

**BEFORE THE NATIONAL GREEN TRIBUNAL (SZ)
CHENNAI**

Application No.143/2022

BETWEEN:

SRI. PARAMESH. V

.....Applicant

AND

**THE DEPUTY COMMISSIONER
AND OTHERS**

.....Respondents

Memo

The undersigned counsel most humbly submits that,

1. Firstly the counsel for the applicant craves leave to submit the reply to the 12th para of the reply statement submitted by respondent 13 and 14 and also craves leave of this Hon'ble court to file an additional reply and produce additional documents on the next date of hearing by filing necessary applications. (Referring to the averments of the reply statements, applicant denies the entire adverse allegation made there under against the applicant in person and any specific non-denial of the same shall not be treated as an admission of the same at their behest.)
2. It is submitted that, in the reply statement submitted by the respondent No.13 and 14, the averments made in para No. 12, is unacceptable. The statement has been perceived and understood as simple unintended faux pas only to suit their convenience. Applicant hereby request the Hon'ble Tribunal to direct the respondent 13 and 14 to furnish material particulars of the allegations raised and clarify the factual position in categorical terms.
3. It is submitted that, applicant is a social activist and he combats for the public cause and the welfare of the public against the corruption, illegal activities, encroachment of public and government lands and much more. It is pertinent to state that as the averments made by the respondent 13 and 14 about the criminal cases, all the cases filed against the applicant are filed by none other than the builders themselves against whom the applicant has raised his voice for their illegal activities and

encroachment of land. The said builders having political link with both man and muscle power have intentionally filed a false cases against applicant, to pressurize applicant not to interfere in their illegal encroachment. It relevant to state that, in those cases the applicant is acquitted and two more cases is still in adjudication. There is no conviction against the applicant, which makes it crystal clear that this applicant has been falsely implicated in those cases. The respondent in order to cover up the illegal activities of encroachment has defamed the applicant intentionally.

4. It is submitted that, applicant is with clean hands before this Hon'ble Tribunal with no motive of any monetary gains, and in regard to the allegations made by the respondent in sending the representative for vested interest is put to strict proof. Moreover, it is requested before this Hon'ble tribunal that if any encroachment were found to pull down the building, if the applicant was to extract money, he would have directly approached the builder for the said allegation of vested interest. It is so surprised to stumble upon certain allegations, which makes crystal clear that the respondent is just trying to an attempt to distort the truth with a brazen lie before this Tribunal by stroking of all false allegations on the applicant.

Hence, this Hon'ble tribunal may be pleased

1. To direct the respondent to withdraw all the personal allegations made against the applicant and seek public apology before this Hon'ble Tribunal.
2. The counsel for the applicant also craves leave of this Hon'ble court to file an additional reply and additional documents at the next date of hearing by making necessary applications, if so required.
3. Further be pleased to pass necessary orders/s as this Hon'ble Court deems fit under the facts and circumstances of the case, in the interest of justice.

Date: 20/2/2023

Bangalore



Advocate for applicant