. 1751/1A and 1751/1B admeasuring total 3.67 Acres (1.82 Acres + 1.85 Acres) under MR No. 13363-16 confirming that the encumbrance/attachment of PACL over the said impugned property stands withdrawn and further issued 'No Objection' in favor of M/s Techno to deal with the said impugned property. Thus, the attachment of the said impugned properties no longer subsists with the Committee. In view of the same, the Panel is of the view that the claim of the Applicant in respect of impugned properties at Survey Nos. 1751/1A admeasuring 1.82 Acres and 1751/1B admeasuring 1.82 Acres under MR No. 13363-16 deserved to be rejected as the same has become infructuous.

34. Although pursuant to the discussion held during the hearing, on being advised to provide clarification regarding the properties further sold by it but included in the claimed impugned properties in the present I.A., the Affidavit (referred to at para 24 above) filed by the Applicant in this regard did not disclose the further sale of the abovementioned Survey Nos. 1719/1, 1751/1A and 1751/1B.

Impugned properties at Ettankulam Village, Tirunelveli District, Tamil Nadu

35. Upon perusal of the Sale Deeds under MR No. 15364-18, it is observed that they pertain to certain properties other than the impugned property at Survey No. 232/2 situated at



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Ettankulam Village, Tirunelveli District. In view of the same, the database maintained by the Committee was examined, but no entry pertaining to the said survey no. finds any mention therein. Further, the EC furnished by the Applicant for the period January 01, 1975 to April 14, 2026 in respect of the impugned property at Survey No. 232/2 at Ettankulam Village, was also examined, and no entry of any attachment is observed therein. In the absence of any documentary evidence available on record of the attachment of the impugned property at Survey No. 232/2, the Panel is not in a position to decide on the claim of the Applicant, and therefore, the present I.A., *qua* Survey No. 232/2, stands disposed of without any direction.

Impugned properties at Mela Ilathaikulam Village, Tirunelveli District, Tamil Nadu

36. With respect to the impugned property at Survey No. 264 admeasuring 6.57 Acres situated at Mela Ilathaikulam Village attached under MR No. 7869-18 claimed vide Sale Deed dated June 10, 2005 bearing no. 773/2005, it is noted that the same property was also the subject matter of a recommendation/order dated February 29, 2024 passed by Shri R.S. Virk, District Judge (Retd.) in File no. 1250 in case of M/s Unosun Solar Private Limited wherein the objection was adjudicated on merits and was allowed. It is further noted that the Hon'ble Supreme Court, vide order dated November 12, 2025, has even affirmed / allowed the application (I.A Nos. 143221 of 2025 and 143222 of 2025) filed by M/s Unosun Solar Private Limited seeking affirmation of the aforementioned order dated February 29, 2024 passed by Shri R.S. Virk, District Judge (Retd.). Thereafter, the Nodal Officer-cum-Secretary to the Committee has even issued a communication dated July 21, 2026 to M/s Unosun Solar Private Limited confirming that the encumbrance/attachment of PACL over the said impugned property stands withdrawn and further issued 'No Objection' in favor of M/s Unosun Solar Private Limited to deal with the said impugned property as it may deem fit. In view of the same, the attachment of the said impugned property at Survey No. 264 admeasuring 6.57 Acres under MR No. 7869-18 no longer subsists with the Committee. Upon seeking clarification regarding its claim in the said impugned property at Survey No. 264 admeasuring 6.57 Acres under MR No. 7869-18, the AR, vide email dated August 19,



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2026, clarified the Applicant's position regarding the abovementioned property at Survey No. 264 admeasuring 6.57 Acres. The AR submitted that while the said land was included in the present proceedings, it was referenced solely to highlight *bona fide* sale made by the Applicant to third parties for valuable consideration. Accordingly, this 6.57-acre tract does not form part of the Applicant's actual claim, and no relief is sought in respect of it. The property was included in the Applicant's list of assets purely to ensure a clean title for its purchaser. Thus, it is confirmed by the Applicant and has been observed from the foregoing that the attachment of the said impugned properties no longer subsists with the Committee. In view of the same, the Panel is of the view that the claim of the Applicant in respect of impugned property at Survey No. 264, admeasuring 6.57 Acres under MR No. 7869-18 deserved to be rejected as the same has become infructuous.

Impugned properties at Sayamalai Village, Tirunelveli District, Tamil Nadu

37. With respect to the impugned property at Survey No. 933/3 admeasuring 2.4 Acres situated at Sayamalai Village, it is noted that MR No. 11970-16 (*submitted by the Applicant*) and MR Nos. 11971-16, 35844-16 and 35849-16 (*as mentioned in the impugned order dated July 31, 2023*) in fact cover Survey No. 933 (*and not Survey No. 933/3*) admeasuring 0.64 Acres, 1.28 Acres, 2.56 Acres and 0.64 Acres, respectively. Further, the database maintained by the Committee was also examined and no entry in respect of the impugned property at Survey No. 933/3 finds any mention in the said database. However, on perusal of the furnished EC for the period January 01, 1995 to April 26, 2026, an entry having no. 18/2022 dated August 03, 2022 against PACL Ltd with remarks '*Lists entries involving PACL Ltd and official correspondance referencing CBI LETTER NO.2000 RC BD 1/2014/E/0004/CBI/BS7FC/NEW DELHI dated 14.05.2018*' encumbrancing the impugned Survey No. 933/3 is observed. However, the specific land measurements for the said impugned property have not been explicitly mentioned in the said list. Thus, even though there is no MR document available on record, it is established from the EC that the impugned property at Survey No. 933/3 is attached as the same has been *prima facie* attached as PACL



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property. In order to ascertain ownership of the Applicant in the said Survey No. 933/3, the documents furnished before the Panel of Recovery Officers namely, Applicant's Sale Deed, the parent documents by which the said impugned property devolved upon the predecessors-in-title to the Applicant, the Applicant's bank statements evidencing payment of sale consideration were examined, the details of which are described at Table 10, Serial No. 04. It is observed that the said documents establish the chain of title from the Vendor(s) to the Applicant which is duly reflected in the EC, and that the payment particulars are found to be consistent with, and duly corroborated by, the underlying bank statements produced by the Applicant. In view of the above, the Panel is of the view that the claim of the Applicant in respect of said impugned property at Survey No. 933/3 deserved to be allowed.

Impugned properties at Melamaruthappapuram Village, Tirunelveli District, Tamil Nadu

38. Vide email dated August 09, 2026, the AR submitted that the Applicant had purchased Survey No. 592/2 admeasuring 2.57 Acres through Sale Deed 927/2008, but its claim was inadvertently omitted from the original claim i.e., the said survey number was not a part of the OP before Mr. R.S. Virk, District Judge (Retd.) and therefore, not adjudicated in the impugned order dated July 31, 2023 (as reproduced in Annexure 1). Considering that the present proceeding is strictly limited to the claims made in the impugned order dated July 31, 2023, the Panel is of the view that this new claim i.e., claim in respect of the property at Survey No. 592/2 admeasuring 2.57 Acres vide Sale Deed 927/2008 (MR. No. 13528-18), by the Applicant cannot be considered at this stage and the Applicant may file a fresh objection in lines with the Public Notice dated November 25, 2024 with the Panel of Recovery Officers.

LEGAL POSITION ON GPA/ATS/WILL TRANSFERS

39. As is noted from above Tables 08A, 09A, 10A, 11A and 12A, various unregistered ATSS were executed in favour of M/s PACL India Ltd. along with registered GPAs in favour of different individuals including Mr. Tarlochan Singh, in whose name PACL Ltd. and PGFL (an associate company of PACL Ltd.) used to purchase the properties. It is further noted that



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while the said GPAs were registered, the corresponding ATSs remained unregistered. In this regards, it is pertinent to refer to Section 54 of the TPA, which defines "sale" and provides the mode of transfer of immovable property. A plain reading of Section 54 of the TPA makes it clear that for tangible immovable property of the value of one hundred rupees and upwards, the transfer can be made only by a registered instrument. On the other hand a contract for the sale of immovable property as an agreement that sale of such property shall take place on terms settled between the parties. Such a contract, by itself, does not create any interest in or charge upon the said property.

40. Further, regarding the transfer of title through a GPA and an unregistered ATS, reference may also be made to the judgement passed by the Hon'ble Supreme Court in the case of **Suraj Lamp & Industries Pvt. Ltd. v. State of Haryana (2012) 1 SCC 656**, wherein the Court expressly discouraged the practice of transferring an immovable property by way of executing a GPA / Agreement to Sell / Will:

"24. We therefore reiterate that immovable property can be legally and lawfully transferred/conveyed only by a registered deed of conveyance. Transactions of the nature of "GPA sales" or "SA/GPA/will transfers" do not convey title and do not amount to transfer, nor can they be recognised or valid mode of transfer of immovable property. The courts will not treat such transactions as completed or concluded transfers or as conveyances as they neither convey title nor create any interest in an immovable property. They cannot be recognised as deeds of title, except to the limited extent of Section 53-A of the TP Act. Such transactions cannot be relied upon or made the basis for mutations in municipal or revenue records. What is stated above will apply not only to deeds of conveyance in regard to freehold property but also to transfer of leasehold property. A lease can be validly transferred only under a registered assignment of lease. It is time that an end is put to the pernicious practice of SA/GPA/will transactions known as GPA sales."

41. In view of the law laid down by the Hon'ble Supreme Court in **Suraj Lamp's case (supra)**, unregistered ATSs does not convey any title in the immovable property covered thereunder, in favour of the purchaser. Furthermore, mere execution of a GPA alone does not transfer any title and cannot be regarded to be a *valid* mode of conveyance of any immovable property.



