

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, EASTERN ZONE  
BENCH AT KOLKATA**

**EXECUTION APPLICATION No. 1 OF 2024/EZ**

**IN**

**ORIGINAL APPLICATION No. 166 OF 2022/EZ**

In the Matter of:

Veterans Forum For Transparency  
in Public Life

...Applicant

-Versus-

Bihar State Housing Board & Ors.

...Respondents

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Date: 31 /12/2024

Place: Chapra, Bihar.



*Agent Kumar*

**उप नगर आयुक्त  
चपरा नगर निगम**

Filed by: *Ghanshyam Pandey*  
*Advocate*

Mr. Ghanshyam Pandey,  
Advocate,

"Hastings Chamber", 7C,  
K. S. R. Road, 2<sup>nd</sup> Floor, Room  
No. 206, Kolkata- 700 001.  
M: 9686750386

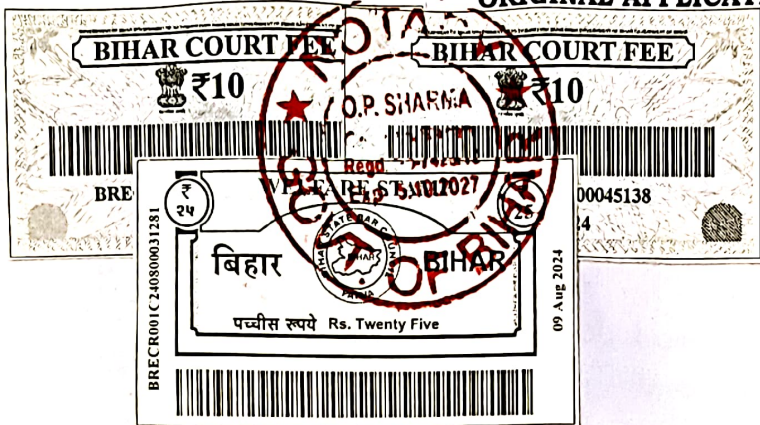
E: [ghanshyamlegala@gmail.com](mailto:ghanshyamlegala@gmail.com)

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239437  
31/12/24Name: Ajeet KumarS/o Vijay Nandan SharmaAdd: AiraP.S. JehanabadBEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL, EASTERN ZONE  
BENCH AT KOLKATA

EXECUTION APPLICATION No. 1 OF 2024/EZ

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In the Matter of:

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Bihar State Housing Board &amp; Ors.

...Respondents

**Counter Affidavit filed on behalf of Respondent no. 5****(i.e. Nagar Nigam, Chapra)**

I, Ajeet Kumar s/o Jay Nandan Sharma aged about 34 years old, permanently residing at Village- Aira, P.O. – Aira, Jehanabad, P.O. – Kurtha, District- Jehanabad, Bihar- 804421, by occupation- Government Service, presently posted as Deputy Municipal Commissioner, Nagar Nigam, Bihar working for gain at the Office of Municipal Commissioner, Nagar Nigam, Salempur, Sadhapur, Chapra, Bihar- 841301, do hereby solemnly affirm and state as followed:

1. That I have made myself acquainted with the facts and circumstances of the Original Application and the Execution Application filed by the applicant and I have thoroughly gone through all the documents pertaining to the subject matter of this instant case and I am competent to file the instant Affidavit before this Hon'ble Tribunal.
2. That by way of the Execution Application no. 1 of 2024/EZ, the applicant has prayed before this Hon'ble Tribunal for the following orders:

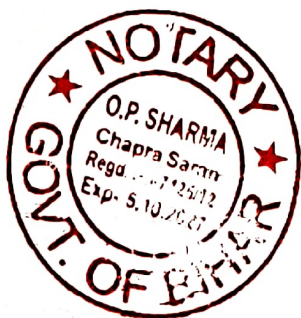
A. To direct the respondents jointly execute the order dated 22-03-2023 as directed by the Hon'ble Tribunal in its letter and spirit;



