

BEFORE THE NATIONAL GREEN TRIBUNAL, EASTERN ZONE,
KOLKATA

MEMORANDUM OF APPLICATION

[Under Section 18(1) read with Section 14 & 15 and
under Section 18(2) of the National Green Tribunal Act,
2010]

ORIGINAL APPLICATION NO 78/2024/EZ

IN

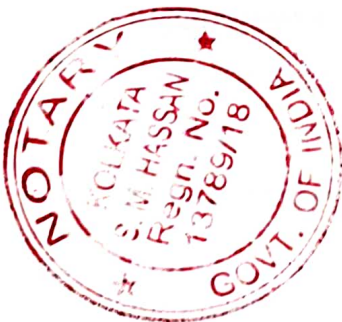
THE MATTER OF :

Abhrajit Roy Chowdhury, son of
Late Kamal Roy Chowdhury,
resident of East View Apartment,
897, Pashupati Bhattacharya
road, Kolkata - 700034.

-VERSUS-

The State of West Bengal & Ors.

..Opposite Party



SUPPLEMENTARY AFFIDAVIT ON BEHALF OF THE APPLICANT

09 SEP 2024

I, Abhrajit Roy Chowdhury, son of Late Kamal Roy Chowdhury, aged about 25 years, by faith Hindu, by occupation – Advocate, residing at East View Apartment, 897, Pashupati Bhattacharya Road, Kolkata – 700034, Post Office – Behala, Sub Post Office – Jaysree, PIN – 700034, do hereby say and solemnly affirm as follows:

1. I am the Applicant herein and as such, I am well conversant with the facts and circumstances of the instant case. I am competent enough to make and affirm this affidavit and I am competent to swear this affidavit on behalf of myself.

2. On 8th September, 2024, at around 11 : 58 hrs., I received an e – mail in my regular e – mail ID being abhrajitrc70@gmail.com sent by one Anindya Chatterjee, representing himself to be the President of one Naba Bangla Parishad having e – mail ID nababanglaparishad@gmail.com . After perusing the said e – mail, I have come to know that the said NababanglaParishad is an independent organization inter alia engaged with activities related to environment protection and I also found out some photographs which will evidence that the subject land in this instant application before this Hon'ble Tribunal is a wetland.

A downloaded copy of the e -mail dated 8th September, 2024 along with the relevant photographs attached thereto are annexed hereto and marked with the letter "S – 1".



3. It is stated that it transpires from the said photographs that several corporate entities and/or companies have installed hoardings and flexes on the subject land. Hence, it would be just and necessary that all those corporations and/or corporate

entities be impleaded as party respondents for proper, effective and expeditious adjudication of this instant Original Application. The said corporate entities and/or companies are given hereunder :

- I. Fortune India Pvt. Ltd.
Having its office at, 195A , Sarat Bose Rd, Lake Market, Kalighat, Kolkata, West Bengal 700029
- II. Ambuja Cement Ltd
Having its office at, 53 A, Indicon Viva Building, Leela Roy Sarani , Ballygunge – 700019.
- III. Associated Cement Companies(ACC) Ltd.,
Having its office at, Anandapur, Eastern Metropolitan Bypass Road, Sector I, Kolkata, West Bengal – 700107.
- IV. Eveready Industried India Ltd.
Having its office at 2, Rainey Park, Kolkata -700019.
- V. Satya Steel , DN-36, Street No. 10, DN Block, Sector V , Bidhannagar , Kolkata , West Bengal – 700091.
- VI. Srijan Realty Private Limited,
36/1A, Elgin Road, Sreepally, Bhowanipore, Kolkata, West Bengal, 700020.
- VII. Skipper Ltd.
Having Its office at 12th floor Trimulla Building, 22E East Topshia Road, East Topshia, Kolkata, West Bengal. PIN - 700046



4. It is stated that the abovementioned facts are necessary for proper adjudication of the instant Original Application pending before this Hon'ble Tribunal.

5. It is, therefore, submitted that the facts pleaded hereinabove and the documents annexed hereto may be treated as part and parcel of the Original Application filed by the Applicant.