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42. In addition to GPA/ATS/Will, certain MR Nos. also contain Affidative, Indemnity Bond, SPA, Possession Certificate etc. In this regards, in the light of Section 54 the TPA such documents, cannot by themselves create any interest in or charge upon the said property. Consequently, the execution of ancillary documents i.e., Affidative, Indemnity Bond, SPA, Possession Certificate Certificate etc collectively fails to convey legal title or ownership to the transferee in the absence of a registered deed of conveyance. Therefore, the mere presence of these ancillary documents cannot substitute the requirement of a registered sale deed or be construed as a valid transfer of absolute title.

APPLICATION OF THE LEGAL POSITION ON GPA/ATS TRANSFERS IN THE PRESENT I.A

43. On the other hand, upon perusal of the submissions made by the Applicant/Objector in the I.A along with the documents produced in support of the claims made therein, it is noted that in the EC records, the sale deeds through which the Applicant claims to have purchased the impugned properties mentioned in Tables 08, 10, 11 and 12 are found to be reflecting in the said records. Further, the entries for the documents forming part of the chain of title pertaining to the impugned properties, as produced by the Appicant, are also reflecting in the said EC records. In order to establish whether the Applicant/Objector has made payment of the sale consideration to acquire the said impugned properties, the Applicant/Objector has furnished copy of its bank statement for the relevant period evidencing the entries showing debits of the amounts towards payment of the sale consideration for the impugned properties. The same has even been captured in the respective tables above in the village-wise observations being made by the Panel. Thus, the execution and registration of sale deeds, the entries in the EC reflecting such transfers, coupled with the Bank statement(s) produced by the Applicant/Objector showing payment being made by the Applicant for purchase of such impugned properties, collectively corroborates its claim over the impugned properties. Further, the fact that there was no subsisting attachment on the impugned properties by the



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SRO at the time of purchase of the said properties by the Objector from the respective vendors cannot be ignored.

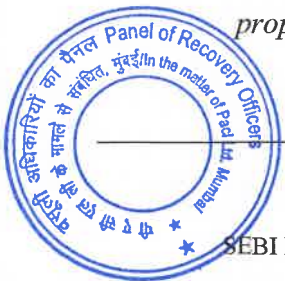
44. Shri R.S. Virk, District Judge (Retd.), while passing the impugned order dated July 31, 2023, had dismissed the objection primarily on the grounds that the Applicant had relied solely on its own registered Sale Deeds without producing the chain-of-title documents of its vendors and that the Applicant's Sale Deeds, all dated post-2004, were preceded in time by the GPAs/ATSs relied upon by PACL, which are dated up to 2003. In this regard, as mentioned in the foregoing paragraph, it is relevant to note that an unregistered GPA/ATS does not, by itself, effect a transfer of title in law, consequently, mere prior execution of such a GPA/ATS by a vendor does not divest that vendor of title in the property(s), and does not preclude that vendor from thereafter validly conveying title by way of a registered Sale Deed. It is, however, noted that the Applicant has, before this Panel, furnished additional documents, including translated Sale Deeds, Pattas, Encumbrance Certificates and bank statements evidencing payment of sale consideration, which were not considered at the time of passing the impugned order. These additional records, now made available, have been perused by the Panel and formed the basis of the findings recorded herein.

45. Here, it is also important to refer to the order dated February 19, 2026 passed by the Hon'ble Supreme Court wherein, while directing that the Category B applications i.e. the 106 applications filed against the order/recommendation passed by Shri R.S. Virk, District Judge (Retd.) be dealt with by the Recovery Officers appointed under Section 28A of the SEBI Act, 1992, the Hon'ble Supreme Court specifically has stated as under:

"12. In view of the fact that the said applications are pending for a lone time, we accordingly direct:

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(iii) The remit of the Recovery Officers shall be confined to determining whether the properties subject matter of such applications, were in fact purchased by PACL Limited



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or relatable to its associate entities, subsidiaries or sister concerns and whether the Applicants establish, on the basis of documentary materials & evidence, that the properties are held by them in their independent capacity.

.....

(vi) A party will not be denied a claim over a property solely for the reason, that at one point and time the property was owned by PACL or its associated entities and it is not clear as to what were the source of funds used by PACL & its sister entities, as the case may be, to purchase the properties, if otherwise it is clear that the party is a bonafide purchaser for value having actually paid the amounts through banking channels.

.....”

46. As can be seen from the aforementioned observations of the Hon'ble Supreme Court in the order dated February 19, 2026, it can be understood that even the Apex Court has directed that claims over a property are liable to be protected where it is evident that the claimant is a *bona fide* purchaser for value who has actually paid the consideration through legitimate means such as banking channels. In the present case, the genuineness of the transaction in respect of the impugned properties stands established through the existence of a duly registered instrument i.e. the respective sale deeds which have been duly entered in the EC, payment of valuable consideration through banking channels and proof of peaceful possession. The Applicant has produced duly registered Sale Deeds through which it had acquired the impugned properties and also produced the parent documents i.e, duly registered Sale Deeds and/or Pattas of its predecessors-in-title, thereby confirming the legality and validity of the transfer. Also, the Sale Deeds of the Applicant and the parent Sale Deeds of the predecessors-in-title are also duly reflected in the EC. The requirement of valuable consideration also stands satisfied as the Sale Deeds itself records the payment details, and the vendors has expressly acknowledged receipt of the entire sale consideration within the recitals of the registered instrument. The Applicant has also produced copy of its bank statements for the relevant period showing payment of sale consideration through



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cheques/demand drafts. In view thereof, the Panel is of the view that the Applicant has established his bonafide purchase in respect of the impugned properties enlisted at Tables 08, 10, 11 and 12 above and therefore, I.A. filed by the Applicant, qua the said impugned properties deserves to be allowed as set out in the operative portion below as well.

ORDER:

47. In view of the foregoing and on a considering the documentary evidence placed on record, the Panel makes the following directions in respect of the impugned properties:

47.1 In light of the reasons recorded against each entry - being cases where the underlying claim was included inadvertently or properties further sold by the Applicant, or is the subject matter of a separate objection petition filed by another entity and pending consideration before the Panel or to be considered by another Committee, the claim with respect to the following impugned properties is liable to be disposed of without any determination on merits:

S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
Madhavakurichi Village						
1.	3258/2006	1719	2.50	-	-	Added inadvertently by the Applicant. A separate claim has already been made in another Objection Petition filed on behalf of M/s. Techno Electric & Engineering Co. Ltd. Accordingly, no relief sought in the present proceeding.
2.	3636/2012	1863	0.40	-	-	Applicant submitted that the same may be ignored.
3.	2861/2010	1751/1A	0.61	-	-	The claim 0.61 Acres forms part of the 1.82 Acres claimed vide Sale Deed 3261/2006. Thus it amounts to duplicate claim.
Mela Ilathaikulam Village						
4.	934/2004	245	3.31	-	-	Added inadvertently by the Applicant. A separate claim has already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt. Ltd. Accordingly, no relief sought in the present proceeding.
5.	706/2004	248/2	1.38	-	-	



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S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
6.	1041/2004	259/2	2.35	-	-	
		259/3	3.61	-	-	
7.	Sale Deed 625/2005 20.05.2005	266/2	2.96	7870-18	2.97	Further sale by the Applicant
8.	Sale Deed 934/2005 04.07.2005	266/1	1.98	7868-18	1.98	
9.	Sale Deed 1137/2005 29.07.2005	267/3	1.82	7868-18	2.42	
10.	Sale Deed 1464/2005 01.09.2005	262	5.00	7868-18	5.98	
11.	Sale Deed 937/2005 04.07.2005	263	10.5	7869-18	10.50	
12.	Sale Deed 809/2005 17.06.2005	234	3.07	7867-18	5.29	
13.		238/1	7.00		7.01	
14.	Sale Deed 790/2005 15.06.2005	265	3.04	7870-18	6.08	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
15.	Sale Deed 1259/2005 13.08.2005	267/2	4.32	7867-18	4.32	
16.	Sale Deed 809/2005 17.06.2005	234	2.22	7867-18	5.29	
17.	Easementary Right Agreement 1549/2005 09.09.2005	246	22.72	12030-18	22.74	
18.	Sale Deed 69/2006 18.01.2006	259/1	2.18	7868-18	2.17	
Sayamalai Village						
19.	197/2012	907/3BI	0.45	-	-	Added inadvertently by the Applicant.
Balapathirampuram Village						
20.	1335/2004	392/1	5.00	-	-	Added inadvertently by the Applicant.