Ajeet Kumar  
उप नगर आयुक्त  
चपरा नगर निगम

B. Hon'ble Tribunal may be pleased to pass order/orders relevant and appropriate to present Execution Applicant.

3. That the respondent no. 5 controverts and refutes all allegations contained in the said application. Save and except for what are specifically admitted, all other contentions and averments made in the said application are denied and disputed in seriatim.
4. With reference to statement contained in Paragraph No. 1 it is a matter of record and do not call for any comment and shall deal with the same at the time of hearing.
5. With reference to statement contained in Paragraph No. 2 it is a matter of record and the Solemn Order of the Hon'ble Tribunal, wherein, the Hon'ble Tribunal was pleased to pass directions for the constructions of R.C.C. Box Drain and free unhindered and continuous flow of water in the drains from the colonies, the said directions were cast upon the respondents no. 1 (Bihar State Housing Board), 2 (Department of Housing and Urban Development), 3 (Bihar State Pollution Board), 4 (District Magistrate Saran), 6 (Zila Parishad, Saran) i.e. the authorities under whom the jurisdiction of Prabhunath Nagar Colony falls and accordingly the respondent no. 5 shall deal with the same at the time of hearing.
6. With reference to statement contained in Paragraph No. 3, it is denied and disputed limited to the liability of the respondent no. 5, as the Solemn Order dated 22-03-2023, did not direct or pass any order or direction upon the respondent no. 5, as such the question of non-compliance of the Hon'ble Tribunal order is baseless as alleged or at all.
7. With reference to statement contained in Paragraph No. 4, it is denied and disputed except what is a matter of record and do not call for any comment and shall deal with the same at the time of hearing. The applicant himself agrees, admits and has sufficient knowledge of the facts that none of the colonies fall under the jurisdiction of respondent no. 5 i.e. Nagar Nigam, Chapra, Bihar. Furthermore, the correct or appropriate authority for the upkeep and maintenance of the area



Ajeet Kumar

उप नगर आयुक्त  
चपरा नगर निगम

would be the respondent no. 7 i.e. Gram Panchayat as the same falls under their jurisdiction.

8. With reference to statement contained in Paragraph No. 5, 6, 7, 8 and 9, it is denied and disputed except what is a matter of record and do not call for any comment and shall deal with the same at the time of hearing.
9. That the respondent no. 5 through this Counter Affidavit would like to bring on record the detailed map of the area which fall under the jurisdiction of the respondent no. 5, the red marked area falls under the jurisdiction of Nagar Nigam, Chapra, similarly the area marked with orange stripped colour which is outside the red coloured zone is the Prabhunath Nagar Colony and other areas and the blue coloured line indicates the said drain in question. Through this detailed map, the respondent no. 5 would like to state that the said area and the allegations levelled against the respondent no. 5 are baseless and fabricated.

**Copy of the Coloured Detailed Map of the area falling under the jurisdiction of respondent no. 5 is annexed hereto and marked as Annexure R/1.**

10. That the respondent no. 5 submits that the applicant vide this application and original application no. 166/22/EZ except making vague statements have failed to give facts which may amount to sufficient cause for adding the respondent no. 5 as a party in the present proceedings.
11. That I have thoroughly gone through the contents of this counter affidavit and I have fully understood the same I am competent to file and sign the instant Affidavit before this Hon'ble Tribunal vide an Authorization granted in my favour by the Municipal Commissioner, Chapra.



**Copy of the Authorisation along with Aadhar Card is annexed hereto and marked as Annexure R/2.**

*Aseef Kumar*  
उप नगर आयुक्त  
चपरा नगर निगम

12. I state that the statements contained in Paragraphs no. 1 - 11 are true to the best of my knowledge and belief and the rest are my humble submissions before this Hon'ble Court.

Prepared in my office.  
*Ghanshyam Pandey*  
 Ghanshyam Pandey,  
 Advocate

*Ajeet Kumar*

DEPONENT

Identified by me

*Sawaliga Pd. Singh.*  
 Advocate.

