

IN THE HIGH COURT OF JUDICATURE AT PATNA
Civil Writ Jurisdiction Case No.526 of 2015

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Asharfi Yadav son of Late Lalji Yadav Resident of village - Amarpura, P.S.
Lokahi, District - Madhubani

... .. Petitioner/s

Versus

1. The State Of Bihar and Ors
2. The Collector, Madhubani
3. The Deputy Collector Land Revenue, Madhubani
4. The Sub-Divisional Officer, Phulparas, District - Madhubani
5. The Circle officer, Lokahi, District - Madhubani
6. Renu Yadav W/o Sri Satyendra Kumar Yadav Resident of Singarahi, P.S.
Lokahi, District - Madhubani

... .. Respondent/s

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Appearance :

For the Petitioner/s	:	Mr. Gajendra Kumar Jha, Adv. Mr. Sushil Kumar Jha, Adv.
For the State	:	Mr. Santosh Chandra Bhaskar, AC to GP-11

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CORAM: HONOURABLE MR. JUSTICE RAJ KUMAR
ORAL JUDGMENT

Date : 10-08-2026

Heard learned counsel for the petitioner as well as the learned counsel appearing on behalf of the State. Although notices have been issued to respondent no. 6 namely Renu Yadav but she has chosen not to appear.

RELIEFS

2. The present application has been filed by the petitioner seeking relief in the nature of *certiorari* for quashing of the order dated 18.11.2014 passed by the Collector in Encroachment Appeal No. 10/14-15 whereby the



Collector, *Madhubani* has rejected the appeal preferred by the petitioner against the order dated 05.05.2014 passed by the Circle Officer wherein the Circle Officer had directed for the removal of the encroachment over Plot No. 1099 measuring 6 *Dhurs* in Village - *Amarpura*, *Thana* No. 38, P.S.- *Lokahi*, District- *Madhubani* within a period of 15 days.

3. The petitioner has further prayed for quashing of the final order dated 05.05.2014 passed by the Circle Officer wherein the petitioner was directed to remove the encroachment on the aforesaid land within a period of 15 days. Petitioner has further prayed for the issuance of a writ in the nature of *mandamus* directing the respondents not to give effect to the aforesaid orders. Earlier matter was heard by this Court and already a stay has been granted by a Co-ordinate Bench of this Court vide order dated 20.02.2015.

FACTS

4. The short facts of the matter are that prior to the vesting of *Zamindari*, a land measuring an area of 3 *Katthas*, appertaining to *Khesra* No. 1099, *Khata* No. 275, situated at *Amarpura* was settled in favour of the petitioner's grandfather, namely, Sri *Babu Lal Gope* by the erstwhile *Maharaja* of *Darbahanga*, on 20.07.1926, almost 100 years



ago and since then the petitioner's family are in continuous and peaceful possession of the aforesaid land. Besides, it is also the case of the petitioner that a *Jamabandi* was created in the name of the grandfather of the petitioner and till date the revenue rent has been paid to the Government up to the year 2013-14, which is marked as Annexure-2 to the writ application.

5. It is the case of petitioner that they are residing in the dwelling house over their share of the above land.

6. On 11.09.2013, on the basis of complaint made by one *Renu Yadav* (respondent No. 6), the Sub-Divisional Officer, *Phulparas, Madhubani* (respondent no. 4) directed the Circle Officer to conduct an enquiry and proceed in the matter and accordingly, the respondent no. 6 filed a writ application bearing CWJC No. 3050/2014 seeking a direction upon the respondent- authorities to remove the encroachment over the land, in question. The same was disposed of by a Co-ordinate Bench of this Court on 07.02.2014, wherein a direction was issued to the respondents-authorities to ensure the removal of encroachment within a period of three months after hearing the parties in question. Consequently, the Circle Officer, *Lokahi, Madhubani* (respondent no. 5) initiated



Encroachment Case No. 21/13-14 on 19.04.2014, issued notice to the petitioner under Section 3(1) of the Bihar Public Land Encroachment Act, 1956, directing him to appear before him on 05.05.2014 and also to file a show-cause vide Annexure 7 of the writ application.

