

BEFORE THE NATIONAL GREEN TRIBUNAL SOUTH ZONE AT CHENNAI
MEMORANDUM OF APPEAL
(Under Sections 16(h) read with 18(1) of the National Green Tribunal Act,
2010)

Appeal No. 11 of 2020

K.Saravanan

....Appellant

Vs.

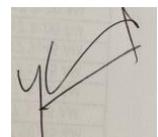
The Tamilnadu Polymer Industries Park Ltd & Anr

...Respondents

REPLY TO THE "OBJECTIONS TO THE WRITTEN ARGUMENTS FILED BY THE APPELLANT" FILED BY THE RESPONDENT

1. It is submitted that the 1st respondent has filed a two page "Objections to the written arguments filed by the Appellant" praying that the Hon'ble Tribunal be pleased to reject the written submissions filed by the appellant and the present reply is filed in response to the same.
2. It is submitted that the appellant has no knowledge of the email dated 07.02.2022 sent by the 1st respondent to the registry of this Hon'ble Tribunal as no copy was marked to the appellant.
3. It is submitted that the counsel for the appellant and their office has been plagued by series of illness and the counsel is still recovering from the aftereffects of COVID. Intervening illness of colleagues prevented the office from functioning normally. If the learned counsel for the respondent had enquired with the counsel's office, this fact would have been communicated to them.
4. It is submitted that the non-filing of written submissions within 3 days of 18.01.2022 is neither willful nor wanton. No prejudice will be caused to the respondent if the written submissions filed by the appellant- providing references to the page numbers in the record and consolidating oral submissions made over a few days, for ease and convenience, is accepted by this Hon'ble Tribunal. It is surprising that the 1st respondent is objecting to the written submissions being accepted by this Hon'ble Tribunal. It is therefore prayed that this Hon'ble Tribunal be pleased to accept the written submissions and thus render justice.

Dated this the 2nd day of march, 2022 at Chennai



Counsel for the Appellant