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S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
21.	2036/2004	376/1D	1.78	-	-	A separate claim has already been made in another Objection Petition filed on behalf of M/s Sarjan Realities Pvt. Ltd. Accordingly, no relief sought in the present proceeding.
22.	1108/2004	391/2	6.7	-	-	
23.	1106/2004	404/1	1.58	-	-	
24.	703/2004	405/1	8.03	-	-	
25.	1721/2004 & 121/2005	410/2	4.15	-	-	
26.	25/2005	418/1	3.22	-	-	
27.	2064/2004	424/IB	1.83	-	-	
28.	2064/2004	424/IC	0.28	-	-	
29.	959/2004	428/2	2.38	-	-	
30.	Sale Deed 676/2005 11.04.2008	373/5B	6.84	23201-17	8.56	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
31.	Sale Deed 867/2005 06.05.2005	376/1A	2.93	12871-18	2.93	
32.		378/3A	1.23	12871-18	1.24	
33.	Sale Deed 1165/2005 08.06.2005	378/1	3.16	9319-18	3.16	
34.	Sale Deed 1363/2005 23.06.2005	386/4B	3.09	23200-17	3.15	
35.	Sale Deed 1562/2005 08.07.2005	385/4A	0.20	12870-18 23031-17	0.31 0.73	
36.		385/4B	01.00	12870-18 23031-17	0.31 3.90	
37.	Sale Deed 1563/2005 08.07.2005	390/2	3.20	12863-18	3.20	
38.	Sale Deed 1741/2005 22.07.2005	413/1	3.03	9314-18 23031-17	2.00 3.29	
39.	Sale Deed 1803/2005 28.07.2005	426/1	3.87	9317-18 8208-18 25914-17	1.09 2.00 2.69	
40.	Sale Deed 1259/2005 15.06.2005	447/2A	1.86	8588-18	4.00	
41.	Sale Deed 1623/2008 11.08.2008	91/1	0.45	8592-18	1.62	
42.	Sale Deed 2081/2010 20.09.2010	414/3	0.12	23200-17	3.16	



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S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
43.	Sale Deed 2114/2011 08.11.2011	504/5	0.36	23199-17	1.03	
44.	Sale Deed 1114/2004 27.07.2004	392/2	15.09	12861-18	5.54	
45.	Sale Deed 1110/2004 & 1050/2007 27.07.2004 & 26.04.2007	404/2A	8.00	12858-18	9.99	
Melamaruthappapuram Village						
46.	Sale Deed 1174/2005 08.06.2005	505/2	4.12	8125-18	1.05	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
47.	Sale Deed 1177/2005 08.06.2005	501	0.94	8125-18	1.48	
48.	Sale Deed 1181/2005 08.06.2005		2.65			
49.	Sale Deed 1303/2005 12.06.2005		2.39			
50.		502	3.48	8125-18	0.87	
51.	Sale Deed 1730/2005 02.07.2005	498/1	0.63	8125-18	0.63	
Pudur Village						
52.	930/2008 & Ex 1610/2011	403/2	4.33	-	-	The claimed Survey No. 403/2 admeasuring 4.33 Acres has already been exchanged by the Applicant with Shri. T. Chakkaravarthi.
53.	Sale Deed 2285/2007 09.08.2007	365/2	1.22	13529-18	1.22	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
54.	Sale Deed 930/2008 22.02.2008					
55.		364/1	1.43	13529-18	1.43	
56.		374/1	1.94	13530-18	4.82	
57.		393/3	0.21	13529-18	0.43	
58.		615	4.28	13529-18	4.28	
59.		366	2.30	13530-18	2.30	
60.		386	3.62	13529-18	3.62	
61.		393/1	1.47	13529-18	4.71	
62.	Sale Deed					



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filed by M/s. Shubh Realty South Private Limited
SEBI/PACL/RO/RG/RD-2/ORD/147/2026**

S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
63.	931/2008	394/1	3.43	13528-18	3.43	
64.	22.02.2008	394/5	0.26	13528-18	0.26	
65.	Sale Deed 933/2008	619	2.40	13530-18	2.40	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
66.	22.02.2008	620/2	1.48		1.48	
67.		374/1	0.97		0.97	
68.	Sale Deed 927/2008	576/3	2.65	13528-18	2.65	
69.	22.02.2008	622	3.80		3.80	
70.		489/4	0.07		0.07	
71.		593/2	2.75		2.75	
72.		663	4.52		4.52	
73.		356	2.08		2.08	
74.	Sale Deed 929/2008	592/1	0.15	13528-18	-	
	22.02.2008					
Echanda Village						
75.	Sale Deed 1611/2007	491/1	1.74	8564-18	1.74	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
76.	06.03.2007	491/2	2.02	8605-18	2.02	
				8602-18	2.02	
77.		535/5	1.80	8605-18	1.80	
				8602-18	1.80	
78.		535/6	1.62	8605-18	1.62	
				8602/18	1.62	
79.		492/3	1.77	8605-18	1.77	
				8602/18	1.77	
80.		535/7E	0.64	8605-18	-	
81.		535/7F	0.36	8564/18		
82.		535/7D	0.35	8602/18		
83.	Deed of Release 1646/2009					
	06.08.2009					
84.	Sale Deed 1611/2007 & 1242/2007	492/2	1.98	8605-18	1.98	
	06.03.2007 & 22.03.2007			8602/18	1.98	
85.	Sale Deed 1645/2009	535/7C	0.2	8605-18	-	
	06.08.2009			8564/18		
				8602/18		
Naduvakurichi Village						

पता (केवल पत्राचार हेतु) / Address for correspondence only:
सेबी भवन, प्लॉट सं. सी4-ए, 'जी' ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400051

SEBI Bhavan, BKC, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051



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SEBI/PACL/RO/RG/RD-2/ORD/147/2026**

S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
86.	Sale Deed 1876/2006 18.12.2006	53	4.85	1025-18	4.84	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
87.		54/2	0.62		0.62	
88.		54/8	0.98		0.98	
89.		54/9	0.88		0.88	
90.	Sale Deed 1879/2006 18.12.2006	39	2.00	1079-18 1025/18	3.99 2.00	
91.	Sale Deed 1877/2006 18.12.2006		4.37			
92.	Sale Deed 376/2007 06.03.2007	55/1	1.29	8564-18	1.33	
93.		55/2	1.59		1.25	
94.	Sale Deed 396/2007 18.12.2006	75/1A	2.77	1079-18	2.77	
95.		75/1C	0.07		0.07	
96.		76/1	4.99		4.99	
97.		76/4	4.37		4.37	
98.		89/2	5.04		5.04	
99.		90/2	4.22		4.22	
100.		91/1	0.72		0.72	
Pattadaikatti Village						
101.	Sale Deed 195/2008 13.02.2008	283/1A	1.14	1078-18	1.15	Corresponding MR document has M/s PGF Ltd. as a party to the transaction. Accordingly, the same is to be dealt with by the Sen Committee.
102.	Sale Deed 1243/2007 22.03.2007		3.42			
103.		206/1	4.12	1078-18	2.08	
104.	Sale Deed 197/2008 13.02.2008					
105.	Sale Deed 1611/2007 06.03.2007	291	5.88	8562-18	2.90	
106.	Sale Deed 35/2008 10.01.2008					
107.	Sale Deed 1424/2008 07.10.2008					
108.		292/1 earlier 292	2.62	8562-18	4.33	
109.	Sale Deed 1611/2007 06.03.2007	292				



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S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
110.	Sale Deed 37/2008 10.01.2008	201	5.25	1078-18	5.25	
111.	Sale Deed 194/2008 13.02.2008					

47.2 Considering that the Applicant has established its chain of title through registered Sale Deeds, corroborated by parent title documents, Encumbrance Certificate entries, Pattas and bank statements evidencing payment of consideration, the claim of the Applicant/Objector with regards to the following impugned properties is liable to be allowed and is accordingly allowed to the extent mentioned against the respective Survey Nos.:

S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
Madhavakurichi Village						
1.	Sale Deed 3242/2006 15.12.2006	1769/1A	0.96	13411-16	0.96	Allowed to the extent mentioned in the MR document
		1730/1	3.08	13363-16	3.08	Allowed to the extent mentioned in the MR document
		1767/1	1.23	13411-16	1.99	Allowed to the extent claimed by the Applicant
		1767/2	1.23		1.92	Allowed to the extent claimed by the Applicant
		1768/2	2.14		2.15	Allowed to the extent claimed by the Applicant
		1769/2	2.89		2.88	Allowed to the extent mentioned in the MR document
		1814/2	1.19	13410-16	1.33	Allowed to the extent claimed by the Applicant
		1815	1.80		1.80	Allowed to the extent mentioned in the MR document
		1816/2	1.84		1.84	Allowed to the extent mentioned in the MR document
		1838/1	0.20	13412-16	4.61	Allowed to the extent claimed by the Applicant
2.	Sale Deed 3257/2006 22.12.2006	1755/1	2.42	11933-16	2.42	Allowed to the extent mentioned in the MR document
3.	Sale Deed 3258/2006	1700/1	0.73	11935-16	0.73	Allowed to the extent mentioned in the MR document



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
	22.12.2006	1701/1	0.70		0.70	Allowed to the extent mentioned in the MR document
		1703/2	1.00		1.00	Allowed to the extent mentioned in the MR document
		1724/2	0.86		0.86	Allowed to the extent mentioned in the MR document
		1784	1.91		1.92	Allowed to the extent claimed by the Applicant
		1717	2.50	11936-16	8.20	Allowed to the extent claimed by the Applicant
		1718	2.50		4.86	Allowed to the extent claimed by the Applicant
		1719/3	0.89	11935-16	0.89	Allowed to the extent mentioned in the MR document
4.	Sale Deed 3259/2006 22.12.2006	1756/1	2.66	13411-16	1.32	Allowed to the extent mentioned in the MR document
		1756/2			1.52	Allowed to the extent claimed by the Applicant
		1819	3.63	11934-16	3.63	Allowed to the extent mentioned in the MR document
		1820	3.71	13364-16	3.71	Allowed to the extent mentioned in the MR document
5.	Sale Deed 3260/2006 22.12.2006	1740/2	1.77	13364-16	1.77	Allowed to the extent mentioned in the MR document
		1741/3	3.06		3.06	Allowed to the extent mentioned in the MR document
6.	Sale Deed 3261/2006 22.12.2006	1749	2.52	13411-16	2.52	Allowed to the extent mentioned in the MR document
7.	Sale Deed 1138/2007 26.04.2007	1749	1.26			
		1642	2.16	13363-16	2.15	Allowed to the extent mentioned in the MR document
		1629	5.04	-	-	No MR available but attached as per EC entry to the extent of 02 Hectare (04.94 Acres). Allowed to the extent mentioned in the EC entry showing attachment.
		1653	3.00	11937-16	3.00	Allowed to the extent mentioned in the MR document
		1654	1.48		1.48	Allowed to the extent mentioned in the MR document
		1680/1B	1.79		1.79	Allowed to the extent mentioned in the MR document
		1702/2	1.40		1.40	Allowed to the extent mentioned in the MR document
		1703/1	3.20	11927-16	3.20	Allowed to the extent mentioned in the MR document
		1724/1	2.16	11927-16	2.16	Allowed to the extent mentioned in the MR document
		1823/2	1.07	1193716	1.07	Allowed to the extent mentioned in the