7. Petitioner thereafter appeared before the respondent-Circle Officer on 05.05.2014, filed his show-cause contending that he was not an encroacher and as such *Jamabandi* in the name of the grandfather of the petitioner has been running over the land in question bearing *Jamabandi* No. 258, which petitioner at this point has stated was carved out of *Jamabandi* No. 275. Despite the show-cause having been filed by the petitioner on 05.05.2014 the respondent no. 5-Circle Officer passed a final order on the same day, directing the petitioner to remove the encroachment from the public land within 15 days of the passing of such order, which is marked as Annexure-8 to the writ application.

8. Aggrieved by the said order, the petitioner moved before the Hon'ble High Court in CWJC NO. 9357/2014 which was disposed of by a coordinate bench of this Court vide an order dated 27.05.2014, whereby liberty was given to the petitioner to prefer an appeal under Section



11 of the Bihar Public Land Encroachment Act, 1956. Accordingly, petitioner had thereafter filed Encroachment Appeal No. 10/14-15 under Section 11 of the Bihar Public Land Encroachment Act, 1956, before the respondent no. 2-Collector, annexing the relevant documents as proof showing the land appertaining to *Jamabandi* No. 275, *Khesra* No. 1099, measuring an area of 3 *Kattha* out of *gairmazarua Aam Khata*, was settled in favour of the petitioner's ancestor, by the erstwhile *Maharaja* of *Darbhangha*, vide settlement deed dated 20.07.1926.

9. It is also stated that *Khata* No. 352 was created in the name of the grandfather of petitioner, namely, *Babu Lal Gope* and since then the family of the petitioner is in continuous and peaceful possession of the same. The Appellate Authority/Collector, taking into consideration the entire facts, rejected the claim of the petitioner and affirmed the final order passed by the Circle Officer, on account of a report submitted by the Circle Inspector and *rajaswa karmachari* that the land appertaining to *Khesra* No. 1099 has been recorded as '*gairmazarua aam rasta*' in the survey *Khatian* of *kism dagar*, upon which the petitioner has constructed a thatched hut. It was also observed by the



Collector that the petitioner has failed to prove his title to the land in question by non-submission of the relevant documents regarding the ownership or the alleged settlement. The Appellate order thus confirmed the final order dated 05.05.2014 passed by the concerned respondent no. 5/Circle Officer.

Submissions on behalf of the Petitioner

10. Learned counsel for the petitioner has vehemently argued that the settlement was made in the year 1926, whereafter *Jamabandi* was created in favour of the Grandfather of the petitioner, namely, Shri Babu Lal Gope, and since then they are in possession of the land in question and even the revenue rents have been paid until 2013-2014, i.e., till the filing of the appeal before the concerned authorities.

11. It is next argued that the petitioner could not be evicted in a summary proceeding initiated under the 'Bihar Public Land Encroachment Act, 1956', as a long-standing *Jamabandi/settlements*, having been settled almost 100 years ago, is running, and even if the *Jamabandi* was disputed, no steps have been taken by the State for the cancellation of the same before a civil court of competent jurisdiction.



12. It is next submitted that it is settled law that a proceeding under the Bihar Public Land Encroachment Act, 1956, cannot be initiated against the *Raiyati* land of the petitioner .

13. Learned counsel also stated that the final order dated 05.05.2014, passed by the Circle Officer is without completing the formalities and due procedure which are to be mandatorily followed under sections 3, 4, and 5 of the Bihar Public Land Encroachment Act, 1956. Moreover, under section 10 of the Bihar Public Land Encroachment Act, 1956, the concerned authorities are vested with the powers of a civil court and they have been specifically empowered to call for records, admit evidence adduced and tendered, and further to conduct an inquiry, if need be, before forming a *prima facie* opinion regarding the nature of land, and if the same is found to be a 'public land' within the meaning of Section 2(3) of the Bihar Public Land Encroachment Act, 1956, only then a proceeding under the Act can be instituted. No compliance of the statutory procedure enshrined under the Bihar Public Land Encroachment Act, 1956, has been done by the Circle Officer. Learned counsel has submitted that from a bare perusal of Annexures 7 and 8 of the writ application



itself, it would be clear that the petitioner was asked to file his show-cause by 05.05.14, by a notice dated 19.04.14. In response thereto, he filed show cause on 05.05.2014, and a final order was passed by the Circle Officer on the same date. Thus, it would not be erroneous to presume that no inquiry in compliance with the provisions enshrined under the Bihar Public Land Encroachment Act, 1956, was conducted nor any evidence was adduced or tendered by the concerned authorities before passing the aforesaid order.