31-12-2024.  
 E.N. 845/93

BEFORE ME

NOTARY PUBLIC

**Attested**

*[Signature]*  
 O.P. SHARMA  
 NOTARY, CHAPRA  
 31/12/24



**VERIFICATION**

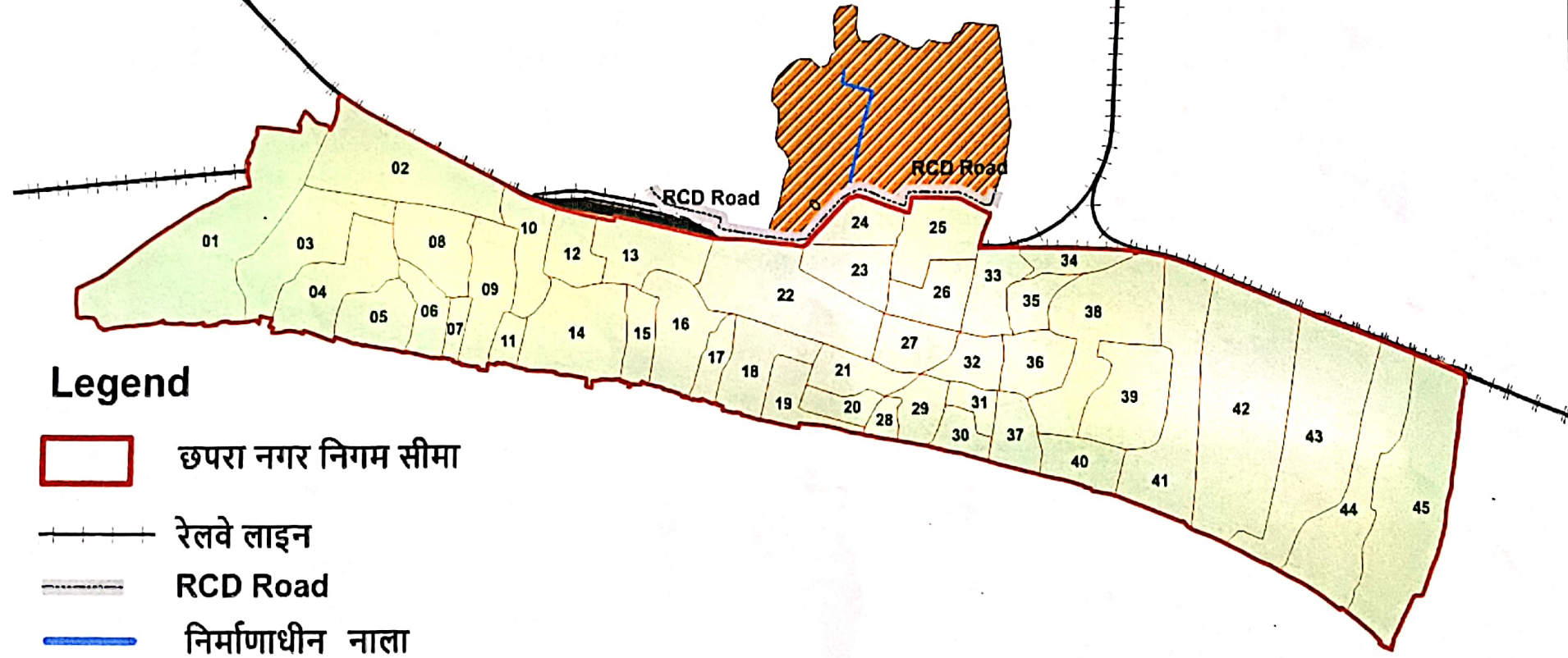
Verified at Chapra, Bihar by the deponent above named on this the 31 day of December, 2024, and say that the contents of this affidavit made in paragraph nos. 1 to 12 are true to my knowledge, those made in paragraph no. 9 and 11 are information derived from records which I verily believe to be true and the rest are my respectful submissions before this Hon'ble Tribunal.

*Ajeet Kumar*


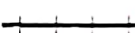



DEPONENT

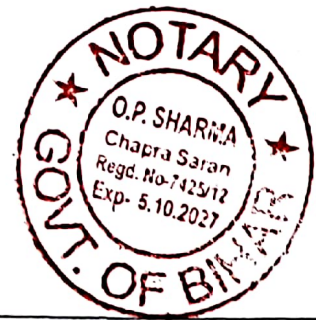


# छपरा नगर निगम सीमा मानचित्र - 7 - Annexure R/1-



## Legend

-  छपरा नगर निगम सीमा
-  रेलवे लाइन
-  RCD Road
-  निर्माणाधीन नाला
-  नगर निगम क्षेत्राधिकार के बाहर का क्षेत्र  
(पंचायत- साढ़ा , मौजा - दहियावां , मुहल्ला - प्रभुनाथ नगर )