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
						MR document
		1831/2	0.52		0.52	Allowed to the extent mentioned in the MR document
		1837	1.95		1.95	Allowed to the extent mentioned in the MR document
		1868	1.05	11936-16	1.04	Allowed to the extent mentioned in the MR document
		1794	1.32	14559-16	0.74	Allowed to the extent mentioned in the MR document
		1719/1	1.95	11936-16	3.58	Further sale by the Applicant and NOC already issued to the purchaser i.e., M/s Techno to the extent of 2.84 Acres.
8.	Sale Deed 4778/2010 23.09.2010		1.63			Allowed to the extent remaining attached in the MR document i.e., 0.74 Acres.
		1719/2	0.70	11936-16	1.64	Allowed to the extent claimed by the Applicant
9.	Sale Deed 1138/2007 26.04.2007	1792	2.36	14559-16	2.80	Allowed to the extent mentioned in the MR document
10.	Sale Deed 3258/2006 22.12.2006	1792	2.50			
11.	Sale Deed 7236/2011 02.11.2011	1793	4.57	14559-16	7.50	Allowed to the extent mentioned in the MR document
12.	Sale Deed 3258/2006 22.12.2006	1793	2.45			
13.	Sale Deed 1138/2007 26.04.2007	1793	1.51			
14.	Sale Deed 3262/2006 22.12.2006	1821/2	3.27	13364-16	3.27	Allowed to the extent mentioned in the MR document
		1821/1	1.10	13412-16	1.10	Allowed to the extent mentioned in the MR document
15.	Sale Deed 1137/2007 26.04.2007	1613/2	1.49	11936-16	1.50	Allowed to the extent claimed by the Applicant
		1619/2	1.77		1.77	Allowed to the extent mentioned in the MR document
		1620	1.75		1.75	Allowed to the extent mentioned in the MR document
		1645/2	2.72	13363-16	2.73	Allowed to the extent claimed by the Applicant
		1655/1	2.33		2.33	Allowed to the extent mentioned in the MR document
		1655/3	0.57		0.57	Allowed to the extent mentioned in the MR document



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
		1758	2.16	11936-16	7.17	Allowed to the extent claimed by the Applicant
		1766/2	0.14	13363-16	2.14	Allowed to the extent claimed by the Applicant
		1773	1.44	13363-16	1.44	Allowed to the extent mentioned in the MR document
		1775	3.44	13364-16	6.87	Allowed to the extent claimed by the Applicant
		1787/2	1.31	13364-16	1.31	Allowed to the extent mentioned in the MR document
		1858	3.78	13364-16	3.78	Allowed to the extent mentioned in the MR document
		1859/1	1.61	13364-16	1.61	Allowed to the extent mentioned in the MR document
		1867	1.72	11936-16	1.72	Allowed to the extent mentioned in the MR document
		1869	4.40	11936-16	4.40	Allowed to the extent mentioned in the MR document
		1659/2	2.53	13363-16	2.53	Allowed to the extent mentioned in the MR document
		1669	1.51	13364-16	1.51	Allowed to the extent mentioned in the MR document
16.	Sale Deed 1139/2007 26.04.2007	1672/2B	0.265	13410-16	0.75	Allowed to the extent claimed by the Applicant
		1672/3B	0.335		0.95	Allowed to the extent claimed by the Applicant
		1706/2	0.689		1.95	Allowed to the extent claimed by the Applicant
		1707/2	0.890		2.52	Allowed to the extent claimed by the Applicant
		1709/2	1.125		3.19	Allowed to the extent claimed by the Applicant
		1712/2	0.593		1.68	Allowed to the extent claimed by the Applicant
		1713/1	0.423		1.20	Allowed to the extent claimed by the Applicant
		1714/1	1.559		4.42	Allowed to the extent claimed by the Applicant
		1716/1	0.272		0.77	Allowed to the extent claimed by the Applicant
		1786/2	0.427		1.21	Allowed to the extent claimed by the Applicant
		1711/1	1.129		3.2	Allowed to the extent claimed by the Applicant
		1708/1	0.557		1.58	Allowed to the extent claimed by the Applicant
		1715/1	1.961	11936-16	4.20	Allowed to the extent claimed by the Applicant
		1721	2.88	13364-16	3.84	Allowed to the extent claimed by the Applicant



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		1787/1	0.589	13412-16	1.26	Allowed to the extent claimed by the Applicant
17.	Sale Deed 1140/2007 26.04.2007	1700/2	4.28	13363-16	4.29	Allowed to the extent claimed by the Applicant
		1701/2	1.42		1.42	Allowed to the extent mentioned in the MR document
		1741/2	0.70		0.70	Allowed to the extent mentioned in the MR document
		1760	2.34		2.33	Allowed to the extent mentioned in the MR document
		1761/1	0.83		0.83	Allowed to the extent mentioned in the MR document
		1761/2	0.81		0.82	Allowed to the extent claimed by the Applicant
		1762	2.32		2.32	Allowed to the extent mentioned in the MR document
		1763/1	1.09		1.09	Allowed to the extent mentioned in the MR document
		1763/2	0.88		0.88	Allowed to the extent mentioned in the MR document
		1836	2.70		2.70	Allowed to the extent mentioned in the MR document
		1830/2	2.34	13364-16	2.35	Allowed to the extent claimed by the Applicant
18.	Sale Deed 893/2008 19.02.2008	1778/1	1.36	13411-16	1.36	Allowed to the extent mentioned in the MR document
		1779/1	2.07	13411-16	2.08	Allowed to the extent claimed by the Applicant
19.	Sale Deed 894/2008 19.02.2008	1822/IB1	1.05	13412-16	1.05	Allowed to the extent mentioned in the MR document
		1822/2	3.10	13364-16	3.10	Allowed to the extent mentioned in the MR document
20.	Sale Deed 5099/2009 12.09.2009	1608/1	0.21	12019-16	0.85	Allowed to the extent claimed by the Applicant
		1863	2.24	12018-16	3.36	Allowed to the extent claimed by the Applicant
		1866	2.50		3.75	Allowed to the extent claimed by the Applicant
		1865/1	6.46	13362-16	9.68	Allowed to the extent claimed by the Applicant
		1873/2	3.88		3.88	Allowed to the extent mentioned in the MR document
		1631	0.88	14560-16	1.32	Allowed to the extent claimed by the Applicant
		1774	1.37	13364-16 14560-16	2.69 2.70	Allowed to the extent mentioned in the MR document
21.	Sale Deed 1137/2007 26.04.2007	1774	4.03			



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
22.	Sale Deed 2513/2010 25.05.2010	1653	1.20	11937-16	3.00	Allowed to the extent claimed by the Applicant
		1654	0.59	11937-16	1.48	Allowed to the extent claimed by the Applicant
Sayamalai Village						
23.	Sale Deed 122/2008 25.01.2008	912/1	0.90	11966-16	0.90	Allowed to the extent mentioned in the MR document
		925/8	0.84	11854-16	0.84	Allowed to the extent mentioned in the MR document
		1008	0.53	26146-17	1.60	Allowed to the extent claimed by the Applicant
		1009/1	0.50	26146-17	1.49	Allowed to the extent claimed by the Applicant
		1009/2	0.39	11932-16	1.16	Allowed to the extent claimed by the Applicant
24.	Sale Deed 123/2008 25.01.2008	910	4.36	11837-16	4.36	Allowed to the extent mentioned in the MR document
		843/2	2.10	11930-16	2.11	Allowed to the extent claimed by the Applicant
		873/3A	1.67	11968-16	0.80	Allowed to the extent mentioned in the MR document
		887/2C	0.44	11957-16	0.44	Allowed to the extent mentioned in the MR document
		934/IB	3.00	11996-16	3.00	Allowed to the extent mentioned in the MR document
		934/IC	3.01	11996-16	3.01	Allowed to the extent mentioned in the MR document
25.	Sale Deed 124/2008 25.01.2008	918/2	2.42	11965-16	2.22	Allowed to the extent mentioned in the MR document
		932/5	1.56	11965-16	1.56	Allowed to the extent mentioned in the MR document
		918/1	2.62	11955-16	2.62	Allowed to the extent mentioned in the MR document
		932/2	1.50	11955-16	1.51	Allowed to the extent claimed by the Applicant
		892/6	2.25	11956-16	2.25	Allowed to the extent mentioned in the MR document
		923/3	1.63	11956-16	1.63	Allowed to the extent mentioned in the MR document
		946/3B	3.26	11917-16	1.63	Allowed to the extent mentioned in the MR document
		899/3	0.75	26152-17	0.75	Allowed to the extent mentioned in the MR document
		899/4	0.68	26152-17	0.68	Allowed to the extent mentioned in the MR document
26.	Sale Deed 125/2008 25.01.2008	912/2	1.03	11967-16	1.37	Allowed to the extent claimed by the Applicant
		998/1A1	3.41	26154-17	3.41	Allowed to the extent mentioned in the MR document