14. Learned counsel thus submits that both the orders dated 05.05.14 and 18.11.14 passed by, Respondent No.5-Circle officer in Encroachment Case No. 21/13-14, as well as by the Respondent No.2-Collector in Encroachment Appeal No. 10/14-15 respectively are untenable in the eyes of law.

Submission on behalf of the State

15. *Per contra* Learned counsel for the State has defended the orders passed by the Circle Officer as well as the Appellate Authority, stating therein that ample opportunity was given to the petitioner to defend the stand, which has been taken by him.

16. Learned counsel next submits that petitioner



did not produce the relevant documents which were required to be produced in support of his ownership of the land in question based on the alleged settlement deed, before the Appellate Authority and in that context the Appellate Authority was justified in passing the order against the petitioner thereby affirming the final order passed by the respondent no. 5/ Circle Officer under Section 6(3) of the Bihar Public Land Encroachment Act, 1956.

17. Learned counsel for the State has also pointed out paragraph 7 of the *counter-affidavit* and has stated therein that the 6 *Dhurs* pertaining to *Khesra* No. 1099, *Rakwa* in the Cadastral Survey *Khatiyān* has been reflected as a *gairmazarua aam rasta*, and as such the petitioner and others have encroached upon the land by constructing a thatched hut over the same. It is also submitted on behalf of the State that the 6 *Dhurs* which have been encroached by the petitioner will not fall within the ambit of the settlement which has been done in favour of the petitioner or the ancestors of the petitioner, since 1926.

18. On the contrary, learned counsel for the petitioner specifically mentioned that 6 *Dhurs* of land is part of the settlement which has been made in favour of the



ancestors of the petitioner and as such there can be no dispute on that point.

CONCLUSION

19. Taking into consideration the materials available on record, the order passed by the Circle Officer as well as the Appellate Authority, what manifests from the order of the Circle Officer is that petitioner has filed a show cause giving the details of the land in question on 05.05.2014. The Circle Officer/respondent no. 5 neither took any steps to peruse the show cause nor summoned the revenue records for ascertaining the correct facts. Therefore, the procedure which was required to be followed by the concerned Circle Officer under the Bihar Public Land Encroachment Act, 1956, was not complied with and hence his actions are contrary to law. It is also very clear that no opportunity of hearing was provided to the petitioner and neither any evidence was adduced on behalf of the parties to come to a definite conclusion. The Circle Officer under the provisions of Section 3, 4, 5 and 10 of the Bihar Public Land Encroachment Act, 1956, was duty bound to follow the guidelines, the same has not been done in the present case, even though the Appellate order has mentioned about some inspection report but a definite and



clear opinion has not been indicated by the Appellate Authority. The law is very clear in view of a catena of judgments of the Hon'ble Supreme Court and this Hon'ble High Court that the Bihar Public Land Encroachment, 1956, is only applicable to a public land, and a proceeding under it cannot be initiated over the *Raiyati* land of the petitioner, especially when they are in possession of the land in question since, last almost 100 years. Law is amply clear that the petitioner could not be evicted in a summary proceeding. In this regard, reliance is being placed upon the judgment of this Hon'ble Court in the case of *Uma Devi v/s State of Bihar* in *CWJC No. 9773/2000 dated 05.03.2001*, wherein it has been held that when a question of title is involved the proceeding under the land encroachment Act is not the remedy. Remedy is to get rights, title or interest, declared by a competent Court of civil jurisdiction and until that right is so decided, authorities cannot call them into question by initiation of proceedings under the Bihar Public Land Encroachment Act, 1956.

20. In the case of *Bipin Bihari Verma vs The State of Bihar*, recently passed on 21.05.2026, in CWJC No. 4876 of 2021, it has been reiterated by a Co-ordinate Bench



of this Court that Long standing *Jamabandis* cannot be cancelled in a summary proceeding. Furthermore, if a *Jamabandi* is continuing since long time and is disputed by the State, the only forum to challenge the same is by the filing of a civil suit before a Civil Court of competent jurisdiction seeking a cancellation of the *Jamabandi*. Para 33 of the Judgment is being cited here under:-

“The collector under Section 4(h) of the Bihar Land Reforms Act lacks jurisdiction to dispute settlements made prior to 01.01.1946; the proper remedy for challenging such settlements is to approach a competent civil court for cancellation of the settlement first, and then the Jamabandi- Longstanding Jamabandis cannot be cancelled in a summary proceeding; In the opinion of this court also, any Jamabandi created on the basis of a settlement said to have taken place way back prior to vesting of the Jamindari, even if the same was not permissible in law, the same needed to be challenged either immediately or if with delay then the proper forum of approaching the competent civil court would be the remedy for cancellation of the settlement first and



then cancellation of Jamabandi.”

