

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI**

O.A.No.....1 4 9.....of 2022

Shankaran.....APPLICANT

Vs

State of Kerala and others.....RESPONDENTS

| SL.NO. | DATE | DETAILS | PAGE NO. |
|--------|------------|--|----------|
| 1 | 05-12-2023 | Additional Re-Joinder Affidavit | 01 to 03 |
| 2 | -- | Some recent photographs of the lands of the applicant wherein the said agricultural activities are being carried out | 04 to 06 |

Certified that the above documents are true copies of their originals.

Dated this the 5th day of December, 2023.



Counsel for the 8th Respondent

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI**

O.A.No.....149.....of 2022

Shankaran.....APPLICANT

Vs

State of Kerala and others.....RESPONDENTS

**ADDITIONAL RE-JOINDER AFFIDAVIT FILED BY THE
RESPONDENT NO.8**

I, Thomas Babu, aged 49 years, Son of T. Baburaj, Managing Partner, Blue Chips Mines & Industries, Vembalathupadam, Kalliyad. P.O., Ottappalam, Shornur, Palakkad-679 122, do hereby solemnly affirm and state as follows:-

1. All facts and averments contained in the additional affidavit filed by the applicant dated 30th November, 2023 is denied.
2. It is respectfully submitted that protection works are made and is being maintained by this respondent as directed by the Kerala State Pollution Control Board and the Geology Department. This respondent also undertakes to maintain it further.



For BLUE CHIPS MINES AND INDUSTRIES

THOMAS BABU
Managing Partner

3. The applicant is now doing agricultural operations without any difficulties from this respondent. Some recent photographs of the lands of the applicant wherein the said agricultural activities are being carried out is produced herewith and marked as **Annexure.R.8.(C)**.
4. It is respectfully submitted that this respondent has already submitted application for the extension of the lease period. Though the Hon'ble High Court Kerala has directed the Director of Mining to consider the same they have not done it for the reason that this application is pending consideration. Therefore, it is prayed that appropriate direction be issued to them.
5. In the circumstances it is prayed that the said application be dismissed. The facts stated above are true and correct to the best of my knowledge, information and belief.

Dated this the 5th day of December, 2023.



Counsel for the 8th respondent



For BLUE CHIPS MINES AND INDUSTRIES
THOMAS BABU
Managing Partner

8th Respondent

VERIFICATION

I, Thomas Babu, aged 49 years, Son of T. Baburaj, Managing Partner, Blue Chips Mines & Industries, Vembalathupadam, Kalliyad. P.O., Ottappalam, Shornur, Palakkad-679 122, do hereby that the contents of paras 1 to 5 are true to my personal knowledge and are believed to be true on legal advice and that I have not suppressed any material fact.

Dated this the 5th day of December, 2023.



Counsel for the 8th respondent



For BLUE CHIPS MINES AND INDUSTRIES

THOMAS BABU
Managing Partner

8th Respondent







This is the true photographs of the Annexure-R8(C) document.

A white rectangular box containing a handwritten signature in black ink. The signature is stylized and appears to be a name followed by a surname.