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
		933/3	2.4	-	-	No MR available but attached as per EC entry. The claim is Allowed.
		997/1	6.31	26154-17	6.31	Allowed to the extent mentioned in the MR document
27.	Sale Deed 126/2008 25.01.2008	891/2	1.13	12016-16	2.26	Allowed to the extent claimed by the Applicant
		907/3C	2.16	12013-16	2.16	Allowed to the extent mentioned in the MR document
		903/2	0.40	11916-16	0.40	Allowed to the extent mentioned in the MR document
		935	2.85	11916-16	2.85	Allowed to the extent mentioned in the MR document
		936/3	2.00	11916-16	2.00	Allowed to the extent mentioned in the MR document
		891/3	1.14	11960-16	1.14	Allowed to the extent mentioned in the MR document
		949/2	4.36	11990-16 11991-16 11992-16	1.46 1.46 1.46	Allowed to the extent claimed by the Applicant
		883/1A	1.41	11958-16	1.41	Allowed to the extent mentioned in the MR document
		891/1	2.26	11961-16	2.26	Allowed to the extent mentioned in the MR document
28.	Sale Deed 127/2008 25.01.2008	884/1	3.03	12014-16	3.03	Allowed to the extent mentioned in the MR document
		884/2A	1.16	11963-16	2.08	Allowed to the extent claimed by the Applicant
		886	6.14	11964-16	6.14	Allowed to the extent mentioned in the MR document
		888	6.47	11964-16	6.47	Allowed to the extent mentioned in the MR document
		1307/2	2.90	11853-16	2.90	Allowed to the extent mentioned in the MR document
29.	Sale Deed 128/2008 25.01.2008	1311/4	0.91	11855-16	0.91	Allowed to the extent mentioned in the MR document
		887/2A	0.605	11993-16	0.61	Allowed to the extent claimed by the Applicant
30.	Sale Deed 232/2008 11.02.2008	877/2	2.29	26147-17	2.29	Allowed to the extent mentioned in the MR document
		892/3	0.68	11919-16	0.67	Allowed to the extent mentioned in the MR document
		1025/1	1.86	26150-17	1.86	Allowed to the extent mentioned in the MR document
31.	Sale Deed 233/2008 11.02.2008	1021/1	2.96	26148-17	5.97	Allowed to the extent claimed by the Applicant



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S. No.	Doc. type, No. & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Order
32.	Sale Deed 234/2008 11.02.2008	1015/2	2.33	25989-17	2.34	Allowed to the extent claimed by the Applicant
33.	Sale Deed 236/2008 11.02.2008	890/1	5.16	11965-16	5.16	Allowed to the extent mentioned in the MR document
34.	Sale Deed 237/2008 11.02.2008	925/13	0.13	11842-16	0.15	Allowed to the extent claimed by the Applicant
		928/6	0.235		0.47	Allowed to the extent claimed by the Applicant
		900/3	0.75	11839-16 11840-16 11841-16	0.75	Allowed to the extent mentioned in the MR document
		847	6.79	11920-16	6.80	Allowed to the extent claimed by the Applicant
35.	Sale Deed 5539/2011 14.12.2011	867/2B1	0.30	26149-17	6.49	Allowed to the extent claimed by the Applicant
	Sale Deed 995/2012 16.03.2012	889/3	0.05	11963-16	2.58	Allowed to the extent claimed by the Applicant
Melamaruthappapuram Village						
36.	Sale Deed 1917/2006 09.08.2006	503	8.605	8059-19	6.44	Allowed to the extent mentioned in the MR document
	Sale Deed 1997/2005 17.08.2005					
	Sale Deed 2214/2005 01.09.2005					
	Deed of Release 2221/2006 14.09.2006					
	Deed of Release 2321/2006 -					
Pudur Village						
37.	Sale Deed 928/2008 22.02.2008	579	0.3	12929-16	1.01	Allowed to the extent claimed by the Applicant



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47.3 For the reasons recorded against each entry in the table below i.e. where no subsisting attachment was found, the claim of the Applicant/Objector is liable to be disposed of without any direction:

S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
Madhavakurichi Village						
1.	Deed of Exchange 5341/2012 27.08.2012	1646/2	0.08	12017-16	2.89	Refer para no. 31.
Ettankulam Village						
2.	Sale Deed 3002/2010 23.06.2010	232/2	0.715	-	-	No attachment found

47.4 For the reasons recorded against each entry in the table below i.e. (a) the MR document relied upon is found to pre-date the Sale Deed vide which the Applicant claims ownership, and (b) a No Objection Certificate has already been issued in favour of another party by the Committee, the claim of the Applicant/Objector is liable to be rejected and is hereby rejected.

S. No.	Doc. type, No & Date	Survey No.	Extent (in Acres)	MR No.	Extent (in Acres) in MR No.	Reason
Madhavakurichi Village						Further sale by the Applicant and NOC already issued to the purchaser i.e., M/s Techno.
3.	Sale Deed 2861/2010 21.06.2010	1751/1A	1.82	13363-16	1.82	
4.	Sale Deed 3261/2006 22.12.2006	1751/1B	1.82	13363-16	1.85	
Mela Ilathaikulam Village						
5.	Sale Deed 773/2005 10.06.2005	264	6.57	7869-18	6.57	Further sale by the Applicant and NOC already issued to the purchaser i.e., M/s Unosun Solar Private Limited
Therkku Sankarankovil Village						



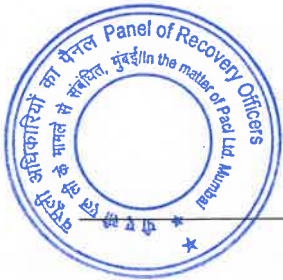
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6.	Sale Deed 447/2008 20.02.2008	126/3	0.91	9711-18	0.91	MR document is a Sale Deed preceding the Sale Deed of the Applicant
		131/1	0.57	7839-18	0.57	
		132/3	0.84		0.84	
		133/3	0.48		0.47	
7.	Sale Deed 450/2008 20-02-2008	125/5	1.285	7838-18	1.29	
		125/8	1.705		1.71	
		126/2B	0.39	9711-18	0.37	
8.	Sale Deed 451/2008 20.02.2008	130/1	2.47		2.87	

47.5 With respect to the new claim raised during the present proceeding i.e. with respect to Survey No. 592/2 admeasuring 2.57 Acres vide Sale Deed 927/2008 (MR. No. 13528-18), the said claim cannot be enteretained at this stage and therefore, the I.A filed with respect to the said impugned property stands disposed of without any determination on merits. However, the Applicant may file a fresh objection in compliance with the Public Notice dated November 25, 2024 issued by PACL Committee, within a period of 90 days from the date of the present order, failing which, the PACL Committee shall be at liberty to proceed with the auction of the said property in accordance with law.

47.6 With respect to the land parcels situated at Mela Ilathaikulam Village which were further sold by the Applicant between 2021 and 2022, as set out in para 24 of this order, it is noted that these parcels are the subject matter of separate I.As filed by the respective purchasers viz. (a) M/s Zonrenew Solar Private Ltd., (b) M/s Sunstreet Solar Private Ltd., (c) M/s Sunsole Solar Private Limited and (d) M/s CSE Solar Sun Park Tamil Nadu Pvt Ltd, which are being dealt and adjudicated separately by this Panel. Accordingly, the I.A filed by the Applicant/Objector with respect to such impugned properties is liable to be disposed of without determination on merits and is hereby accordingly disposed of.



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47.7 The impugned order dated July 31, 2023 passed by Shri R.S. Virk, District Judge (Retd.) stands modified accordingly, to the extent set out in para no. 47.1, 47.2, 47.3 and 47.4 above.

Place: Mumbai

Date: August 31, 2026



MS. RESHMA GOEL

RECOVERY OFFICER

MR. BAL KISHOR MANDAL

RECOVERY OFFICER

MS. PREETI PATEL

RECOVERY OFFICER

रेशमा गोयल / RESHMA GOEL
उप महाप्रबंधक एवं वसूली अधिकारी
Deputy General Manager & Recovery Officer
(पी ए सी एल लि के मामले से संबंधित, मुंबई) / (In the matter of PACL Ltd. Mumbai)

बाल किशोर मंडल / BAL KISHOR MANDAL
उप महाप्रबंधक एवं वसूली अधिकारी
Deputy General Manager & Recovery Officer
(पी ए सी एल लि के मामले से संबंधित) / (In the matter of PACL Ltd.)

प्रीति पटेल / PREETI PATEL
उप महाप्रबंधक एवं वसूली अधिकारी
Deputy General Manager & Recovery Officer
(पी ए सी एल लि के मामले से संबंधित, मुंबई) / (In the matter of PACL Ltd. Mumbai)