21. Similar principle has been applied in the case of *Sunita Rani Sah vs State of Bihar*, in CWJC No. 15484 of 2022, dated 18.06.2026, in Para 19 that “ *longstanding Jamabandi can not be cancelled*”. The only remedy available for the State is to file a civil suit and get a declaration against the party in question.

22. Taking into consideration the entire discussions made above, this Court is of the opinion that present proceeding which has been initiated under the Bihar Public Land Encroachment Act, 1956, against the petitioner is vitiated as the issue of *Jamabandi* and the settlement of land in favour of the ancestors of the petitioner has not been properly considered by the respondent authorities. Even the contention on behalf of the respondent that wrong *Jamabandi* has been created in favour of the petitioner will not support the case of the State as the same *Jamabandi* which has been created in favour of the ancestors of the petitioner is still in existence and has not been challenged before any forum by the State up till now. This Court thus holds that Bihar Public Land Encroachment Act, 1956, shall not apply to *Raiyati* land settled long back. Accordingly, the orders passed by the



Appellate Authorities vide order dated 18.11.2014 passed in encroachment appeal No. 10/14-15 and final order dated 05.05.2014 passed by the respondent no. 5/Circle Officer, Madhubani, are hereby quashed.

23. Matter is remanded back to the /respondent no. 5/Circle Officer, Madhubani for considering the case of the petitioner in terms of paras 28 to 30 of this order.

24. The grounds which have been taken by the petitioner regarding the settlement of land and *Jamabandi* will be examined minutely by the Circle Officer and a *prima facie* satisfaction with respect to the same shall be recorded, after hearing the parties in accordance with law.

25. The entire exercise by the respondent no. 5/Circle Officer, Madhubani, must be completed within a period of four months from today, till then status quo as of today shall be maintained between the parties.

Guidelines/Directions

26. This Court is in *seisin* of this roster for the past few months has come across numerous matters arising out of the Bihar Public Land Encroachment Act, 1956, wherein most of the matters are either pending before the concerned authorities empowered under the Act or long



pending before this Hon'ble High Court. It would not be out of place to mention that the proceedings under the Bihar Public Land Encroachment Act, 1956, cannot be initiated against the *raiyati* lands and the same can only be initiated in cases of encroachment over public land as defined under section 2(3) of the Bihar Public Land Encroachment Act, 1956. In this vein, it is of utmost importance to reiterate that persons having *bona fide* rights, title or interest in their lands shall not be subjected to suffering without any reason. Despite this being the position, in most cases, disputes regarding the petitioners' right, title, and interest in the *raiyati* lands arise. This, in turn, gives rise to piecemeal litigation at every stage of the proceedings under the Bihar Public Land Encroachment Act, 1956. It would not be untrue to state that such a phenomenon not only causes agony and harassment to the parties but also incessantly piles on and increases the burden on the Courts and the State, and unnecessarily gives rise to litigation that could very well be concluded by adhering to the statutory mechanism enshrined under the Act of 1956 (Supra). Hence, it would be in consonance with the objectives enshrined under the Bihar Public Land Encroachment Act, 1956, that concerned authorities be directed to curtail



unscrupulous and frivolous complaints, tainted with high-handedness, obliqueness or untowardness, made under section 3(1) of the Bihar Public Land Encroachment Act, 1956. Many writ applications are preferred by the parties assailing the notice directing to remove encroachment or notice to show cause as to why encroachments should not be removed, issued under section 3(1) of the Act, passed at the preliminary stage itself, while other applications even though preferred seeking the quashing of the final orders passed by the concerned authorities under section 6 (1) of the Bihar Public Land Encroachment Act, 1956, are preferred without exhausting the remedy of appeal enshrined under section 11 of the Bihar Public Land Encroachment Act, 1956, or remedy of review under section 13 of the Bihar Public Land Encroachment Act, 1956, as applicable. This Court, hence, has deemed it necessary and fit that, unless and until definitive guidelines are issued in this regard, such events shall continue to plague the administration of justice. The proposed guidelines are enumerated as follows-