6. The statements made in paragraphs 1 and 2 are true to my knowledge and belief and paragraphs 3 to 5 are matters of record and the rest are my humble submissions before this Hon'ble Court.

Prepared in my office

me

Debyayan Banerji
Advocate

Abhisit Roy Chowdhury
The deponent is known to

Debyayan Banerji
Advocate



SOLENNLY AFFIRMED AND DECLARED
BEFORE ME ON IDENTIFICATION

S. M. Hassan
S. M. HASSAN
NOTARY

09 SEP 2024



নব বাংলা পরিষদ
বাংলার পক্ষে, বাঙালি বাঁচুক

বাংলার ঐতিহ্য, সংস্কৃতি ও বাঙালির নাগরিক অধিকার সুনিশ্চিত করুন।
বাংলার মাটি, বাঙালির অধিকার।
বাংলা ভাষা বাঁচুক, বাঙালি বাঁচুক।

নব বাংলা পরিষদ

(একটি চ্যারিটেবল ট্রাস্ট) গভঃ রেজিঃ নং-IV-1901-00177/2024

কার্যালয় : সিডি-১৪০, সেক্টর-১, বিধাননগর, কলকাতা-৭০০০৬৪,
ফোন-৯৯০৩১২৭৯৬৭, ই-মেল : nababanglaparishad@gmail.com

To

Date: 06.09.2024

Mr.Abhrajit Roychowdhury,

Advocate, High Court, Calcutta

Sir,

Our organization is inter alia, engaged in social activities involving protection of the environment and the interest of public at large. It has come to our notice that you have filed an application before the Hon'ble National Green Tribunal, Eastern Zone at Kolkata alleging illegal installation of hoardings, flexes and other structure on the area of land opposite to Bypass Dhaba, falling under the East Kolkata Wetlands Management Act, 2006. Our organization has carried out an independent inspection on the said wetlands and have taken necessary photographs of the subject land. Since we are supporting your cause all along, hence, we bona fide forward those photographs which will clearly show that the subject land is a wetland and having a water body.