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Annexure 1

TABLE A. Madhavakurichi Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	26.04.2007 & 23.09.2010	1138/2007 & 4778/2010	1719/1	3.58	S. Chelladurai M. Mohan Raj & 9 Ors.	Shubh Realty -Do-	11936-16
2.	22.12.2006 & 21.06.2010	3261/2006 & 2861/2010	1751/1B	1.82	E.R. Sivaparsad & Anr. Smt. Arputham & 6 Ors.	Shubh Realty -Do-	13363-16
3.	15.12.2006	3242/2006	1769/1A	0.96	P.M. Joseph	Shubh Realty	13411-16
4.	26.04.2007; 22.12.2006 & 02.11.2011	1138/2007; 3258/2006 & 7236/2011	1793	4.57	S. Chelladurai G.Suresh R. Arumugam & 7 Ors.	Shubh Realty Shubh Realty -Do-	14559-16
5.	22.12.2006	3262/2006	1821/2	3.27	K.D. Baby	Shubh Realty	13364-16
6.	26.04.2007	1137/2007	1613/2	1.49	S. Cheladurai	Shubh Realty	11936-16
7.	26.04.2007	1137/2007	1619/2	1.77	-do-	-do-	-do-
8.	26.04.2007	1137/2007	1620	1.75	-do-	-do-	-do-
9.	26.04.2007	1137/2007	1645/2	2.72	-do-	-do-	-do-
10.	16.04.2007	1137/2007	1655/1	2.33	-do-	-do-	13363-16
11.	26.04.2007	1137/2007	1655/3	0.57	-do-	-do-	-do-
12.	26.04.2007	1137/2007	1758	2.16	-do-	-do-	11936-16
13.	26.04.2007	1137/2007	1766/2	0.14	-do-	-do-	13363-16
14.	26.04.2007	1137/2007	1773	1.44	-do-	-do-	-do-
15.	26.04.2007	1137/2007	1774	4.03	-do-	-do-	13364-16
16.	26.04.2007	1137/2007	1775	3.44	-do-	-do-	-do-
17.	26.04.2007	1137/2007	1787/2	1.31	-do-	-do-	-do-
18.	26.04.2007	1137/2007	1858	3.78	-do-	-do-	-do-
19.	26.04.2007	1137/2007	1859/1	1.61	-do-	-do-	-do-
20.	26.04.2007	1137/2007	1867	1.72	-do-	-do-	11936-16
21.	26.04.2007	1137/2007	1869	4.40	-do-	-do-	-do-
22.	26.04.2007	1137/2007	1659/2	2.53	-do-	-do-	13363-16
23.	26.04.2007	1137/2007	1669	1.51	-do-	-do-	13364-16
24.	26.04.2007	1138/2007	1629	5.04	S. Chelladurai	Shubh Realty	
25.	26.04.2007	1138/2007	1642	2.16	-do-	-do-	13363-16
26.	26.04.2007	1138/2007	1653	3.00	-do-	-do-	11937-16
27.	26.04.2007	1138/2007	1654	1.48	-do-	-do-	-do-
28.	26.04.2007	1138/2007	1680/1B	1.79	-do-	-do-	-do-
29.	26.04.2007	1138/2007	1702/2	1.40	-do-	-do-	-do-



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Annexure 1

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
30.	26.04.2007	1138/2007	1703/1	3.20	-do-	-do-	11927-16
31.	26.04.2007	1138/2007	1724/1	2.16	-do-	-do-	-do-
32.	26.04.2007	1138/2007	1749	1.26	-do-	-do-	13411-16
33.	26.04.2007	1138/2007	1823/2	1.07	-do-	-do-	11937-16
34.	26.04.2007	1138/2007	1831/2	0.52	-do-	-do-	-do-
35.	26.04.2007	1138/2007	1837	1.95	-do-	-do-	-do-
36.	26.04.2007	1138/2007	1868	1.05	-do-	-do-	11936-16
37.	26.04.2007	1138/2007	1792	2.36	-do-	-do-	14559-16
38.	26.04.2007	1138/2007	1793	1.51	-do-	-do-	-do-
39.	26.04.2007	1138/2007	1794	1.32	-do-	-do-	-do-
40.	26.04.2007	1139/2007	1672/2B	0.265	S. Cheladurai	Shubh Realty	13410-16
41.	26.04.2007	1139/2007	1672/3B	0.335	-do-	-do-	-do-
42.	26.04.2007	1139/2007	1706/2	0.689	-do-	-do-	-do-
43.	26.04.2007	1139/2007	1707/2	0.890	-do-	-do-	-do-
44.	26.04.2007	1139/2007	1709/2	1.125	-do-	-do-	13410-16
45.	26.04.2007	1139/2007	1712/2	0.593	-do-	-do-	-do-
46.	26.04.2007	1139/2007	1713/1	0.423	-do-	-do-	-do-
47.	26.04.2007	1139/2007	1714/1	1.559	-do-	-do-	-do-
48.	26.04.2007	1139/2007	1715/1	1.961	-do-	-do-	11936-16
49.	26.04.2007	1139/2007	1716/1	0.272	-do-	-do-	13410-16
50.	26.04.2007	1139/2007	1721	2.88	-do-	-do-	13364-16
51.	26.04.2007	1139/2007	1786/2	0.427	-do-	-do-	13410-16
52.	26.04.2007	1139/2007	1787/1	0.589	-do-	-do-	13412-16
53.	26.04.2007	1139/2007	1708/1	0.557	-do-	-do-	-do-
54.	26.04.2007	1139/2007	1711/1	1.129	-do-	-do-	13410-16
55.	26.04.2007	1140/2007	1700/2	4.28	N. Parmasivam	Shubh Realty	13363-16
56.	26.04.2007	1140/2007	1701/2	1.42	-do-	-do-	-do-
57.	26.04.2007	1140/2007	1741/2	0.70	-do-	-do-	-do-
58.	26.04.2007	1140/2007	1760	2.34	-do-	-do-	-do-
59.	26.04.2007	1140/2007	1761/1	0.83	-do-	-do-	13363-16
60.	26.04.2007	1140/2007	1761/2	0.81	-do-	-do-	-do-
61.	26.04.2007	1140/2007	1762	2.32	-do-	-do-	-do-
62.	26.04.2007	1140/2007	1763/1	1.09	-do-	-do-	-do-
63.	26.04.2007	1140/2007	1763/2	0.88	-do-	-do-	-do-
64.	26.04.2007	1140/2007	1830/2	2.34	-do-	-do-	13364-16
65.	26.04.2007	1140/2007	1836	2.70	-do-	-do-	13363-16
66.	25.05.2010	2513/2010	1653	1.20	Smt. H. Firthouse & 8 Ors.	Shubh Realty	11937-16
67.	25.05.2010	2513/2010	1654	0.59	-do-	-do-	-do-
68.	21.06.2010	2861/2010	1751/1A	0.61	Smt. Arputham & Ors.	Shubh Realty	13363-16



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
69.	15.12.2006	3242/2006	1730/1	3.08	P. M. Joseph	Shubh Realty	-do-
70.	15.12.2006	3242/2006	1767/1	1.23	-do-	-do-	13411-16
71.	15.12.2006	3242/2006	1767/2	1.23	-do-	-do-	-do-
72.	15.12.2006	3242/2006	1768/2	2.14	-do-	-do-	-do-
73.	15.12.2006	3242/2006	1769/2	2.89	-do-	-do-	-do-
74.	15.12.2006	3242/2006	1814/2	1.19	-do-	-do-	13410-16
75.	15.12.2006	3242/2006	1815	1.8	-do-	-do-	-do-
76.	15.12.2006	3242/2006	1816/2	1.84	-do-	-do-	-do-
77.	15.12.2006	3242/2006	1838/1	0.20	-do-	-do-	13412-16
78.	22.12.2006	3257/2006	1755/1	2.42	Smt. Prabha	Shubh Realty	11933-16
79.	22.12.2006	3258/2006	1700/1	0.73	G. Suresh	Shubh Realty	11935-16
80.	22.12.2006	3258/2006	1701/1	0.70	-do-	-do-	-do-
81.	22.12.2006	3258/2006	1703/2	1.00	-do-	-do-	-do-
82.	22.12.2006	3258/2006	1717	2.50	-do-	-do-	11936-16
83.	22.12.2006	3258/2006	1718	2.50	-do-	-do-	-do-
84.	22.12.2006	3258/2006	1719/3	0.89	-do-	-do-	11935-16
85.	22.12.2006	3258/2006	1719	2.50	-do-	-do-	11935, 11936-16
86.	22.12.2006	3258/2006	1724/2	0.86	-do-	-do-	11935-16
87.	22.12.2006	3258/2006	1784	1.91	-do-	-do-	-do-
88.	22.12.2006	3258/2006	1792	2.50	-do-	-do-	14559-16
89.	22.12.2006	3258/2006	1793	2.45	-do-	-do-	-do-
90.	22.12.2006	3259/2006	1756/1	1.20	M.A. Joseph	Shubh Realty	13411-16
91.	22.12.2006	3259/2006	1756/2	1.46	-do-	-do-	-do-
92.	22.12.2006	3259/2006	1819	3.63	-do-	-do-	11934-16
93.	22.12.2006	3259/2006	1820	3.71	-do-	-do-	13364-16
94.	22.12.2006	3260/2006	1740/2	1.77	P.P. Unnikrishnan	Shubh Realty	-do-
95.	22.12.2006	3260/2006	1741/3	3.06	-do-	-do-	-do-
96.	22.12.2006	3261/2006	1749	2.52	E.R. Sivaparsad & Anr.	Shubh Realty	13411-16
97.	22.12.2006	3261/2006	1751/1A	1.82	-do-	-do-	13363-16
98.	22.12.2006	3262/2006	1821/1	1.10	K. D. Baby	Shubh Realty	13412-16
99.	18.05.2012	3636/2012	1863	0.40			12018-16
100.	23.09.2010	4778/2010	1719/2	0.70	M. Mohan Raj & 9 Ors.	Shubh Realty	11936-16
101.	12.09.2009	5099/2009	1608/1	0.21	Smt. Sivaniyammal & 4 Ors.	Shubh Realty	12019-16
102.	12.09.2009	5099/2009	1774	1.37	-do-	-do-	13364-16
103.	12.09.2009	5099/2009	1863	2.24	-do-	-do-	12018-16
104.	12.09.2009	5099/2009	1865/1	6.46	-do-	-do-	13362-16



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
105.	12.09.2009	5099/2009	1866	2.50	-do-	-do-	12018-16
106.	12.09.2009	5099/2009	1873/2	3.88	-do-	-do-	13362-16
107.	12.09.2009	5099/2009	1631	0.88	-do-	-do-	14560-16
108.	19.02.2008	893/2008	1778/1	1.36	Shri. Sudalaimuthu Konar & 4 Ors.	Shubh Realty	13411-16
109.	19.02.2008	893/2008	1779/1	2.07	-do-	-do-	-do-
110.	19.02.2008	894/2008	1822/1B1	1.05	P.M. Joseph	Shubh Realty	13412-16
111.	19.02.2008	894/2008	1882	3.10	-do-	-do-	13364-16
112.	27.08.2012	5341/2012	1646/2	0.08			12017-16
Total				203.104 (Acres)			