I. Section 3 of the Bihar Public Land Encroachment Act, 1956, deals with the initiation of proceedings under the Act, and states that upon the receipt of any



application/information by any person/source, alleging that *public land* as defined under section 2(3) of the Act, has been encroached by any person, the Collector/in most cases the Circle Officer is obligated to formulate a *prima facie* view and issue a notice to show cause against the person requiring him to appear on a date which shall not be less than two weeks from the date of service of notice to show cause:-

(a) Why he should not be restrained from making such encroachment by the issue of injunctions; or

(b) Why such encroachment should not be removed.

II. According to Section 4 of the Act, after such notice is served upon the persons or any person interested in the encroachment, they have to appear and raise their defence before the Circle Officer/Collector, as the case may be.

III. Following which, under Section 5 of the Bihar Public Land Encroachment Act, 1956, the Circle Officer/Collector hears the parties concerned on the date so specified in the notice, and takes such other evidence as may be adduced on that behalf.

IV. Section 6(1) of the Act stipulates that the Collector shall, after hearing the persons concerned and taking evidence, if any, under section 5 and after making such enquiry as he



deems necessary, the Collector may,

- a either drop the proceedings, or*
- b issue a temporary injunction or*
- c if any person who, together with his homestead, does not own more than 5 acres of land, has encroachment up to 10 dec. of public land continuous to his agricultural holding and has used the encroached public land for agricultural purposes. The collector shall order the settlement of such public land with such person on payment of rent and damages for the use of this land, or*
- d where the temporary encroachment on public land has been removed by the person making the encroachment, after some time, the Collector shall order payment of damages for the use of the land during the period of encroachment, or*
- e in the cases not covered by the foregoing sub-clauses, the Collector shall direct the person making encroachment of the public land to remove the encroachment within a specified period, which shall not in any case be more*



than two weeks in case the encroachment is not removed within the specified time the crops standing or all types of structures existing on the encroached land shall be forfeited by the Collector.

27. This Court is of the opinion that in most of the writ applications preferred before this Hon'ble Court, orders passed under Sections 6(1) (e), 3(1) of Bihar Public Land Encroachment Act, 1956, are brought under challenge.

28. This Court, therefore, is of the opinion that, when the concerned authorities, be it the Circle Officer or the Collector, form a *prima facie* view under section 3 of the Bihar Public Land Encroachment Act, 1956, they must call for and take cognizance of the following records by taking recourse to the powers enshrined under section 10 of the Act which stipulates that the Circle Officer/Collector for the purposes of enquiries under this Act, shall have powers to issue commission, hold local inspection, summon and enforce the attendance of witnesses and to compel the production of documents as a Civil Court under the CPC, 1908, mentioned herein under:-

a jamabandi,



- b khatiyā,*
- c register-II entries,*
- d decrees passed in title/partition suits or any other suit for declaration of title concerning the parties,*
- e settlements of gairmazura aam/khas made by the erstwhile Maharajas, or those by ex-landlords or by parwanas, or*
- f settlements made through pattas of gairmazura aam/khas or*
- g settlements made under the provisions of the Bihar Land Reforms Act or*
- h settlements made under any other law in force in India at the time,*

during the conduct of the hearing as prescribed under sections 4 and 5 of the Bihar Public Land Encroachment Act, 1956, and record a definitive finding as to whether a *bona fide* dispute exists regarding the nature of the land between the parties. If such a query is answered in the positive, such cases shall not be subjected to the proceedings made under Bihar Public Land Encroachment Act, 1956, and the same could be



resolved in the manner as provided below-

- a In case the dispute arises on account of the claim of jamabandi which has been created recently, the State, if so advised, under section 9 of the Bihar Land Mutation Act, 2011, shall submit an application before the addl. Collector, for the cancellation of the disputed jamabandi; or,*
- b In case the dispute arises on account of the claim of a long-standing jamabandi, if the same is supported by substantial documents proving such right, title or interest in the land tendered by the petitioner before the concerned authorities, the same shall be treated as a bona fide dispute and the onus to disprove the same shall be upon the state by filing of a civil suit before a court of competent jurisdiction seeking a cancellation of the settlement/jamabandi, or*
- c However, in cases where no documents have been tendered by the petitioner in support of the claimed right, title or interest in land, then the onus to prove that such a title validly exists*



shall lie upon the petitioner, and they shall be directed to move before a civil court of competent jurisdiction, seeking a declaration of the claimed rights/title/interests, or

d In this vein, the Court is of the opinion that while giving effect to this guideline, every case has to be answered based on the attribution of onus to prove the title as the case may be or to prove that a title does not exist, and onus has to be attributed based on the facts and circumstances surrounding each and every case.