With thanks


Anindya Chatterjee

President

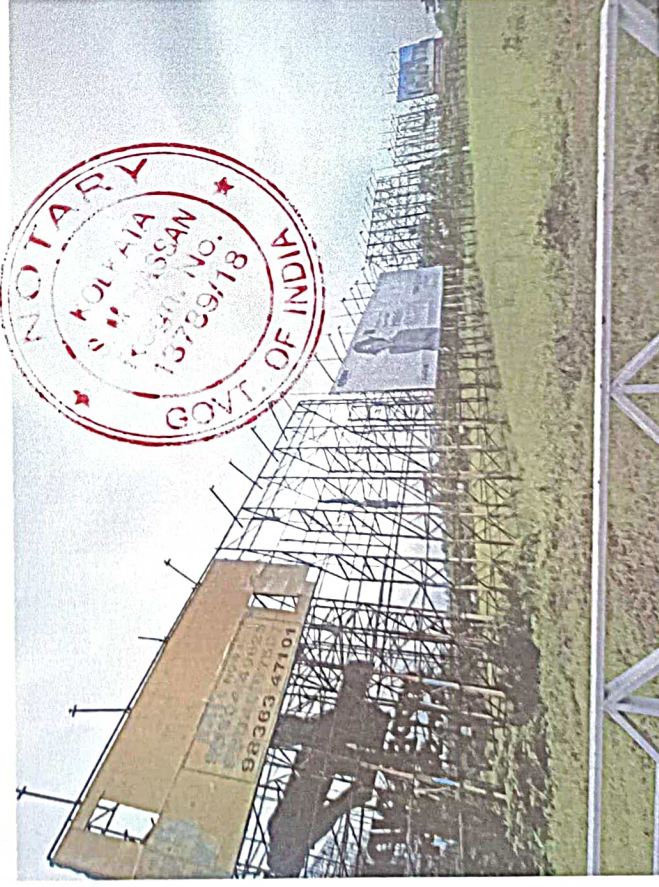
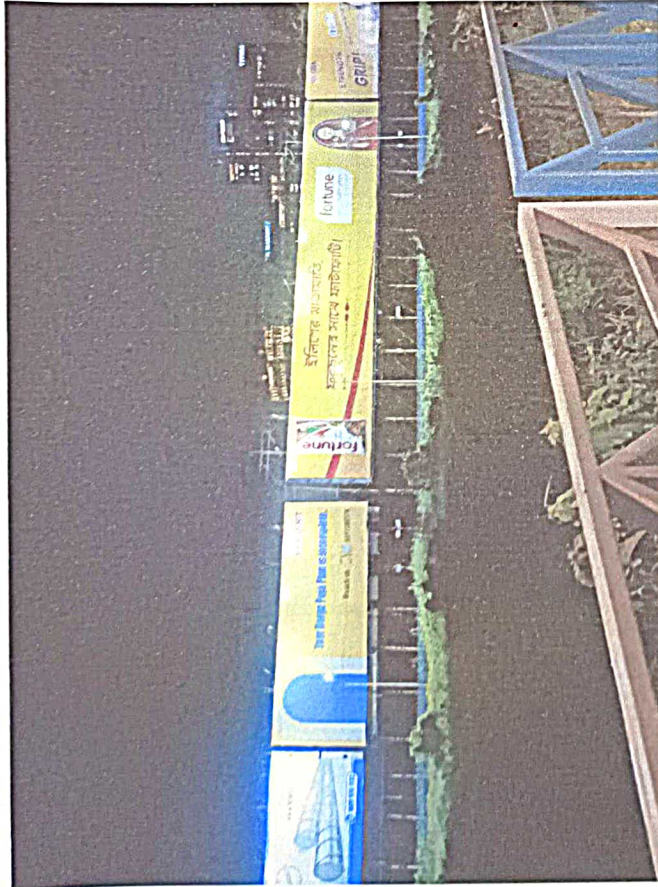