B. Mela Ilathaikulam Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	17.06.2005	809/2005	234	5.29	Shri R.Shivakumar & Anr.	Shubh Realty	7867-18
2.	17.06.2005	809/205	238/1	7.00	-do-	-do-	-do-
3.	28.07.2004	934/2004	245	3.31	Shri S.Kasi Narauanan & 3 Ors.	Sarjan Realities	7870-18
4.	09.09.2004	1549/2005	246	22.72			12030-18
5.	16.06.2004	706/2004	248/2	1.38	Shri Sabariraj Santhiyagu	Sarjan Realities	19990-17
6.	18.01.2006	69/2006	259/1	8.14	Shri Dharmaraj	Shubh Realty	7868-18
7.	19.08.2004	1041/2004	259/2	2.35	Shri P. Koilpillai & Anr.	Sarjan Realities	-do-
8.	19.08.2004	1041/2004	259/3	3.61	-do-	-do-	-do-
9.	01.09.2005	1464/2005	262	5.00	Shri. Savarimuthu	Shubh Realty	-do-
10.	04.07.2005	937/2005	263	10.5	Shri. Nootrandu Jebaraj & 3 Ors.	Shubh Realty	7869-18
11.	10.06.2005	773/2005	264	6.57	Shri R.Sivakumar	Shubh Realty	-do-
12.	15.06.2005	790/2005	265	3.04	Shri. Abraham	Shubh Realty	7870-18
13.	21.05.2005	625/2005	266/2	2.96	Shri James & Anr.	Shubh Realty	-do-
14.	04.07.2005	937/2005	266/1	1.98	Shri. Nootrandu Jebaraj & 3 Ors.	Shubh Realty	7868-18
15.	13.08.2005	1259/2005	267/2	4.32	Smt. Mary & 4 Ors.	Shubh Realty	7867-18
16.	29.07.2005	1137/2005	267/3	1.82	Shri Chelliah	Shubh Realty	7868-18
Total				89.99 (Acres)			



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Annexure 1

C. Ettankulam Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	23.06.2010	3002/2010	232/2	0.715	Smt. Lakshmi Ammal & 20 Ors.	Shubh Realty	15364-18

D. Sayamalai Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	14.12.2011	5539/2011	867/2B1	0.30	S.S. Murugesan	Shubh Realty	26149-17
2.	11.02.2008	232/2008	877/2	2.29	A. Venkatesan & Anr.	Shubh Realty	26147-17
3.	25.01.2008	124/2008	899/3	0.75	Rajendran & 5 Ors.	Shubh Realty	26152-17
4.	25.01.2008	124/2008	899/4	0.68	-do-	-do-	-do-
5.	25.01.2008	125/2008	997/1	6.31	Gurusamy Thevar & 7 Ors.	Shubh Realty	26154-17
6.	25.01.2008	125/2008	998/1A1	3.41	-do-	-do-	-do-
7.	25.01.2008	122/2008	1008	0.53	Ramaraj Thalaivar & 7 Ors.	Shubh Realty	26146-17
8.	25.01.2008	122/2008	1009/1	0.50	-do-	-do-	-do-
9.	02.11.2008	234/2008	1015/2	2.33	A. Vankatesan & Anr.	Shubh Realty	25989-17
10.	02.11.2008	233/2008	1021/1	2.96	Pitchaipandian & 18 Ors.	Shubh Realty	26148-17
11.	02.11.2008	232/2008	1025/1	1.86	A. Venkatesan & Anr.	Shubh Realty	26150-17
12.	28.01.2008	126/2008	900/3	0.250			11839-16
13.	25.01.2008	123/2008	910	4.360	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11837-16
14.	11.02.2008	237/2008	925/13	0.125			11842-16
15.	11.02.2008	237/2008	928/6	0.235			-do-
16.	25.01.2008	127/2008	1307/2	2.900	Swaminathapan-dian & 2 Ors.	Shubh Realty	26145-17
17.	25.01.2008	128/2008	1311/4	0.910	Niraikulathan Thevar & 7 Ors.	Shubh Realty	11855-16
18.	25.01.2008	122/2008	925/8	0.840	Ramaraj Thalaivar & 7 Ors.	Shubh Realty	26146-17
19.	25.01.2008	126/2008	903/2	0.400			11916-16
20.	25.01.2008	126/2008	935	2.850			-do-
21.	25.01.2008	126/2008	936/3	2.000			-do-
22.	25.01.2008	124/2008	946/3B	3.260	Rajendran & 5 Ors.	Shubh Realty	11917-16
23.	11.02.2008	232/2008	892/3	0.680	A. Venkatesan &	Shubh Realty	11919-16



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
					Anr.		
24.	25.01.2008	123/2008	843/2	2.100	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11930-16
25.	11.02.2008	237/2008	847	6.790			11920-16
26.	25.01.2008	122/2008	1009/2	0.390	Ramaraj Thalaivar & 7 Ors.	Shubh Realty	11932-16
27.	25.01.2008	123/2008	918/1	2.620	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11955-16
28.	25.01.2008	124/2008	932/2	1.500	Rajendran & 5 Ors.	Shubh Realty	-do-
29.	25.01.2008	124/2008	892/6	2.250	-do-	-do-	11956-16
30.	25.01.2008	124/2008	923/3	1.630	-do-	-do-	-do-
31.	25.01.2008	123/2008	887/2C	0.440	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11957-16
32.	25.01.2008	126/2008	883/1A	1.410			11958-16
33.	25.01.2008	126/2008	891/1	2.260			11961-16
34.	25.01.2008	126/2008	891/3	1.140			11960-16
35.	16.03.2012	925/2012	889/3	0.050			11963-16
36.	25.01.2008	127/2008	884/2A	1.160	Swaminathapan-dian & 2 Ors.	Shubh Realty	-do-
37.	25.01.2008	127/2008	886	6.140	-do-	-do-	11964-16
38.	25.01.2008	127/2008	888	6.470	-do-	-do-	-do-
39.	11.02.2008	236/2008	890/1	5.160	Mariappan & Anr.	Shubh Realty	11965-16
40.	25.01.2008	124/2008	918/2	2.420	Rajendran & 5 Ors.	Shubh Realty	-do-
41.	25.01.2008	124/2008	932/5	1.560	-do-	-do-	-do-
42.	25.01.2008	122/2008	912/1	0.900	Ramaraj Thalaivar & 7 Ors.	Shubh Realty	11966-16
43.	25.01.2008	125/2008	912/2	1.030	Gurusamy Thevar & 7 Ors.	Shubh Realty	11967-16
44.	25.01.2008	123/2008	873/3A	1.670	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11968-16
45.	25.01.2008	125/2008	933/3	2.400	Gurusamy Thevar & 7 Ors.	Shubh Realty	11970-16
46.	25.01.2008	126/2008	949/2	4.360			11990-16
47.	25.01.2008	128/2008	887/2A	0.605	Niraikulathan Thevar & 7 Ors.	Shubh Realty	11993-16
48.	25.01.2008	123/2008	934/1B	3.000	Chinna Ramasamy Thevar & 6 Ors.	Shubh Realty	11996-16
49.	25.01.2008	123/2008	934/1C	3.010	-do-	-do-	-do-



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
50.	25.01.2008	126/2008	907/3C	2.160			12013-16
51.	25.01.2008	127/2008	884/1	3.030	Swaminathapan-dian & 2 Ors.	Shubh Realty	12014-16
52.	19.01.2012	192/2012	907/3B1	0.450			12015-16
53.	25.01.2008	126/2008	891/2	1.130			12016-16
Total				109.965 (Acres)			

E. Balapathirampuram Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	11.08.2008	1623/2008	91/1	0.45	Muthupandi & 28 Ors.	Shubh Realty	8592-18
2.	11.04.2008	676/2005	373/5B	6.84	Gomathi & 7 Ors.	Shubh Realty	23201-17
3.	17.12.2004	2036/2004	376/1D	1.78	Madasamy Thevar & 3 Ors.	Sarjan Realities	25915-17
4.	06.05.2005	867/2005	376/1A1	2.93	Ramar Reddiar	Shubh Realty	12871-18
5.	06.05.2005	867/2005	378/3A	1.23	-do-	-do-	-do-
6.	08.06.2005	1165/2005	378/1	3.16	Chennappa Reddiar & 3 Ors.	Shubh Realty	9319-18
7.	08.07.2005	1562/2005	385/4A	0.20	Smt. Packiathai & Anr.	Shubh Realty	12870-18
8.	27.07.2004 & 08.07.2005	1108/2004 & 1562/2005	385/4B	2.36	Smt. Mothi V. Subsari	Sarjan Realities	-do-
9.	23.06.2005	1363/2005	386/4B	3.09	Subbaiah Pandian	Shubh Realty	23200-17
10.	08.07.2005	1563/2005	390/2	3.20	Shunmugaiah	Shubh Realty	12863-18
11.	27.07.2004	1108/2004	391/2	6.70	Smt. Mothi V. Subsari	Sarjan Realities	8585-18
12.	25.08.2004	1335/2004	392/1	5.00	Shunmugaiah @ Maruthaiah Thevar	Sarjan Realities	12870-18
13.	27.07.2004	1110/2004	392/2	15.09	Mothi G. Venkatesan	Sarjan Realities	12861-18
14.	27.07.2004 & 26.04.2007	1110/2004 & 1050/2007	404/2A	8.00	Mothi G. Venkatesan	Sarjan Realities	12858-18
15.	27.07.2004	1106/2004	404/1	1.58	Badri Narayanan & Anr.	Sarjan Realities	12852-18
16.	28.05.2004	703/2004	405/1	8.03	V. Annamurugan	Sarjan Realities	25912-17
17.	15.10.2004 & 24.01.2005	1721/2004 & 121/2005	410/2	4.15	Paramaiah Thevar	Sarjan Realities	9318-18
	22.07.2005	1741/2005	413/1	3.03	S. Vanaraj	Sarjan Realities	
					Subbaiah Thevar &	Shubh Realty	9314-18



