

**IN THE NATIONAL GREEN TRIBUNAL (SOUTH ZONE),
CHENNAI**

Original Application No. 128 of 2021 (SZ)

Between:

Ibrahim Karim

.....Applicant

v.

State of Kerala & Ors

.... Respondents

MEMO FILED BY THE COUNSEL FOR APPLICANT

Aforesaid Original Application is filed against the illegal construction of Multi Utility Complex in Ittiyappara Town of Ranni Taluk in Pathanamthitta District; causing serious Environmental damages. In the Joint Committee report it is an admitted fact that, the proposed area of construction of Multi Utility Complex is a flood plain.

I am producing the recent photographs of the proposed site being flooded in the current heavy rain scenario prevailing in the State of Kerala for proof of flood plains (now the proposed construction site) being used by nature (Pamba River and its Tributaries). The said photographs were taken by a Friend of the Applicant herein on 16.10.2021 & 17.10.2021. Photographs are submitted alongside this memo for perusal of this Hon'ble Tribunal.

Dated this the 20th day of October 2021



Counsel for the Applicant

