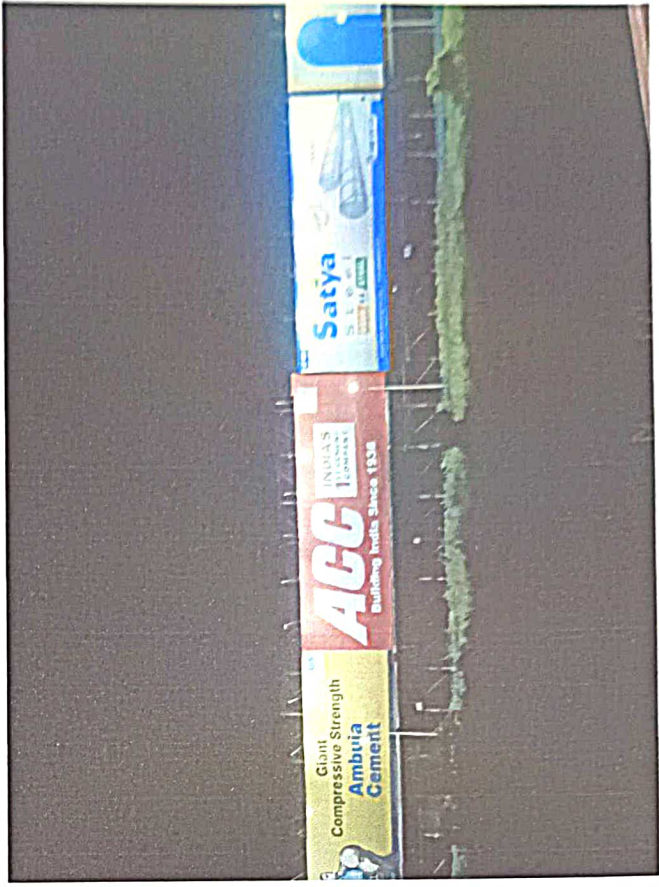
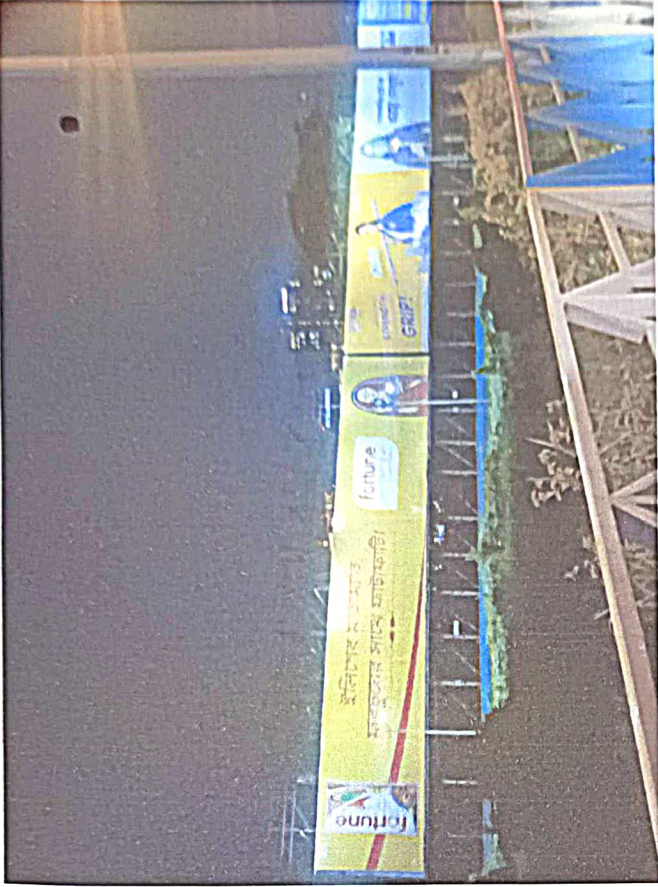
Naba Bangla Parishad