29. It is further reiterated that on a plain reading of Section 4 (g) & (h) of the Bihar Land Reforms Act, 1950, it is amply clear that the Collector, under sub-section (g), if of the opinion that the State is entitled to direct the possession of any property, he shall pass an order requiring the person upon whom any estate or tenure is so vested to show cause within a reasonable period of time and subsequently under sub-section (h) shall have the power to annul any transfer including any settlement or lease of any land comprised in such estate or tenure and dispossess the person claiming under it and take possession of such property as he may deem fair and



equitable. However, the same shall not be applicable to transfers, including settlements or leases of any land appertaining to any tenure or estate made before the 1st of January 1946, in favour of the person claiming interest in such estate or lease or settlement.

30. The concerned authorities under section 3(1) of the Act, upon the receipt of a complaint or an application, as the case may be, from any person regarding the existence of encroachment over public land, shall verify the veracity of the same and if the authority so empowered, upon examination thereof, is of the opinion that such a complaint is directed towards making some untoward gain or profit or is preferred to achieve an ulterior motive, the authority shall record such reasons in writing and proceed against such person under the provision of section 248 of the BNS, 2023.

31. This Court further deems it proper in the interests of justice to observe that writ applications preferred assailing the notice to file a show cause issued under section 3 (1) of the Act or those assailing a final order passed under section 6(1) of the Bihar Public Land Encroachment Act, 1956, without exhausting the remedy of appeal as enshrined under section 11 of the Bihar Public Land Encroachment Act,



1956, as a general rule are discouraged since the Legislature has already established the mechanism of availing of a statutory remedy in the form of an appeal under the Act. Moreover, it is made clear that persons to whom show cause notices have been issued under section 3(1) of the Act have to mandatorily file their reply and show cause before the authorities, and no writ applications assailing the notice to show cause issued under section 3(1) of the Act shall be preferred. However, that is not to say that a writ applicant aggrieved by the said orders is completely deprived of his liberty to approach this Court under its extraordinary jurisdiction enshrined under Article 226. They may still approach this Hon'ble Court without exhausting the remedy of an appeal under the Act or assailing any proceedings initiated under this Act, if there exists a violation of principles of natural justice, any patent illegality or any error of law on the face of the record or any longstanding settlements of the land in question, that warrants the exercise of the extraordinary powers of the writ court under Article 226.

32. These directions are being given for the dispensation of justice and to simplify the procedure so that a genuine person with absolute Rights/Titles over their lands are



not unnecessarily harassed and disturbed, especially in cases where there is a serious dispute with respect to title of the property in question, and the concerned authorities, if unable to tender a definitive conclusion about the rival claims made in respect of such property, cannot proceed for removal of encroachment/demolition of the dwelling house of persons without following due procedure prescribed by law, including the valid service of notice and hearing the parties in question and adjudicating the issue.

33. Since right to shelter is a fundamental right under Article 21 of the Constitution of India and Article 300A protects the property of individuals from interference in the peaceful possession of the land they rightfully claim, such as passing of orders for removal of encroachment in *khatiyani* land, without following the due process and valid service of notice, as also examine each case in terms of the guidelines prescribed under paras 28 to 30 hereinabove. Non-compliance with the same may warrant liability upon the State or its instrumentalities, of payment of due compensation for the damages done by illegal demolitions or excesses resulting from the arbitrary exercise of powers by the authorities. The quantum and the mode of payment of compensation, however, have to be



determined on the basis of the peculiar facts and circumstances surrounding each case.

34. The application stands *allowed* in view of the observations made hereinabove.

35. Let a copy of this order be communicated through FAX/Email to District Magistrates of all the districts of Bihar through Registrar General, Patna High Court.

(Raj Kumar, J)

Vats/Ashutosh

AFR/NAFR	AFR
CAV DATE	N/A
Uploading Date	13.08.2026
Transmission Date	N.A

