

**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**

By Order dated 13.09.2022, this Hon'ble Tribunal was pleased to direct me to file a sketch, though not to scale, explaining the location of the construction and the water streams around it.

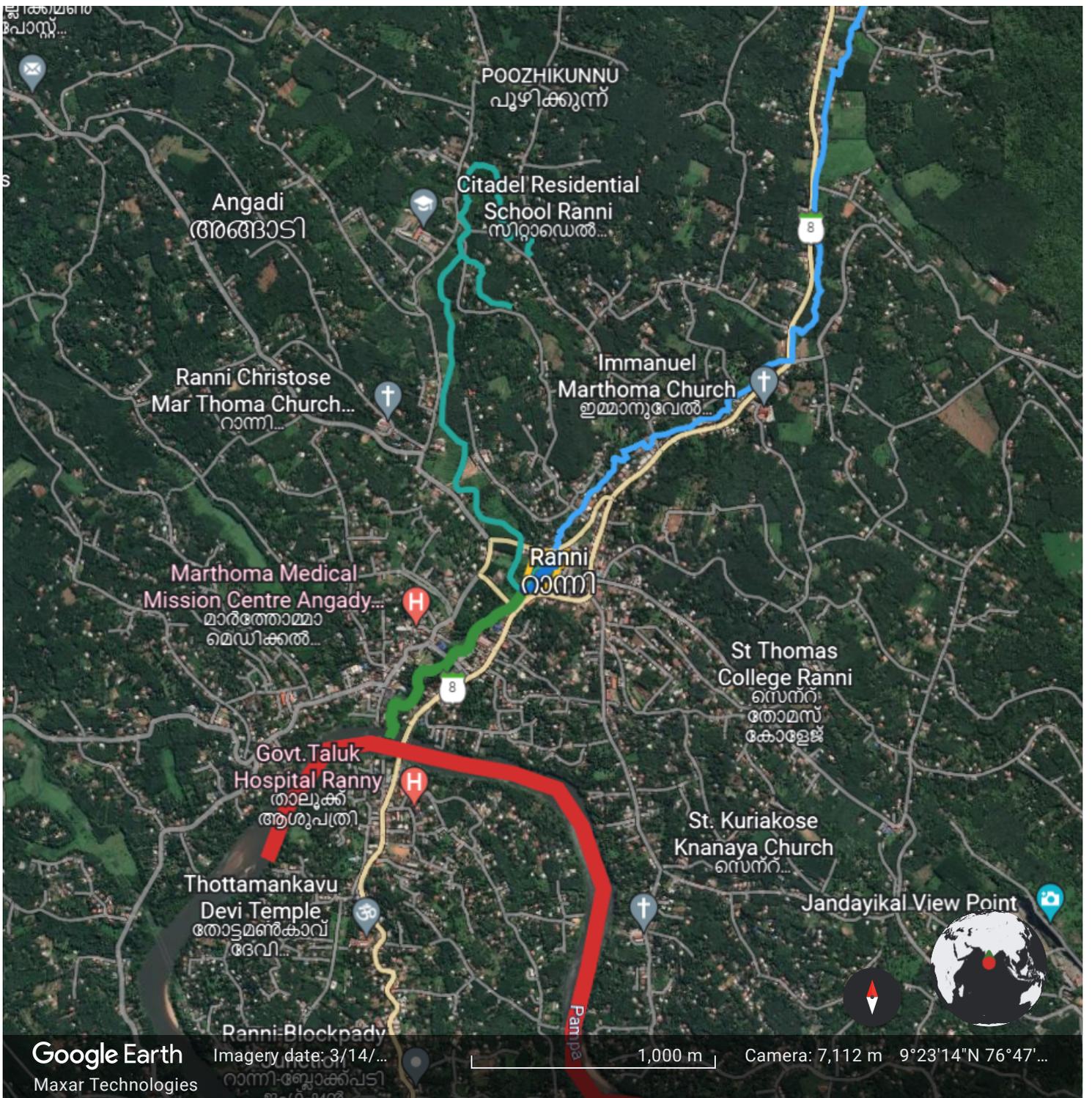
A detailed Sketch, prepared from the Aerial Imaging of Google Earth (including relevant timeline image/ photographs of the Site and other relevant/ different lay-outs), are produced as evidence, as directed by this Hon'ble Tribunal, and are annexed along with this memo for this Hon'ble Tribunal's reference and record.

In addition to the above, a Drone Aerial Video Footage inclusive of relevant proof for the freshly laid down Survey Stones, by Governmental authorities, to falsely prove that the stream was a land of the construction area which is filled by the Government of Kerala, is also forwarded to [judicial-ngtisz@gov.in](mailto:judicial-ngtisz@gov.in), as instructed, which would facilitate a better comprehension of the ground realities. The said Drone Aerial Video Footage may also be accepted and treated as if the same is produced along with this memo.