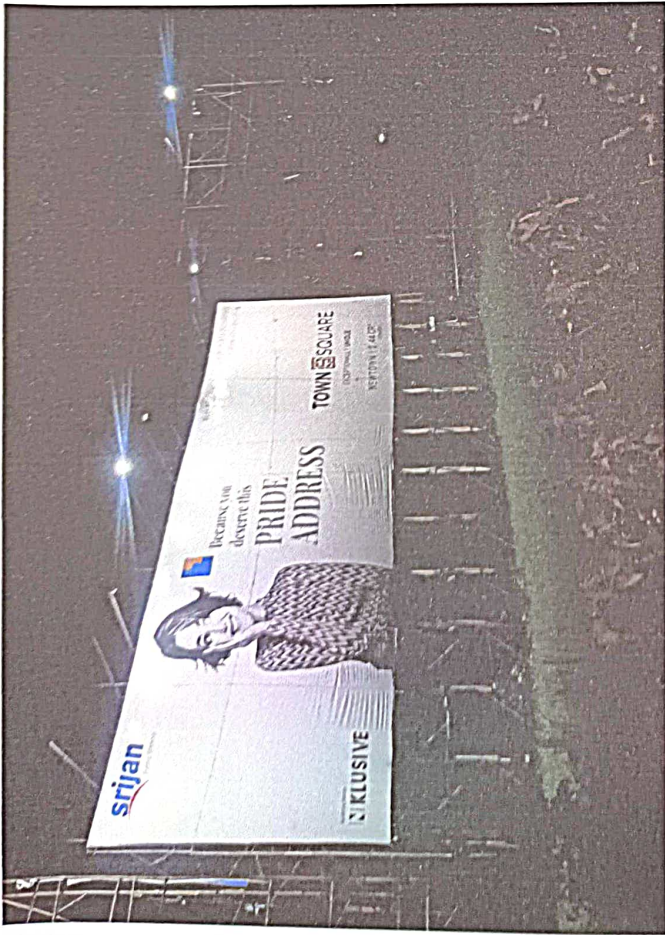
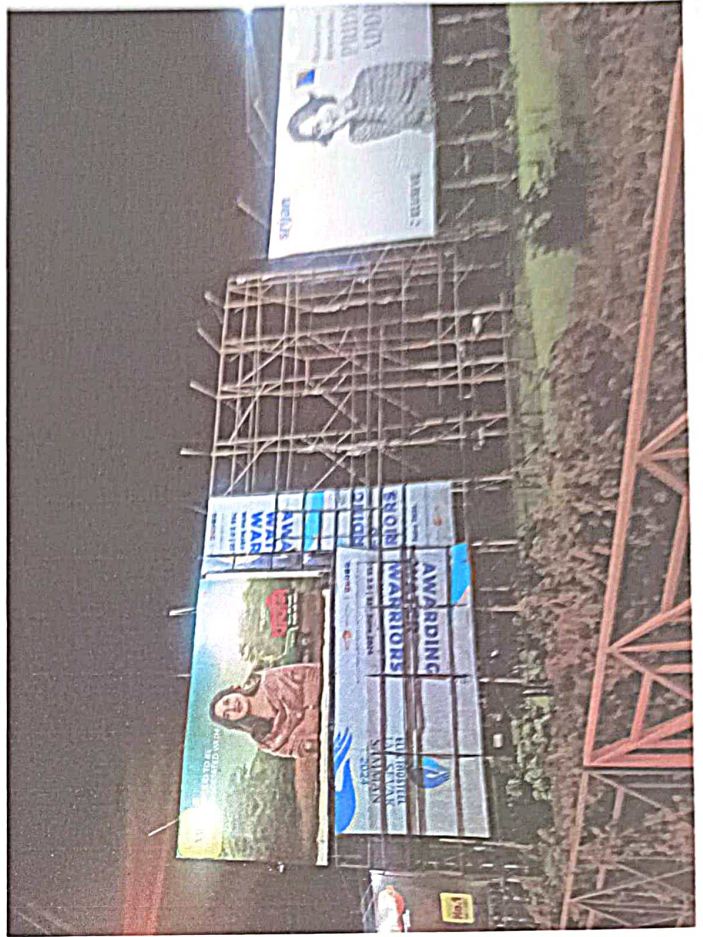
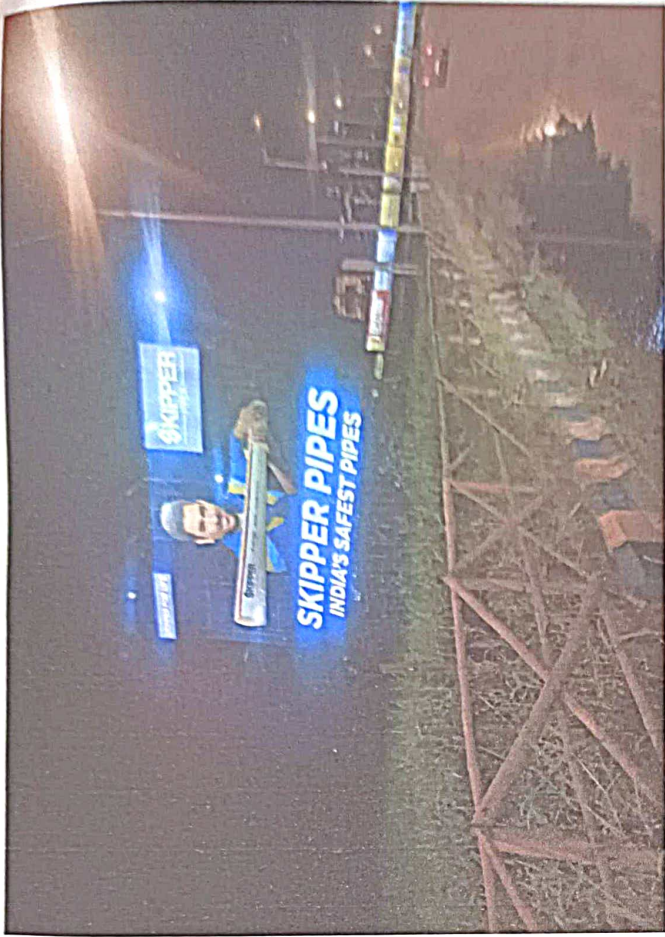


HOARDING SURVEY REPORT 2024
under
EAST KOLKATA WETLAND
MANAGEMENT AUTHORITY AREA
on Eastern Metropolitan Bypass by
NABA BANGLA PARISHAD

05.09.24









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