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
					Anr.		
19.	20.09.2010	2081/2010	414/3	0.12	Velusamy Thevar & 2 Ors.	Shubh Realty	23200-17
20.	06.01.2005	25/2005	418/1	3.22	M. Chelladurai	Sarjan Realities	23045-17
21.	22.12.2004	2064/2004	424/1B	1.83	Sornathai	Sarjan Realities	8209-18
22.	22.12.2004	2064/2004	424/1C	0.28	Sornathai	Sarjan Realities	-do-
23.	28.07.2005	1803/2005	426/1	3.87	Ramakrishna Thevar & 13 Ors.	Shubh Realty	9317-18
24.	01.07.2004	959/2004	428/2	2.38	M. Veerapandian	Sarjan Realities	9313-18
25.	15.06.2005	1259/2005	447/2A	1.86	Athimoola Thevar & 4 Ors.	Shubh Realty	8588-18
26.	08.11.2011	2114/2011	504/5	0.36			23199-17
Total				90.74 (Acres)			

F. Melamaruthappapuram Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	08.06.2005	1730/2005	498/1	0.63	Paramaiah Thevar & Anr.	Shubh Realty	8125-18
2.	08.06.2005; 08.06.2005 & 17.06.2005	1177/2005; 1181/2005 & 1303/2005	501	5.98	Kalisamy Thevar & Anr. Madasamy Thevar & 5 Ors. Iyyathurai & 12 Ors.	Shubh Realty Shubh Realty Shubh Realty	-do-
3.	17.06.2005	1303/2005	502	3.48	Iyyathurai & 12 Ors.	Shubh Realty	-do-
4.	09.08.2006	1917/2006	503	8.605	Marithai & 2 Ors.	Shubh Realty	-do-
5.	08.06.2005	1174/2005	505/2	4.12	Smt. Dhuraichi @ Pannai & 5 Ors.	Shubh Realty	-do-
Total				22.815 (Acres)			

G. Pudur Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	22.02.2008	933/2008	619	2.40	Smt. Alphonsamma	Shubh Realty	13530-18
2.	22.02.2008	933/2008	620/2	1.48	-do-	-do-	-do-



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
3.	22.02.2008	930/2008	374/1	2.91			-do-
4.	22.02.2008	930/2008	366	2.30			-do-
5.	13.08.2007 & 22.02.2008	2285/2007 & 930/2008	365/2	1.22	N. Sankaranarayanan & 6 Ors.	Shubh Realty	13529-18
6.	22.02.2008	930/2008	364/1	1.43			-do-
7.	22.02.2008	930/2008	615	4.28			-do-
8.	22.02.2008	930/2008	386	3.62			-do-
9.	07.03.2011	1610/2011	403/2	4.33			-do-
10.	22.02.2008 & 22.02.2008	930/2008 & 931/2008	393/1	1.47	S. Nellaiappan & 16 Ors.	Shubh Realty	-do-
11.	22.02.2008	930/2008	393/3	0.21			-do-
12.	07.03.2011	1610/2011	579	5.26			-do-
13.	22.02.2008	927/2008	576/3	2.92	Smt. Therasiamma Joy	Shubh Realty	13528-18
14.	22.02.2008 & 07.03.2011	929/2008 & 1610/2011	592	2.57	M. Muthiah & 10 Ors.	Shubh Realty	-do-
15.	22.02.2008	927/2008	593/2	2.75	Smt. Therasiamma Joy	Shubh Realty	-do-
16.	22.02.2008	927/2008	663	4.52	-do-	-do-	-do-
17.	22.02.2008	927/2008	622	3.80	-do-	-do-	-do-
18.	22.02.2008	927/2008	489/4	0.07	-do-	-do-	-do-
19.	22.02.2008	927/2008	356	2.08	-do-	-do-	-do-
20.	22.02.2008	931/2008	394/1	3.43	S. Nellaiappan & 16 Ors.	Shubh Realty	-do-
21.	22.02.2008	931/2008	394/5	0.26	-do-	-do-	-do-
Total				53.31 (Acres)			

H. Echanda Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	06.03.2007	1611/2007	491/1	1.74	K.V. Ramakrishnan & Anr.	Shubh Realty	8564-18
2.	06.03.2007	1611/2007	491/2	2.02	-do-	-do-	8605-18
3.	06.03.2007 & 22.03.2007	1611/2007 & 1242/2007	492/2	1.98	K.V. Ramakrishnan & Ors. K.V. Ramakrishnan & Anr.	Shubh Realty Shubh Realty	-do-
4.	19.03.2009	572/2009	492/3	1.77			-do-
	06.03.2007	1611/2007	535/3	1.80	K.V. Ramakrishnan	Shubh Realty	-do-



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
					& Ors.		
6.	06.03.2007	1611/2007	535/6	1.62	K.V. Ramakrishnan & Ors.	Shubh Realty	-do-
7.	06.08.2009	1645/2009	535/7C	0.20	Periyasamy Thevar	Shubh Realty	8564, 8605-18
8.	06.08.2009 & 03.06.2007	1646/2009 & 1611/2007	535/7D	0.35	Smt. Lakshmiammal & 2 Ors. K.V. Ramakrishnan & Ors.	Shubh Realty Shubh Realty	-do-
9.	03.06.2007	1611/2007	535/7E	0.64	K.V. Ramakrishnan & Ors.	Shubh Realty	-do-
10.	03.06.2007	1611/2007	535/7F	0.36	K.V. Ramakrishnan & Ors.	Shubh Realty	-do-
Total				12.48 (Acres)			

I. Therkkku Sankarankovil Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	20.02.2008	450/2008	126/2B1	0.39	Azhakumuthu Servai & 3 Ors.	Shubh Realty	9711-18
2.	20.02.2008	450/2008	125/5	1.29	-do-	-do-	7838-18
3.	20.02.2008	450/2008	125/8	1.71	-do-	-do-	-do-
4.	20.02.2008	447/2008	126/3	0.91	Madasamy Chettiar & 3 Ors.	Shubh Realty	9711-18
5.	20.02.2008	451/2008	130/1	2.47	Sankarapandian & 9 Ors.	Shubh Realty	-do-
6.	20.02.2008	447/2008	131/1	0.57	Madasamy Chettiar & 3 Ors.	Shubh Realty	7839-18
7.	20.02.2008	447/2008	132/3	0.84	Madasamy Chettiar & 3 Ors.	Shubh Realty	-do-
8.	20.02.2008	447/2008	133/3	0.48	Madasamy Chettiar & 3 Ors.	Shubh Realty	-do-
Total				8.66 (Acres)			

J. Naduvakurichi Minor Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
	18.12.2006	1879/2006	39	6.37	Smt. Gilda D. Correya	Shubh Realty	1079-18



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
2.	18.12.2006	1879/2006	53	4.85	-do-	-do-	1025-18
3.	18.12.2006	1879/2006	54/2	0.62	-do-	-do-	-do-
4.	18.12.2006	1879/2006	54/8	0.98	-do-	-do-	-do-
5.	18.12.2006	1879/2006	54/9	0.88	-do-	-do-	-do-
6.	06.03.2007	376/2007	55/1	1.29	K.V. Ramakrishnan & Anr.	Shubh Realty	8564-18
7.	06.03.2007	376/2007	55/2	1.59	-do-	-do-	-do-
8.	18.12.2007	396/2007	75/1A1	2.77	Smt. Kamala G. Pillai	Shubh Realty	1079-18
9.	18.12.2007	396/2007	75/1C	0.07	-do-	-do-	-do-
10.	18.12.2007	396/2007	76/1	4.99	-do-	-do-	-do-
11.	18.12.2007	396/2007	76/4	4.37	-do-	-do-	-do-
12.	18.12.2007	396/2007	89/2	5.04	-do-	-do-	-do-
13.	18.12.2007	396/2007	90/2	4.22	-do-	-do-	-do-
14.	18.12.2007	396/2007	91/1	0.72	-do-	-do-	-do-
Total				38.76 (Acres)			

K. Pattadaikatti Village, Tirunelveli District

S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
1.	11.01.2008 & 13.02.2008	37/2008 & 194/2008	201	5.25	K.V. Govindan & Anr. Ramachandra Velayutham and 2 Ors.	Shubh Realty Shubh Realty	1078-18
2.	22.03.2007 & 13.02.2008	1243/2007 & 197/2008	206/1	4.12	K.V. Ramakrishnan & Anr. Ramakrishnan & 7 Ors.	Shubh Realty Shubh Realty	-do-
3.	22.03.2007 & 13.02.2008	1242/2007 & 195/2008	283/1A	4.57	K.V. Ramakrishnan & Anr. Smt. Vellaithai & 21 Ors.	Shubh Realty Shubh Realty	-do-
4.	07.10.2008; 06.03.2007 & 10.01.2008	1424/2008; 1611/2007 & 35/2008	291	5.88	Smt. Koilal @ Kovilthai & 10 Ors. K.V. Ramakrishnan & Anr. K.V. Govindan & Anr.	Shubh Realty Shubh Realty Shubh Realty	8562-18
5.	07.10.2008 &	1424/2008 &	292	2.62	Smt. Koilal @	Shubh Realty	-do-



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S.No.	Date of Purchase	Document No.	Survey No.	Extent (in Acres)	Seller	Purchaser	MR No.
	06.03.2007	1611/2007			Kovilthai & 2 ors. K.V. Ramakrishnan & Ors.	Shubh Realty	
Total				22.44 (Acres)			



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