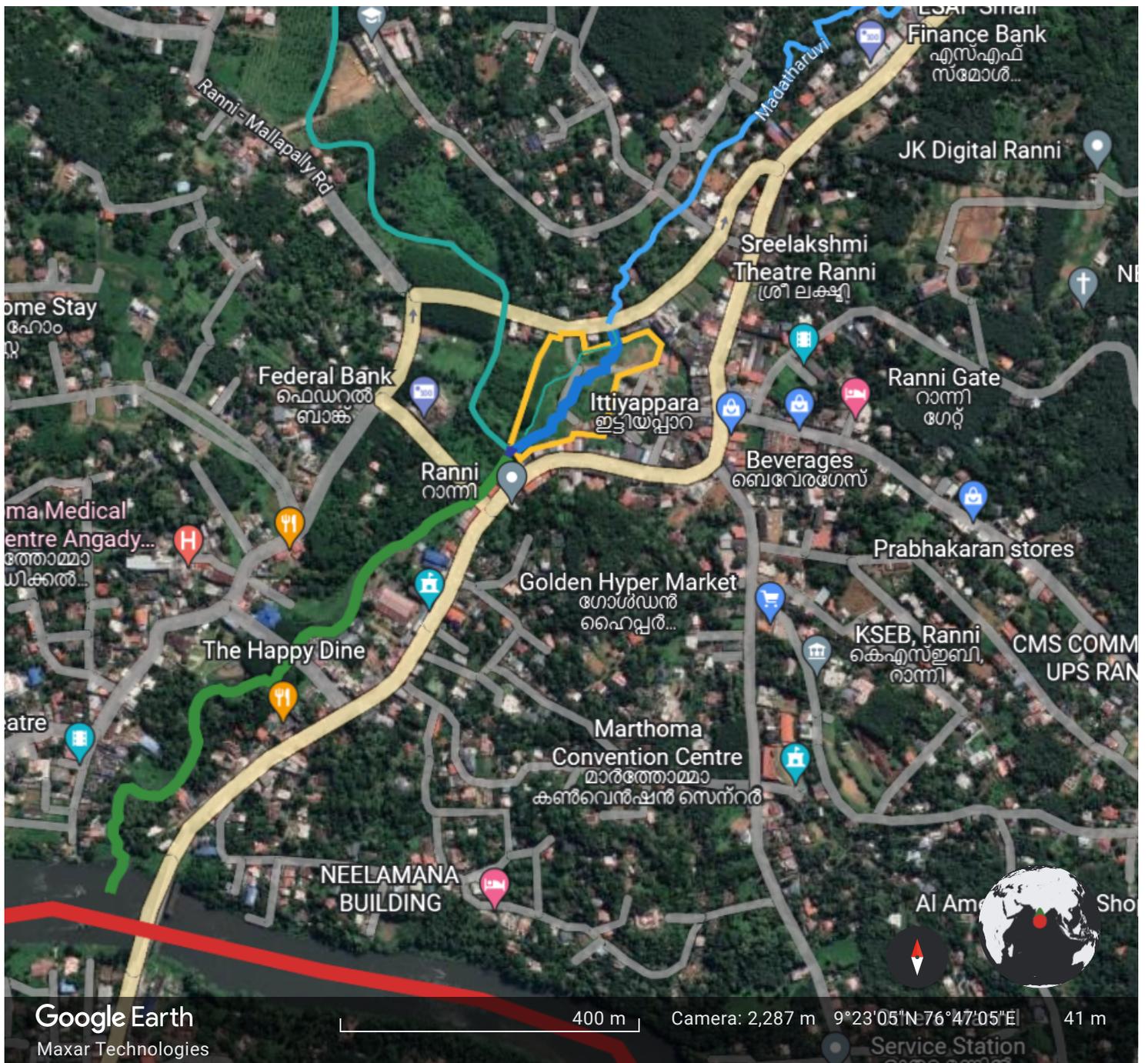
Dated this the 7th day of November 2022



Counsel for the Applicant



- Klappana-Madatharuvi
- Madatharuvi
- Klappana
- Pampa
- Site, in question in the O.A, where Government of Kerala has filled up stream



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- Site, in question in the O.A., where Government of Kerala has filled up stream
- Previous flow of Madatharuvi through the site before filling up
- Current flow of Madatharuvi through the site after filling up



Rani Home Nursing

Ittiyappara Bus Station Rd

Kerala Gramin Bank

Jan Aushadi Medical Store Manimala

Ittiyappara Bus Station Rd

HIRAHSO Ittiyappara Bus Station Rd

Rose Petals Ladies & Gents wear

Yuvarani

JR Towing & Recovery service

Peniel Ground, Ranni, ഐ.എ.ടി.സി....

Ranny Pathanamthitta Aadichipuzha

Master's Academy, Ranni

Manappuram Finance Limited

Safa Traders, Ittiyappara, Ranni

KSRTC (Kerala State Road Transport...)

Ranni Bus Stand

Federal Bank ATM

Ittiyappara bus