**Attested**  
*[Signature]*  
O.P. SHARMA  
NOTARY, CHAPRA  
21/12/24

*[Signature]*  
31/12/2024  
अमीन  
छपरा नगर निगम

*[Signature]*  
31/12/24  
नगर प्रबंधक  
छपरा नगर निगम

*[Signature]*  
31.12.24  
उप नगर आयुक्त  
छपरा नगर निगम

Date: 31-12-2024

**TO WHOMSOEVER IT MAY CONCERN**

**Subject: Authorization for Filing and Signing Documents in  
Connection with OA/166/2022/EZ and EA/1/2024/EZ before the  
Hon'ble National Green Tribunal, Eastern Zone, Kolkata Bench.**

**Respected Sir/Madam,**

I, Sunil Kumar Pandey, son of Surendra Pandey, aged about 58 years old, working for gain as Municipal Commissioner, Nagar Nigam, Chapra, Bihar, at at the Office of Municipal Commissioner, Nagar Nigam, Salempur, Sadhapur, Chapra, Bihar- 841301, do hereby authorize Shri. Ajeet Kumar s/o Jay Nandan Sharma aged about 34 years old, permanently residing at Village- Aira, P.O. – Aira, Jehanabad, P.O. – Kurtha, District- Jehanabad, Bihar- 804421, by occupation- Government Service, presently posted as Deputy Municipal Commissioner, Nagar Nigam, Bihar working for gain at the Office of Municipal Commissioner, Nagar Nigam, Salempur, Sadhapur, Chapra, Bihar- 841301, to file, sign, and submit any and all documents related to **OA/166/2022/EZ** and **EA/1/2024/EZ** before the Hon'ble National Green Tribunal, Eastern Zone, Kolkata Bench, on behalf of myself and Nagam Nigam, Chapra.

This authorization includes, but is not limited to, the filing of applications, petitions, affidavits, or any other documents related to the cases mentioned above, and the signing of any necessary documents or undertakings as required by the Hon'ble Tribunal.

I confirm that the person authorized herein shall act on behalf of myself and Nagam Nigam, Chapra in all matters related to these cases and shall be entitled to take any steps necessary for the effective representation of my interests in the proceedings.



Please consider this letter as an official authorization for the said purpose.

Thank you for your attention and cooperation.

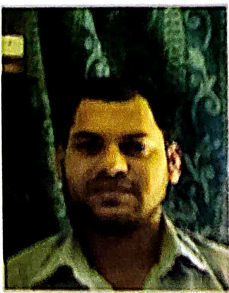
Yours sincerely,  
*Prithvi Kumar Pandey*  
Municipal Commissioner,  
Nagar Nigam,  
Chapra, Bihar.  
**Municipal Commissioner**  
**Chapra Nagar Nigam**



**भारत सरकार**  
**Government of India**

**आधार**

Aadhaar no. issued : 29/03/2016



**अजीत कुमार**  
**Ajeet Kumar**  
**जन्म तिथि/DOB: 04/01/1990**  
**पुरुष/ MALE**



**आधार पहचान का इशारा है, नागरिकता या जन्मतिथि का नहीं ।  
इसका उपयोग सत्यापन (ऑनलाइन प्रमाणीकरण, या क्यूआर कोड/  
ऑफलाइन एक्सएमएल की स्कैनिंग) के साथ किया जाना चाहिए ।**

**Aadhaar is proof of identity, not of citizenship  
or date of birth. It should be used with verification (online  
authentication, or scanning of QR code / offline XML).**

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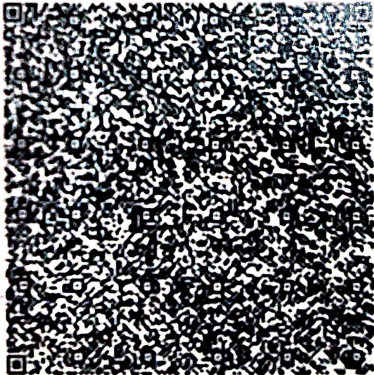
**मेरा आधार, मेरी पहचान**







**भारतीय विशिष्ट पहचान प्राधिकरण**  
**Unique Identification Authority of India**


पता:  
 आत्मज: जय नंदन शर्मा, अईरा पी.ओ अईरा, जहानाबाद,  
 कुरथा, जहानाबाद,  
 बिहार - 804421

Address:  
 S/O: Jay Nandan Sharma, aira p.o aira,  
 Jehanabad, PO: Kurtha, DIST: Jehanabad,  
 Bihar - 804421



**3222 7358 1754**  
**VID : 9116 3163 9703 7562**

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  [www.uidai.gov.in](http://www.uidai.gov.in)

